UK Plastics Pact Roadmap to 2025

Transforming the UK plastics system

FOR CONSULTATION

The UK Plastics Pact

The UK Plastics Pact is transforming the way that the UK makes, uses, and disposes of plastic. We need to move away from a linear plastics economy towards a circular system where we capture the value of plastic – keeping it in the economy and out of the environment.

The UK Plastics Pact brings together governments, businesses, local authorities, citizens and NGOs behind a common vision and commitment to a set of four ambitious targets.

WRAP launched The UK Plastics Pact in 2018, working in partnership with Ellen MacArthur Foundation to create the first national implementation of the vision for a New Plastics Economy.

Our targets to 2025:

1. Eliminate problematic or unnecessary single-use packaging through redesign, innovation or alternative (reuse) delivery models
2. 100% of plastic packaging to be reusable, recyclable, or compostable
3. 70% of plastics packaging effectively recycled or composted
4. 30% average recycled content across all plastic packaging

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A Roadmap to 2025

With 18 months of The UK Plastics Pact remaining, this is the third iteration of the Roadmap to 2025. Delivering all four targets will be contingent on the effective implementation of packaging reforms along with significant investment by business. Using the latest available insight on packaging policy developments, the Roadmap sets out:

- the critical pathway to achieving Targets 1 & 4
- the actions that need to happen by 2025 in preparation for the effective implementation of key policy measures; and
- the actions that need to be delivered in the period 2025-2030 to ensure the delivery of the final two Targets 2 & 3

As well as guiding members and supporters, it also acts as a tool to galvanise wider action by governments, funders, investors, NGOs and businesses who are not members of The UK Plastics Pact, but without which the Pact targets will not be reached.

Our members:

- Over **140 members**, comprised of:
  - Retailers
  - Brands & Manufacturers
  - Hospitality & Food Service
  - Packaging Manufacturers
  - Waste Management & Reprocessors
- Over **50 supporters**, comprised of:
  - Charities & NGOs
  - Academia
  - Technology & Data Providers
  - Trade Associations
  - Industry Bodies

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Target 1: Eliminating Problem Plastic

Context

- ✓ Strong progress made on the seven of the eight original items* with majority removed ahead of legislation, including PVC
- ✓ Initial focus on items that: were often littered, could be replaced with reusable alternatives or hindered the recycling process.
- ✓ Decline in the volume of single-use packaging placed on the UK market.
- ✓ Fast progress on additional six items** added to the list in 2022 to strengthen the ambition
- × Slower progress on PS due, in part, to cost and regulatory barriers.
- × Slower progress on removal of packaging from fresh, uncut produce
- × Greater opportunity to align with Target 2 and strengthen focus on hard to recycle packaging

Priorities

1. Removal of polystyrene and PVC (noting that PVC use in healthcare packaging will take longer to phase out)
2. Removal of packaging from fresh, uncut fruit and veg in line with the Pathway to Selling More Fruit & Veg loose
3. Removal of multi-pack film wrap, PVC cling film, sachets and jiggers for restaurant use, and non-compostable tea and coffee bags and fruit stickers.
4. Remaining challenges for the removal of items on the list addressed through focused Sprint Groups and solutions shared.
5. Eliminating Problematic Plastic list updated to place stronger emphasis on materials which will not be recyclable in the future: for example, multi-material rigids packaging, and to align as a minimum with UK legislation and the European Packaging and Packaging Waste Directive.

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*Single use plastic cutlery, plates, bowls, stirrers, cotton buds with plastic stems and straws.
**Multi-pack wrappers, packaging for uncut fresh fruit & veg, PVC cling film, non-compostable tea & coffee bags and fruit stickers, sachets and jiggers in restaurant settings.

Problematic & Unnecessary Roadmap

By end 2024

Removal of:

- Polystyrene (and if not fully removed, actions plans in place for complete removal by end of 2025)
- Residual PVC (excluding healthcare)
- Multipack wrappers
- Sachets & jiggers in restaurants
- Non compostable tea & coffee bags
- Non compostable fruit stickers
- PVC cling film

Clarity on the feasibility of removing multi-material film and phased targets set by category with deadlines for their removal.

