

Under wraps?

What Europe's
supermarkets aren't telling us
about plastic

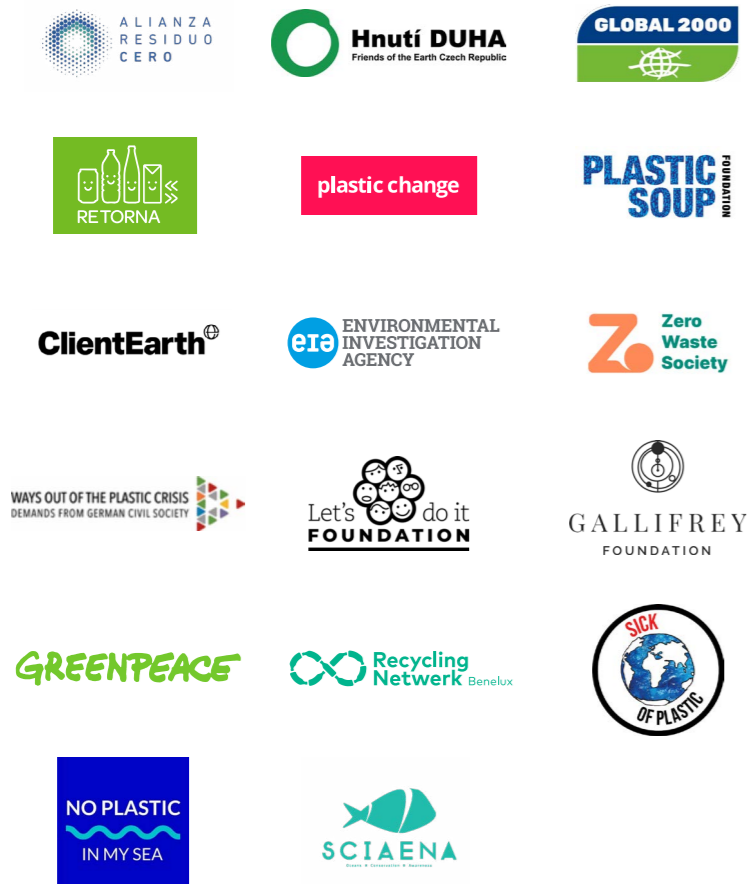


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#breakfreefromplastic

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List of abbreviations

DRS	Deposit return system
EIA	Environmental Investigation Agency
EMF	Ellen MacArthur Foundation
EPR	Extended Producer Responsibility
FMCG	Fast-moving consumer goods
PET	Polyethylene terephthalate
PPWD	Packaging Waste Directive
PRO	Producer Responsibility Organisations
UNEA	United Nations Environment Assembly
SUP	Single-Use Plastics Directive

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Executive summary

Plastic pollution has been overwhelming ecosystems, affecting wildlife, exacerbating the climate crisis and interfering with our health. Barely a week passes without another horrific fact emerging about the devastating toll that plastic takes on the planet and its inhabitants. So far in 2022 alone, we have discovered microplastics deep in the lungs of living people, in the tissue of patients undergoing surgery and in people's blood. We learnt that the chemicals found in everyday plastics are eating away at human fertility such that they may make unassisted reproduction impossible by 2040. Despite the outrage, coordinated action and mounting pressure from across all sectors of society – from NGOs, legislators and consumers – the amount of plastic that the plastic industry is placing on the market is growing and on a 'business as usual' trajectory this is even projected to skyrocket.

European supermarkets are very important actors when it comes to plastic pollution but they have largely been let off the hook. With a €2.4 trillion turnover, this sector has the resources to act,¹ and public opinion polls consistently show that citizens firmly believe that retailers have a responsibility to address plastic pollution; however, this first-ever analysis of the role that European supermarkets play in addressing the plastic pollution crisis, shows disappointing results. It reveals that some of the biggest retail chains in Europe are only paying lip service to the problem, while behind the scenes they are trying to delay action and distract consumers and policymakers over their role in the plastic crisis.

Rather than implementing systemic changes and supporting the legislation required to address the problem, retailers have concentrated their efforts on voluntary commitments. Many of them are members of different national Plastic Pacts and some of them have signed the New Plastic Economy Global Commitment by the Ellen MacArthur Foundation (EMF). As such they are focusing on recyclability as their main strategy to deal with the plastic crisis instead of prioritising waste prevention and reuse systems, in line with the waste hierarchy. Only very few companies make serious efforts to reduce their plastic and other single-use packaging and move towards more environmentally friendly business models that prominently feature reuse systems.



Main findings

For this report, a coalition of around 20 NGOs contacted 130 retailers across 13 European countries (between June and December 2021) with a questionnaire covering three categories: Transparency and performance; commitments; and support for government policy. Only 39 retailers (30%) provided a written response to the questionnaire and many failed to reply to all the questions asked. Therefore, we further investigated policies and public disclosure of relevant information through desktop research of 74 of the contacted European retailers, focusing on the ones with the highest turnover and with a presence in at least two European countries.

The total overall average score achieved by retailers across three categories was only 13.1 points (out of 100) or 13%. Only two companies exceeded 60%, forming the top of the table. These companies are Aldi in the UK with 65.3%, and Aldi in Ireland with 61%. The rest of the highest-scoring companies were significantly behind, with Lidl in the UK with 44.7%, Carrefour in France with 41.7% and the French organic supermarket BioCoop with 37% making up the top five. On the other end of the scale are the 14 companies that did not receive any points at all, including Cora (Belgium); BILLA and PENNY (REWE Group), Coop and Tesco (Czech Republic); Maxima, Prisma and Selver (Estonia); Leclerc (France); Musgrave and Dunnes Stores (Ireland); Intermarché (Portugal); Metro (Ukraine); and Carrefour (Spain).

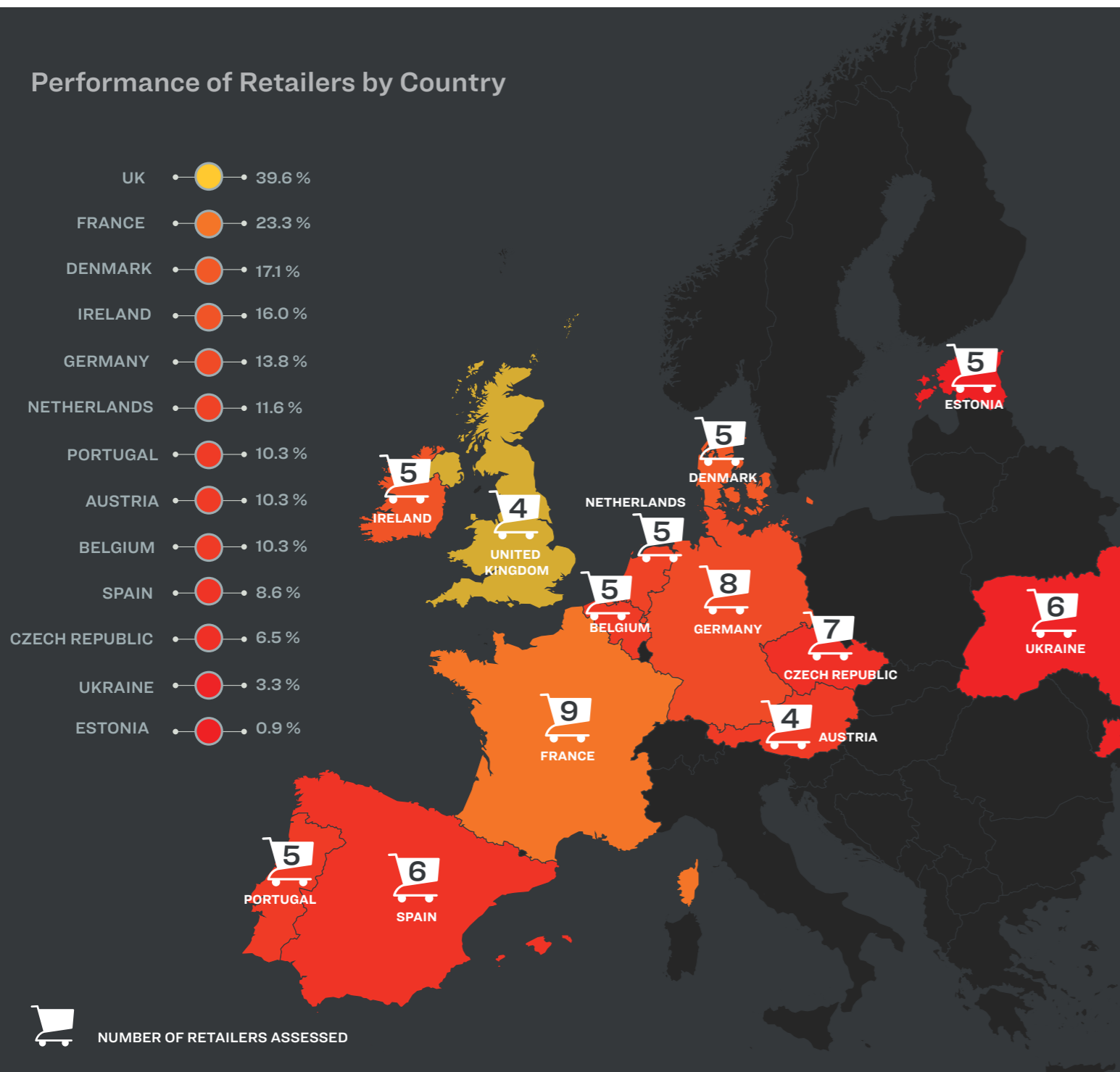
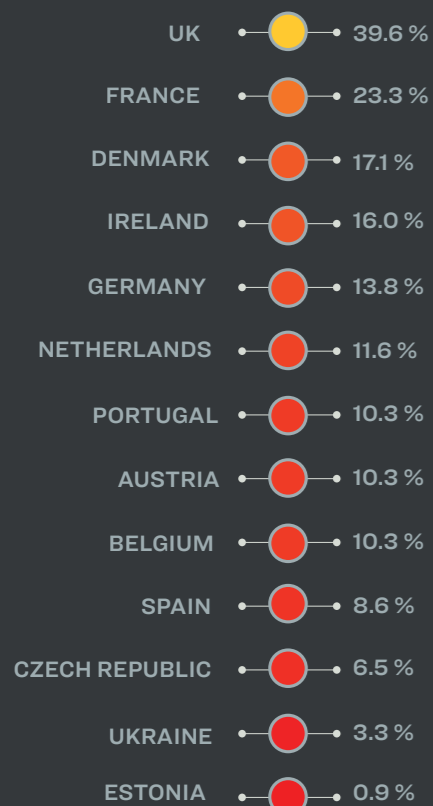
Transparency and performance

In this section we evaluated the level of disclosure, such as plastic footprint for own-brand and branded products, and how retailers are performing regarding the share of reusable packaging and recycled content. The main findings are:

- The overall performance in this section was very poor with only 7.1% of the total points achieved on average, indicating overall low transparency and low levels of reuse and recycled content.
- The best-performing companies in this section were Marks & Spencer and Aldi in the UK, achieving more than 60% of the available points, with Aldi in Ireland and Lidl in the UK achieving over 50%.
- Of the companies evaluated, 82% did not provide the most basic information about their plastic footprint, which casts a shadow of a doubt over their quantitative commitments, where they exist, because they lack a baseline.

- The average for the 'packaging reusability' section was even worse with no company reaching more than 40% of the maximum points and an average of only 5.1%. The French organic supermarket BioCoop was the only company that provided detailed data for primary (consumer-facing) packaging reuse, saying that one-third (34%) of their products sold were in bulk, refillable or in reusable packaging.
- Only 13 companies provided figures on the overall recycled content of their own-branded products. With a reported recycled content average of more than one-third (38%), Aldi UK is the best-performing company for this indicator. Overall, 61 companies (82%) reported no recycled content in their packaging.

Performance of Retailers by Country



Commitments

In this section we evaluated what kind of commitments companies have with regards to the reduction of plastic packaging, the introduction of recycled content and their reuse and refill targets. The main findings are:

- The average performance in this section was 17.1% of the maximum available points, indicating low overall ambition to significantly reduce plastic packaging and increase reuse, refill and recycled content.
- Aldi UK and Aldi Ireland were the only companies reaching more than 60% of the scores, with French companies BioCoop and Carrefour in third and fourth place, respectively with just over 50% of the maximum points. Of note is that Marks & Spencer in the UK, which scored the highest in the 'transparency and performance' section, is not in the top ten for its commitments.
- On average, retailers scored 32.3% of the available points in the recycled content commitment category and only 21.5% for commitments to reduce plastic packaging. Pledges to increase packaging that is refillable or reusable scored an abysmal 3.3% average of the available points.

Government policy support

In this section we investigated where retailers stand on some of the government policies, such as support for an all-inclusive deposit return system (DRS),^A support for DRS for refill and support for mandatory reuse targets. The main findings are:

- The average score across the three indicators included in this section was only 12.7% of the available points.
- Germany's organic retailer Alnatura was the highest-scoring company with 70% of the total, followed by BioCoop in France with 60%; both were the only organic retailers included in the survey.
- Out of the 74 retailers, only 5 (Aldi Ireland, Aldi Denmark, Aldi UK, Lidl UK and BioCoop in France) were considered to provide strong support for an all-inclusive beverage DRS. This is unsurprising given that supermarkets have been identified as one of the main lobby groups against the implementation of DRS in many European countries.
- Similarly, only Alnatura in Germany said that it supported binding government targets for refillable and reusable packaging. Conditional support for such targets was expressed by Dagrofa (Denmark), REWE Group, EDEKA and Netto in Germany as well as Système U in France. A further 14 retailers supported voluntary rather than binding targets.

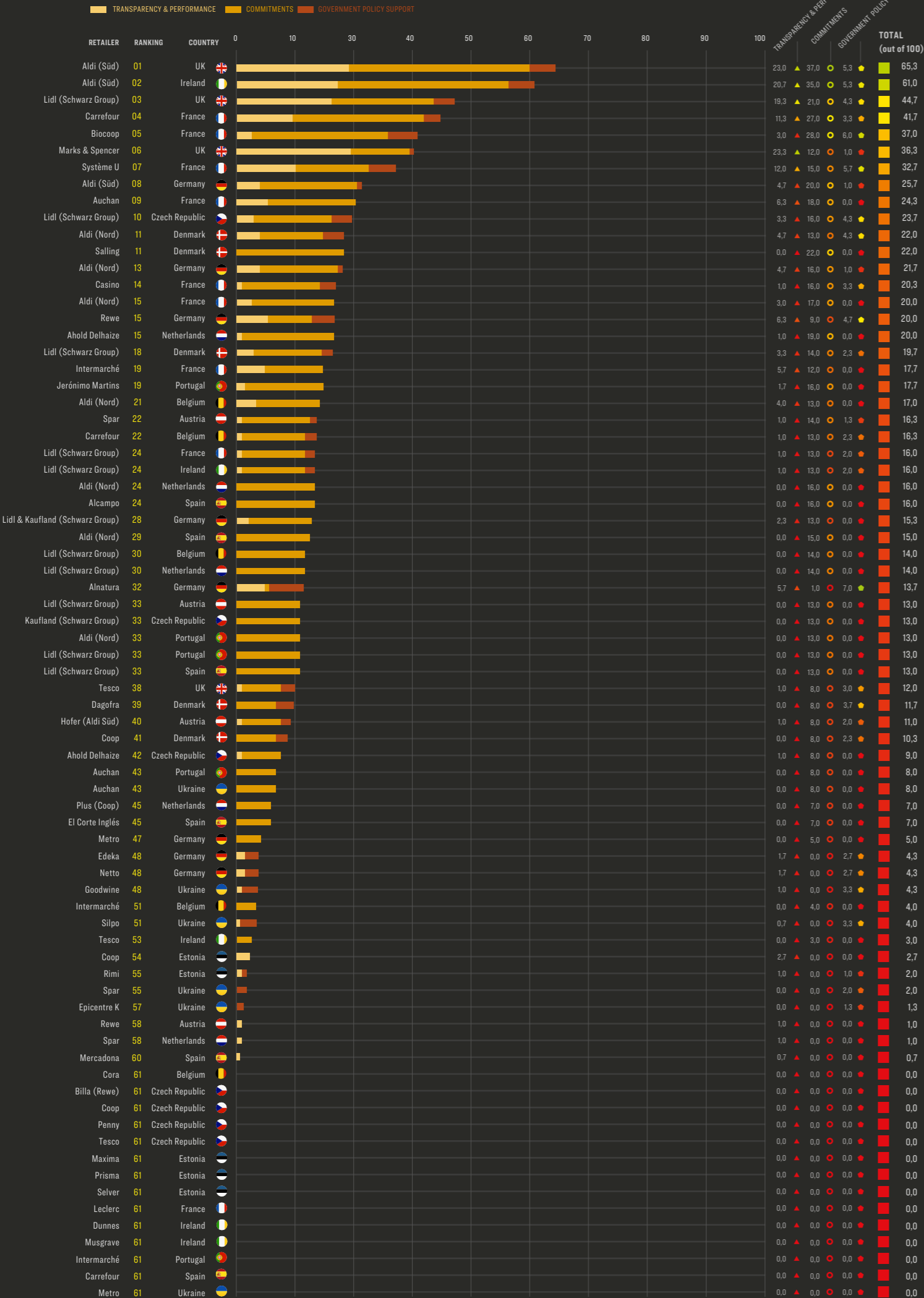
Performance in different countries

Average scores achieved across the 13 countries were very low. Retailers from the UK achieved 39.6%^B and the French retailers scored 23.3%, sitting at the top of the country ranking. No other country achieved a total average of more than 20%. The average score achieved by retailers in Spain, the Czech Republic, Ukraine and

A An all-inclusive DRS means a system that includes all sizes of beverage containers and all materials, namely plastic, glass, aluminium, cartons and pouches.

