



# NATIONAL PACT ON PLASTIC PACKAGING

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## CONTEXT

**Plastic is a material with undeniable qualities, vector of technical progress and symbol of the democratization of consumption. It is used for the packaging, transport and protection of products consumed daily in France and around the world.**



However, its increasing use since the 1960s contributes to climate change and impacts biodiversity. The production of virgin plastic, based on the use of fossil fuels, generates large amounts of greenhouse gases.

Each year, between 8 and 12 million tons of plastic enter the oceans, the equivalent of one garbage truck full of plastic every minute. Recent studies highlight the importance of micro-plastics in marine plastic pollution, resulting from the fragmentation of macro-waste or fibres and microbeads contained in certain products. Research now suggests that oceans could contain more plastics than fish by 2050.

Through awareness-raising campaigns from NGOs and media, the general public and civil society now call for the implementation of actions to combat plastic pollution. Businesses and governments are also mobilizing. The UN Sustainable Development Goals (SDGs) call on industries, businesses and consumers to reduce marine pollution and adopt more sustainable consumption and production patterns (SDGs 12 and 14). Voluntary commitments to SDG 14 by these different actors are gathered within the Ocean Action Community. The G7 has also positioned itself to support a common action in support of increased recycling of plastics.



## INTRODUCTION OF THE NATIONAL PACT ON PLASTIC PACKAGING

**It now appears essential to collectively rethink the use of plastic towards more sober uses and better management of this material.**

To this end, the French Government, businesses, and civil society organizations co-created a National Pact on plastic packaging. This commitment is at the heart of the strategy detailed in the Circular Economy Roadmap and the European Strategy on Plastics. It is also based on the vision of the Ellen MacArthur Foundation's New Plastics Economy Global Commitment.



The Pact pursues and extends a transition from a linear model «take, make, dispose» to a circular economy of plastic in France. This profound paradigm shift involves rethinking and innovating on the entire life cycle of materials and plastic products.



**The Pact brings together all voluntary actors in the plastic value chain (producers, converters, national brands, distributors, waste management operators), civil society and the Government. Beyond the stakeholders involved during its inception, the Pact aims at mobilizing a growing number of signatories. It aims to support progress through concrete commitments, dialogue and collaboration.**



## COMMON VISION

**We, the signatories of the New Plastics Economy Global Commitment, endorse the vision of a circular economy for plastics, where plastics never become waste. We recognise this vision offers a root cause solution to plastic pollution with profound economic, environmental, and societal benefits. Collectively, we will work towards this vision by meeting our individual commitments and collaborating within and beyond this coalition of signatories.» within and beyond this coalition of signatories.**

For plastic packaging, specifically, we recognize a circular economy is defined by six characteristics from the Ellen MacArthur Foundation's «New Plastics Economy Global Commitment»:



### **1 Elimination of problematic or unnecessary plastic packaging through redesign, innovation, and new delivery models is a priority**

- a. Plastics bring many benefits. At the same time, there are some problematic items on the market that need to be eliminated to achieve a circular economy, and sometimes, plastic packaging can be avoided altogether while maintaining utility.



### **2 Reuse models are applied where relevant, reducing the need for single-use packaging**

- a. While improving recycling is crucial, we cannot recycle our way out of the plastics issues we currently face.
- b. Wherever relevant, reuse business models should be explored as a preferred 'inner loop', reducing the need for single-use plastic packaging.



### **3 All plastic packaging is 100% reusable, recyclable, or compostable**

- a. This requires a combination of redesign and innovation in business models, materials, packaging design, and reprocessing technologies.
- b. Compostable plastic packaging is not a blanket solution, but rather one for specific, targeted applications.



