

The UK Plastics Pact Eliminating Problem Plastics: Consultation document 2024

Consultation deadline 12 September 2024

1. Background

In June 2019 WRAP published the first 'Eliminating Problem Plastics' report following consultation with members. Members were consulted again in 2020 and an updated report and revised list of problem plastics for removal was published in February 2022 ['Eliminating Problem Plastics'](#).

An item or packaging material is considered problematic or unnecessary if:

- Its use is avoidable or reusable options are available.
- It does not commonly enter recycling or composting systems.
- It's not recyclable or hampers the recycling process.
- It pollutes our environment.

Since the Target 1 list was introduced, members have collectively delivered a 99.6% reduction in problematic and unnecessary items. The list has enabled members to embed changes ahead of the introduction of bans and restrictions and provided space for collaboration and solution finding.

Many of the original items are now subject to bans across the UK and are expected to be completely phased out. Whilst progress has been made on items which are not subject to restrictions, notably PS and PVC, it has been at a far slower pace.

Delivery of the Pact Targets 2 (recyclability) and 3 (effectively recycled) is contingent on the removal or redesign of plastic packaging which is not recyclable and which will not be included within Simpler Recycling.

The Target 1 list therefore provides an important framework for renewed focus and effort on materials that hinder progress towards Targets 2 and 3 and, although the end date of 2025 is fast approaching, it is important to the credibility of the Pact to maintain momentum and ambition whilst also reflecting developments.

It is for this reason that WRAP is consulting on a wider list of materials which will not be effectively recycled at scale and therefore defined as recyclable within the duration of the Pact nor when household film collections are implemented through Simpler Recycling (shown in Table 1), along with items designated red in the [Polymer Choices](#) best practice design for recyclability (shown in Figure 1).

This approach was developed with The UK Plastics Pact Eliminating Problem Plastics Sprint Group in early 2024 and was presented to The UK Plastics Pact Advisory Group in April 2024.

Table 1: Non-recyclable packaging reported by UK Plastics Pact members for the calendar year 2022

Non-recyclable packaging	Tonnes (2022)	Actions
PP film	89,000	Increase collections
PE film	77,400	Increase collections
PET film	22,000	Find recycling pathway
Multi-polymer film	25,200	Target 1 List / Redesign
PS	12,900	Target 1 List / Redesign
PVC	1,720	Target 1 List / Redesign
Multi-polymer rigid (including tubes)	3,350	Target 1 List / Redesign
Other/unknown	55,000	Identify what it is
Non-NIR detectable	3,550	Target 1 List / Redesign
Packaging with PVC components	250	Target 1 List / Redesign
Packaging with metal components	2,870	Target 1 List / Redesign
Packaging with silicone components	1,330	Target 1 List / Redesign

Figure 1: Defining what's recyclable and best in class polymer choices for packaging: Summary

CLASSIFYING WHAT'S CURRENTLY RECYCLABLE

PACKAGING PREFERRED MATERIALS AND FORMATS GUIDELINES

RED	AMBER	GREEN
<p>Materials or formats that are disruptive to recycling in the UK and/or considered not recyclable, to be designed out.</p> <p>Materials:</p> <ul style="list-style-type: none"> Oxo-oxo degradable/biodegradable materials or additives. Any compostable materials should follow WRAP's guidance on the subject, see separate guidance PVC or PS, including components PvDC – including as a barrier within laminates in consumer packaging applications Non-NIR detectable colours Expanded, foamed or other density modified plastics, other than EPP. Bottles, pots/tubs/trays or films with non-recyclable barrier layers, such as PA, PvDC etc. Silicone valves² Any other thermoset plastic materials Water soluble plastic packaging, where the material isn't an inherent part of the product PETG which isn't currently recycled in the UK Non PE/PP flexible film, except PET lidding Multi-layer, multi polymer films and complex laminates Packaging with glass or metal components e.g. springs, ball bearings. Natural and clear PET trays with PE coating³ 	<p>To be used where functional requirements are not met by materials or formats in the green listings.</p> <p>Materials:</p> <ul style="list-style-type: none"> Mixed polyolefin (PE and PP) film NIR detectable colours, preferably lighter colours and avoiding red for PET – which affects future PET jazz uses <p>Formats:</p> <ul style="list-style-type: none"> Fruit nets if 100% PE Plastic yokes for cans and bottles Shrink sleeves with greater than 40% coverage. Sleeves should also weigh <5% of the pack (to adhere to recyclable definition) and the sleeve should be easy to remove during the recycling process (to ensure that the bottle isn't directed to the jazz stream) Tamper evidence items should be designed to be retained by the container In mould labels (e.g. for margarine tubs) should minimise ink coverage EPP Bottles, pots/tubs/trays or films with greater than 5% EVOH barrier layer Jazz and opaque PET trays with PE coating³ 	<p>Preferred for recycling in the UK via kerbside collection or retailer front of store collection points.</p> <p>Materials:</p> <ul style="list-style-type: none"> Rigid PET* (aPET and rPET), PP, HDPE or LDPE – all clear or natural in colour (excluding household DIY and garden chemicals, such as bleach, turpentine and weed killer) PE or PP film recycled via retailer front of store collection points, including lightly metalised, where the metalised layer is vacuum deposited to the inside of the pack cPET: move from dark to light colours in cPET trays, the use of white or natural should be avoided because this can be detected as clear and contaminate the PET stream. The use of recycled jazz cPET materials in packaging should be recognised along with their contribution to the circular economy Bottles, pots/tubs/trays or films with less than 5% EVOH barrier layer <p>Formats:</p> <ul style="list-style-type: none"> Mono material pouches (exc. from DIY products) Mono lidding film⁵, same material as tray when permanently attached⁶