B Better performance of UK retailers can be explained by the fact that EIA and Greenpeace UK have produced an annual retailer plastic footprint report, *Checking Out on Plastics*,² since 2017. In the first iteration of the survey, many retailers struggled with clear and consistent reporting, but over the course of the project and through sustained engagement, including refining the methodology in consultation with the retailers, the quality of data and level of transparency from UK retailers has drastically improved.

Retailer ranking – overview of retailer performance



Estonia was below 10%. Another noticeable trend is the considerable variation in scores of international retail groups in the various countries in which they operate. For example, the Schwarz Group, which owns the Lidl and Kaufland brands, achieved 44.7% in the UK and between 13% and 23.7% in other countries such as Germany and the Czech Republic. Aldi Süd scored over 60% in the UK and Ireland, whereas it scored only 11% in Austria where it operates under the Hofer banner. Such divergence in policies cannot be explained by diverging national legislation and it points to the fact that even more progressive retailers do not have a holistic company-wide approach to deal with the plastic crisis across different countries.

The way forward

Although the current retailer performance is disappointing, the analysis also shows that such abysmal results do not have to remain the reality. The Changing Markets Foundation has combined the best responses from the questionnaire to create a best-in-class fictional retailer that got a total score of 82.7%. Performance and commitments around reuse were a major blind spot, as none of the retailers was found to be performing well. Most other issues were found to be addressed well by at least one existing retailer, which means that simply by combining existing practices supermarkets could up their game, increasing their transparency, as well as providing credible and meaningful commitments to reduce, reuse and recycle their plastic packaging, while also supporting ambitious government policies that would drive a level playing field in the sector.

The report also points to the problematic greenwashing practices by some supermarkets. The EMF reported that supermarkets that have signed up to their New Plastics Economy commitment, place on the market over 60% of soft flexible packaging that is unrecyclable. Our report shows that rather than redesigning and reducing their packaging, supermarkets try to recycle the unrecyclable. Greenwashing examples can be found in the UK, with the creation of The Flexible Plastic Fund and supermarkets' in-store soft plastic collection schemes ultimately stemming from a lack of government policy. Tesco and Sainsbury's installed bins for separate collection of flexible packaging in their stores and contracted a company to manage this waste, but the company was found to be exporting to third countries such as Turkey, where previous investigations have shown that the waste was illegally dumped and burned. Supermarkets must stop the perpetuation of false solutions and greenwashing and invest in true solutions such as plastic reduction, upscaling reuse and actively supporting adequate policy. Governments must create policy frameworks that ultimately lead to plastic reduction, especially for hard to recycle and non-essential single-use plastics, and the creation of reuse and effective recycling systems.

The report ends with recommendations for retailers, governments, consumers and investors.

References

- 1 Retail Index (2022) Rankings and Profiles of Food Retailers in Europe. [ONLINE] Available at: <https://www.retail-index.com/sectors/foodretailersineuropeandworldwide.aspx>
- 2 Environmental Investigation Agency and Greenpeace (2021) Checking Out on Plastics III. [ONLINE] Available at: <https://checkingoutonplastics.org>



1. A crisis of convenience

The global plastic pollution crisis is a climate crisis, a biodiversity crisis, a public-health crisis, an environmental justice crisis and a crisis of accountability all packaged into one.¹ It is a crisis that ranges from the macro to the micro level: From the climate-disrupting consequences of carbon emissions across plastic's life cycle, and entire ecosystems and human societies undermined by plastic pollution, to the ubiquitous presence of microplastics and toxic chemicals found in plastics in soils, waters and in our digestive, respiratory and even vascular systems. The world is stewing in a toxic, plastic soup, yet despite the outrage, coordinated action and mounting pressure from across all sectors of society - from NGOs, legislators and consumers - the amount of plastic that is being placed on the market is growing.

Almost all single-use plastic products are produced from fossil fuels, such as crude oil and (fracked) gas.² Modelling in a recent report by Pew Charitable Trusts and Breaking the Plastic Wave, estimates that a business-as-usual scenario could see as much as triple the amount of plastic leaking into the natural environment by 2040 compared with today, equating to as much as 50kg of plastic entering the ocean for every metre of shoreline - saddling the world with even more permanent plastic contamination.³ The plastic industry will also account for a 19% share of the global carbon budget by 2040.⁴

A primary cause of the crisis is that cheap, disposable plastic has come to dominate our lives as consumers and has completely overwhelmed our waste management systems. This has resulted in leakage of plastic into the natural world on an unprecedented scale, and mismanagement of waste in the form of incineration, dumping, open-burning or plastic-to-fuel - all adding to the burden on the climate, biodiversity and human lives. This is further exacerbated by the plastic waste trade, where high-income and high-consuming countries are off-shoring their plastic waste onto others.⁵ Supermarkets represent most people's primary touchpoint with single-use plastic packaging, with supermarket shelves stocked with convenient single-use packaging items - sometimes used only for seconds, disposed of and ending up in the environment for centuries.

Globally, only 9% of plastic produced has been recycled.⁶ While in the European Union (EU) this might be slightly higher, in part as a result of exporting plastic waste to third countries, packaging by far represents the largest end-use market for plastics in Europe and is causing huge end-of-life problems. The statistics reveal that 40.5% of plastic production in Europe is solely destined for plastic packaging,⁷ and despite the initial pandemic slowdown, European plastics manufacturers benefited from the high demand for plastics in 2021 and saw an increase in plastic production, the highest since 2011.⁸

Photos: Waste from European supermarkets found dumped in Turkey

Credit: Dr. Sedat Gündoğdu, Çukurova University

A cause of mounting concern is the research being done into the health consequences of our proximity to plastic. In a 2022 study, microplastics were found deep in the lungs of living people for the first time, with particles discovered in the tissues of patients undergoing surgery. Of these microplastics, polypropylene, used in thicker plastic packaging and pipes, and polyethylene terephthalate (PET), used in bottles and clothes, were the most commonly found.⁹ An earlier study published in March 2022, revealed microplastics detected in human blood for the first time; scientists found tiny plastic particles in the blood of almost 80% of those tested.^{10,11} While these do not make causal links between the presence of microplastics and long-term human health effects, earlier research suggests that microplastics may cause damage to human cells¹² and, even more worryingly, have been found in the placentas of unborn children.¹³ Chemical additives used in plastics have been associated with chronic inflammations, alterations of the endocrine system and reproduction, as well as cancer.¹⁴

This barrage of bad news about our plastic lives has, of course, not gone unnoticed. More than any other environmental issue, plastic pollution generates outrage, finger-pointing and handwringing from all corners of society. In the EU, 87% of citizens are worried about the impact of plastic production on the environment, while 74% are worried about its impact on their health.¹⁵ In February 2022 an IPSOS Mori poll implemented across 28 countries revealed that 75% of people want a ban on single-use plastics,¹⁶ while 85% of the respondents thought manufacturers and retailers should be responsible for reducing, reusing and recycling plastic packaging.¹⁷ According to the poll, the majority of consumers in every country agreed that they would prefer to purchase products that use as little plastic packaging as possible, with a global average of 82% making these demands.¹⁸

Campaign groups have succeeded in exposing corporate irresponsibility and are pushing for stricter regulation on plastic around the world. The growing zero-waste movement is sending a strong signal to consumer brands and retailers to change course, while Zero-Waste Cities networks are growing stronger every year. One effect of this intensifying pressure is a strong mandate for action from governments and policymakers. A 2020 Duke University analysis of two decades of plastic legislation shows a clear upward trend.¹⁹ These policies are also increasingly comprehensive, seeking to address plastic at all stages of its life cycle, with 25% of policies between 2000 and 2005 being comprehensive compared with 59% in 2018 alone.

Companies that are more than superficially committed to mitigating their contribution to the plastic crisis should welcome regulation on this issue – particularly where it seems that consumer pressure will not wane, legislation levels the playing field and ensures that investments are focused on viable solutions to the plastic crisis, over sticking-plaster distraction. Simultaneously, companies taking a lead on sustainability can position themselves ahead of government legislation, pre-empting market pressure and gaining from early adopter's advantage.²⁰ This creates a positive leader versus laggard dynamic and is a way for companies to respond directly to societal pressure and distinguish themselves in the market. This is where European supermarkets can also show their leadership and respond to citizens' concerns over the plastic crisis and lead on ambitious implementation of EU legislation.

1.1. EU and international legislation to regulate plastic pollution

1.1.1. EU legislation to drive change in the retail sector

The EU has made it a priority to address plastic pollution and waste in recent years, including its 2018 European Plastics Strategy²¹ and the 2020 Circular Economy Action Plan.²² The EU has already taken strong measures to reduce pollution and waste from single-use plastics and is expected to adopt further measures to support the transition away from unnecessary packaging and single-use plastics, towards reusable products and packaging.

In addition to the EU's Single-Use Plastics Directive (SUP),²³ the EU will review its Packaging and Packaging Waste Directive (PPWD) in the coming years, with the Commission's proposal expected in July 2022, and discussions in the European Parliament and the Council (i.e. Members) in 2022 and 2023.²⁴ The PPWD sets several conditions that packaging has to fulfil to be allowed on the EU market. The revision of the PPWD notably aims at tackling excessive packaging and improving packaging design to promote reuse and recycling. Therefore, the revision is likely to include measures to support packaging reduction and the upscale of reusable packaging and reuse systems, including reuse targets applying to the retail sector, economic incentives and measures to harmonise the format of reusable packaging and reuse infrastructures, including a deposit return system (DRS) and reverse logistics. Several EU countries have already adopted reuse targets in the last couple of years, including Austria, France, Germany, Portugal and Romania and discussions are ongoing in several other countries in Europe. Retailers must contribute to the achievement of the targets by making reusable packaging available to consumers, providing their own-branded products in reusable packaging, putting in place take-back systems and supporting progressive legislation across the board in their different operating markets.

The EU is also about to harmonise definitions and labelling for bio-based, biodegradable and compostable plastics and to set conditions for their use. This will impact the marketing of these products in the retail sector (in addition to the measures on single-use bio-based, biodegradable and compostable plastics, including in the SUP Directive). The upcoming EU legislation on Green Claims will also impact retailers by setting conditions and regulations for claims and labelling on packaging and products (e.g. on the reusability of the packaging and the feedstock used) and prevent greenwashing.²⁵

1.1.2. End plastic pollution: Towards a legally binding international instrument

The recognition of the need for government action on plastics reached new heights in March 2022. The United Nations Environment Assembly (UNEA), the world's highest-level decision-making body on the environment, adopted a resolution entitled *End plastic pollution: Towards an international legally binding instrument*, which sets to change the course of global governance on plastics by establishing a new global instrument, or in other words, a plastics treaty.²⁶

The UNEA plastics resolution is a significant moment in global efforts to combat plastic pollution – it kick-starts, with urgency, negotiations with a timeline of agreeing the treaty by the end of 2024. It provides negotiators with a broad mandate to address plastic pollution in all environments, not just oceans, with interventions envisaged across the full life cycle of plastics to address virgin plastic production, product design and environmentally sound waste management, alongside recognition of the array of risks to human health and the role of the informal sector in waste collection and management. Critically, the resolution recognises several approaches, such as prevention and reuse, as tools for reducing plastic pollution.

As the treaty is negotiated and adopted, it has the potential to support retailers, fast-moving consumer goods (FMCG) companies and packaging companies in creating or implementing their commitments against a transparent and level playing field by establishing harmonised reporting requirements and consistent metrics, developing binding targets and supporting the transition towards reduction and reuse through infrastructure development. Ultimately, by establishing a global framework, companies will benefit from investment in more integrated systems for packaging design, reverse logistics, material collection and waste management as part of a transition to a more circular economy.



2. Hiding in plain sight: European food retailers' responsibility to address the plastic crisis

European food retailers have a pivotal role in the way that consumers purchase and dispose of plastic packaging. As the primary touchpoint between citizens and plastic, they have a responsibility to address the plastic crisis. While 69% of European grocery shoppers said they are loyal to a particular retailer, 78% said they would move to a different retailer if their sustainability expectations were not met.²⁷ The same Salesforce survey found that 84% of shoppers believe that it is important that retailers become 'more sustainable' with regard to packaging and single-use plastic - action on plastic is a matter of customer retention in a crowded marketplace.

In Europe more than 40% of plastic goes into packaging, such as single-use containers, food packaging and beauty and personal care products.²⁸ Grocery retailers are one of the major users and distributors of such plastic packaging, whether it is through selling branded goods - manufactured and packaged by other companies - or own-brand goods.²⁹ In addition to packaging for goods, retailers are responsible for additional plastic such as carrier bags and plastics used in logistics and transport. Yet, of this vast amount of packaging, much of it is causing significant end-of-life issues. The Ellen MacArthur Foundation (EMF) reports in its latest Global Commitment 2021 progress report that among the retailer signatories (16 companies) of its New Plastics Economy, on average 62% of signatories' packaging remains unrecyclable, with a miniscule 6.3% of packaging by weight being classed as reusable.³⁰

Yet while 'branded litter' such as Coca-Cola and Pepsi bottles, Mondelez snack wrappers and Unilever detergent leaks into the natural environment clearly emblazoned with the logo of the company that made it, for supermarkets or retailers, who act as the middleman between brand and consumer, this reputational fall out is lessened - although still a factor for branded packaging - weakening the pressure to act. At the same time, as the key touchpoint between consumers and packaging, plastic reduction strategies such as DRS or refill infrastructure rely heavily on retailers. The result is a form of stalemate, whereby systemic measures cannot be implemented without retailers' support, but retailers have become the key actors blocking the implementation of reforms (see Box 2.3: Supermarkets lobbying against DRS and reuse).

While cheap disposable plastic packaging has become core to the modern supermarket business model, these retailers have resources to become part of the solution to the plastic crisis, rather than exacerbators of it. In Europe,

Photo: Bananas wrapped in plastic in Tesco, UK

Credit: Changing Markets Foundation

the revenues of the leading companies in the food retail sector combined have reached €2.4 trillion turnover.³¹ France, Germany, and the United Kingdom have the highest food retail turnover in Europe, in a highly concentrated market, with five major retailers accounting for more than 50% of the market.³² The biggest retail chains are the German Schwarz Group with the discounters Lidl and Kaufland, and REWE Group (Germany) with its biggest banners REWE and the discounter PENNY, Tesco in the UK and Carrefour in France. The Schwarz Group, which includes Kaufland and Lidl, was the best-performing food retailer in Europe in both 2020 and 2021, having generated a gross revenue of around €139.6 million and €144.6 million, respectively.³³ In response to the unprecedented increase in customer demand for online groceries, food retailers accelerated and quickly escalated their capacity to adapt to satisfy that demand. UK food retailers were leading the way with Tesco holding 27% of the UK's market share now selling 5% of its turnover through the internet.^{34,35} This proves that when there is a great demand for change, retailers mobilise the resources to create that change. Overall, in Europe, supermarkets and convenience stores account for 55% of consumers' weekly food purchases.³⁶

TOP 10 FOOD RETAILERS IN EUROPE

TURNOVER (REVENUE) FOR 2020 IN BOLLION €

RANK	RETAILER	TURNOVER	STORES	HEADQUARTER
01	SCHWARZ	125,3	12.600	
02		106,3	8.826	
03	REWE	63,7	8.369	
04		61,0	3.600	
05	TESCO	56,67	4.613	
06		55,37	11.145	
07	E.Leclerc	40,9	1500* *estimate	
08		40,0* *estimate	2.659	
09	Sainsbury's	36,4	2.297	
10	Auchan	31,6	4.084	

Figure 2.1: Revenues of the leading Top 10 companies in the food retail sector in Europe in 2020 (in billion EUR).

Source: Retail Index (2022) Rankings and Profiles of Food Retailers in Europe. [ONLINE] Available at: <https://www.retail-index.com/sectors/foodretailersineuropeand-worldwide.aspx>



2.1. Retailers stalling progress on plastic

Despite the seriousness of the plastic pollution crisis, broadly speaking, retailers have been sluggish to implement the necessary changes to their operations to scale back their everyday addiction to plastic packaging, in many cases doing barely more than the legal minimum. Furthermore, they employ a variety of tactics in the corporate playbook to delay progress, distract from the need to change and derail mandatory measures. Whether by design or unintentionally, these tactics stand in the way of progressive reforms and maintain the sector's disastrous addiction to single-use plastic.

2.2. Delay

Delaying tactics from retailers serve, unintentionally or deliberately, to stall progress by creating the illusion of change or other tactics, such as withholding data. A fundamental lack of transparency and lack of disclosure is a key way that retailers stall progress, and forms part of the rationale for our questionnaire. Across Europe, this lack of data is a fundamental barrier to understanding how large the problem is, and therefore to identifying solution pathways. In contrast with the data black hole in continental Europe, a survey of UK supermarkets' plastic usage by the Environmental Investigation Agency and Greenpeace UK has been a critical step in understanding the scale of the problem. Their investigation reported that the plastic footprint in 2019 of some leading UK supermarkets (branded and own brand), was an estimated 896,853 tonnes of plastic packaging put on the market.³⁷ In addition, it was estimated that over 2.1 billion plastic carrier bags and 'bags for life' were issued by only the top ten supermarkets in 2019. The number of plastic 'bags for life' (the heavier duty reusable option and not the thinner single-use carrier bags) issued by the supermarkets increased with more than 1.58 billion issued in 2019, a 4.5% increase compared with 2018. This represents almost 57 bags per UK household during the year.³⁸ While we have these crucial data for UK supermarkets, elsewhere in Europe, despite the role of supermarkets as some of the largest single-use plastic packaging users and their critical role in addressing the crisis, transparency is a major blind spot. We do not know precisely how much plastic packaging European retailers contribute to the market because that data is simply unavailable and many retailers refuse to disclose their plastic footprint. This lack of transparency makes setting meaningful policies and commitments difficult because, without a baseline, it is impossible to understand how ambitious such measures are and track progress towards the targets.³⁹

BOX 2.1: Legal challenge against Ahold Delhaize for plastics transparency failings

In November 2021, environmental law NGO ClientEarth and Dutch plastics campaigning group Plastic Soup Foundation reported Ahold Delhaize to the Dutch financial regulator for failing to disclose key information on its use of plastics and for not reporting plastic-related risk.⁴⁰ In the complaint, the NGOs argued that this amounted to a breach of EU law,⁴¹ which requires public companies to disclose material information about the impacts they have on the environment and the risks their business face related to sustainability.

