
More trash, more cash
Who is really behind the plastic crisis in Spain?
PEPSICO
Coca-Cola
Colgate
ACTIVIA
MILK
Freeway Cola
ecoembes

The information in this document has been obtained in good faith from sources that are believed to be reliable, but any potential interpretation of this report as making an allegation against a specific company or companies named would be misleading and incorrect. The authors accept no liability whatsoever for any direct or consequential loss arising from the use of this document or its contents.

This report was written and researched by the Changing Markets Foundation. The calculations for the cost of littering were provided by Eunomia Research and Consulting.

We would like to thank all of our contributors and reviewers.

Changing Markets FOUNDATION

#breakfreefromplastic

www.changingmarkets.org

www.breakfreefromplastic.org

Designed by Pietro Bruni - toshi.ltd

Printed on recycled paper

Published in March 2021

Contents

List of figures, tables and boxes 4

Executive summary 5

1. Background: the problem with plastic in Spain 9

Box 1.1: Refresh your memory: Delay, distract and derail tactics used by the Spanish plastics industry 10

2. The manipulation of the Extended Producer Responsibility system 13

Box 2.1: Litter clean-ups in Spain could cost the industry up to €744 million per year 14

2.1. Ecoembes' continuous battle against DRS 17

Box 2.2: The kings of greenwashing: Greenpeace exposes Ecoembes 17

2.2. Reciclos: The latest attempt to kill DRS 20

Box 2.3: Reciclos is not a new trick – before, there was Greenredeem UK 23

Box 2.4: Ecoembes reacts to Talking Trash 24

Box 2.5: Ecoembes attacks the media 25

2.3. Ecovidrio: The quiet opponent 26

3. Spanish retailers: Swerving responsibility 29

3.1. Mercadona: One of the biggest opponents of DRS 32

4. A change of heart: The biggest beverage producers support DRS 35

5. Delaying and derailing legislation at the regional and national level 40

5.1. The Balearic Islands: Best-in-class legislation 40

5.2. A response from the government 42

Box 5.1: DRS: Less plastic, more jobs 43

6. Conclusions and recommendations 45

6.1. Recommendations 45

7. References 48

List of figures, tables and boxes

Figures

Figure 2.1: EU Waste Framework and Single-Use Plastics Directive

Figure 2.2: Living like kings: The profitable business of Ecoembes

Figure 4.1: Revolving doors between different industry associations

Tables

Table 2.1: Cost of street litter management in Spain per year

Table 2.2: Cost of managing beach litter per year

Table 2.3: Total litter management costs per year

Table 3.1: Retailers' responses regarding total plastic footprint and position on the implementation of DRS to Changing Markets Foundation 2020

Table 4.1: Response of trade associations regarding their position on DRS and reuse targets

Table 5.1: Treatment of lightweight packaging

Boxes

Box 1.1: Refresh your memory: Delay, distract and derail tactics used by the Spanish plastics industry

Box 2.1: Litter clean-ups in Spain could cost the industry up to €744 million per year

Box 2.2: The kings of greenwashing: Greenpeace exposes Ecoembes

Box 2.3: Reciclos is not a new trick – before, there was Greenredeem UK

Box 2.4: Ecoembes reacts to *Talking Trash*

Box 2.5: Ecoembes attacks the media

Box 5.1: DRS: Less plastic, more jobs

Executive summary

Like many European countries, Spain is struggling with an ever-growing mountain of trash and, within this, the pervasive problem of plastic pollution. Spain is the fourth largest consumer of plastic in Europe as each Spaniard generates over 100kg of plastic waste every year. This addiction to plastic is driving the ever-increasing pollution of the Mediterranean Sea; with Spain the second biggest source of Mediterranean pollution behind Turkey.

Spain is also on the cusp of implementing new targets adopted under the European Union's revised Waste Package and Single-Use Plastics (SUP) Directives. According to the latter, the Spanish government has to implement several new measures, such as more than 90% separate collection and 30% recycled content in all plastic bottles by 2030. It is also required to increase the ambition of several Extended Producer Responsibility (EPR) schemes, which must now cover the full cost of litter clean-ups. Introducing ambitious legislation to implement these targets is not just good for the environment and health – it also makes financial sense. This is a pivotal opportunity for Spain to set the agenda for the next decade, and with it, the country can change course on plastic pollution, moving to higher collection, reuse and recycling rates.