### **4 All plastic packaging is reused, recycled, or composted in practice**

- a. No plastics should end up in the environment. Landfill, incineration, and waste-to-energy are not part of the circular economy target state.
- b. Businesses producing and/or selling packaging have a responsibility beyond the design and use of their packaging, which includes contributing towards it being collected and reused, recycled, or composted in practice.
- c. Governments are essential in setting up effective collection infrastructure, facilitating the establishment of related self-sustaining funding mechanisms, and providing an enabling regulatory and policy landscape.



**We recognize this vision is the target state we seek over time and acknowledge that realizing it will require significant effort and investment. We also recognize the importance of taking a full life-cycle and systems perspective, aiming for better economic and environmental outcomes overall. Above all, we recognize the time to act is now.**



### **The use of plastics is fully decoupled from the consumption of finite resources**

- a. This decoupling should happen first and foremost through reducing the use of virgin plastics (by way of dematerialization, reuse, and recycling).
- b. Using recycled content is essential (where legally and technically possible) both to decouple from finite feedstocks and to stimulate demand for collection and recycling.
- c. Over time, remaining virgin inputs (if any) should switch to renewable feedstocks where proven to be environmentally beneficial and to come from responsibly managed sources.
- d. Over time, the production and recycling of plastics should be powered entirely by renewable energy.



### **All plastic packaging is free of hazardous chemicals, and the health, safety, and rights of all people involved are respected**

- a. The use of hazardous chemicals in packaging and its manufacturing and recycling processes should be eliminated (if not done yet).
- b. It is essential to respect the health, safety, and rights of all people involved in all parts of the plastics system, and particularly to improve worker conditions in informal (waste picker) sectors.

## **BROADENING THE BASE OF SIGNATORIES AND EVOLUTION**

**Subsequent to the transition and the progress made by the signatories, the Pact and the scope of its commitments is intended to be enriched and to evolve in order to:**

- Take into account all segments of the plastic value chain;
- Extend the scope of commitments to all types of plastic products and packaging;
- Integrate the issue of textile microfibers, and primary micro-plastics;
- From the perspective of continuous progress, the targets may be revised depending on the results of the annual review.



## COMMITMENTS

Signatories commit to translating this shared vision into their activities or areas of responsibility.



### The French Government commits to:

- a. Encourage the elimination of problematic or unnecessary plastic packaging, starting with the ban of the use of EPS in food containers and single use plastic cups but also by encouraging the elimination of PVC in household, commercial and industrial packaging by 2022.
- b. Explore the implementation of various financial mechanisms to incentivize redesign of products, particularly regarding recyclability, reuse and integration of recycled material.
- c. Evaluate concrete ways of improving collection, sorting, recycling and recovery schemes, and the related investments.
- d. Collectively achieve 60% of plastic packaging effectively recycled by 2022.
- e. Strengthen recycling infrastructures and innovate on collection mechanisms that improve performance and target effective value sharing with all stakeholders by 2025.
- f. Encourage the co-creation of innovative solutions between public and private research.



### Businesses commit to:

- a. End the use of PVC in household, commercial and industrial packaging by 2022, and take steps to eliminate other problematic or unnecessary plastic packaging by 2025, starting with EPS.
- b. By 2025, test and if possible, develop commercial reuse, and bulk sale models for families of products not affected by these models until now.
- c. Redesign packaging (through eco-design) to make them reusable and 100% recyclable by 2025.
- d. Collectively achieve 60% of plastic packaging effectively recycled by 2022.
- e. Incorporate an average of 30% of recycled plastic material into packaging by publicly sharing target rates and their progress by 2025.
- f. Identify, test and if possible, industrialize three innovative solutions per year.



### Civil Society commits to:

- a. Monitor the progress made by companies and promote good practices that ought to be further developed.
- b. Conduct educational and awareness campaigns towards the general public on the issues of plastic pollution.
- c. Promote an ambitious approach to combating plastic pollution including the government, economic actors and civil society stakeholders.