Retailers provide a loose option for priority uncut fruit and veg

By end 2025

Removal of:

- **Non-NIR detectable plastic packaging**
- **Hard to recycle components**

Recyclable alternatives identified for:

- **Pharmaceutical packaging**
- **Category 1* non-recyclable multi-material film (for agreed categories)**

Retailers sell 30% of uncut fresh fruit and veg loose

By end 2030

Removal of:

- **Remaining PVC from healthcare packaging where technically/ regulatory feasible**

Recyclable alternatives or recycling pathways identified for:

- **Category 2** non-recyclable multi-material film for key categories which require further R&D**

Retailers sell 50% of uncut fresh fruit and veg loose by 2030

** Where alternatives are available*
*** Where alternatives are more challenging, eg meat joints*

Target 2: 100% Recyclable* or Reusable

Progress so far

- ✓ 11% increase in packaging that is recyclable in practice and at scale driven largely by reductions in multi-materials, PS, PVS and non-NIR detectable packaging.
- ✓ Industry consensus on design for recyclability and wide-scale adoption of best practice guidance.
- ✓ Nationwide front of store collection points for film as an interim measure.
- ✓ Guidance on use of compostable packaging
- × Delay to the implementation of kerbside film collections and investment in critical infrastructure to sort and reprocess film collected at front of store (now 2027).
- × Lack of clarity on recycling pathways for film
- × Significant proportion of material reported as unknown or other.
- × Delay to the introduction of packaging EPR and modulated fees, expected to drive improvements in packaging design.

Priorities moving forward

1. Redesign of multi-material non-recyclable film and rigid plastic packaging ahead of Simpler Recycling
2. Reduction in the 6% of packaging reported that is unknown
3. Clarity on packaging EPR and modulated fees to drive design improvements
4. Circular solutions identified for residual material that will not be collected and recycled at scale ahead of Simpler Recycling
5. Removal of non-recyclable materials – PVC, PS, non NIR-detectable, hard to recycle components

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**Include compostable as a form of recycling*

Target 2 Recyclability

The art of the possible...

	2022	2025
% recyclable at kerbside	70.10%	**77.49%**
% recyclable kerbside + PP/PE front of store	87.10%	**97.10%**

The route to get there...

Non-recyclable material	**2022**	**2025**
PP film	**9.1%**	**11.7%**
PE film	**7.9%**	**7.9%**
Other/unknown	**5.6%**	**0.0%**
Multi-material film	**2.6%**	**0.5%**
PET film	**2.2%**	**2.2%**
Polystyrene	**1.3%**	**0.1%**
Non-NIR detectable	**0.4%**	**0.0%**
Multi-material rigid	**0.3%**	**0.0%**
Hard to recycled e.g. metal components	**0.3%**	**0.0%**
PVC	**0.2%**	**0.1%**
PVC components	**0.0%**	**0.0%**
Total non-recyclable	**29.9%**	**22.5%**

Recyclability Roadmap

By end 2024

75% of all plastic packaging is recyclable at kerbside

94% of all plastic packaging is recyclable at kerbside or supermarkets

50% reduction in unknown/other reported by members

Removal of multi-material rigid packaging

Greater clarity on the recycling pathways for film

All rigid plastic packaging compliant with design guidelines

By end 2025

78% recyclable at kerbside

97% recyclable at kerbside or supermarkets

PET lidding film recycling pathways identified

Category 1 multi-material film removed and all flexible packaging compliant with design guidelines

Hard to recycle components designed out (metal components, non NIR-detectable components etc)

95% reduction in unknown/other reported by members

Design of compostable packaging compliant with standards and certification scheme rules.

By end 2030

100% packaging designed for recyclability ahead of implementation of Simpler Recycling film collections, leading to 100% packaging classified as recyclable once film collections are fully rolled out in 2028*.