The high costs of littering

Calculations by Eunomia Research and Consulting for this report show that the cost of cleaning up packaging litter on streets and coastal areas alone costs Spanish municipalities and therefore taxpayers up to €744 million every year. Up to €529 million of this is solely the cost of cleaning up littered beverage containers, such as plastic bottles, cans and Tetra Paks. Although these costs are currently covered by public money, EU legislation stipulates that they should be accounted for by EPR schemes, meaning the producers should pay them by the end of 2024 at the latest. For this reason, it is in the industry's interest to adopt effective and well-evidenced litter-prevention strategies, such as deposit return systems (DRS), which would ensure a high rate of separate collection of beverage containers. The introduction of DRS can also be a critical precursor for reuse and a key mechanism to help companies achieve recycled content targets.

More trash, more cash – an obsolete business model

Unfortunately, this report shows that powerful organisations that have successfully prevented any attempt to reform the Spanish waste management system for years are once again gearing up to derail ambitious legislation. Ecoembes, a powerful monopoly in waste management, disguised as an NGO, is spearheading the defence of industry interests. Recent NGO and media reports have exposed Ecoembes as a key vehicle to distract, delay and derail legislation.

Understanding Ecoembes' business model is key to comprehending its outsized influence and reluctance to reform. As a Producer Responsibility Organisation (PRO) its business model depends on licensing fees based on the weight of packaging, which means that Ecoembes benefits from an increase in plastic packaging being put on the market since this represents a greater flow

of income into its coffers. In other words, the current system is built on the premise that as more packaging is created, more cash is received. Ecoembes' sister organisation Ecovidrio, which manages a similar system for glass bottles, operates under an identical business model for glass waste. For both Ecoembes and Ecovidrio, an increase in reuse and reduction in packaging would actually reduce their incomes and undermine their monopoly, which explains why both organisations are so viciously fighting progressive legislative reforms.

Reciclos – the latest attempt to kill DRS

Our correspondence with various industry players and associations has revealed that the industry is aligning itself behind a voluntary return and reward system – a true sticking-plaster solution that has already been rejected in other countries. Reciclos was launched by Ecoembes in 2019 and started operating in May 2020 as the SDR (Sistema de Devolución y Recompensa), which translates as return and reward system. At first sight, Reciclos seems very similar to the DRS which Ecoembes is so fiercely trying to derail: it rewards the consumer for bringing back their plastic bottles and cans. But instead of returning money, Reciclos gives points to the consumer via a smartphone app, which they can exchange for rewards, such as public transportation travel tickets or bicycle rental.

Although the system claims to be technologically innovative, a closer look reveals significant shortcomings: it is complicated, it does not incentivise consumers to return all of their used containers, and it excludes several groups (young people, people who do not own a smartphone, etc.). Also, it is not a viable long-term system, as participating companies can at any time decide to stop offering rewards and other incentives. The roll-out of collection points for plastic bottles and cans is also not widespread. Our sources say that Ecoembes plans only 2,000 collection points for a country of almost 47 million people. It is evident that Reciclos will not enable the industry to meet its 90% separate collection target. If this distraction tactic fools policymakers, then Spain will fail dismally to meet its European targets.

Who's really behind these tactics?

In key decision-making positions in Ecoembes – either on the board or as advisors – sit some of the biggest Spanish retailers and consumer goods companies. Some of these companies – Coca-Cola, PepsiCo, Colgate-Palmolive, Nestlé, Unilever, P&G and Mondelēz International – consistently come up as the top plastic polluters globally in the Break Free From Plastic brand audits.[1] Others, especially big retailers, like Mercadona and Alcampo, have been the most active opponents of progressive legislative reforms on plastic waste. These companies are the same entities responsible for producing the waste that Ecoembes is meant to manage, while at the same time they hold significant power within the organisation and are instrumental in pulling the strings behind the scenes.

Interestingly, the biggest beverage producers – Coca-Cola, Nestlé, Danone and PepsiCo – are all members of European trade groups – the European Federation of Bottled Waters (EFBW) and the European Association of Manufacturers of Soft Drinks (UNESDA) – which have recently come out publicly in favour of a well-designed DRS. These groups rightly say that such system is the only way for their members to achieve collection targets set by the SUP and help close the loop, while at the same time reducing climate emissions. However, in Spain, the same companies are not walking the talk, and they continue to oppose DRS while hiding behind the front of Ecoembes and Ecovidrio.

