Single-use plastic sachets: advice from the Advisory Committee on Packaging (ACP)

Background:

Single-use plastic sachets are an established ingredient in marketing and selling for a number of UK business sectors. Concern has been raised by a number of people highlighting the potential damage used or discarded sachets have on the environment; some have asked for them to be banned. The ACP established a working group (wg) chaired by Mike Baxter – member representing plastic – and he included many ACP members as well as others who could add value.

Operating belief:

The ACP values the environment as well as economic activity related to packaging. It supports finding practical and efficient methods to eliminate or minimise harms to the environment, and to support a ban only if there are no practical alternatives or the harm is quantifiably large without mitigating factors. Plastic sachets are established economic activity with jobs and consumer utility presently.

Size of sachet:

The wg determined **sachets up to a maximum size of 70mm square** would be in scope. The tromel size in most materials' recovery facilities and plastics recovery facilities means that any sachet larger than this size can be recovered from the waste stream for recycling (some sorting facilities could be close to accommodating 50mm square). While this does not happen on a large scale presently the introduction of Extended Producer Responsibility (EPR) for all packaging should facilitate greater capture and recycling. In addition, retailer front-of-store collection schemes which are currently being rolled out nationally (eg, Tesco's collection of plastic film) should significantly increase the capture rates for larger sachets.

Business sectors:

The wg agreed to initially focus on the two business sectors which are responsible for the vast majority of sachets placed on the market. These are:

- i. **Cosmetics:** The sale and promotion of cosmetics, perfumes and toiletries, where sachets are primarily used as a sampling tool.
- ii. *Catering:* Catering/restaurants/on-the-go food where sachets are used to dispense single-serve portions of ketchup, sauces, salad cream, vinegar etc.

Other UK business sectors do use small sachets, the biggest being hotels and hospitality. However, a number of hotel chains have recently moved from single-use sachets for products such as soap and shampoo to inroom refillable bottles. The wg agreed to initially focus on the two big user sectors and revisit other smaller sector users once the initial advice had been monitored for effectiveness. It believes that example of a leading sector could easily be followed by others voluntarily.

Litter:

While used or discarded sachets may be a problem in certain countries this does not appear to be the case in the UK. In the Keep Britain Tidy annual littering survey, which records the most littered items, sachets do not appear in the top 20 most littered items.

Volume:

The wg concluded that there are not any verifiable use figures available. A Plastic Planet claimed 855bn sachets being used worldwide which could imply 5-8bn in the UK. On the other hand RECOUP say 202,000T of "other" plastic was used leading to an estimate of 500-700m of sachets in the UK. However, without detailed understanding of the methodology used to determine these claims the numbers have to be viewed as mere estimates. The two UK trade associations whose members are the major users of small sachets -- the Cosmetics, Toiletries and Perfumery Association (CTPA) and the Food Packaging Association (FPA) -- have

confirmed that they do not hold member data on total usage. There are a number of reasons for this **knowledge gap**. Commercial confidentiality could be an issue; this is certainly the case for suppliers of the printed or laminated rolls of film which are used during the filling or fabrication process. In fact, there is very little UK manufacturing capacity to produce printed and laminated rolls of film which are used by packer-fillers. These master rolls of film are mostly supplied from Spain, Italy and Pacific rim countries. But UK import statistics will simply show these products as printed plastic film.

Recommendations:

We recommend that governments in the UK endorse a voluntary EPR scheme by industry on the basis that its effectiveness including in waste prevention and recycling would be monitored and analysed annually with the wg's participation and in this time better data on volumes, environmental and consumer impact are collected. These schemes would have producers and retailers paying for the costs of sachet collection and forwarding on to recycling as well as associated costs such as consumer information. In that time better data would be collected and producers and packers would explore the use of alternative material including compostables and degradables. These would be complementary to other initiatives like the UK Plastics Pact by WRAP, the plastics tax and government's current EPR consultations towards policy.

Establishment of a voluntary EPR scheme for cosmetics:

The CTPA represents the majority of UK CTP retailers, packer-fillers and marketing businesses in this sector. Work has already commenced on the introduction of a sachet-return scheme with the UK's largest chemist chain. This scheme is due to be launched in autumn of 2021. We are advised that Minister Pow has been or will be invited to the launch. The CTPA will also take responsibility for establishing an additional EPR scheme in the critical market sector of sampling whilst discouraging the use of random sampling 'give-aways'.

Establishment of a voluntary EPR scheme for catering:

The FPA has agreed to facilitate the establishment of a UK wide EPR scheme, financed by a voluntary levy on the manufacturers and suppliers of the filled sachets to end users and food-service distributors. The FPA have experience of this kind of scheme having facilitated a number of similar schemes with some of the UK's largest fast-food/restaurant chains with the establishment of single-use coffee cups' collection and recycling schemes. However, the FPA have advised that work on the establishment of an EPR scheme for the catering sector should be delayed until autumn 2021. This sector has been badly impacted by the Covid pandemic and is just starting to recover and thus needs that time.

Recycling facilities for sachets:

Recycling of plastic sachets is difficult partly because of small size and partly because some of the contents remain in used or discarded sachets and they are not easy to clean. However, the two major UK recyclers of sachets, Enval and ReNew, have confirmed adequate recycling facilities already exist to reprocess collected returned sachets. While the volume of sachets in numbers may appear large, in terms of recycling tonnages they very much doubt this would exceed 300T pa.

Monitoring and data:

Each industry scheme would collect data on sachets put on the market, collected and recycled both in numbers and weight. They would also collect data on shift to alternative materials like compostables or degradables by participating organisations. The wg will provide independent monitoring and annually an analysis and consequent advice including collection of data on sorting and recycling recovery facilities on their capacity. The ACP could also work with local authorities and retailers to have a definition for sachets so that better data is captured by them.