**Achieving this target is contingent on the implementation of Simpler Recycling and clarity on the transition period for collections.*

Target 2: 100% Recyclable or Reusable

Progress so far

- ✓ Wide range of trials underway to test and learn from reuse and refill systems including those supported by UKRI through the SSPP Challenge Fund
- ✓ Greater level of understanding of the operational challenges and barriers and possible solutions, including the role of standardisation
- ✓ Trials undertaken to understand the shopper journey and interventions which are needed to make it easy, attractive and convenient for citizens to engage with refill.
- ✓ Funding secured to extend WRAPs Recycling Locator out to include reuse/refill locations.
- ✓ Strong signalling from European Parliament on future reuse obligations for specific sectors
- × Limited data and evidence on the efficacy of trials and business case for reuse/refill.
- × Lack of clarity on the UK policy direction for reuse/refill
- × Limited cross sectoral collaboration to standardise and deliver reuse systems at scale.

Priorities moving forward

1. Targets, metrics and reporting methodology agreed to support the Reuse Roadmap
2. Use of the reuse accessibility matrix by brands and retailers to prioritise and focus effort
3. Blueprints developed and trialled to scale reuse for high impact/high feasibility product categories
4. International community of practice developed to share insights and agree standards
5. Working with Government to provide clarity of future UK regulation to support the investment and citizen participation in reuse and refill systems
6. Increased citizen awareness of and participation in reuse/refill

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Reuse & Refill Roadmap

By end 2024

Brands and retailers identify priority packaging types/categories for reuse

Blueprint developed and trial(s) planned to standardise reuse in a key FMCG category

Citizen reuse/refill locator developed

International reuse community of practice with the network of Plastic Pacts developed

The benefits of reuse/refill are better understood through improved data capture, insight sharing and reporting.

By end 2025

Each member retailer and brand has commercialised at least two reusable packaging systems.

All brands and retailers share learnings from trials

Reuse/refill systems are increasing; becoming more visible

Reuse targets embedded within the Reuse Roadmap and consistent measurement in place

Clarity in UK policy measures for reuse

Citizens are using the Recycling Locator to find reuse/refill offerings.

Further blueprints refined and developed for standardisation of reuse in additional FMCG categories

By end 2030

European Packaging & Packaging Waste targets delivered for categories in scope

Reuse/refill systems are more mainstream

Target 3: 70% Effective Recycling

Progress to date

- ✓ Investment in new capacity in the UK since 2018 including investment in non-mechanical recycling
- ✓ Significant increase in plastics recycling, including in the UK
- ✓ Inclusion of films in core set of materials for future kerbside collections
- ✓ FPF FlexCollect trials underway in 9 local authorities
- ✓ Implementation of DRS in Northern Ireland and digital DRS trial in Wales.
- ✓ Front of store collection points for film now nationwide
- × Further investment in infrastructure stymied by delays to packaging reforms and the exclusion of mass balance in The Plastics Packaging Tax, leading to capacity shortfalls
- × Limited end markets for film recyclate due to capacity, cost and regulation

Priorities moving forwards

1. Implementation of key packaging reforms
2. Coordination of citizen messaging, labelling and communication campaigns to maximise participation in recycling (DRS and Simpler Recycling) and reduce contamination
3. Completion of kerbside collection trials for film to inform the efficient and effective role out of service provision and dissemination of information
4. Nationwide collection of films and flexibles, including, in the interim, continuation of front of store collection points to support end market development
5. Investment in UK infrastructure for film recycling
6. Clarity on future proposals for export bans
7. Reduced losses during the recycling process due to the development of bale specifications

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Effective Recycling Roadmap

By end 2024

Supermarkets continue to provide collection points for films and flexibles

Supermarkets and brands support end market development

Industry supports citizen campaigns and amplifies messaging to help supercharge recycling rates for key formats

Recycle Week 2024 tackles confusion and uncertainty around recycling.

Recycling industry continues to invest in infrastructure to support roll out of Simpler Recycling.