Similarly, European retailer Lidl has publicly supported DRS in Austria and the UK but continues to oppose it in Spain. This shows that in Spain, these companies prefer to stick to greenwashing solutions while maintaining the status quo. Although this might look like a good strategy in the short term, not meeting the targets set by the EU will prove costly – not just from a reputational perspective, but also due to companies' liability for litter clean-ups, recycled content, etc. This is something that investors in these companies should keep under close scrutiny, as it may affect their bottom line in the future.

Regions taking steps in the right direction

On the positive side, our research also revealed that several Spanish regions are taking steps in the right direction by considering or implementing their own ambitious legislation. The Balearic Islands recently published a groundbreaking study, which highlighted that recycling rates for light packaging in the region are only 25% – confirming that Ecoembes' model will not deliver on EU targets; therefore, a DRS must be implemented. In addition, Valencia has proposed legislation that would oblige producers to set up at least 3,000 reverse vending machines across its territory and require that the consumer receives a cash incentive of at least 2 cents per container returned. This means that these two regions are moving away from a voluntary system like Reciclos, as promoted by Ecoembes.

The Spanish government has a pivotal opportunity to reform its obsolete waste management system and meet the ambitious European targets, while also creating new recycling jobs and saving significant resources on managing plastic pollution. For this to happen, it must not fall for the distractions put forward by plastic polluters and instead form part of the vanguard with other European countries that are taking steps in the right direction, like Portugal and Austria.

1. Background: the problem with plastic in Spain

The plastic pollution crisis is one of the most high-profile environmental issues and has generated widespread public outrage, advocacy campaigns, numerous voluntary company commitments and initiatives. As shown in the Changing Markets Foundation report *Talking Trash: The corporate playbook of false solutions to the plastic crisis*, many of these corporate initiatives and commitments focus solely on end-of-pipe solutions (like clean-ups), instead of addressing the root causes of the problem (e.g. by reducing plastic production). Despite the flurry of voluntary corporate initiatives, the production of plastics worldwide is expected to double again in the next 10–15 years.[2] Plastic waste is entering the ocean at a rate of about 11 million metric tons a year, and this is estimated to triple by 2040.[3]

Spain is one of Europe's top plastic polluters, with an average of 0.28kg of plastic generated per person daily – over 100kg annually – with packaging representing 44.1% of all plastic consumed, while 64.4% of all waste (by weight) is plastic.[4] Plastic waste has also been steadily increasing by 3.5% a year. Furthermore, Spain is the vsecond largest source (after Turkey) of plastic pollution in the Mediterranean Sea[5] – the sixth largest area of plastic accumulation in the world.[6]

Spain is also the fourth largest consumer of plastic in the EU, with a total of 4.6 million tonnes in 2016.[7] The country accounts for 10% of all single-use plastics consumed in Europe, including 3.5 billion soft-drink bottles, 1.5 billion disposable coffee cups, 5 billion plastic straws and 207 million disposable packaging units per year. Moreover, regarding glass, Spain generates around 30kg of waste glass per capita, and over 400,000 tonnes of glass per year are not recycled.[8]

Spain, like all other member states, is currently in the process of transposing the EU Circular Economy Package and the Single-Use Plastic Directive (SUP), under which, among other measures, it has to achieve the objective of 90% separate collection of plastic bottles by 2029 and a minimum of 30% of recycled content in every plastic bottle by 2030. Under this framework, the Spanish government is working to reform the Law on Waste and Contaminated Soils with the view of achieving those targets. However, *Talking Trash* exposed the extensive lobbying activities that the industry – led by Ecoembes – has engaged in to stop progressive legislation that would lead to the implementation of proven solutions such as mandatory deposit return systems (DRS) and binding policies on reuse targets.

This report delves deeper to investigate the actions and tactics of other companies in the plastics supply chain, specifically focusing on retailers and further analysing the activities of Ecoembes and fellow producer responsibility organisation (PRO) Ecovidrio. It analyses in more detail the organisational and financial structures of Ecoembes and Ecovidrio to shine a light on their motivation for blocking meaningful action on plastic pollution.