² Currently classified as disruptive, rather than non-recyclable ³ See definition on page 8 ⁴ Excludes PET with a PE sealing layer ⁵ Excludes PET with a PETG layer ⁶ In this instance the film element is generally not recycled

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2. Structure of the Eliminating Problem Plastics Report

The Eliminating Problem Plastics report contains the following two lists:

- a) Items or materials for elimination, as far as possible, with a timeline for their removal; and
- b) Items or materials for further investigation where members are asked to develop and implement solutions to address the issues the items present.

2.1 The Existing Elimination List Items / Materials

- Disposable plastic cutlery
- Disposable plastic plates and bowls
- Plastic straws
- Cotton buds with plastic stems
- Plastic stirrers
- Household Polystyrene Packaging
- Oxo-degradable plastic product
- Polyvinyl chloride (PVC) packaging
- Plastic wrapping for multi-sales of tins, bottles, and cartons
- Non-compostable tea and coffee bags
- PVC cling film
- Single-use, single-serving plastic sachets/jiggers in restaurant settings
- Non-compostable fruit/veg stickers
- Plastic packaging for uncut fresh fruit and vegetables unless it is demonstrated to reduce food waste

2.2 The Existing Investigation List Items/Materials

- Multi-layer non-recyclable plastics (e.g., pet and baby food pouches)
- Multi-pack rings for canned drinks
- Single-use plastic bags, including carrier bags and fresh produce bags
- Mono material flexible plastic packaging (e.g. crisps, fruit and vegetable film packaging)
- Bottle tops/caps
- Single-use plastic bottles
- Internal plastic trays e.g. trays for premium biscuits.
- Disposable plastic cups
- Plastic cup lids (from hot beverage cups)
- Plastic coffee pods
- Single-use, single-serving sachets, jiggers and pots outside of restaurants
- Tear off tamper evident strips on containers
- Excessive headspace / oversize packaging
- Plastic lids (additional) on dairy, DIY etc. products

Please refer to the [Eliminating Problem Plastics Report](#) for the rationale behind the above items and the key actions associated with them. This consultation seeks feedback on proposed changes to both lists.

3. Proposed Amendments to the Elimination and Investigation Lists

3.1 Proposed Additions/Changes to the Elimination List

Existing Items/Materials	Deadline for Elimination	Avoidable/Reusable Options	Not commonly recycled	Not recyclable/Contaminates recycling	Pollutes environment	Rationale
Multi-material non-recyclable rigid or flexible plastics for certain categories (e.g., pet and baby food pouches)	Suggest by the end of 2025	✓	✓	✓		<p>These materials are not widely recycled. Examples exist where manufacturers have redesigned multi-material packaging and moved to mono-materials so as to be in scope of collections and recyclable once Simpler Recycling is implemented (for example pet food, baby food, detergents and toothpaste tubes).</p> <p>It is therefore proposed that for categories where redesign is feasible multi-material non-recyclable plastics is moved to the elimination list in support of Target 2.</p> <p>To determine which categories should be included, please provide details for:</p> <ul style="list-style-type: none"> a) The categories where you have already redesigned or identified opportunities to move multi-layer packaging to mono-materials so that we can share insights. b) The categories for which multi-material packaging cannot be redesigned due to performance requirements and lack of alternatives and for which a longer timeline is required to either seek recyclable alternatives or implement recycling pathways.
Natural and clear PET trays with PE coating	Suggest by the end of 2025	✓		✓		<p>PE coatings on clear PET trays cause the PET to become cloudy during recycling, so demoting clear PET to the jazz rPET stream, and should therefore be designed out. PE on coloured PET is less of an issue, as this will</p>