By end 2025

Kerbside film collection trials completed and insights cascaded

Clarity of infrastructure capacity requirements and business case for investment

Growth in confidence in recycling

Feasibility for UK plastics bale specifications explored to drive up quality and reduce contamination

By end 2030

Consistent collection of all rigid packaging (2026)

Consistent collection of PE/PP film (2027)

Implementation of DRS (2027)

70% effective recycling rate (by 2028*)

Implementation of EPR, Simpler Recycling and DRS policies drive collection rates and funds from EPR are targeted at critical infrastructure and communications activity

Mandatory labelling introduced.

*Achieving this target is contingent on the implementation of Simpler Recycling, DRS and clarity on the transition period for collections and the effective implementation of packaging EPR

Target 4: 30% Average Recycled Content

Progress to date

- ✓ Average recycled content has tripled, predominantly due to increases in PET bottles and trays
- ✓ Challenge Test underway to develop a standard testing protocol to show the cleaning and decontamination efficiency of polyolefin recycling plants when seeking regulatory approval.
- ✓ Support provided to HMRC including site visits to UKPP members to illustrate the challenge of using the current definition of RC and to demonstrate the need for the inclusion of non-mechanical recycling.
- ✓ Role of non-mechanical recycling understood working in concert with mechanical recycling
- ✓ Design specifications driving up quality of recyclate (e.g the reduction in the use of PE liners in PET trays, the removal of colour from caps and closures and the move to mono structures.
- × Lack of acceptance of mass balance in the Plastics Packaging tax and misalignment of definitions over recycled content
- × Regulation prohibits use of recycled content in many food grade applications.
- × Costs and market availability

Priorities moving forwards

1. Plastics Packaging Tax reformed to enable mass balance approach for non-mechanical recycling output.
2. Retailers and brands specify the highest sustainable levels of recycled content where regulation and market availability allow and send clear signals for future demand to support investment.
3. Market developments increase availability of food grade recycled content
4. Tray to tray recycling enables sustained levels of recycled content in PET trays

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Recycled Content Roadmap

By end 2024

28% average recycled content

Retailers and brands specify recycled content in packaging at the highest levels in line with technical limitations and market availability across all products and categories

Response on the Mass Balance Approach consultation within Plastics Packaging Tax

Commitment on the demand for recyclate from end users

Members actively specifying non-food contact recycled content for skin contact packaging use.

Challenge test (P1-3) for rPP developed & published

By end 2025

30% average recycled content*

Output from non-mechanical recycling processes to count as PCR, within Plastics Packaging Tax

Challenge test (P4+) for rPP developed & published

UK tray to tray circularity becoming more prevalent

Further targets set for recycled content beyond 2025

By end 2030

Plastics Packaging Tax recalibrated to incentivise use of recycled plastic and stimulate collections and recycling?

Tray-to-tray recycling is the norm and happening at scale

Recyclate from non-mechanical processes used at scale

Wider approval and acceptance of food grade polyolefins

*Achieving this target is contingent on revisions to the Plastics Packaging Tax

Summary

While the trajectory to 2025 is positive, the implementation of packaging reforms will be essential in: driving up collections and investment in critical UK infrastructure; improved packaging design; and the availability of food grade post-consumer recycled content. Clear signalling by Government of future reuse obligations will also help to galvanise action and overcome the commercial and technical barriers to scaling reuse.

The priority actions for each Target Roadmap are designed to help the sector prepare for the implementation of policy measures beyond 2025, ensuring that they are the final jigsaw pieces rather than further stepping stones towards fulfilling the UK Plastics Pact Targets.

For many of the challenges, solutions already exist. The Pact will continue to share insights, experience and expertise and draw out these solutions through cross-sector collaborations.

The trajectory beyond 2025 will also lay the foundations for a successor agreement to The UK Plastics Pact - building on the strong foundations laid to date and preparing industry for future packaging regulation, in the UK, across Europe and globally as the outcomes of the Global Treaty to End Plastics Pollution negotiations become clearer.

The ambition of the Pact was not designed to be easily fulfilled, system transformation requires value chain collaboration, commitment, innovation, leadership and investment. That is why we are proud of what we have achieved to date, and what we will continue to achieve together as we strive to reduce the impact of plastic packaging, keeping it in the economy and out of the environment.

Together we can. Together we will.

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