Credit: *Les Stone*

Box 1.1: **Refresh your memory: Delay, distract and derail tactics used by the Spanish plastics industry**

Talking Trash exposed various tactics to distract, delay and derail progressive legislation to address plastic pollution.[9] Ecoembes was found to be leading the plastic pollution lobby in Spain and using the following tactics:

- Manipulating data and inflating figures on plastic recycling rates to create an illusion that the issue of plastic pollution is under control. Ecoembes claimed that 75.8% of disposable single-use lightweight containers were recycled in 2018.[10] However, Spanish NGOs claimed the true figure was closer to 25%.[11]
- Greenwashing by publishing pompous voluntary commitments that end up being broken or postponed.
- Blaming consumers for not knowing how to recycle, while keeping quiet about the industry's role in the plastics crisis and the need to reform the ineffective recycling system.
- Influencing or directly funding scientific studies to discredit proven solutions.
- Manipulating the media by utilising sponsored content to distract from real solutions and trying to bury undesirable stories.

The latest tactic used by the plastics industry in Spain has been to exploit the Covid-19 health crisis to gain more time and delay implementing the Spanish Strategy for Circular Economy (EEEC). Faced with Spain's new draft Law on Waste and Contaminated Soils, in a statement to Europa Press, the ES Plásticos platform – comprised of organisations such as Cicloplast, the Spanish Association of Plastics Industries (Asociación Española de Industriales de Plásticos- ANAIP), the Technological Institute of Plastic (Instituto Tecnológico de Plásticos - AIMPLAS) and Plastics Europe – demanded the government engage in more 'open dialogue' with the industry.

On behalf of the sector, Cicloplast's general director, Isabel Goyena, used the opportunity to highlight the plastics industry's contributions to fighting the pandemic and the need for more plastics to keep everyone safe from the virus. She demanded a continuation of discussions on the impact of the new regulations and the technical issues that they pose for Spain's plastics industry.[12] In the statement, the platform also blamed consumers for plastic pollution, saying that low recycling rates are due to the lack of consumer knowledge about how to properly sort their waste. [13]





2. The manipulation of the Extended Producer Responsibility system

The plastic packaging sector in Spain operates under the Extended Producer Responsibility (EPR) legislation, whereby companies producing plastic must also pay Producer Responsibility Organisations (PROs) for the costs of managing their waste. The two main PROs for packaging in Spain are Ecoembes for plastics and Ecovidrio, which manages the same system for glass packaging.

EPR schemes for packaging were created following the adoption of EU legislation that made producers accountable and partially financially responsible for the end of life of the products they put on the market. However, existing EPR schemes have been criticised for promoting **lightweighting** (reducing the weight of packaging) instead of recyclability due to a lack of eco-design criteria or eco-modulated fees that would drive better packaging design. A recent investigation by the European Court of Auditors concluded that because most EPR schemes require members to pay fees according to the weight of the plastic packaging they place on the market, there was little incentive for producers to increase recyclability, instead of focusing on lightweighting packaging in order to reduce costs.[14]

In Spain, the implementation of Law 11/1997 on Packaging and Waste, introduced on 24 April 1997, presented for the first time the option for an Integrated Management System which intended to make producers more accountable. The law stated that companies had to be covered by EPR. This obligation could be satisfied in two ways: individually or collectively via DRS; or collectively, through an Integrated System of Waste Management (Sistema de Gestión Integral - SIG). However, five months before this legislation was introduced, Sociedad Ecoembalajes España, S.A. (Ecoembes) was established. According to the Greenpeace report *Ecoembes Miente*, the peculiar sequence of events surrounding the creation of Ecoembes and the law's introduction has raised red flags.[15] Greenpeace claims that Ecoembes was created before it was even officially known that the waste law would encourage the establishment of a waste management system in Spain. Currently, Ecoembes exercises a monopoly on the collection of plastic containers in Spain through agreements with local and regional entities to finance the collection system. This monopoly is key to understanding Ecoembes' outsized influence over many aspects of Spain's waste management and recycling operations.[16]

At the forefront of Ecoembes, some of the major shareholders are the biggest plastic polluters - Coca-Cola, PepsiCo, Danone, Colgate, Nestlé, Unilever, P&G and Mondelēz International. These companies are not only the same entities responsible for producing the waste that Ecoembes is meant to manage but also hold the main positions of significant responsibility within the organisation. Ecoembes thus plays a double role: on the one hand, it acts as a standard-bearer of environmental advocacy and an innovator in technology through initiatives like 'the Circular Lab'; on the other hand, it vigorously lobbies against policies that are not set up for the industry's convenience - especially when it comes to the implementation of a DRS.