## DIALOGUE, COLLABORATION AND IMPLEMENTATION

**All actors commit to the implementation of this Pact through the following actions**

- Ensure transparency in the collaboration between signatories through dialogue while complying with competition law.
- Collectively organize the follow-up of the quantitative targets by developing a reporting mechanism for monitoring commitments and trajectories (in alignment with the modalities set out in Annex I section 2 of the present Pact).
- Rally to the Pact essential actors in achieving quantitative targets and in increasing the rates of collection, reuse and recycling.
- Introduce plastic issues in school curriculum and consider “civic services” around the prevention of plastic pollution.
- Improve consumer awareness and simplify sorting processes by standardizing instructions.
- To ensure the effective achievement of these principles is an important part of the implementation of the Signatories’ commitments. It will be guaranteed by an independent body. This body will be responsible for ensuring the governance of the implementation of the Pact and the dialogue between the signatories as well as the reporting on the commitments made in the present Pact.
- The signatories commit to ensure regular consultations every six months through this independent body.

## GOVERNANCE AND FOLLOW UP

**Beyond the commitments mentioned above, the Pact suggests a series of principles relating to the rallying of other actors, the follow-up of the commitments and the way in which the activity of the Pact is structured. This section clarifies the governance of the Pact and its operationalization.**

The signatories will ensure the creation of a Steering Committee in charge of the activities and the dynamic of the pact. It will make it possible to report on the progress of the pact with regard to the commitments made. It will ensure the transparency and independence of the implementation of the Pact. The Steering Committee, responsible for guiding the work across signatories, will ensure:

- Transparency and objectivity in the work and consultations between signatories;
- The respect of the vision of the circular economy for the plastics;
- The monitoring of the progress towards achieving the commitments,
- Ensure the rallying of new signatories
- The development of a reporting mechanism and its implementation by the signatories
- The communication resulting from the work of the signatories
- Share good practices and coordination with relevant initiatives at international level

The Steering Committee will bring together a «narrow» number of members among the signatories of the Pact while respecting a balance in the decisions and opinions issued between businesses representing the plastic packaging value chain, civil society and the public administration.

The operational and implementation aspects will be guaranteed by the structures capable of organizing the work of the Pact. The signatories will also ensure:

- Organization and coordination of meetings
- Rallying new signatories, including companies from the entire plastic packaging value chain, governments, NGOs and other relevant organizations
- Follow-up of work towards achieving the objectives of the signatories
- The establishment of an annual public reporting mechanism.



## APPENDIX I : Technical note on commitments and their follow-up

### Section 1 : Commitments

As part of the commitment (a), EPS is one of the problematic or unnecessary packaging that will be studied as soon as this agreement is signed. The EPS is to be differentiated from other forms of PS for which a recycling system is under development. As part of the implementation of this Pact, signatories will agree on a list of packaging to be designated as problematic or unnecessary and for which measures for their elimination will have to be taken.

Regarding commitment (e), the 30% recycled plastic incorporation target is a smoothed average that allows for variability in the conditions of access between the different resins effectively marketed in France. Certain recycled resins have a very high incorporation rate in packaging. Others are subjected to more variable access conditions which may have a rate of incorporation lower than the target rate of 30%.

Regarding commitment (f), innovative solutions can be punctual, but they will have to tend towards a structuring and transforming character. A solution will be designated as “important” if it leads to a multi-stakeholder collaboration along the plastic value chain or if it involves substantial infrastructure projects. Solutions may not be able to deploy and deliver their effects in the short term. The goal is to achieve a deployment of different achievements in a period of 2 to 3 years.

### Section 2 : Indicators for reporting on commitments

Signatories commit to measure annually the progress made on each of their commitments. The reporting mechanism should make it possible to evaluate these progresses in concrete terms and also to encourage a dynamic of individual and collective actions to achieve in the best conditions possible the commitments contained in the Pact.

Signatories will focus on the development of an information and measurement system around concrete indicators. This reporting mechanism will be collectively discussed as soon as the Pact is formally launched. For each commitment, the signatories commit to provide data through the following measures:

Commitment (a): Signatories share a list of problematic or unnecessary plastic packaging as well as trajectories and action plan for their elimination. Indicators on the use of PVC are expected.