The lawyers' review of Ahold Delhaize's annual report found that the grocery retailer:

- did not disclose its plastic footprint;
- failed to describe the impact that the plastic it uses has on the environment, the climate and people's health; and
- did not acknowledge that its use of plastic packaging poses financial risks to its business.

Demands for transparency from investors

Shareholders have also been active in demanding more transparency on plastic footprint and policies from supermarkets such as Kroger, Target and Walmart.⁴² As investors become more concerned about the financial risks that plastic-polluting companies are exposed to, supermarkets should expect more interventions from shareholders demanding that they collect and openly report plastic-related information.



DELAY DISTRACT DERAIL



Voluntary commitments and group initiatives themselves are another delaying tactic, and there has been an eruption of such measures over recent years; however, previous research by the Changing Markets Foundation found a shocking amount of overlap between corporate membership of the initiatives that claim to solve plastic pollution on the one hand, and industry initiatives that are working to delay or derail ambitious legislation, on the other.⁴³ In their responses to our letters, retailers also highlighted their memberships of different initiatives. Out of the 13 countries analysed in this report, many of them have established a Plastic Pact – a voluntary initiative by the EMF and WRAP – where companies and governments can become signatories. Such pacts were established in France, Poland, Portugal, the Netherlands and the United Kingdom. In addition to this, there is also a regional European Plastic Pact that has over 81 members and was initiated by the Danish, Dutch and French environment ministries. Other countries analysed in our report also had independent country initiatives such as Repak Plastic Pledge (Ireland), the Green Packaging Initiative (Austria) and CBL^C Sector Plan Sustainable Packaging (the Netherlands).

Likewise, some of the largest retailers in Europe are signatories of the EMF's New Plastics Economy Global Commitment: Ahold Delhaize Group (Albert Heijn), Carrefour, Jerónimo Martins, Metro, the Schwarz Group and Sonae.^D Despite being members of all these pacts and initiatives, most retailers failed to provide to us even the most basic information, such as their plastic footprint, in their responses to our questionnaire. A closer look at the Global Commitment Signatory Report 2021, shows that while *transparency* is at the forefront of the commitment's areas of progress, most of the retailers' responses regarding *plastic packaging weight (metric tonnes)* leave us completely in the dark, as most companies submitted their data only to the EMF. Only Carrefour disclosed plastic packaging by weight, which was reported as 37,256 metric tons in the Global Commitment 2021 Signatory Report.⁴⁴ Such a lack of progress, even on issues as basic as transparency around public packaging, should not be acceptable.

Another tactic revealed in *Talking Trash* report is that companies use their membership in voluntary initiatives to defend themselves from public scrutiny. This has once again become apparent in how some companies responded to the questionnaire for this report. For example, Lidl, Plus Retail and Spar in the Netherlands did not answer specific questions in the questionnaire but they provided a similar response, indicating that they already report data on a yearly basis to the Dutch Plastic Pact and the CBL on their packaging. Yet a closer look at their website reveals that this information is not publicly available. The Plastic Pact Netherlands monitoring report even indicates that '*it was not yet possible for all parties to provide all the data requested*'. The report published in 2019 indicated that it was '*not yet clear whether some parties simply failed to supply the requested data or whether they cannot reasonably be expected to have access to the data, given the nature of their activities*'.^{45,46}

Back in 2020, the *Talking Trash* investigation concluded that the overall problem with voluntary commitments and targets is that they are meaningless unless there is an effective way to enforce compliance. This problem persists. The proliferation of voluntary initiatives is being used as a fig leaf for companies that are failing in their responsibility to address the plastic crisis and creating an illusion that action is being taken voluntarily.

2.3. Distract

Elsewhere, many supermarkets are responsible for perpetuating false solutions in their efforts to tackle plastic waste and distracting consumers with fake recycling schemes, sticking-plaster solutions and short-term strategies that look good but are not sufficient.

A recent investigation in the UK, revealed that a waste exporter contracted by both Sainsbury's and Tesco (to manage soft plastics that they collected from customers in their voluntary in-store soft plastics take-back schemes)

^C CBL is the Dutch supermarket business association.

^D The retailers mentioned as signatories of the EMF New Plastics Economy Global Commitment are not the full extent of retailer signatories, only the ones that are being analysed for the purpose of this report.



Photos: Waste from European supermarkets found dumped in Turkey

Credit: Dr. Sedat Gündoğdu, Çukurova University

breached UK export regulations when it shipped waste to five sites in Turkey. In some cases, waste companies were found to be mislabelling their waste to get around restrictions with little-to-no transparency about the final destination of their waste (more in Box 3.3: The UK soft plastics problem).⁴⁷

Piecemeal approaches to the plastic pollution crisis are also used by retailers, intentionally or otherwise, to distract consumers and policymakers from a lacklustre commitment to cutting plastic. Such short-lived strategies mainly focus on recycling, lightweighting and switching plastic packaging for other single-use materials such as paper or, even worse, still using single-use plastic containers and presenting it as reusable. Furthermore, when looking at the fine print, these voluntary initiatives, while widely promoted by the companies, are only being implemented in a few stores while the company continues to sell problematic products, such as single-serve condiment sachets for home use. An example of this is Mercadona's Strategy 6.25, which aims to reduce plastic and manage its waste but a closer look shows that it has focused on switching to other single-use alternatives and small projects, such as in-store recycling bins that run on a voluntary basis.⁴⁸ As Box 2.2 reveals, it also greenwashes some of its thicker plastic products as 'reusable'.



BOX 2.2: Mercadona's false reusability claims

Mercadona is one of Spain's largest supermarket chains, accounting for almost 25% of the total Spanish market. In 2019 it published a new strategy that focuses on plastic waste, 'Strategy 6.25'. This strategy, however, only seems to be switching from single-use plastic to other single-use alternatives or rebranding single-use plastic products as reusable. An example of this is the rebranding of their single-use plastic cava glasses as 'reusable' because they can supposedly be washed.⁴⁹ This is a clear example of greenwashing and could potentially be in contradiction to the EU's Single-Use Plastics Directive. Although the Changing Markets Foundation and Break Free from Plastic (BFFP) have previously exposed this kind of false reuse tactic, for example, in the *More Trash, More Cash* report published in March 2021, these items continue to be sold online and in stores by Mercadona.⁵⁰



Figure 2.2: Mercadona's Strategy 6.25 consists of switching single-use plastic items for other single-use alternatives or presenting them as reusable.

Source: Changing Markets (2021) *More trash, more cash: Who is really behind the plastic crisis in Spain?* [ONLINE] Available at: <http://changingmarkets.org/wp-content/uploads/2021/03/MoreTrashMoreCash.pdf>

Figure 2.3: Plastic cava glasses are sold as a greener reusable alternative but are no different or more durable to single-use plastic.

Source: Changing Markets (2021) *More trash, more cash: Who is really behind the plastic crisis in Spain?* [ONLINE] Available at: <http://changingmarkets.org/wp-content/uploads/2021/03/MoreTrashMoreCash.pdf>

2.4. Derail

While failing to achieve even the minimum requirement of transparency and disclosure, supermarkets across Europe have also been key players in stalling progress on legislative efforts to tackle plastic. In several EU countries, such as Austria and Spain, big retailers have been part of the opposition to policies, such as DRS, highly effective and proven solutions to alleviate plastic pollution, through their various industry associations and also through 'recycling' organisations, called Producer Responsibility Organisations (PROs). These organisations are set up to collect licensing fees for packaging placed on the market and to sub-license Green Dot™ labels (e.g. chasing arrow symbols) to companies for their packaging and to partly provide funding for waste management and recycling. Yet investigations, including our own in Austria, the Czech Republic and Spain, have revealed how they exert undue influence on legislation, coordinating lobbying activities against more effective collection (and recycling) proposals.⁵¹

For example, our investigation in Austria revealed that a powerful coalition of companies, including retail giants Hofer, Lidl, REWE Group (BILLA, BIPA, MERKUR, PENNY etc.) and Spar, had tirelessly worked to influence the government's decision against a DRS, by largely orchestrating lobbying efforts through the highly reputed Altstoff Recycling Austria AG (ARA), Austria's largest PRO.⁵² Furthermore, the latest efforts to derail real solutions such as DRS and reuse targets have been spearheaded by the PRO Ecoembes, which unites the biggest FMCGs, such as Coca-Cola, Danone, Nestlé and Unilever and the biggest supermarkets in Spain, such as Alcampo, Carrefour, Lidl and Mercadona.⁵³



BOX 2.3: Supermarkets lobbying against DRS and reuse

With the Single-Use Plastics Directive requiring single-use plastic bottles to have a separate collection rate of 90% by 2029 and 30% recycled content by 2030, governments around Europe will have to implement DRS to achieve these targets. This system consists of a small deposit that is charged on the purchase of included beverage containers, which is then refunded to the consumer when the empty container is returned to a collection point.⁵⁴

In Europe, Croatia, Denmark, Estonia, Finland, Germany, Iceland, Lithuania and the Netherlands have existing forms of DRS, and this year, Latvia and Slovakia have rolled out systems with Malta set to join in the coming months.⁵⁵ Many countries are still on their legal journey towards implementing a DRS, including Scotland (2023), Spain (2023), Portugal (2023), England, Wales and Northern Ireland (2024) and Austria (2025). Figure 2.4 shows that countries with deposit systems in place on average exceed a 90% collection rate for PET bottles, whereas the average EU collection rate is under 60%.

The highest return rates can be seen in systems that use a return-to-retail approach, where retailers become legally responsible for accepting empty containers for recycling; however, our investigations have revealed that retailers have been some of the major opponents to the implementation of the DRS. For example, in Austria, supermarkets were found to be signing letters opposing the introduction of DRS and instead promoting clean-ups and awareness-raising campaigns, despite the fact that 83% of Austrians were found to be in favour of a DRS. In Spain, investigations have revealed that supermarkets, such as Carrefour and Mercadona, have been the key lobbyists against a DRS, with Mercadona even threatening to remove the products of the consumer brands that supported a DRS from its shelves.^{56,57} In many cases, supermarkets were also against the inclusion of glass in DRS, which would be crucial for enabling of reuse systems for beverage containers.⁵⁸ In the Netherlands, where a partial DRS for large PET bottles and re-

usable glass beer bottles has been in place for a long time, supermarkets have been lobbying to get DRS removed. After the conversation turned to expanding the system to small PET bottles and cans, supermarkets lobbied against this decision until the end. For cans specifically, even after the decision was announced, supermarkets tried to undermine the DRS by refusing to take back cans in the supermarket with the other returned packaging, and instead lobbied for stand-alone outdoor return vending machines just for cans.⁵⁹

AVERAGE EU PLASTIC BOTTLE-COLLECTION RATES IN 9 COUNTRIES WITH DEPOSIT RETURN SYSTEMS (2020)

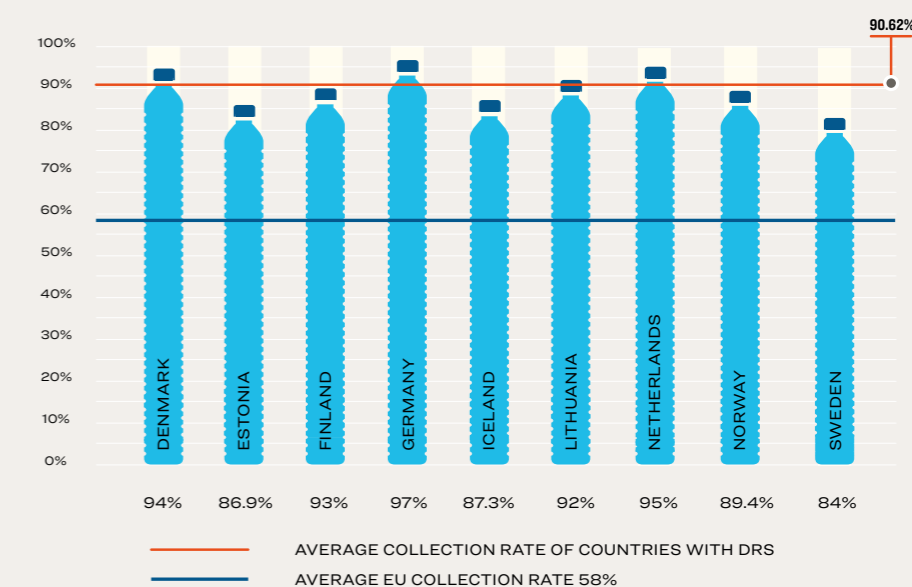


Figure 2.4: Plastic bottle collection rates with or without a DRS
Source: Changing Markets Foundation and Reloop⁶⁰

Overwhelming concern from all quarters about plastic pollution has led to high levels of corporate scrutiny and a mandate for comprehensive legislation. The response has been a simultaneous eruption of voluntary, industry initiatives and a steady increase in regulation as the dominant market force. As we have seen, the response from retailers and supermarkets across Europe calls into question their commitment to tackling the plastics problem and stands in high contrast to their bold claims and lofty statements.

Rather than delaying progress, distracting with false solutions and derailing mandatory measures, it is high time that retailers rise to the challenge and embrace systemic solutions to the plastic crisis through packaging innovation, improved product design, delivery systems based on reuse models, wide roll-out of DRS and overall, more sustainable supply chains. The sector must make the most of the early opportunity and responsibility to invest in zero-waste systems and support progressive policies that deliver this, before regulatory pressure forces them to comply.⁶¹



3. Analysis and ranking of European retailers' performance

3.1. The scope of the analysis

As part of a European-wide project to evaluate the transparency, policies and the role played by European retailers in the global plastic pollution crisis, 21 organisations across Europe (members of the BFFP movement), reached out to 130 retailers in 13 countries with a short questionnaire that covered three topics: *Transparency*, *company commitments* and *support for progressive government policies* (see Appendix 2). Supporting organisations translated the questionnaire and accompanying materials into their national language and contacted retailers between June and November 2021.

Of 130 retailers contacted, only 39 retailers (30%) provided a written response to the questionnaire, but many of these responses did not include meaningful replies to the questions asked. For this reason, we have limited our final analysis to 74 retailers, covering those with the highest turnover and with a presence in at least two European countries. Where meaningful written responses were lacking, these retailers were further investigated with regards to their policies and public disclosure of relevant information covering plastic packaging, their own products as well as branded products sold in their shops.

Table 3.1 shows the retailers included in the analysis and indicates whether they provided meaningful answers to the questionnaire (green), engaged but did not provide meaningful answers to the questionnaire (orange) or did not respond at all (red). Due to this dearth of information, our assessment of companies in orange and red had to rely entirely on publicly available sources, mostly the company's own websites, annual reports and sustainability reports.

Through the questionnaire, we have also identified a lack of a cohesive approach from brands or retailer groups operating in multiple countries with regards to their levels of engagement, transparency, disclosure of reliable data or support for legislation. Notably, in some countries more than others, engagement with the questionnaire was particularly poor. This includes those retailers in the Netherlands, Portugal and Spain, where none of the retailers provided meaningful answers.

Retailers included in the analysis



* Lidl Austria (Schwarz Group) responded to our questionnaire, but said we could not use the data, so we had to rely on information in the public domain.

** On 6 September 2021 it was announced the supermarket chains Plus and Coop have reached an agreement on a merger. The stores will continue under the name Plus but the name Coop will disappear. The combined organisation is expected to become operational early 2022.

*** Only UK supermarkets with EU stores were contacted to take part in this survey. The reason provided for Tesco UK not submitting a survey response in this instance included: that they fully publish packaging data for the UK, which is the overwhelmingly biggest market in which they operate. This includes publishing packaging data for the EIA and Greenpeace UK Checking Out on Plastics Survey. Most of the packaging materials they use as a business are in their UK operations, where they have detailed packaging footprint transparency previously. It is for this reason that they requested it be known that this is why they did not submit survey responses for this report. This is also the reason why the score was so low in this report.

**** This was the first research of Ukrainian supermarkets' plastic footprint and efforts to reduce it, helping to create a baseline for future research. The Russian invasion of Ukraine started after the research period on 24 February 2022 and has understandably dramatically shifted collective focus away from waste reduction and connected environmental issues, with many retailers losing their warehouses and shops throughout Ukraine due to bombings. Our Ukrainian partner organisation Zero Waste Ukraine remains committed to their cause and intends to continue cooperation and implementation of recommendations when peace is restored.

***** Metro operates largely as wholesaler supplying products to registered businesses.

3.2. Scoring methodology

Using the questionnaire as a starting point, indicators and a scoring methodology were developed to assess the performance of the retailers. The full methodology is provided in Appendix 2. In total 100 points could be achieved across the three sections of *transparency and performance* (36 points), *commitments* (54 points) and *government policy support* (10 points).