According to its website, Ecoembes is officially recognised as a non-profit that acts as the umbrella body for more than 12,300 member companies. These member companies, unlike the shareholders, have no involvement in the capital or any of the corporate decisions of Ecoembes. Instead, these companies sign an 'adhesion contract', which means that by paying the 'Punto Verde'

(Green Dot ™) fee for their packaging, they become exempt from the obligation to manage their own waste. Between 2009 and 2019 the cost of this fee for PET was €0.377/kg. In 2020, the fee increased to €0.433/kg, and the fee for 2021 will increase again to €0.490/kg.[17] As a result, this has incentivised producers only to reduce the weight of plastic packaging in order to reduce the costs they incur from the EPR scheme, rather than increasing recyclability or switching to other alternatives, like reusable packaging. After a company pays the fee, Ecoembes is in sole charge of managing the company's waste.[18]

Box 2.1: **Litter clean-ups in Spain could cost the industry up to €744 million per year**

Packaging products, of which the majority are plastic packaging, are consistently some of the most common litter items found on European beaches and in the seas.[19] Furthermore, street cleaning operations in Spain can cost municipalities from approximately €30 to over €100 per person per year.[20] Litter is therefore an important environmental and financial concern for public authorities. An important consideration for future policy in Spain is also the fact that, according to new European legislation, EPR schemes will now have to cover the cost of litter clean-ups, collection, transport, treatment and awareness-raising measures by the end of 2024 at the latest. This means that a major cost that is currently paid by public authorities and consequently taxpayers will need to be incorporated into the EPR scheme and paid by the industry.

For this reason, the Changing Markets Foundation asked Eunomia Research and Consulting to estimate the total cost of managing packaging and beverage container litter in Spain. The study focused on street and beach litter clean-ups, as the costs of cleaning plastic pollution after it has entered the ocean is more difficult to estimate. Litter data, in general, is scarce in most countries, which can make such calculations challenging. In Spain, this is particularly challenging, as there is a significant lack of reporting of tlitter data and a lack of transparency about waste management in general.

For its calculations, Eunomia used two studies conducted by Amigos de la Tierra (Friends of the Earth Spain) and the University of Castellón on street litter and its composition. It was assumed that packaging is 15–22% of street litter by weight, while beverage containers are 10–18% of all litter.[21] Packaging includes plastic bottles, plastic cups, plastic trays, aluminium cans and foil, steel cans, cardboard, cartons/Tetra Paks and glass bottles. Beverage containers include plastic bottles, aluminium cans, steel cans, cartons/Tetra Paks and glass bottles. Street cleaning costs were estimated using Newtral's Ránking de *Gastos en Limpieza Viaria* database, as it offered the greatest coverage of the population in relation to the researched costs, and it was assumed that 58% of their total street cleaning costs go to litter management.

Table 2.1: Cost of street litter management in Spain per year

	Low total cost	High total cost	Low cost per capita	High cost per capita
Non-beverage packaging (€)	202M	153M[a]	4	3
Beverage container litter (€)	274M	451M	6	10
All packaging litter (€)	477M	603M	10	13t

a It should be noted that the scenarios refer to the range of costs for packaging overall. While the cost of non-beverage packaging decreases in the higher scenario, this is because there is a much higher prevalence of beverage containers in the high composition as a percent of packaging litter, so while the non-beverage packaging costs are lower, overall packaging costs are higher.

For the beach litter calculations, Eunomia used data from the Spanish Ministry of Ecological Transition and Demographic Challenge (Ministerio para la Transición Ecológica y el Reto Demográfico – MITECO), which suggests that packaging materials account for nearly 50% of shore litter by count, and beverage containers are 16% of shore litter by count.[22] Costs were obtained from two sources for these calculations. One set was sourced from KIMO International, which provided a beach cleaning estimate for Spain of between €13,200 and €87,500 per km.[23] Calculations from previous Eunomia research provided an estimated cost for cleaning a bathing beach of up to €40,000 per km for the EU, a similar figure to that found in the KIMO data.[24] Adjusting for inflation yields an estimated range of total beach litter cleaning costs for Spain of between €42 million and €278 million for all litter types.