Commitment (b): Report testing of the implementation of commercial reuse, reuse and bulk sale models by measuring the proportion of products marketed in bulk or in reusable formats.

Commitment (c): Measure the proportion of reusable and recyclable packaging by specifying, as far as possible, the type of resin and the families of packaging concerned.

Commitment (d): Measure the actual recycled plastic content and evaluate the impact of the decisions taken collectively or individually by the signatories contributing to increasing the rate of plastic packaging effectively recycled.

Commitment (e): Measure the rate of recycled plastics incorporated into packaging.

Commitment (f): Report the number of solutions identified as innovative and share the individual or collective action plans to pilot the test and their industrialization. A measure of the impact of these solutions and their contribution to the commitments made in the Pact is also desirable.

As part of the implementation of the monitoring mechanism, the signatories will apply the following principles:

- The reporting mechanism will focus on procedures and information systems existing at the French or International level. These will eventually be modified to ensure effective monitoring of the mea-



asures and indicators mentioned above.

- All signatories will conduct a first test of these indicators in the first year following the official announcement of the Pact.
- This test will help construct a baseline of the group of signatories.
- From these initial conditions, the signatories will develop their trajectory for the following years.
- In the second year following the official announcement of the Pact, each signatory commits to share the indicators and their trajectory to follow the commitments made in the Pact. The indicators will be made public by each signatory on an annual basis.

## APPENDIX II: GLOSSARY

From New Plastics Economy Global Commitment

**Compostable packaging:** A packaging or packaging component (1) is compostable if it is in compliance with relevant international compostability standards (2) and if its successful post-consumer (3) collection, (sorting), and composting is proven to work in practice and at scale (4).

### Notes

1. ISO 18601:2013: A packaging component is a part of packaging that can be separated by hand or by using simple physical means (e.g. a cap, a lid and (non in-mould) labels).
2. Including ISO 18606, ISO 14021, EN13432, ASTM D-6400 and AS4736.
3. ISO 14021's usage of term clarifies post-consumer material as material generated by households or by commercial, industrial and institutional facilities in their role as end users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.
4. At scale' implies that there are significant and relevant geographical areas, as measured by population size, where the packaging is actually composted in practice.

**Composting:** Aerobic process designed to produce compost.

Note 1 to entry: Compost is a soil conditioner obtained by biodegradation of a mixture consisting principally of vegetable residues, occasionally with other organic material and having a limited mineral content.

Source: ISO 472:2013, Plastics - Vocabulary .

**Material recycling:** Reprocessing, by means of a manufacturing process, of a used packaging material into a product, a component incorporated into a product, or a secondary (recycled) raw material; excluding energy recovery and the use of the product as a fuel.

Source: ISO 18604:2013 - Packaging and the environment — Material recycling, modified (note to entry not applicable).

**Post-consumer recycled content:** Proportion, by mass, of post-consumer (1) recycled material in a product or packaging.

### Note

1. ISO14021's usage of term clarifies post-consumer material as material generated by households or by commercial, industrial and institutional facilities in their role as end users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.

Source: ISO 14021:2016 modified, *Environmental labels and declarations — Self-declared environmental claims (Type II environmental labelling), Usage of terms, modified (focus on post-consumer recycled material)*

**Recyclable packaging:** A packaging (1) or packaging component (2,3) is recyclable if its successful post-consumer (4) collection, sorting, and recycling (5) is proven to work in practice and at scale.



## Notes

1. In the context of a 2025 timeframe and the Global Commitment, a package can be considered recyclable if its main packaging components, together representing →95% of the entire packaging weight, are recyclable according to the above definition, and if the remaining minor components are compatible with the recycling process and do not hinder the recyclability of the main components. Otherwise, only the recyclable components of a package (or the recyclable parts of components - see footnote 3) can be counted towards achieving this commitment, and only when other components do not hinder or contaminate their recyclability.