- *Transparency and performance:* This includes indicators such as the reporting of tonnage and number of items packed using plastic among the retailers' own brands (private labels) as well as the branded products of supplying food manufacturers. This section also includes the mean recycled content in own-brand packaging and information about the extent to which primary (consumer units), secondary (packaging group consumer units into larger packs or so-called stock-keeping units) and tertiary packaging (bulk or transit packaging) is reusable.
- *Commitments:* This section consists of the targets that companies have adopted to reduce their plastic packaging; increase the amount of refillable or reusable packaging; and increase recycled plastic content. Indicators for each of these targets includes measurement methods, the year when the target is to be achieved, current progress and which products are included (scope). Additionally, there are also indicators addressing retailers' overall packaging material reduction goals and the adoption of delisting policies for brands that do not meet retailers' commitments.
- *Support for government policies:* These indicators include the extent to which retailers support government policies for all-inclusive DRS for beverages, their specific support for refill and reuse DRS and their position on binding targets to increase the number of products whose packaging is refillable or reusable.

3.3. Results summary

The first-ever analysis of the role that European supermarkets play in addressing the plastic pollution crisis, shows disappointing results (Figure 3.1). The total average score achieved was only 13.1 points (out of 100). At the top of the table, the highest scoring companies were Aldi in the UK with 65.3 points and Aldi in Ireland with 61 points. These are the only two companies that breached the 60-point mark. The rest of the highest scoring companies were significantly behind, with Lidl in the UK at 44.7 points, Carrefour in France at 41.7 points and the French organic supermarket BioCoop at 37 points, making up the top five. The two best performers' leading position was achieved from their disclosure of how much plastic is being used in their own brands and in the branded products that they stock on their shelves and from the strength of their commitments to reduce plastic packaging and increase the use of recycled content. Overall, 82% of companies evaluated were not even able to provide information about their plastic footprint, which casts a shadow of a doubt over their quantitative commitments, where they exist, because we were not able to establish how these will be measured. Companies also often failed to provide methodologies on how their targets will be calculated and measured.

On the other end of the spectrum are the 14 companies that did not receive any points at all, including Cora (Belgium); Tesco, Coop, BILLA and PENNY (REWE Group) (Czech Republic); Maxima, Prisma and Selver (Estonia); Leclerc (France); Musgrave and Dunnes Stores (Ireland); Intermarché (Portugal); Carrefour (Spain) and Metro (Ukraine).

Most of the companies that scored zero points did not provide answers to the questionnaire and this is also reflected in the rest of the assessments. Companies that engaged with the request for information and provided meaningful answers achieved an average score of 18.1 points, which is more than 2.5-times the number of points

Table 3.1: Retailers included in the analysis

Retailer ranking – overview of retailer performance

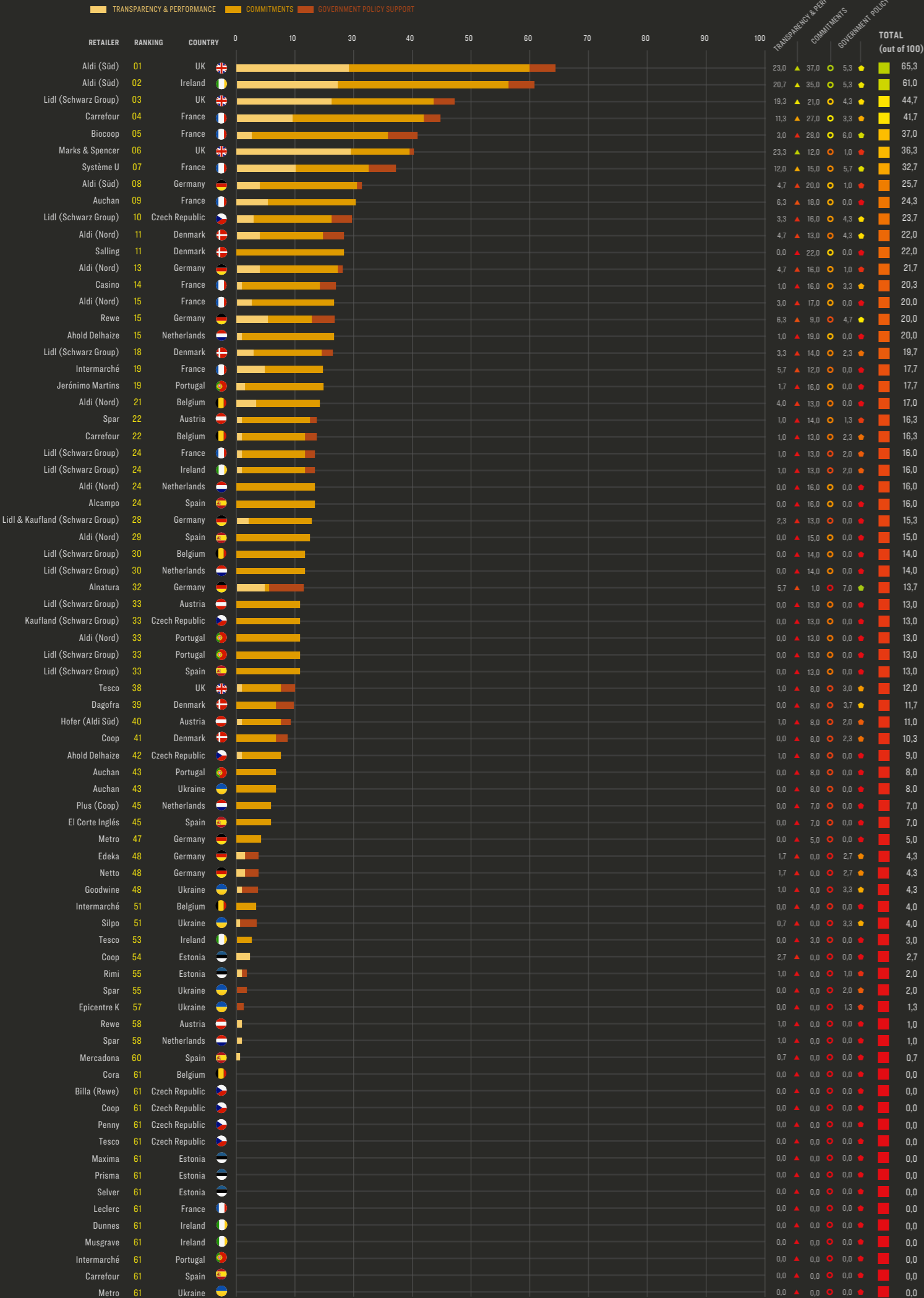


Figure 3.1: Retailer ranking – overview of retailer performance

compared with the companies that did not engage, which averaged 7.5. The highest scoring retailer that did not engage meaningfully with the questionnaire is Ahold Delhaize in the Netherlands, which ranked 15th.

Although most retailers did not disclose much meaningful information in their letters, their websites in general provide even less useful data. This is particularly the case for the section on *supporting government policies and legislation* and the section covering *transparency and performance*. In many cases, it was also challenging to find the person responsible for sustainability to whom our members could address their correspondence. This clearly shows that European retailers still have a long way to go when it comes to transparency, stakeholder engagement and to playing a more progressive role in addressing the plastic crisis. In the following section, we provide a more detailed analysis of how performance could be improved.

3.4. Scoring analysis

Digging deeper into the data supplied by the retailers and available in their publicly available reports reveals significant shortcomings when it comes to addressing the environmental footprint of plastic packaging in the food retail sector. Of particular concern is that only 16% of retailers provide information about the amount of plastic they are using for their own operations. It is difficult to manage what one does not measure. Retailers performed especially badly with regards to their commitments to increase reusable and refillable packaging. On average only 3.5% of the total achievable points across all companies were reached. This is particularly worrying as reuse/refill systems are higher up on the waste hierarchy, as opposed to recycling, where retailers also scored poorly with 32% of available points.

3.4.1. Transparency and performance

The measurement and disclosure of how much plastic is used in the packaging of products, how much of the packaging is made up of recycled plastic and how much of it is reusable are all vital elements to assess progress towards retailers' commitments. Retailers exert much more control over the products that are manufactured for their own brands, compared with branded products by independent manufacturers. Nevertheless, similar to scope 3 greenhouse gas emissions, it is critical for retailers to measure the overall tonnage of plastic packaging and the number of items packaged in plastic and to include those products in their plastic policies and commitments. Even though some companies may have such figures but chose not to publicly disclose them, it is more likely that a large number of retailers are not tracking them at all. This means that they have no baseline to measure any progress towards their plastic packaging reduction commitments. Equally, it is important that retailers disclose such figures publicly so that their progress towards the targets can be openly scrutinised.

Table 3.2 shows the ten best scoring companies in the *transparency and performance* section of the assessment as a percentage of the maximum achievable points. Even though Marks & Spencer and Aldi in the UK achieved more than 60% of the available points, the overall performance in this section has been very poor with only 7.1% of the total points achieved on average. The average for the *packaging reusability* section was even worse with no company reaching more than 40% of the maximum points, at an average of only 5.1%.

In addition, there are large discrepancies in reporting by international retail chains across the countries they are operating in. Aldi, for instance, scores more than 20 points out of 36 in the *transparency and performance* section in the UK and Ireland but fewer than 5 points in all other jurisdictions where it was assessed. Scores for Lidl (Schwarz Group) also fluctuated widely between 19.3 points in the UK and no points at all in Austria, Belgium, the Netherlands, Portugal and Spain.

Top 10 retailer scores in transparency and performance section

RETAILER	COUNTRY	PLASTIC FOOTPRINT	RECYCLED CONTENT	REUSABLE PACKAGING	TRANSPARENCY & PERFORMANCE
TOTAL AVERAGE		9,0%	6,3%	5,1%	7,1%
M&S	UK	100,0%	33,3%	38,5%	64,8%
ALDI	UK	100,0%	66,7%	17,9%	63,9%
ALDI	IRELAND	100,0%	33,3%	17,9%	57,4%
LIDL SCHWARZ	UK	100,0%	33,3%	7,7%	53,7%
Système U	FRANCE	50,0%	33,3%	12,8%	33,3%
Carrefour	FRANCE	50,0%	33,3%	7,7%	31,5%
Auchan	FRANCE	25,0%	33,3%	0,0%	17,6%
REWE	GERMANY	25,0%	0,0%	17,9%	17,6%
Intermarché	FRANCE	25,0%	0,0%	12,8%	15,7%
ALNATURA	GERMANY	25,0%	0,0%	12,8%	15,7%

3.4.1.1. Plastic footprint

Despite the crucial importance of measuring and disclosing their plastic footprint transparently, only 12 of the 74 retailers assessed (16%) reported the tonnage (total weight) of the plastic packaging used in their own brands as part of their plastic footprint. Only six of them reported the number of plastic packaging items in their own brands, including Aldi, Lidl and Marks & Spencer in the UK, Lidl in Ireland and Carrefour and Système U in France. While others may be measuring these figures, they are not openly disclosing them. This lack of transparency puts their commitments to plastic reduction and recycled content in question.

When it comes to the branded products they stock, only five supermarkets reported the plastic packaging weight of these and four of them reported the number of units packed in plastic.

The four retailers that reported figures across all four indicators of their plastic footprint were the three retailers in the UK that responded to the questionnaire in detail (Aldi, Lidl and Marks & Spencer, and Aldi in Ireland.) Tesco, the fourth retailer contacted in the UK, after several months' delay stated that as the majority of its operations were UK-based it would not take part in the survey and as a result did not score any points in this category. It is important to note that these high scores of UK supermarkets are probably because UK retailers have previously undertaken UK-specific surveys of a similar nature for the Environmental Investigation Agency (EIA) and Greenpeace UK since 2017.

Table 3.2: Top 10 retailer scores in the transparency and performance section

3.4.1.2. Recycled content

Regarding measuring and disclosing the overall recycled content of packaging, the quality of responses and the level of progress were equally disappointing. Only 13 companies provided figures on the overall recycled content of their own-branded products. With a reported recycled content average of 38%, Aldi UK is the best-performing company for this indicator. A total of 61 companies (82%) either have no recycled content in their packaging, do not know the average recycled content or chose not to disclose this figure.

3.4.1.3. Reusable packaging

Reusability is a much more systemic plastic reduction strategy than recycled content as it reduces plastic production at source and over a more extended period of time. However, none of the companies tracked the reusability of their total packaging and therefore, it follows that no retailer provided details about the associated methodology to measure this. In addition, none of the retailers provided or disclosed information about the reusability percentage for either primary (consumer product packaging), secondary packaging (packaging group consumer units into larger packs or so-called stock-keeping units) or tertiary packaging (bulk or transit packaging). This means that any points awarded to the retailers were based on examples and pilot projects for reusability, such as refill stations, rather than their comprehensive tracking and accounting.

The only exception to this was the example of French organic supermarket BioCoop, who said that 34% of products sold were in bulk, in refillable packaging or in reusable packaging - earning them a high score for the primary packaging reusability indicator.

Overall examples for reusable primary packaging were identified for 29 retailers. Figures for secondary and tertiary reusability were even more disappointing, with only 11 and 9 retailers receiving points for these indicators, respectively.



BOX 3.1: French circular economy legislation and Anti-waste Law

The French Anti-waste Law, adopted in 2020, was described as an 'ambitious piece of legislation' aimed at tackling waste and pollution at all stages with the introduction of 50 measures, including a ban on single-use plastics by 2040.⁶² The law also aims to reduce waste by encouraging reuse and providing more transparent information to consumers.

Among the most important measures in the legislation are targets for reduction, reuse and recycling milestones - set by decree for 2021-2025, gradually raising the level of ambition every five years:

- phase out all single-use plastic packaging by 2040, with five-yearly reduction and reuse targets;
- eliminate unnecessary plastic packaging by 2025;
- recycle 100% of plastics by 2025; and
- reduce by half the plastic bottles sold between 2020 and 2030.

The law has a significant impact on the retail sector because it covers 44% of the plastic packaging in France on different products categories.⁶³ For the first five-year period, 20% of plastic reduction in single-use packaging has been adopted, with variations according to product categories. In addition, the law has introduced bans on everyday plastic items such as tea bags, disposable tableware and fruit and vegetable packaging.

It also encourages the development of reuse models with a goal of 5% of reusable packaging in 2023 (and 10% in 2027) and provides some funds to help the introduction of reuse models in different sectors, products and categories. Finally, The Climate and Resilience law, resulting from the proposals of the Citizens' Climate Convention in 2021, adopts the objective to grow products sold in bulk. The law establishes a new standard obliging each store to provide 20% bulk in shops of over 400m² by 2030, which represents a gradual expansion by approximately four times the current supply in a decade.⁶⁴

3.4.2. Commitments

While the section on *transparency and performance* evaluates the current situation, indicators under the *commitments* section assess the level of ambition of the retailers' future goals to avoid and reduce plastic packaging. These commitments were broadly divided in three sections: Plastic reduction, the use of recycled content in plastic packaging and the commitments to scale-up packaging that can be refilled or reused. In addition, there were also indicators on the overall packaging reduction goals (all materials, not just plastic) and the delisting policy for branded products that are not consistent with retailer commitments.

This assessment found that the commitments adopted by European retailers lack the ambition needed to make a dent in the global plastic pollution crisis. Rather than implementing the systemic changes required to address the problem, retailers have concentrated their efforts on voluntary commitments that do not result in the vital paradigm change needed to eliminate the overflow of plastic packaging. They are focusing on recycling and recyclability as their main strategies to deal with the plastic crisis instead of following the waste hierarchy and prioritising waste prevention and reuse systems - thus taking a relatively easy route requiring only minimal redesign or rethinking of retail systems. Globally, less than 9% of plastic ever produced has been recycled, with retailers selling a high proportion of single-use plastic packaging that is non-recyclable.⁶⁵ The EMF reported in their latest New Plastic Economy Global Commitment progress report that the limited number of retailers that have signed up to the agreement have on average 62% of non-recyclable plastic packaging in their portfolio (see Box 3.3: The UK's soft plastics problem).⁶⁶

Table 3.3: Top 10 retailers' scores in the commitments section

Top 10 retailer scores in the commitments section							COMMITMENTS
RETAILER	COUNTRY	Plastic packaging reduction	Recycled content increase	Refill or reuse targets	Overall packaging reduction	Product delisting policy	
TOTAL AVERAGE		21,5%	32,3%	3,3%	14,9%	4,5%	17,1%
		80,0%	86,7%	33,3%	100,0%	100,0%	68,5%
		80,0%	80,0%	27,8%	100,0%	100,0%	64,8%
		53,3%	53,3%	50,0%	100,0%	0,0%	51,9%
		60,0%	73,3%	27,8%	33,3%	33,3%	50,0%
		60,0%	86,7%	0,0%	0,0%	0,0%	40,7%
		33,3%	60,0%	22,2%	66,7%	33,3%	38,9%
		53,3%	66,7%	0,0%	66,7%	0,0%	37,0%
		46,7%	66,7%	0,0%	66,7%	0,0%	35,2%
		53,3%	66,7%	0,0%	0,0%	0,0%	33,3%
		53,3%	53,3%	0,0%	33,3%	0,0%	31,5%

This is also clearly represented in Table 3.3. On average, retailers score 32% of the available points in the recycled content commitment category and only 21.5% for commitments to reduce plastic packaging. Pledges to increase packaging that is refillable or reusable scored an abysmal 3.3% average of the available points. Scores for delisting policies were also particularly poor with an average of 4.5% of the available total. Combined with the low scores on overall packaging reduction this results in an average of 17.1% of the maximum available points in the *commitments* section.

Aldi UK and Aldi Ireland are the only companies reaching more than 60% of the scores, with French companies BioCoop and Carrefour in third and fourth place with just over 50% of the maximum points. Of note is that Marks & Spencer in the UK, which scores highest in the *transparency and performance* section, is not in the top ten for their commitments.