When focusing on packaging litter, the total cost is estimated to be between €21 million and €141 million each year. The breakdown for different categories can be seen in Table 2.2 below.

Table 2.2: Cost of managing beach litter per year

	Total low	Total high	Per capita low	Per capita high
Non-beverage packaging (€)	9M	62M	0.20	1.30
Beverage container litter (€)	11M	78M	0.25	1.67
All packaging litter (€)	21M	141M	0.45	2.99

Adding the estimates for street and beach litter clean-up costs together leads to a range of total litter costs in Spain, which can be seen in Table 2.3.

Table 2.3: Total litter management costs per year

	Total low	Total high	Per capita low	Per capita high
Non-beverage packaging (€)	211M	215M	4.20	4.30
Beverage container litter (€)	285M	529M	6.25	11.67
All packaging litter (€)	496M	744M	10.45	15.97

Although this estimate does not include other areas where littering also occurs (intercity roads, other natural areas, deep sea, etc.), we can see that if the cost for litter clean-up is added to the EPR scheme, it will significantly increase the costs for the industry, adding up to as much as €744 million per year. For this reason, it would make sense for the industry to support proven litter-prevention strategies, such as DRS. Studies have shown that DRS can reduce beverage container litter from 13% of the total to 2.9%, as demonstrated by Australian states that have DRS.[25] Removing a significant share of beverage containers from litter could save the industry around €400 million.