						be recycled in the jazz rPET stream, with or without PE contamination. It is proposed that they are added to the Elimination list.
Non-recyclable non-NIR detectable coloured plastics	Suggest by the end of 2025	✓	✓	✓		Non-NIR-detectable coloured packaging was on the original 2019 watch list and significant work has been undertaken by members to redesign. However over the past year the use of non-NIR-detectable plastic has increased. Adding it to the elimination list will therefore ensure members continue to focus on removal in support of Target 2.
Silicone components	Suggest by the end of 2025	✓		✓		While not making the whole pack non-recyclable, silicone valves used in caps and closures are a contaminant to recycling. Most silicone components have been removed and replaced with alternatives. Silicone components are on the red list in the polymer choices document. It is proposed that they are added to the Elimination list in support of Target 2.
Packaging with glass or metal components e.g. springs, ball bearings	Suggest by the end of 2025	✓	✓	✓		For example triggers with metal springs, pumps with glass ball bearings or fruit nets with metal fastenings. Metal is particularly damaging to recycling equipment. It is proposed that they are added to the Elimination list.
Wet wipes with plastic content	Suggest by the end of 2025	✓	✓		✓	The UK Government will introduce new legislation to ban wet wipes containing plastic, expected to take effect late 2024 with an 18-month transition period. For completeness it is therefore suggested that they are added to the elimination list.
Disposable Vapes	Suggest by the end of 2025	✓	✓		✓	A disposable vape has a very short life span and, as well as encouraging youth vaping, they are frequently littered and harmful to our environment when not disposed of correctly. In January 2024, the government announced that disposable vapes will be banned in England. The Scottish Government and Welsh Government have also confirmed they intend to introduce legislation. For completeness it is therefore suggested that they are added to the elimination list.

3.2 Proposed Additions/Changes to the Investigation List

Existing Items/Materials	Avoidable/ Reusable Options	Not commonly recycled	Not recyclable/ Contaminates recycling	Pollutes environment	Rationale
Non-tethered drinks tops/caps (except milk)	✓	✓	✓	✓	Change to wording: Untethered bottle tops and caps are often not collected for recycling as the public are unsure about what to do with them, they are often littered and if not are lost in the recycling process due to their small size. New legislation in the European Union requires that by July 2024, all plastic closures must remain “tethered” (attached) to single-use beverage containers after the container is opened. The change of wording from ‘bottle tops/caps’ to ‘Non-tethered drinks tops/caps (except milk)’ is to reflect that many manufacturers are making the move to tethered caps due to European legislation.
Plastic hotel miniatures – toiletries and drinks miniatures	✓	✓			New item: Generally not recycled because of their small size, several hotel chains have already voluntarily removed miniatures/single use plastic toiletries and drinks. Alternative delivery mechanisms exist including refillable pump dispensers, hotel bars and vending machines. Aligned with the European Packaging and Packaging Waste Regulations.
Any inks (used for decoration and/or instructions etc.) which are detrimental to recycling, e.g. for food grade materials, through chemical changes during thermal cycles during recycling.	✓		✓		New item: There is a risk with some inks, which may undergo a chemical change, due to high temperatures during recycling, which could affect the use of materials in food contact applications. Include on watch list to ensure this is monitored and appropriate action is to be taken. Refer to page 16 of Recoup’s Recyclability by Design for more information on inks.
Bottles, pots/tubs/trays or films with non-recyclable barrier layers, such as PA, PVdC etc	✓		✓		New item: Some barrier layers in plastics packaging are acceptable for recycling, but other such as a barrier layer of PA or PVdC will prevent a pack from being recyclable. Propose adding to watch list to ensure progress is being made.

Water soluble plastic packaging, where the material isn't an inherent part of the product	✓	✓			New item: Consult with industry and monitor increased usage and implications for recycling streams, including paper.
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4. Next Steps

1. This document will be sent to all UK Plastics Pact members in July 2024 and published on the WRAP website.
2. A webinar has been scheduled for members on 24 July to run through the proposed changes and answer any queries.
3. Feedback should be submitted via the survey monkey form by the deadline on 12 September 2024.
4. Feedback will then be collated and used to inform the updates to the Eliminating Problem Plastics report.