BOX 3.2: Why a focus on recyclable, compostable and reusable packaging is not enough

The EMF, founded in 2009, is a UK registered charity that aims to 'inspire a generation to rethink, redesign and build a positive future through the framework of a circular economy'.⁶⁷ In 2017, EMF launched the report *The New Plastics Economy: Rethinking the Future of Plastics* at the World Economic Forum in Davos. In October 2018, the New Plastics Economy Global Commitment was launched in collaboration with the UN Environment Programme (UNEP). More than 500 organisations signed up to 2025 targets related to addressing plastic waste at its source, including eliminating certain problematic plastics such as PVC; ensuring all single-use plastics are recyclable, compostable or biodegradable; and that a percentage of recycled plastic content is included in packaging.⁶⁸ Core partners of the New Plastics Economy initiative are major packaging, plastics and FMCG companies, such as Coca-Cola, Danone, Nestlé and PepsiCo and a few retailers, including Ahold Delhaize, Carrefour, Jerónimo Martins, Metro AG, the Schwarz Group and Walmart.⁶⁹ Many of these companies have set themselves a goal to make all their packaging recyclable, compostable or reusable, which is also a goal that some of them reported in our questionnaire. As we asked for a specific breakdown, these responses did not get any points in the retailer survey. In addition, any commitments to increase the recyclability or reusability of products should be coupled with ensuring that those products are not just theoretically able to be recycled or reused, but retailers need to set up systems that enable these activities in practice and at scale and to support government policies that drive this, such as DRS.

3.4.2.1. Plastic packaging reduction

The highest scoring retailers in this section were Aldi UK and Aldi Ireland both of which received 12 out of 15 points (80% of the total available points). Both companies have a goal to reduce plastic packaging by 50% by 2025 over their 2015 baseline and their commitments apply to both their own-branded and branded products. There are some doubts, however, whether they will be able to achieve their goals as their progress has been slow and currently, their achieved reduction is less than 10% over the baseline. Subsequently, they only achieved low scores

for this indicator. Aldi UK and Aldi Ireland are also the only companies that explicitly apply their commitments not only to their own products but also to branded products. Having said that, the branded product range is a very small percentage of their sales, with less than 10% in the UK, therefore it is worth noting that there is a large challenge of impact on branded suppliers and a lack of retailer targets for both branded and own-brand targets that is closer to equal across both ranges.⁷⁰

On the other end of the spectrum, it is particularly disappointing that out of the 74 retailers included, 35 (47%) have not set or communicated any overall plastic packaging reduction target even though such a commitment can be adopted and achieved relatively easily, especially for a retailer's own brands.

3.4.2.2. Recycled content increase

Increasing the recycled content at least for store-owned brands is a commitment that is neither particularly difficult to adopt nor to progress, beyond an increase in per-unit packaging cost. Nor does it require retailers to make fundamental changes in the way they operate as the responsibility can be passed on to the product manufacturers for both branded and own-brand product lines. This means that there is a risk that retailers can use recycled content commitments as an easy way out to avoid making the more systemic changes to the way they operate. This is particularly the case considering the low scores for policies to increase refillable and reusable packaging.

For example, Danish retailer, Salling and Aldi UK achieved the highest scores in this section with 86.7% of the total available points. Salling indicated that back in September 2020 it achieved its target of 30% recycled plastic content in packaging and therefore increased its target even further to 40% by 2023. On the other hand, Aldi UK has a goal of 50% recycled content by 2025 and unlike Salling, this applies to its own brands as well as branded products.

At the other end of the spectrum, 33 of the European retailers assessed were found not to have yet made any commitments on recycled content in their plastic packaging. Retailers in France scored highest for this indicator on average, with 53% of the available points followed by retailers in Denmark with 50.7%. There is not one country in which all retailers assessed have made commitments to increase the recycled content of their plastic packaging, and in Estonia, none of the retailers have done so. It is important to note that in the UK, a recycled plastic tax came into force on 1 April 2022 and all companies that do not have at least 30% recycled content in their packaging will have to pay £200 tax per tonne.⁷¹

3.4.2.3. Refillable or reusable increase

As previously mentioned, the performance by retailers in this survey was particularly poor when it comes to commitments to increase refill and reuse. Overall, 88% of the assessed retailers do not have a commitment at all and even among the companies that do, the average score was only 26% of the total points.

French organic retail chain BioCoop had the highest score in this section (50% of the total) as it was the only company assessed that had a measurable commitment. The company promises that by 2023 all their own-brand glass products will be reusable through a DRS system. Others, such as Aldi UK and Carrefour France either aim for a year-by-year increase of refillable or reusable packaging or have set an absolute number of items as a target. This is generally considered a weaker approach, especially when baseline figures are not provided. French retailers also scored points for their support of the French circular economy law that will mandate specific targets for refillable and reusable packaging (see Box 3.1: French circular economy legislation and Anti-waste Law for more details).

Of particular concern is that only one retailer has developed something resembling a strategy on how to implement or facilitate an increase in the percentage of refillable or reusable packaging.

The extremely low scores may be explained by the fundamental changes required in the logistics and operations of supermarkets to achieve high rates of reusability. Nevertheless, such fundamental operational changes must be made and are vital to reduce plastic pollution. They are heavily advocated for by civil society and environmental experts and as such, are becoming the focus of legislative proposals. In addition, there is also the risk that if these changes are not made ahead of time and companies disregard them or leave it too late, they might fail to adapt. In this regard, retailers acting now on reuse and refill will have an early advantage ahead of any regulation.

3.4.2.4. Overall packaging reduction

Only four companies were awarded high scores for having policies that aim to reduce their overall packaging material by at least 50%. These included Tesco and Aldi in Ireland, BioCoop in France and Aldi in the UK. On average, less than 15% of the available points were achieved for this indicator. Nearly three-quarters of retailers assessed have not adopted an overall packaging reduction target, even though this is one of the easier policies to implement.

3.4.2.5. Product delisting policies

Commitments are only as strong as the follow-through in implementing them. To address the plastic pollution crisis, it is imperative that retailer commitments not only apply to their own-branded products but also to branded products from consumer brands that take up most of the shelf space in supermarkets.

A large number of retailers did not disclose any policies for delisting companies or have not adopted such policies. While 69 companies (93%) had no delisting policy for branded products, a more important comparison is with companies that included branded products in their commitments. Only two companies in this survey (Aldi UK and Aldi Ireland) were found to explicitly include branded products in their recycled content and plastic packaging reduction commitments (although they did not have commitments for refill and reuse). To their credit, both companies have developed strong associated delisting policies and were awarded high scores in this category.

Both companies wrote that '100% of all own-label products are to be reusable, recyclable or compostable by 2022 (2025 for branded products). Any products with non-recyclable packaging will not receive clearance to be sold in our stores from these deadlines'.

BOX 3.3: The UK soft plastics problem



The UK has a soft plastics packaging problem.^{E,72} Such plastics are not only difficult to recycle, but there is little recycling capacity within the UK, despite flexible plastic being the second-largest form of plastic consumed after plastic bottles, representing 22% of all UK citizen plastic packaging.^{F,73} Demand for soft plastics from UK recyclers is low given how difficult they are to recycle, in addition 87% of UK local authorities are not currently collecting plastic film from household kerbsides^{G,74} given that this plastic waste stream acts as a contaminant impacting the recyclability of other waste and UK recycling facilities are not necessarily equipped to manage them.⁷⁵ In 2020, at least 96% of UK soft plastic packaging was not recycled, accounting for 75% of the total plastic packaging waste that was disposed of that year ending up in landfills or being incinerated.^{G,76,77,78} With these figures in mind, there is no doubt that current UK government policy, including consistent recycling household collection for recycling of soft plastics, is lagging.^{H,79,80} Supermarkets and brands (who make up a large proportion of those putting soft plastics packaging on the market), are subsequently struggling to meet their plastic packaging sustainability objectives.⁸¹ Pair that with the obligations within the UK's Extended Producer Responsibility (EPR) Scheme for packaging⁸² and the enforcement of the UK plastic packaging tax starting in April 2022,⁸³ UK supermarkets and brands are looking for ways to deal with their soft plastic packaging waste.

As a result, nine UK supermarkets – Aldi, Coop, Iceland, Lidl, Marks & Spencer, Morrisons (who co-own their own recycling facility), Sainsbury's, Tesco and Waitrose – have been trialling and expanding in-store soft plastic take-back recycling schemes to achieve their targets and obligations.^{84,85,86,87,88,89,90,91,92} These schemes provide in-store bins where customers can bring back their soft plastic packaging waste for it to be recycled; however, these voluntary schemes have several issues.

For instance, in 2021 two of the supermarkets contracted the UK waste company Eurokey Recycling Ltd. to treat in-store collected soft plastics in Eurokey's facility in Zielona Góra, Poland.⁹³ While Eurokey has received formal complaints from local residents about its poor storage management, it has refused to disclose any details of where the material ends up or the total amounts it receives.^{94,95,96,97,98} In addition, the UK Environment Agency (EA) suspended Eurokey Recycling Ltd. accreditations as a packaging waste exporter for a six-day period in November 2021, following several breaches of regulation for exporting plastic waste to sites in Turkey, Poland and the Netherlands.⁹⁹ The UK, and many other European countries, rely on exporting plastic waste abroad to try and achieve recycling targets, as currently the UK EPR for packaging pricing instruments are set up in such a way whereby it is assumed that 100% of plastic packaging waste is recycled upon point of export, which is likely not the case, thus falsely inflating recycling targets.^{I,100,101}

Another two supermarkets in the UK – Sainsbury's and Waitrose – have signed up to team up with other industry players to achieve voluntary and government obligations, via the creation of the £1 million UK Flex-

ible Plastic Fund (which has yet to commence). This Fund was initially funded in 2021 by Mars UK, Mondelez International, Nestlé, PepsiCo and Unilever¹⁰² – all five companies were found to be within the global top ten plastic-polluting corporations in 2021.¹⁰³ The aim of this voluntary initiative is to increase the supply of recycled plastic and build the UK soft plastic recycling market¹ by guaranteeing a minimum value of £100 per tonne of recycled product to incentivise recycling to process soft plastic.¹⁰⁴ Subsequently, member companies will receive a payment or what the fund has denominated as 'packaging recovery notes' for the soft plastic recycled (thus also allowing them to meet their legal EPR for packaging producer requirements).¹⁰⁵ While the UK Government supports this initiative, as it is in line with their 'polluter must pay' stance when it comes to plastic policy, the five companies funding this initiative have gigantic profits within the hundreds of millions of pounds every year.^{106,107,108,109,110,111} With these figures in mind, a collective £1 million fund for such a problematic plastic waste stream is nowhere close to financing recycling solutions for this issue or to get the largest plastic polluters to pay. Furthermore, the Flexible Plastic fund commits to recycle at least 80% of the plastics collected in the UK – rising to 100% by 2023; however, until 2023, due to a lack of capacity, up to 20% of soft plastic waste collected will be exported to Europe (the fund will not support the export of any recyclable material outside of Europe).¹¹²

Recycling of soft flexible plastics is not the answer to the plastic crisis, especially as soft plastics have a high rate of material loss occurring both at the sorting and recycling stages and affect the recovery rates of other waste materials. Soft plastic packaging is mostly downcycled and is also being used to push forward risky and potentially false solutions such as chemical recycling.^{113,114,115,116} To date there is no independent life cycle assessment of chemical recycling, a new and undeveloped technology, which is already being promoted by the industry as a silver bullet solution that would allow hard-to-recycle plastics to form part of a circular economy.¹¹⁷

Additionally, without meaningful and timebound plastic reduction targets as safeguards, these initiatives could result in increasing amounts of hard-to-recycle soft plastics being placed on the market.

Legislative action on the other hand is the most viable route, including the UK government introducing bans on plastic waste exports and elimination of non-essential hard-to-recycle packaging, such as soft flexible plastic, by mandating targets to reduce plastic packaging by 50% by 2025 (against a 2019 baseline).¹¹⁸ Although now under different legislative regimes, the European Commission and governments should also consider these recommendations in a bid to put adequate safeguards in place to halt the development of further false solutions.^K

E The terms can be used interchangeably but typically refer to different kind of plastics (soft, scrunchy, flexible, film, etc.)
 F WRAP estimates that flexible plastic represents 22% of all UK citizen plastic packaging (in terms of tonnage), second to bottles, which make up 44%.
 G This includes being treated in energy from waste facilities and as refuse-derived fuel.
 H The Government is currently consulting on consistent recycling collections for England (not Wales, Scotland and Northern Ireland). The current proposal states that local authorities should adopt the collection of plastic film material from all households no later than 2027.
 I UK recycling facilities do not have 100% recycling rates. One example includes Devon County Council's recycling centres and rates and current destination countries have high waste mismanagement rates, including Malaysia and Turkey.
 J 'The initiative will provide fully audited transparency – at least 80% of the plastics collected will be recycled in the UK – rising to 100% by 2023. Until 2023, where there are currently limits in UK capacity and technology, up to 20% could be exported to qualifying facilities in Europe only. All material will be fully traceable and tracked from the collector through to new products'.
 K For EU-specific recommendations, please refer to the Rethink Plastic Alliance recommendation on the Waste Shipment Regulation (https://rethinkplasticalliance.eu/wp-content/uploads/2021/01/rpa_waste_shipment_regulation_recommendations.pdf) and the Rethink Plastic Alliance Policy Briefing (<https://rethinkplasticalliance.eu/wp-content/uploads/2022/02/1702-RPA-European-Grocery-Retail-Plastic-Policy-Briefing-V7.pdf>)

3.4.3. Government policy support

The section on retailer support for government policies and legislation was the most difficult to score as most supermarkets that replied to the questionnaire refrained from providing clear and concise statements. Hence the average score across the three indicators included in this section was only 12.7% of the available points (Table 3.4). Germany's organic retailer Alnatura was the highest scoring company with 70% of the total, followed by BioCoop in France with 60%, both were the only organic retailers included in the survey.

Top 10 retailer scores for the government policy support section				
RETAILER	COUNTRY	Support for all-inclusive DRS	Support for reuse targets	GOVERNMENT POLICY SUPPORT
TOTAL AVERAGE		13,1%	12,2%	12,7%
ALNATURA	Germany	50,0%	100,0%	70,0%
biocoop	France	100,0%	0,0%	60,0%
Système U	France	50,0%	66,7%	56,7%
ALDI	UK	66,7%	33,3%	53,3%
ALDI	Italy	66,7%	33,3%	53,3%
REWE	Germany	33,3%	66,7%	46,7%
LIDL SCHWARZ	UK	50,0%	33,3%	43,3%
LIDL SCHWARZ	Czechia	50,0%	33,3%	43,3%
ALDI	Denmark	50,0%	33,3%	43,3%
Dagrofa	Denmark	16,7%	66,7%	36,7%

Table 3.4: Top 10 retailer scores for government policy support section

3.4.3.1. Support for all-inclusive DRS

Government legislation and policies are key to solving the plastic pollution crisis and play an important role in providing a level playing field for the retail sector and consumer goods companies. In the past, retailers and their associations have proven to be very strong opponents to the implementation of ambitious legislation, such as DRS. Yet, all-inclusive DRS for beverages and legislated targets for increasing refillable and reusable packaging are vital to eliminate plastic pollution and littering. Some countries investigated (Denmark, Estonia, Germany and the

Netherlands) already have DRS in place. In other countries, DRS have been discussed, with retailers mostly playing a very negative role in these discussions (for more see Box 2.3: Supermarkets lobbying against DRS and reuse).

While little information on these subjects has been found for companies that did not respond to the questionnaire, the replies by retailers that did respond largely fell short of clear support for regulatory initiatives to address the problem. Out of the 74 retailers, only 5 (Aldi Denmark, Aldi Ireland, Aldi UK, BioCoop in France and Lidl UK) were considered to provide strong support for an all-inclusive beverage DRS.

Of all the 74 retailers analysed in this report, only one retailer, BioCoop (France) fully supports a DRS for beverages. This position was clearly stated in their answer to the questionnaire, as they are 'in favour of a deposit for universal reuse based on the use of interoperable standards between different players with reuse loops as local as possible'.