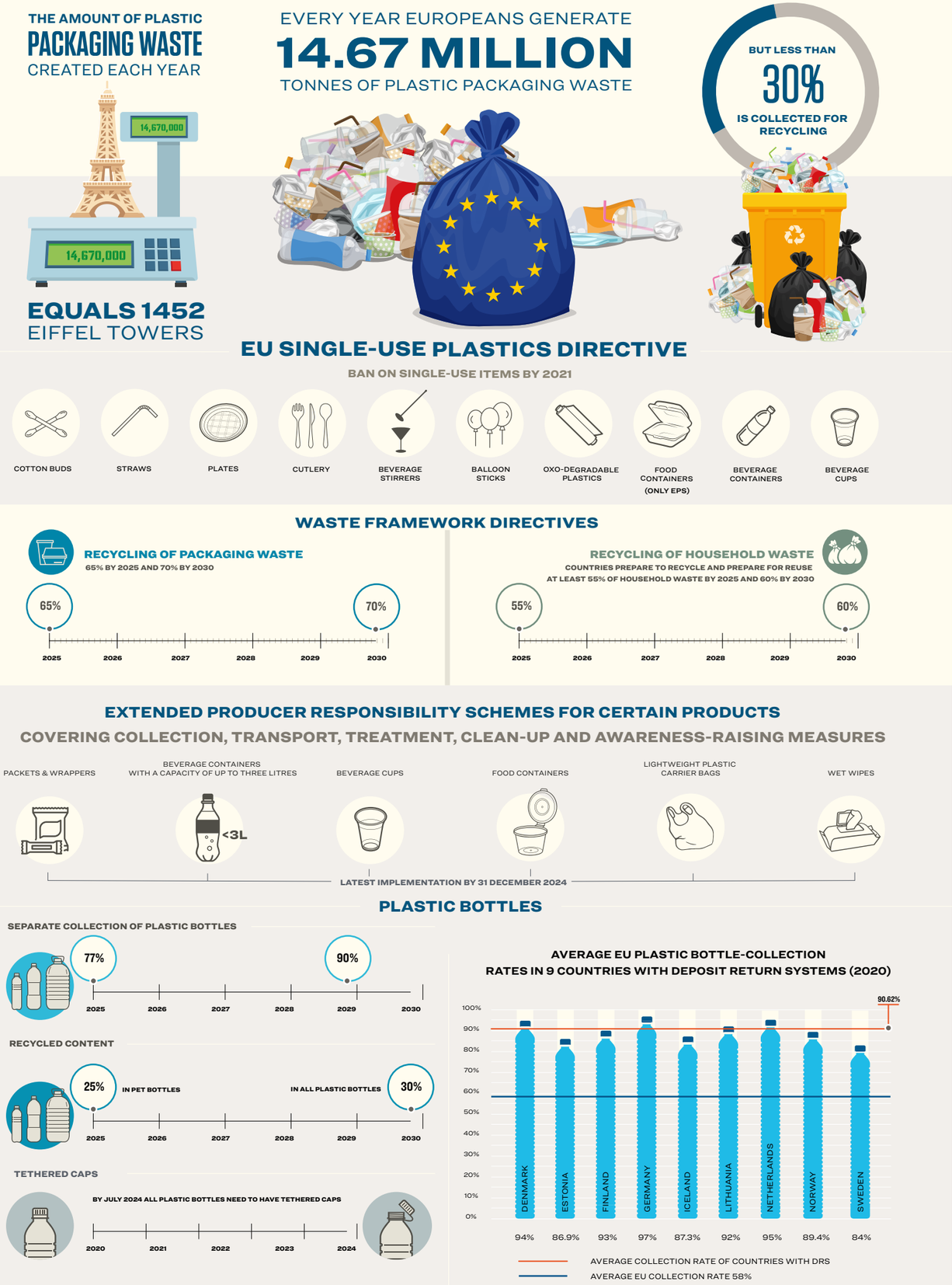


Figure 2.1: EU Waste Framework and Single-Use Plastics Directive

2.1. Ecoembes' continuous battle against DRS

The powerful opposition to DRS has been successful to date in preventing its implementation at the level of autonomous communities and at the national level. The opportunity to introduce such legislation has already occurred at several junctures over the last 20 years.

Over the years, Ecoembes has led the charge against DRS, sponsoring a variety of news articles and scientific studies, and even supporting spurious environmental organisations, such as the Libera Project, which pushes responsibility for the existing litter problem onto consumers.[26] This project advocates for recycling, nature clean-ups and citizen 'education campaigns' as the solution to Spain's littering problems.[27] This distraction tactic involves trying to convince consumers that the litter problem – or 'Basuraleza' as the organisation calls it – can be solved through recycling alone and omits to call for additional solutions such as DRS and targets for refill and reuse. Other false narratives that have been peddled by Ecoembes include arguing that the increased costs of the system will fall on consumers, that the system is not beneficial to the environment, and that it will discourage the recycling of containers that are not included in the DRS.[28]

But the real driver of this entrenched opposition is Ecoembes' own business model, whereby the more single-use plastic packaging that is placed on the market, the more money the organisation receives through the Green Dot™ fee. Ecoembes' income does not depend on



the amount of packaging that actually ends up being collected or recycled, but on the volume of packaging originally placed on the market. The cost of these fees is ultimately also passed to the consumer, but the lack of any incentives or criteria for recyclable designs and packaging materials has resulted in sluggish recycling rates and ever more waste being created by the system.

More than 90% of Ecoembes' income derives from licensing of the Green Dot™.[29] A recent investigation by Greenpeace (*Ecoembes Miente*) showed that in the decade from 2008 to 2018, Ecoembes' revenue grew from €391 million to €579 million.[30] Additionally, Greenpeace also exposed the excessive salaries of Ecoembes' top executives – who include representatives of Danone, Unilever, P&G, Coca-Cola, Promarca, Alcampo and Mercadona (Spain's largest supermarket chain). In 2018, the ten members of Ecoembes' board of directors were paid a total of €2,108,000, with each of them receiving an estimated of €211,000. By contrast, the average wage in Spain for 2018 was just under €28,000.[31]

Box 2.2: The kings of greenwashing: Greenpeace exposes Ecoembes

On 20 October 2020, a new Greenpeace report, *Ecoembes Miente* (*Ecoembes Lies*), revealed further problems with the EPR system run by Ecoembes.[32] The investigation exposed how contracted recycling companies approved by Ecoembes are storing, burying and exporting plastics in an irregular way to Malaysia, Ghana and Indonesia, while continuing to count this as recycling.[33] Among other things, the report explains why Ecoembes reports such high recycling rates: everything that Ecoembes sells to its pre-approved recycling companies is considered to be recycled, regardless of what actually happens to this waste.