### Examples :

- If a bottle and its cap are recyclable, the packaging can be claimed to be recyclable if it has a label (←5% of total weight) that does not hinder the recyclability of the bottle and cap.
- If that same bottle has a label that hinders or contaminates the recycling of the bottle and cap, the entire packaging is non-recyclable.
- If a package has (a) certain component(s) that are not recyclable and that make up →5% of the total packaging weight (e.g. 12%) and that do not hinder or contaminate the recycling of the remaining recyclable components of the package, then only that recyclable part (e.g. 88%) can be counted towards this commitment.

1. Longer-term, the aim should be for all packaging components (e.g. including labels) to be recyclable according to the above definition.
2. A packaging component is a part of packaging that can be separated by hand or by using simple physical means (ISO 18601), e.g. a cap, a lid and (non in-mould) labels.
3. A packaging component can only be considered recyclable if that entire component, excluding minor incidental constituents (6), is recyclable according to the definition above. If just one material of a multi-material component is recyclable, one can only claim recyclability of that material, not of the component as a whole (in line with US FTC Green Guides<sup>22</sup> and ISO 14021).
4. ISO 14021 defines post-consumer material as material generated by households or by commercial, industrial and institutional facilities in their role as end users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain. It excludes pre-consumer material (e.g. production scrap).
5. Packaging for which the only proven way of recycling is recycling into applications that do not allow any further use-cycles (e.g. plastics-to-roads) cannot be considered 'recyclable packaging'.
6. ISO 18601:2013: A packaging constituent is a part from which packaging or its components are made and which cannot be separated by hand or by using simple physical means (e.g. a layer of a multi-layered pack or an in-mould label).

**Renewable content:** Proportion, by mass, of renewable material in a product or packaging.

Renewable material: Material that is composed of biomass from a living source and that can be continually replenished. <sup>29</sup> When claims of renewability are made for virgin materials, those materials shall come from sources that are replenished at a rate equal to or greater than the rate of depletion.

Source: ISO 14021:2016, Environmental labels and declarations — Self-declared environmental claims (Type II environmental labelling) - Sections 7.14.1. Usage of term and 7.14.2. Qualifications.

**Reusable packaging:** Packaging which has been designed to accomplish or proves its ability to accomplish a minimum number of trips or rotations (1,2) in a system for reuse (3,4).

Source: ISO 18603:2013 - Packaging and the environment - Reuse, modified (packaging component mentioned in notes)

## Notes

1. A trip is defined as transfer of packaging, from filling/loading to emptying/unloading. A rotation is defined as a cycle undergone by reusable packaging from filling/loading to filling/loading (ISO 18603).



2. The minimum number of trips or rotations refers to the fact that the 'system for reuse' in place should be proven to work in practice, i.e. that a significant share of the package is actually reused (measured e.g. by an average reuse rate or an average number of use-cycles per package).
3. A system for reuse is defined as established arrangements (organisational, technical or financial) which ensure the possibility of reuse, in closed-loop, open-loop or in a hybrid system (ISO 18603).
4. See above for the definition of reuse, which stresses amongst other things the need for the packaging to be refilled or used again for the same purpose for which it was conceived.

### **Reuse of packaging**

Operation by which packaging is refilled or used for the same purpose for which it was conceived, with or without the support of auxiliary products (1) present on the market, enabling the packaging to be refilled.

*Source: ISO 18603:2013, Packaging and the environment - Reuse , modified (clarification in note 1 below).*

### **Note**

1. An auxiliary product is a product used to support the refilling/loading of reusable packaging. (...) An example of an auxiliary product is a detergent pouch used to refill a reusable container at home (ISO 18603). As per ISO 18603, auxiliary products that are one-way products (i.e. designed to be used once) are not considered reusable packaging.