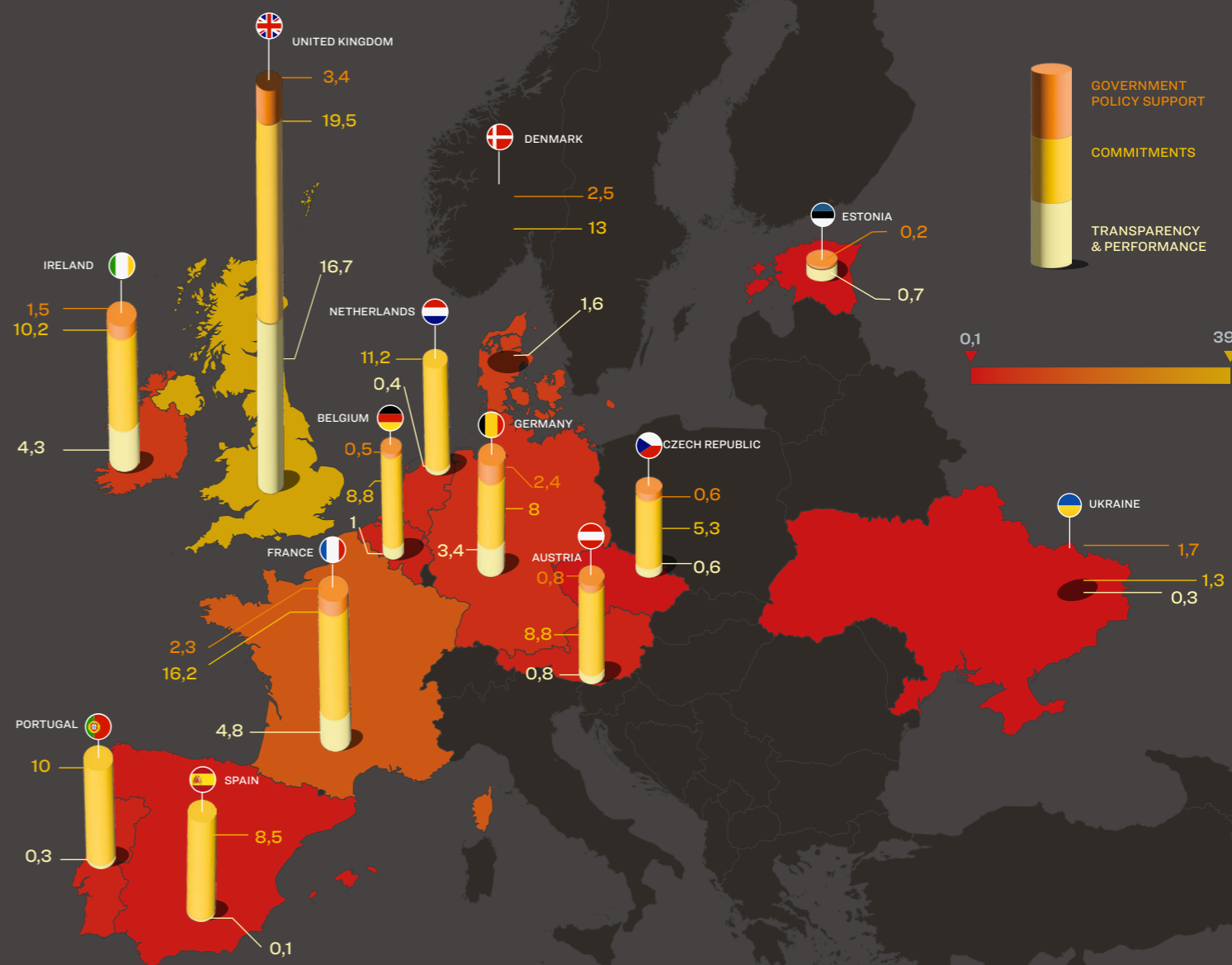
BioCoop was the only retailer assessed to give strong, unconditional support for DRS for refillable and reusable beverage, whereas a further 15 retailers were assessed to only give conditional support. For example, by saying that they would possibly be in favour only if further research is conducted. The vast majority, 48 retailers (64.9%), did not report supporting DRS for beverages nor DRS for refill/reuse.

3.4.3.2. Support for reuse targets

When it comes to retailer support for targets for refillable and reusable packaging, only Alnatura in Germany was assessed to be explicitly supporting such government mandated targets. Conditional support was given by Dagrofa (Denmark), EDEKA, Netto and REWE in Germany as well as Système U in France, whereas a further 14 retailers supported voluntary rather than binding targets.

Table 3.5: Retailer performance by country

Retailer performance by country



BOX 3.4: Mandatory reuse quota for supermarkets in Austria

In October 2021, the Austrian parliament passed a waste management law that includes a mandatory requirement to increase the amount of reusable beverage bottles and thus decrease packaging waste.¹¹⁹ According to this new law, all food retailers - with outlets larger than 400m² - have to offer beverages in reusable bottles (both in stores and online). Retailers must choose between one of the following models:

Meet a supply quota per beverage segment (15% of offered beer items, 15% of water items, 10% of juice, 10% of non-alcoholic soft drinks and 10% of milk) in at least 35% of stores by the beginning of 2024, in at least 90% of the stores by January 2025 and in all stores by the end of 2025.

At least 25% of all beverages (by volume) sold by retailers need to be in reusable packaging by January 2024, offering products in all beverage segments.

All outlets and online shops are also required by law to clearly label single-use and reusable beverage containers at the point of sale; however, despite this great improvement in legislation a big loophole remains when calculating the reusable quota for water, juice and soft drinks, beverages in single-use-containers up to 0.5l are not included, which means that retailers are likely to not offer reusable packaging in this segment and the overall required reuse quota is in reality even lower than the 10% or 15% mentioned in the law. What makes the law unique in the EU is that the implementation will be checked and if a company does not comply with the regulation, the authorities can place an administrative penalty of €4,500 up to €100,000 (depending on the number of outlets) every time they check. Additionally, to meet the reuse quota, a DRS for all disposable beverage packaging made of

plastic or metal will be introduced starting January 2025. This should ensure that the mandatory collection rate of 90% for single-use plastic bottles stipulated by the EU Single-Use Plastics Directive can be achieved. Large outlets will have to install reverse vending machines (RVMs) that are able to process single-use and reusable containers in all stores.¹²⁰ At the moment, the discount supermarkets Hofer and Lidl do not have any RVMs in their stores, whereas Spar and REWE do have machines that take back reusable bottles.

Considering that 90% of all food retail revenue is generated by only four retail chains in Austria - Hofer, Lidl, REWE and Spar - the industry strongly led the opposition and intended to undermine the efforts to introduce proven legislative solutions such as the mandatory implementation of DRS and reusable bottles in 2020.¹²¹

Despite their continued efforts and tactics for delay, campaigns from environmental NGOs such as Greenpeace,¹²² Global 2000¹²³ and efforts from the Environmental Ministry¹²⁴ led by the Green Party resulted in a change of heart with Hofer, Lidl and REWE announcing their support for the law in October 2021.¹²⁵

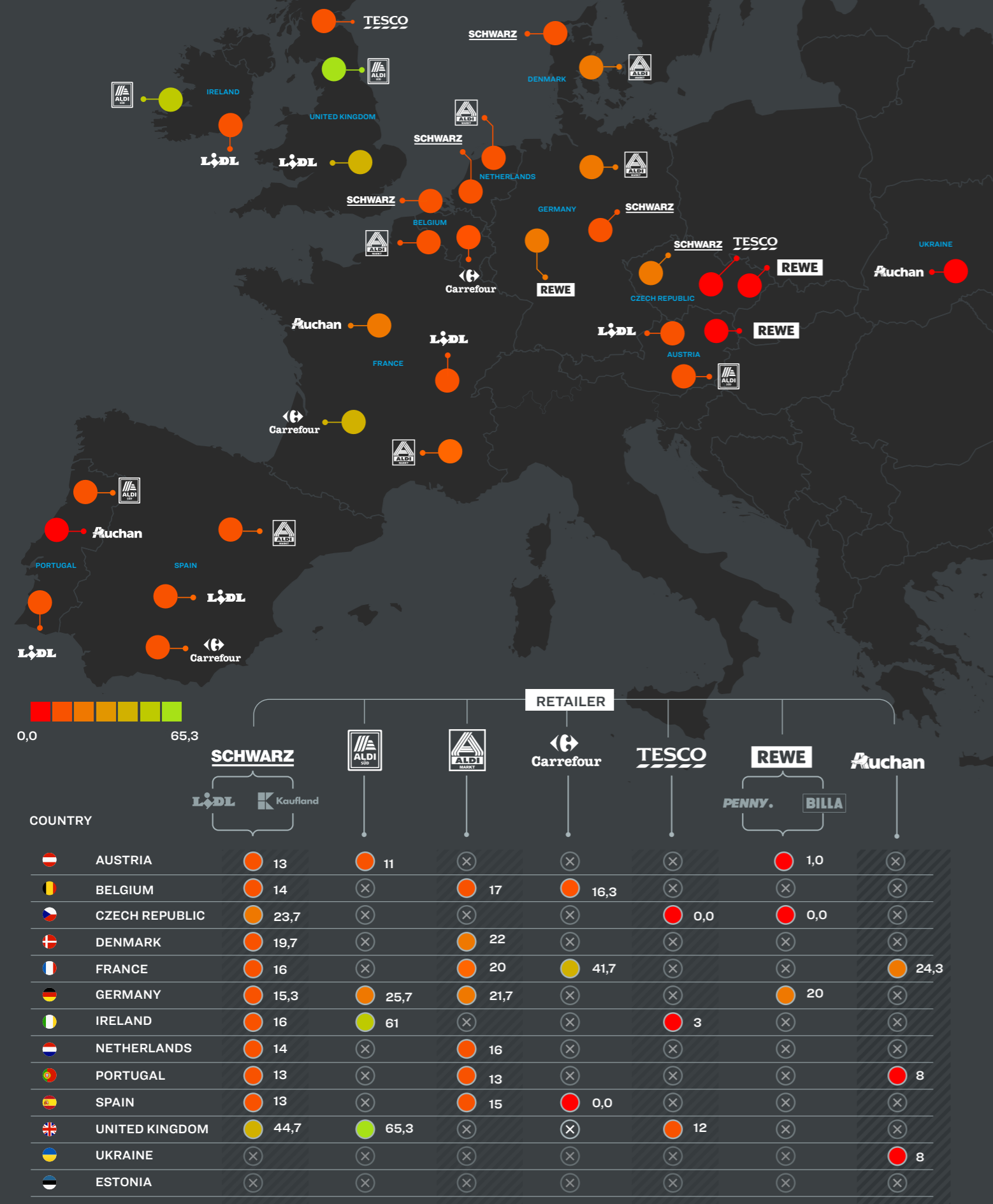
Although this new waste management law is a great step forward in the right direction towards the reduction of single-use plastics, the industry was still able to considerably water down the reuse quota compared with the original plan from the ministry, which would have been 55% by 2030.¹²⁶ Retailers are still fighting to further influence the design of DRS in Austria, all while retailer associations operating on their behalf, demand the government to secure compensation for investments in DRS.¹²⁷

COUNTRY	TRANSPARENCY & PERFORMANCE	COMMITMENTS	GOVERNMENT POLICY SUPPORT	TOTAL
UK	16,7	19,5	3,4	39,6
FRANCE	4,8	16,2	2,3	23,3
DENMARK	1,6	13,0	2,5	17,1
IRELAND	4,3	10,2	1,5	16,0
GERMANY	3,4	8,0	2,4	13,8
NETHERLANDS	0,4	11,2	0,0	11,6
PORTUGAL	0,3	10	0,0	10,3
AUSTRIA	0,8	8,8	0,8	10,3
BELGIUM	1,0	8,8	0,5	10,3
SPAIN	0,1	8,5	0,0	8,6
CZECH REPUBLIC	0,6	5,3	0,6	6,5
UKRAINE	0,3	1,3	1,7	3,3
ESTONIA	0,7	0,0	0,2	0,9

MAXIMUM AVAILABLE POINTS: 36 54 10 100

Double standards of major European supermarket chains

This map only presents the performance of the retail chains that have operations in two or more countries



3.5. Country performance

When it comes to the scores achieved across the 13 countries, what is most noticeable, is how low the scores are on average (Table 3.5). Retailers from the UK achieved 39.6%, while second place, France, scored 23.3%. No other country achieved a total average of more than 20%. The average score achieved by retailers in Spain, the Czech Republic, Ukraine and Estonia was below 10% of the total. Even though retailers in the UK are on average ahead of their counterparts in other European countries, this is most likely contributable to multiple factors, such as consumer pressure, and the fact that supermarkets there have been subject of annual rankings by the EIA and Greenpeace over several years. One factor for better performance could also be that only four UK retailers were included in this survey.

3.6. Inconsistencies among the largest retail chains operating in different countries

Comparing the scores that the large international retail groups achieve in the various countries they operate, reveals concerning variations in scores (Table 3.6). Differences within the scores of the Schwarz Group, which owns the Lidl and Kaufland retail chain brands and is the largest food retailer in Europe,¹²⁸ is mostly noticeable from its high score in the UK of 44.7% versus the other ten countries in which it operates. Here the scores are much more consistent ranging between 23.7% and 13%, which shows the disparity in policies, commitments and transparency that the same retailers have across their different markets.

One of Europe's largest retail chains, Aldi, shows much more extreme differences with scores of 60% and more in the UK and Ireland, dropping down to 11% in Austria, where it operates under the Hofer banner. Aldi was split into two separate entities in 1965 and the two leading retailers in this analysis are part of Aldi Nord. The scores achieved by companies that are part of Aldi Süd are more consistent but much lower than those achieved by Aldi Nord group members.

Four other retail chains (Auchan, Carrefour, REWE Group and Tesco) operate in at least three countries that were included in the analysis and they all show similar and significant differences in scores. Of particular note here is that all of these remaining large retail groups tend to score higher in the country in which they are headquartered.

There are likely multiple factors at play that explain these results. These large retail chains have larger market shares in the countries in which they are headquartered and therefore, where they are more susceptible to reputational risks. In addition, consumer pressure, existing legislation and environmental campaigns by NGOs are stronger in some countries than others, resulting in further variations in the actions taken by retailers. Yet, no matter the reason for the range of scores achieved, it is evident that progress has been sluggish and disproportionate with the systemic change needed to address the plastic packaging crisis.

It is also likely that some retailers would have achieved higher scores if they had engaged and replied to the questionnaire that they were provided with as this would have led to additional disclosure compared with what was found from public sources. However, by far, this has not resulted in scores consistent with the transformative changes required to address the plastic pollution crisis and drastically reduce the amount of single-use plastic used in the packaging of supermarket products.

The large discrepancies of the scores within international retail groups are highly disappointing and could indicate that retailers are not primarily concerned with addressing the global plastic pollution crisis. Instead, they appear to be focusing their efforts on a piecemeal implementation of policies, end-of-pipe solutions and voluntary commitments, where they observe their greatest financial and reputational risks.

To ensure that plastic packaging reduction efforts are credible and genuine and to ensure that consumers in different countries are valued in the same way, it is important for retailers to urgently implement their efforts uniformly across all operations no matter the jurisdictions in which they take place.

Table 3.6: Performance comparison of major retail chains



Photo: Refill at the 'Harm Less Store' in Hornsey, UK

Credit: David Mirzoeff











4. Conclusions and recommendations





This investigation clearly demonstrates that European retailers still have a long way to go when it comes to playing a constructive role in addressing the plastic crisis. These powerful players are in fact turning a blind eye to the crisis. Although their customers would expect that they are investing in systemic solutions, we have seen little evidence for this. Even the minimum effort – retailers' engagement with our correspondence – has been very disappointing. Of 130 retailers contacted, only 39 retailers (30%) provided a written response to the questionnaire, but many of these responses did not provide meaningful replies to the questions. Further analysis of 74 retailers also revealed a lack of publicly available information with regards to concrete actions to tackle the plastic crisis. Given that concerns over plastic pollution and the desire for companies to address this issue consistently rank above 80% or even 90% in public opinion polls, such lack of action and engagement is disappointing and out of touch. It also clearly points to the limits of voluntary actions and the need for more ambitious and comprehensive legal measures to spring these retailers into meaningful action.

To recap, the average scores on the *transparency and performance* section of the assessment were only 7.1%, with the average for the *packaging reusability* being the worst, with no company reaching more than 40% and the average achieving only 5.1%. The average score in the section on *commitments* was 17.1%. Of this, the area of action with the highest average scores was *recycled content commitments* at just over 30%. Retailers' *support for progressive government policies* saw an average of only 12.7% with most retailers not indicating strong support for either DRS or for reuse targets.

However, the analysis also shows that such abysmal results do not have to be the reality. Combining the best responses from the questionnaire also gives us the opportunity to identify ways forward for retailers. If we combine the best scores achieved by any company for each of the indicators, we get a total score of 82.7% for a fictional best-in-class retailer. As no retailer demonstrated good enough performance across the board, yet some scored highly in certain areas of assessment, we have pulled together the best responses to give an idea of what the 'best' retailer on plastic would currently look like. As all these strategies are being implemented by existing retailers, this table also provides a realistic vision of existing measures with which the supermarkets could up their game and put in place meaningful commitments to reduce, reuse and recycle their plastic packaging.

Table 4.1 highlights some of the highest scoring retailers for each indicator. It shows that UK retailer Marks & Spencer scored maximum points on transparency and for good reporting of its own-brand and branded plastic tonnage.

Indicator	Retailer	Response from retailers	Points (of possible maximum)
1 TRANSPARENCY AND PERFORMANCE			
1.1 PLASTIC FOOTPRINT			
1.1.1	Reports branded plastic units in 2020	M&S 	103,236,019 units 4.0 (4.0)
1.1.2	Reports branded plastic tonnage in 2020	M&S 	1,177 tonnes 4.0 (4.0)
1.1.3	Reports own-brand plastic units 2020	M&S 	3,164,625,435 units 4.0 (4.0)
1.1.4	Reports own-brand plastic tonnage 2020	M&S 	24,227 tonnes 4.0 (4.0)
1.2 RECYCLED CONTENT			
1.2.1	Mean recycled content in own-brand packaging	 	38% 4.7 (7.0)
1.3 REUSABLE PACKAGING			
1.3.1	% of total packaging that is reusable	None of the retailers provided information for this indicator 0.0 (3.0)	
1.3.2	Measuring method for reusability	None of the retailers provided information for this indicator 0.0 (3.0)	
1.3.3	Reusability % of primary packaging	 	'For our 725 stores, in 2020, 34% of the products sold by the Cooperative were in bulk, in refillable packaging or in reusable packaging. Sold without single-use packaging'. 3.0 (3.0)
1.3.4	Reusability % of secondary packaging	M&S 	'97% of secondary & tertiary plastic packaging is reusable by weight, compared to 68% of total secondary & tertiary packaging'. 2.0 (2.0)
1.3.5	Reusability % of tertiary packaging	M&S 	'97% of secondary & tertiary plastic packaging is reusable by weight, compared to 68% of total secondary & tertiary packaging'. 2.0 (2.0)
2 COMMITMENTS			
2.1.1-2.1.5	Plastic packaging reduction target	<ul style="list-style-type: none"> Measured as plastic density (average plastic weight per product sold) (Aldi, UK) Reduction target of 50% (Aldi, UK) To be achieved by 2022 (BioCoop, France) Current reduction percentage is 9% (Aldi, UK) Applies to food and non-food, branded and own brands (Aldi, UK) 	13.0 (15.0)
2.2.1-2.2.5	Recycled content increase target in plastic packaging	<ul style="list-style-type: none"> Measured by dividing the total tonnage of recycled plastic packaging into the total tonnage of all plastic packaging (Aldi, UK) Target of 50% recycled plastic content (Aldi, UK) To be achieved by 2023 (Salling, Denmark) Current progress is 30% (Salling, Denmark) Applies to all products (food and non-food, branded and own brand) (Aldi, UK) 	15.0 (15.0)

Indicator	Retailer	Response from retailers	Points (of possible maximum)	
2.3.1- 2.3.6	Target to increase refillable or reusable packaging	<ul style="list-style-type: none"> Measured by % of specific product types that are consignable for reuse (BioCoop, France) Target of 50% of the zero waste offer (bulk and refillable and reusable packaging) (BioCoop, France) To be achieved by 2025 (BioCoop, France) Progress of 7.3% year on year increase between 2019 and 2020 (Aldi, UK) Applies to all products (food and non-food, branded and own brand) (Aldi, UK) Strategy includes having a number of refill/reuse initiatives followed by the testing of these initiatives to understand what works and does not work to find a format that customers will use. These learnings will inform a further target on refill and reuse (Aldi, UK) 	11.0 (18.0)	
2.4.1	Overall packaging material reduction target	Tesco (Ireland)	'In 2019, we launched our Packaging Commitments to 2025, which included: Packaging weight on all own-label products will be halved'. 3.0 (3.0)	
2.5.1	Delisting policy for brands with non-recyclable or excessive packaging	 	<p>'100% of all own-label products are to be reusable, recyclable or compostable by 2022 (2025 for branded products). Any products with non-recyclable packaging will not receive clearance to be sold in our stores from these deadlines.</p> <p>In 2020, we wrote to all our suppliers in a letter signed by our CEO stating that we needed them to work with us to deliver these pledges and that our future buying decisions would be based on their ability to develop and lead on packaging'.</p>	3.0 (3.0)
3 GOVERNMENT POLICY SUPPORT				
3.1.1-3.1.2	Support for all-inclusive DRS	 	<p>'BioCoop is in favour of a deposit for universal reuse based on the use of interoperable standards between different players with reuse loops as local as possible.</p> <p>The Monetary Deposit is a lever to improve the rate of return, whether for reuse or recycling'.</p>	6.0 (9.0)
3.2.1	Support for reuse targets	 	<p>'In our Alnatura stores we comply with the reusable beverage quotas.</p> <p>We would welcome an EU-wide reusable system, since we also sell our products in other European countries and German reusable packaging cannot be sold there at present'.</p>	4.0 (4.0)

Aldi UK scored high points for current levels of mean recycled content, for plastic packaging reduction and for recycled content increase targets. BioCoop France scored half the points for its target to increase refillable or reusable packaging, while Aldi Ireland scored all the points for its ambitious delisting policy. The only indicators where no company achieved any points were for releasing figures on the percentage of plastic packaging that is reusable and the associated methodology for calculating this. This is a universal weak point, but at the same time also a critical solution to the plastics crisis; therefore, retailers need to ramp up their efforts to deliver on reuse and refill.

Another important and problematic trend that this investigation identified was the very large discrepancies in scores within international retail groups. For example, while Aldi Süd was the top performer in the UK and Ireland, with 65.3 and 61%, respectively, it only achieved 11% in Austria, where it operates under the name Hofer and 25.7% in Germany. Similarly, Lidl had a high score in the UK, but scored less than 20% in most other countries. This piecemeal approach shows that retailers do not have a consistent and holistic strategy when it comes to addressing the plastic pollution crisis across all the countries in which they operate. In some countries, such as Spain and the Czech Republic, all the retailers performed poorly. These were also the countries where previous investigations by Changing Markets revealed the negative role that retailers play in delaying and derailing the implementation of ambitious legislation.

Major European retailers have a crucial role to play in bringing solutions and change in the way they operate by championing reuse systems and publicly supporting progressive government policies in all their countries of operation.

4.1. Recommendations

The findings of our assessment and questionnaire set out a clear path forward for retailers as well as critical enabling policies for governments.

4.1.1. Recommendations for retailers

- Retailers should start by becoming transparent and disclosing plastic footprint (in units and tonnes) of their own brand and branded plastic products. This will allow for further clarity and understanding of what the real extent of the problem is and enable setting baselines to measure the progress of their reduction commitments.
- Retailers should set consistent targets across all markets in which they operate, covering both own brand and branded products. They should avoid double standards in different countries and ensure that reporting on progress is regular (preferably on an annual basis), transparent and based on independently verified data. They should also provide a consistent and transparent methodology to understand how progress is measured.
- Retailers should support progressive government policies to ensure that there is a level playing field in the sector. These policies are listed below under recommendations for governments. Retailers should also put an end to greenwashing tactics, which include using their memberships of voluntary initiatives as a tool to delay progress and to distract policymakers and consumers about their true level of action.
- Retailers should stay away from fast fixes such as replacing one single-use material for another and invest into systemic solutions to the plastic crisis that prioritise overall packaging reductions and investments in reuse and refill delivery systems.
- The main chemicals of concern that are common in food packaging are bisphenols, phthalates,

benzophenones, synthetic phenolic antioxidants and perfluoroalkyl chemicals (PFAS). These migrate into food and this transfer increases with heat, long-term storage and the natural chemical properties (acid/oil) of some food and drink. Thus, it is important for retailers to ensure that no packaging is made with such chemicals of concern. For further information see the Food Packaging Forum's Brand and Retailer Initiatives database, which lists commitments and resources on this issue: <https://www.foodpackagingforum.org/brand-retailer-initiatives>.

4.1.2. Recommendations for governments

- We urge legislators to set legally binding targets for plastic reduction, prioritising single-use plastics and introduce mandatory corporate reporting on plastic footprint to create a level playing field for all sections of the retailer sector.
- In countries where one is not yet in place, governments should commit to and implement an all-inclusive DRS for all beverage containers with a legal take-back obligation for points of sale (with a possible exemption for smaller points of sale). Such a consumer-friendly deposit return scheme will lead to higher rates for collection, recycling and reuse. In countries with a partial DRS in place, governments should expand the scheme to cover all beverage containers.
- Policymakers at the EU and national level should introduce mandatory and ambitious reuse targets and other supportive policy mechanisms (such as differentiated deposits for refillables) and ensure that these also apply for the retail sector. Recommendations for setting effective reuse targets are available here: https://rethinkplasticalliance.eu/wp-content/uploads/2022/04/WeChooseReuse_EffectiveTargets_def.pdf
- Legislators across Europe should pursue and support standardisation of reusable packaging, to help drive plastic reduction without relying on false solutions such as lightweighting or substitution with other single-use materials.
- Governments must ban extra-EU plastic waste exports to third countries (excluding European Free Trade Area) and fully transpose the Basel Convention (the Plastic Waste Amendments) within the EU.

4.1.3. Recommendations for consumers

Faced with a deluge of plastic packaging in supermarkets, many consumers find themselves stuck when it comes to reducing their plastic footprints. Meanwhile many companies have benefited from the narrative that it is an individual's responsibility to cut out plastic, rather than a system-wide issue. We firmly believe reducing plastics should not be solely the consumer's responsibility, but rather part of a systemic change that is led by legislators and implemented by companies, such as supermarkets and consumer brands. For this reason, we encourage individuals to be vocal in calling for legislation, holding corporations accountable and amplifying the voices of those pushing for change.

- Write to your supermarket and ask about how much plastic they are using. Use social media to call out their overpackaging and put pressure on them to put in place ambitious commitments to reduce plastic and set up reuse and refill systems.
- Call on your government to follow through with implementation of ambitious plastic legislation.
- Sign up to BFFP's 'We Choose Reuse' Commitment to call for a shift from single-use to reuse and refill systems across the world: <https://www.breakfreefromplastic.org/we-choose-reuse/>

BOX 4.1: Recommendations for investors

The environmental imperative to take bold and decisive action on plastics is clear. But with the walls closing in on single-use plastics, investors in the listed grocery retail companies referred to in this report must also consider the financial risks that retailer investees are exposed to arising from:

- **New EU laws and policies** aimed at reducing plastic waste and carbon emissions. These will impact any company whose business model relies on plastics.
- **Increasing public awareness** of the negative impacts of plastics on the environment, the climate and our health.
- **New legal action on plastic pollution** as citizens and NGOs take action against companies involved in the plastics crisis.

Consumer goods companies have already noted that concern around plastic packaging has impacted sales.¹²⁹ As reported by a trade press outlet in 2021, international credit rating agency Moody's produced a report cautioning the grocery retail sector that lack of progress in reducing plastics looked 'set to hit supermarket share prices'.¹³⁰ Investor engagement with retailer investees must be credible and robust to effectively manage their own reputational and investment risk. Investors should:

- Seek commitments from retailers that they are acting on the recommendations set out in this report to:
 - disclose their plastic footprint in units and tons, on an annual basis;
 - set absolute reduction targets for plastic packaging; and
 - set a target for the proportion of all packaging to be reusable/refillable.
- Engage with retailers and request they provide regular updates on their progress against their targets.
- Where retailers are in danger of failing to meet such targets, investors should escalate their engagement.

Appendix 1: Detailed scores by retailers



39.6 COUNTRY SCORE

COUNTRY: UNITED KINGDOM



TESCO

M&S



23.3 COUNTRY SCORE

COUNTRY: FRANCE

Intermarché

E.Leclerc

Casino

Systeme U

biocoop

TOTAL

44,7

SCORES

65,3

SCORES

12,0

SCORES

36,3

SCORES

Plastic footprint

16,0

16,0

0,0

16,0

Recycled content

2,3

4,7

0,0

2,3

Reusable packaging

1,0

2,3

1,0

5,0

TRANSPARENCY & PERFORMANCE

19,3

23,0

1,0

23,3

Plastic packaging reduction

5,0

12,0

5,0

5,0

Recycled content increase

9,0

13,0

0,0

7,0

Refill or reuse targets

4,0

6,0

1,0

0,0

Overall packaging reduction

2,0

3,0

0,0

0,0

Product delisting policy

1,0

3,0

2,0

0,0

COMMITMENTS

21,0

37,0

8,0

12,0

Support for all-inclusive DRS

3,0

4,0

3,0

1,0

Support for reuse targets

1,3

1,3

0,0

0,0

GOVERNMENT POLICY SUPPORT

4,3

5,3

3,0

1,0

TOTAL

17,7

SCORES

0,0

SCORES

20,3

SCORES

32,7

SCORES

37,0

SCORES

Plastic footprint

4,0

0,0

0,0

8,0

0,0

Recycled content

0,0

0,0

0,0

2,3

0,0

Reusable packaging

1,7

0,0

1,0

1,7

3,0

TRANSPARENCY & PERFORMANCE

5,7

0,0

1,0

12,0

3,0

Plastic packaging reduction

0,0

0,0

4,0

0,0

8,0

Recycled content increase

8,0

0,0

8,0

10,0

8,0

Refill or reuse targets

4,0

0,0

4,0

5,0

9,0

Overall packaging reduction

0,0

0,0

0,0

0,0

3,0

Product delisting policy

0,0

0,0

0,0

0,0

0,0

COMMITMENTS

12,0

0,0

16,0

15,0

28,0

Support for all-inclusive DRS

0,0

0,0

2,0

3,0

6,0

Support for reuse targets

0,0

0,0

1,3

2,7

0,0

GOVERNMENT POLICY SUPPORT

0,0

0,0

3,3

5,7

6,0



23.3 COUNTRY SCORE

COUNTRY: FRANCE



Auchan

Carrefour



17.1 COUNTRY SCORE

COUNTRY: DENMARK



coop

Falling

TOTAL

16,0

SCORES

20,0

SCORES

24,3

SCORES

41,7

SCORES

Plastic footprint

0,0

0,0

4,0

8,0

Recycled content

0,0

2,3

2,3

2,3

Reusable packaging

1,0

0,7

0,0

1,0

TRANSPARENCY & PERFORMANCE

1,0

3,0

6,3

11,3

Plastic packaging reduction

4,0

8,0

8,0

9,0

Recycled content increase

9,0

8,0

10,0

11,0

Refill or reuse targets

0,0

0,0

0,0

5,0

Overall packaging reduction

0,0

1,0

0,0

1,0

Product delisting policy

0,0

0,0

0,0

1,0

COMMITMENTS

13,0

17,0

18,0

27,0

Support for all-inclusive DRS

2,0

0,0

0,0

2,0

Support for reuse targets

0,0

0,0

0,0

1,3

GOVERNMENT POLICY SUPPORT

2,0

0,0

0,0

3,3

TOTAL

19,7

SCORES

22,0

SCORES

11,7

SCORES

10,3

SCORES

22,0

SCORES

Plastic footprint

0,0

4,0

0,0

0,0

0,0

Recycled content

2,3

0,0

0,0

0,0

0,0

Reusable packaging

1,0

0,7

0,0

0,0

0,0

TRANSPARENCY & PERFORMANCE

3,3

4,7

0,0

0,0

0,0

Plastic packaging reduction

5,0

4,0

0,0

8,0

9,0

Recycled content increase

9,0

8,0

8,0

0,0

13,0

Refill or reuse targets

0,0

0,0

0,0

0,0

0,0

Overall packaging reduction

0,0

1,0

0,0

0,0

0,0

Product delisting policy

0,0

0,0

0,0

0,0

0,0

COMMITMENTS

14,0

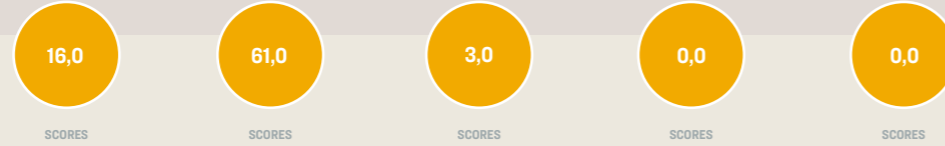


16.0
COUNTRY SCORE

COUNTRY: IRELAND



TOTAL



Plastic footprint	0,0	16,0	0,0	0,0	0,0
Recycled content	0,0	2,3	0,0	0,0	0,0
Reusable packaging	1,0	2,3	0,0	0,0	0,0

TRANSPARENCY & PERFORMANCE



Plastic packaging reduction	4,0	12,0	0,0	0,0	0,0
Recycled content increase	9,0	12,0	0,0	0,0	0,0
Refill or reuse targets	0,0	5,0	0,0	0,0	0,0
Overall packaging reduction	0,0	3,0	3,0	0,0	0,0
Product delisting policy	0,0	3,0	0,0	0,0	0,0

COMMITMENTS



Support for all-inclusive DRS	2,0	4,0	0,0	0,0	0,0
Support for reuse targets	0,0	1,3	0,0	0,0	0,0

GOVERNMENT POLICY SUPPORT



13.8
COUNTRY SCORE

COUNTRY: GERMANY



TOTAL



Plastic footprint	0,0	0,0	4,0	0,0
Recycled content	0,0	0,0	0,0	0,0
Reusable packaging	1,7	0,0	1,7	1,7

TRANSPARENCY & PERFORMANCE



Plastic packaging reduction	0,0	5,0	0,0	0,0
Recycled content increase	0,0	0,0	0,0	0,0
Refill or reuse targets	0,0	0,0	0,0	0,0
Overall packaging reduction	0,0	0,0	1,0	0,0
Product delisting policy	0,0	0,0	0,0	0,0

COMMITMENTS



Support for all-inclusive DRS	0,0	0,0	3,0	0,0
Support for reuse targets	2,7	0,0	4,0	2,7

GOVERNMENT POLICY SUPPORT



13.8
COUNTRY SCORE

COUNTRY: GERMANY



TOTAL



Plastic footprint	0,0	0,0	0,0	4,0
Recycled content	2,3	2,3	2,3	0,0
Reusable packaging	0,0	2,3	2,3	2,3

TRANSPARENCY & PERFORMANCE



Plastic packaging reduction	4,0	7,0	8,0	9,0
Recycled content increase	9,0	7,0	10,0	0,0
Refill or reuse targets	0,0	0,0	0,0	0,0
Overall packaging reduction	0,0	2,0	2,0	0,0
Product delisting policy	0,0	0,0	0,0	0,0

COMMITMENTS



Support for all-inclusive DRS	0,0	1,0	1,0	2,0
Support for reuse targets	0,0	0,0	0,0	2,7

GOVERNMENT POLICY SUPPORT

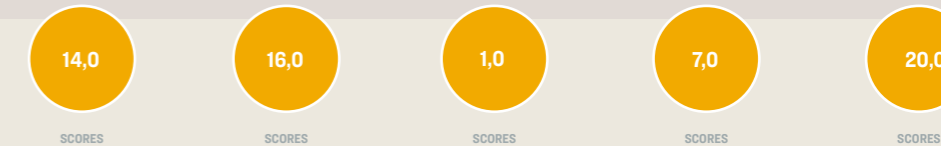


11.6
COUNTRY SCORE

COUNTRY: NETHERLANDS



TOTAL



Plastic footprint	0,0	0,0	0,0	0,0	0,0
Recycled content	0,0	0,0	0,0	0,0	0,0
Reusable packaging	0,0	0,0	1,0	0,0	1,0

TRANSPARENCY & PERFORMANCE



Plastic packaging reduction	4,0	7,0	0,0	7,0	7,0
Recycled content increase	9,0	8,0	0,0	0,0	10,0
Refill or reuse targets	0,0	0,0	0,0	0,0	0,0
Overall packaging reduction	1,0	1,0	0,0	0,0	2,0
Product delisting policy	0,0	0,0	0,0	0,0	0,0

COMMITMENTS



Support for all-inclusive DRS	0,0	0,0	0,0	0,0	0,0
Support for reuse targets	0,0	0,0	0,0	0,0	0,0

GOVERNMENT POLICY SUPPORT





10.3
COUNTRY SCORE

COUNTRY: PORTUGAL

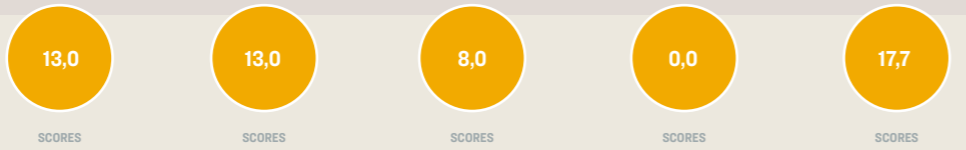


10.3
COUNTRY SCORE

COUNTRY: BELGIUM



TOTAL



Plastic footprint	0,0	0,0	0,0	0,0	0,0
Recycled content	0,0	0,0	0,0	0,0	0,0
Reusable packaging	0,0	0,0	0,0	0,0	1,7

TRANSPARENCY & PERFORMANCE



Plastic packaging reduction	4,0	5,0	0,0	0,0	8,0
Recycled content increase	9,0	7,0	8,0	0,0	8,0
Refill or reuse targets	0,0	0,0	0,0	0,0	0,0
Overall packaging reduction	0,0	1,0	0,0	0,0	0,0
Product delisting policy	0,0	0,0	0,0	0,0	0,0

COMMITMENTS

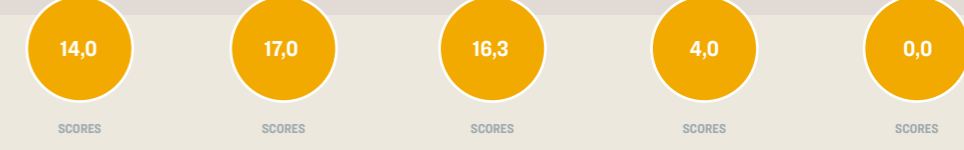


Support for all-inclusive DRS	0,0	1,0	0,0	0,0	0,0
Support for reuse targets	0,0	0,0	0,0	0,0	0,0

GOVERNMENT POLICY SUPPORT



TOTAL



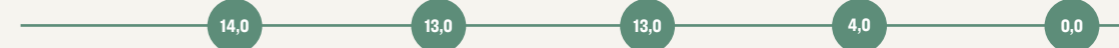
Plastic footprint	0,0	4,0	0,0	0,0	0,0
Recycled content	0,0	0,0	0,0	0,0	0,0
Reusable packaging	0,0	0,0	1,0	0,0	0,0

TRANSPARENCY & PERFORMANCE



Plastic packaging reduction	5,0	4,0	4,0	4,0	0,0
Recycled content increase	9,0	8,0	8,0	0,0	0,0
Refill or reuse targets	0,0	0,0	0,0	0,0	0,0
Overall packaging reduction	0,0	1,0	1,0	0,0	0,0
Product delisting policy	0,0	0,0	0,0	0,0	0,0

COMMITMENTS



Support for all-inclusive DRS	0,0	0,0	1,0	0,0	0,0
Support for reuse targets	0,0	0,0	1,3	0,0	0,0

GOVERNMENT POLICY SUPPORT



10.3
COUNTRY SCORE

COUNTRY: AUSTRIA



8.6
COUNTRY SCORE

COUNTRY: SPAIN



TOTAL



Plastic footprint	0,0	0,0	0,0	0,0
Recycled content	0,0	0,0	0,0	0,0
Reusable packaging	0,0	1,0	1,0	1,0

TRANSPARENCY & PERFORMANCE



Plastic packaging reduction	4,0	0,0	5,0	0,0
Recycled content increase	9,0	6,0	7,0	0,0
Refill or reuse targets	0,0	0,0	1,0	0,0
Overall packaging reduction	0,0	2,0	1,0	0,0
Product delisting policy	0,0	0,0	0,0	0,0

COMMITMENTS

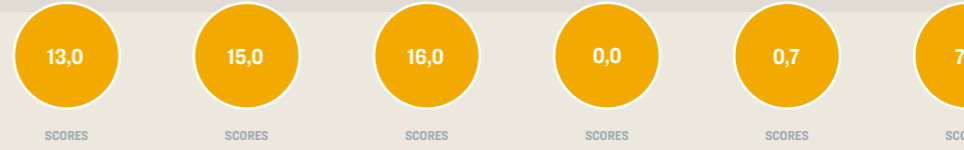


Support for all-inclusive DRS	0,0	2,0	0,0	0,0
Support for reuse targets	0,0	0,0	1,3	0,0

GOVERNMENT POLICY SUPPORT



TOTAL



Plastic footprint	0,0	0,0	0,0	0,0	0,0
Recycled content	0,0	0,0	0,0	0,0	0,0
Reusable packaging	0,0	0,0	0,7	0,7	0,0

TRANSPARENCY & PERFORMANCE



Plastic packaging reduction	4,0	7,0	8,0	0,0	0,0
Recycled content increase	9,0	7,0	8,0	0,0	7,0
Refill or reuse targets	0,0	0,0	0,0	0,0	0,0
Overall packaging reduction	0,0	1,0	0,0	0,0	0,0
Product delisting policy	0,0	0,0	0,0	0,0	0,0

COMMITMENTS



Support for all-inclusive DRS	0,0	0,0	0,0	0,0	0,0
Support for reuse targets	0,0	0,0	0,0	0,0	0,0

GOVERNMENT POLICY SUPPORT





6.5

COUNTRY SCORE

COUNTRY: CZECH REPUBLIC



3.3

COUNTRY SCORE

COUNTRY: UKRAINE



TOTAL



Plastic footprint	0,0	0,0	0,0	0,0
Recycled content	2,3	0,0	0,0	0,0
Reusable packaging	1,0	0,0	0,0	0,0

TRANSPARENCY & PERFORMANCE



Plastic packaging reduction	5,0	0,0	0,0	0,0
Recycled content increase	11,0	0,0	0,0	0,0
Refill or reuse targets	0,0	0,0	0,0	0,0
Overall packaging reduction	0,0	0,0	0,0	0,0
Product delisting policy	0,0	0,0	0,0	0,0

COMMITMENTS



Support for all-inclusive DRS	3,0	0,0	0,0	0,0
Support for reuse targets	1,3	0,0	0,0	0,0

GOVERNMENT POLICY SUPPORT



TOTAL



Plastic footprint	0,0	0,0	0,0	0,0	0,0	0,0
Recycled content	0,0	0,0	0,0	0,0	0,0	0,0
Reusable packaging	0,0	0,0	0,0	0,7	1,0	0,0

TRANSPARENCY & PERFORMANCE



Plastic packaging reduction	0,0	0,0	0,0	0,0	0,0	0,0
Recycled content increase	0,0	8,0	0,0	0,0	0,0	0,0
Refill or reuse targets	0,0	0,0	0,0	0,0	0,0	0,0
Overall packaging reduction	0,0	0,0	0,0	0,0	0,0	0,0
Product delisting policy	0,0	0,0	0,0	0,0	0,0	0,0

COMMITMENTS



Support for all-inclusive DRS	2,0	0,0	0,0	2,0	2,0	0,0
Support for reuse targets	0,0	0,0	0,0	1,3	1,3	1,3

GOVERNMENT POLICY SUPPORT



6.5

COUNTRY SCORE

COUNTRY: CZECH REPUBLIC



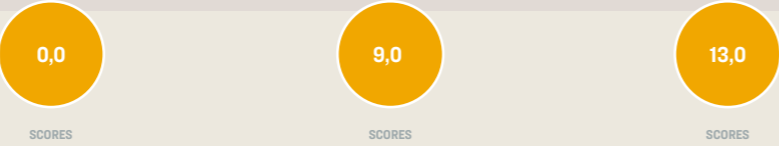
0.9

COUNTRY SCORE

COUNTRY: ESTONIA



TOTAL



Plastic footprint	0,0	0,0	0,0
Recycled content	0,0	0,0	0,0
Reusable packaging	0,0	1,0	0,0

TRANSPARENCY & PERFORMANCE



Plastic packaging reduction	0,0	0,0	0,0
Recycled content increase	0,0	8,0	0,0
Refill or reuse targets	0,0	0,0	0,0
Overall packaging reduction	0,0	0,0	0,0
Product delisting policy	0,0	0,0	0,0

COMMITMENTS

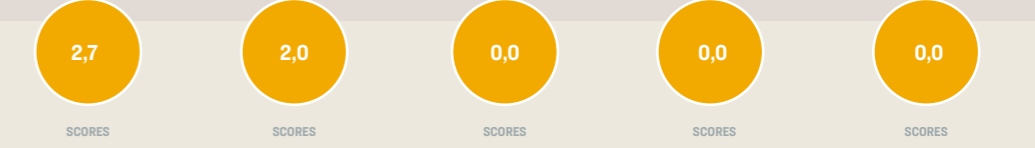


Support for all-inclusive DRS	0,0	0,0	0,0
Support for reuse targets	0,0	0,0	0,0

GOVERNMENT POLICY SUPPORT



TOTAL



Plastic footprint	2,7	0,0	0,0	0,0	0,0
Recycled content	0,0	0,0	0,0	0,0	0,0
Reusable packaging	0,0	1,0	0,0	0,0	0,0

TRANSPARENCY & PERFORMANCE



Plastic packaging reduction	0,0	0,0	0,0	0,0	0,0
Recycled content increase	0,0	0,0	0,0	0,0	0,0
Refill or reuse targets	0,0	0,0	0,0	0,0	0,0
Overall packaging reduction	0,0	0,0	0,0	0,0	0,0
Product delisting policy	0,0	0,0	0,0	0,0	0,0

COMMITMENTS



Support for all-inclusive DRS	0,0	1,0	0,0	0,0	0,0
Support for reuse targets	0,0	0,0	0,0	0,0	0,0

GOVERNMENT POLICY SUPPORT





Appendix 2: Detailed scoring methodology

- Only information provided by the retailers in their answers to the questionnaire or information found on their own country-specific websites were considered in the assessments.
- An exception to this occurs when national retailers can get points through group-level policies. This is the case when the letters or national, country-specific websites provide links to international policies that are located on other websites owned by the retail group (e.g. Reset Plastic Strategy for the Schwarz Group). Alternatively, group-level policies need to clearly state that they either include the national country being assessed or that they apply to all companies/countries in the group.
- Companies are not awarded points for being a member of a pact unless they repeat the goals and targets of the pact or have clear links to those targets.
- Information provided by retailer associations on behalf of their member retailers are not considered as scoreable responses for individual retailers and subsequently are not awarded points.
- When companies have a target for indicators 2.1.2, 2.2.2 or 2.3.2 this implies they have a method to measure their commitments. Therefore, the relevant method indicator (2.1.1, 2.2.1 and 2.3.1) is generally scored as 'LOW' even when no method is provided. In addition, in cases where no details of the method are provided, 'MEDIUM' points are awarded when there is enough information available that allows for the presumption of the method being consistent with what is considered a 'HIGH' scoring methodology.
- When companies do not have targets in sections (2.1, 2.2 and 2.3), they received no points for the entire section.
- It is presumed that when companies say, 'own brands' or 'private labels' in their commitment scopes (indicators 2.1.5, 2.2.5 and 2.3.5), this applies to food and non-food own brands and is therefore scored as 'MEDIUM'.
- Broad statements such as '100% of the own-brand packaging must be recyclable, reusable or compostable by x year' have not been awarded any points.

No.	Indicator	HIGH	MEDIUM	LOW	NONE
1 TRANSPARENCY AND PERFORMANCE					
1.1 PLASTIC FOOTPRINT					
1.1.1	Reports branded plastic units in 2020	Reports figure	n/a	n/a	Not reported
1.1.2	Reports branded plastic tonnage in 2020	Reports figure	n/a	n/a	Not reported
1.1.3	Reports own brand plastic units 2020	Reports figure	n/a	n/a	Not reported
1.1.4	Reports own brand plastic tonnage 2020	Reports figure	n/a	n/a	Not reported
1.2 RECYCLED CONTENT					
1.2.1	Mean recycled content in own-brand packaging	At least 50% weight	At least 30% weight	Below 30% or figure given relates to the number of packaged products rather than weight	Not reported
1.3 REUSABLE PACKAGING					
1.3.1	% of total plastic packaging that is reusable	Reports figure	n/a	n/a	Not reported
1.3.2	Measuring method for reusability	Reports as % of total weight	n/a	Reports as % of number of units or other measurements	Not reported
1.3.3	Reusability % of primary packaging	At least 10% weight	At least 5% weight	Below 5% weight or gives relevant examples	Not reported
1.3.4	Reusability % of secondary packaging	At least 50% weight	At least 25% weight	Below 25% weight or gives relevant examples	Not reported
1.3.5	Reusability % of tertiary packaging	At least 50% weight	At least 25% weight	Below 25% weight or gives relevant examples	Not reported
2 COMMITMENTS					
2.1 PLASTIC PACKAGING REDUCTION TARGET					
2.1.1	Measurement method	Reduction target by % of total weight or density (avg. plastic weight per unit sold)	No methodology is provided but it is likely to be in line with the preferred methodology	Reduction as % of sales in relation to turnover or other indicators such as number of products	Not reported
2.1.2	Reduction target	At least 50% weight or density	At least 25% weight or density		Not reported
2.1.3	Year of achieving target	Earlier than 2025	2025	Later than 2025	Not reported
2.1.4	Current progress	At least 30% weight or density	At least 15% weight or density	Below 15% weight or density	Not reported
2.1.5	Target scope	All 4 out of these: • Own food • Own non-food • Branded food • Branded non-food	2 or 3 out of these: • Own food • Own non-food • Branded food • Branded non-food	1 of these: • Own food • Own non-food • Branded food • Branded non-food	Not reported
2.2 RECYCLED CONTENT INCREASE					
2.2.1	Measurement method	% of weight of all packaging	No methodology is provided but it is likely to be in line with the preferred methodology	Number of products containing recycled packaging or other non-absolute weight measurement	Not reported

No.	Indicator	HIGH	MEDIUM	LOW	NONE
2.2.2	Target	At least 50% weight	At least 25% weight	Below 25% weight	Not reported
2.2.3	Year of achieving target	Earlier than 2025	2025	Later than 2025	Not reported
2.2.4	Current progress	At least 30% weight	At least 10% weight	Below 10% weight	Not reported
2.2.5	Target scope	All 4 out of these: • Own food • Own non-food • Branded food • Branded non-food	2 or 3 out of these: • Own food • Own non-food • Branded food • Branded non-food	1 of these: • Own food • Own non-food • Branded food • Branded non-food	Not reported
2.3 REFILL OR REUSE TARGETS					
2.3.1	Measurement method	% of products that have refillable/reusable packaging compared to all product types on sale	No methodology is provided but it is likely to be in line with the preferred methodology	Any other method that does not compare absolute figures refillable/reusable products	Not reported
2.3.2	Target	At least 25% by 2025 or 30% by 2030	At least 15%	Below 15% or year on year target	Not reported
2.3.3	Year of achieving target	Earlier than 2025	2025	Later than 2025	Not reported
2.3.4	Current progress	At least 15%	At least 10%	Below 10%	Not reported
2.3.5	Target scope	All 4 out of these: • Own food • Own non-food • Branded food • Branded non-food	2 or 3 out of these: • Own food • Own non-food • Branded food • Branded non-food	1 of these: • Own food • Own non-food • Branded food • Branded non-food	Not reported
2.3.6	Target achievement strategy	Has a clear and independently audited action plan including milestones	Has an action plan without milestones or not yet audited	Provides examples only or has no action plan	Not reported
2.4 OVERALL PACKAGING REDUCTION TARGET					
2.4.1	Overall packaging material reduction target	At least 50% by 2025 or 25% or more by 2023 or earlier	At least 25% by 2025 or at least 10% by 2023 or earlier	Below 25% by 2025	Not reported
2.5 PRODUCT DELISTING POLICY					
2.5.1	Delisting policy for brands with non-recyclable or excessive packaging	Strict policy of delisting after a deadline no later 2025, applies to all products	Strict delisting at later time or less strict delisting or for some products	Weak delisting policy or only subsection of products included	Not reported
3 GOVERNMENT POLICY SUPPORT					
3.1 SUPPORT FOR ALL-INCLUSIVE DRS					
3.1.1	Support for all-inclusive DRS for beverages	Supports all-inclusive DRS for beverages without qualification	Conditional support for all-inclusive DRS for beverages	Supports partial DRS only or no clear support for all-inclusive DRS for beverages	Does not support or not reported
3.1.2	Specific support for reuse/refill for beverages	Unconditional support reuse/refill for beverages	n/a	Conditional support reuse/refill for beverages	Does not support or not reported
3.2 SUPPORT FOR REUSE TARGETS					
3.2.1	Position on binding refill/reuse targets	Support for binding refill & reuse target	Conditional support for binding refill and reuse target	Support for voluntary refill & reuse target or for incentives	Does not support or not reported

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