MORE TRASH, MORE CASH: THE PROFITABLE BUSINESS OF ECOEMBES

ECOEMBES IN 2018 RECEIVED

€453M
FROM THE GREEN DOT™

90%
OF THEIR INCOME

ecoembes

10%
COMES FROM THE SALE OF RECOVERED MATERIALS TO THE RECYCLING INDUSTRY

€126M
FROM OTHER INCOME

IN 2018, ECOEMBES PAID €2.108 MILLION

TO ITS BOARD OF DIRECTORS

THE EVOLUTION OF THE INCOME OF ECOEMBES



ONE ADVISOR OF ECOEMBES EARNS **2.5 TIMES MORE THAN: THE PRIME MINISTER OF SPAIN**



PRIME MINISTER OF SPAIN RECEIVES
€82,978

THE KING OF SPAIN RECEIVES
€242,769

THE QUEEN OF SPAIN RECEIVES
€130,092

Figure 2.1: Living like kings: The profitable business of Ecoembes

EACH BOARD MEMBER RECEIVED APPROXIMATELY **€211,000**/YEAR

ecoembes
BOARD OF DIRECTORS

VICE PRESIDENT I	SECRETARY	CEO	VICE PRESIDENT II	PRESIDENT
JAVIER SOLANS SENÉN	IGNACIO LARRACOECHEA JAUSORO	ÓSCAR MARTÍN RIVA	JAIME RODRÍGUEZ BERTIZ	XAVIER ORRIOLS ARUMI
GENERAL DIRECTOR OF SPAIN AND PORTUGAL, PROCTER & GAMBLE	PRESIDENT PROMARCA	REPRESENATIVE OF ECOEMBES	PRESIDENT EUROMADI IBÉRICA S.A	DELEGATE ADVISOR DE NUEVA PESCANOVA S.L.
AGAINST DRS	AGAINST DRS	AGAINST DRS	AGAINST DRS	AGAINST DRS

ADVISORS

JORDI MIRÓ GASET COMMERCIAL GENERAL DIRECTOR DANONE S.A. IN FAVOUR OF DRS	TOMÁS PASCUAL GÓMEZ-CUÉTARA PRESIDENT FIAB/ CALIDAD PASCUAL S.A.U. AGAINST DRS	MANÉ CALVO GARCÍA-BENAVIDES CEO LUIS CALVO SANZ S.A. AGAINST DRS	JAVIER LÓPEZ ZAFRA DIRECTOR OF EXTERNAL AND INSTITUTIONAL RELATIONS L'OREAL SPAIN S.A. AGAINST DRS
JEROME DU CHAFFAUT GENERAL DIRECTOR UNILEVER SPAIN S.A. UNKNOWN POSITION	GUILLERMO VALLÉS ALBAR PRESIDENT RECICAP ESPAÑA S.L. AND DIRECTOR OF SUPPLY OF SAICA AGAINST DRS	JUAN IGNACIO DE ELIZALDE DIRECTOR GENERAL REFRESCOS ENVASADOS S.A. (GROUP COCA-COLA) IN FAVOUR OF DRS	ANTONIO BALAIRÓN RUÍZ GENERAL DIRECTOR ANEP AGAINST DRS
MARCELO MIRANDA RENAU DIRECTOR GENERAL CICLOPLAST AGAINST DRS	DAVID CID LEÓN GENERAL DIRECTOR FOR PURCHASES DERIVED FROM OIL MERCADONA S.A. AGAINST DRS	PEDRO ALONSO VILLOSLADA DIRECTOR GENERAL SUPERMARKET ALCAMPO AGAINST DRS	

© CREDIT: GREENPEACE (2020) ECOEMBES MIENTE [ONLINE] AVAILABLE AT: https://es.greenpeace.org/es/en-profundidad/ecoembes-lo-reyes-del-greenwashing/

Ecoembes disputed Greenpeace's accusations, arguing that it will continue to focus on its *2016–2020 Strategic Plan*.[34,35] A closer look at this plan reveals its lack of ambition: expanding recycled content and lightweighting are the key objectives. Ecoembes claims to reduce the environmental footprint of packaging by reducing the average container weight by 20%, which would result in savings of 530,000 tons of material. As outlined earlier in this report, lightweighting has been a key strategy of the industry for decades, but it has not achieved any reduction of packaging on the market or resulted in any increase in recycling rates. The commitment to increase the amount of recycled content in packaging seems to be an empty promise, as it is not accompanied by a concrete target or strategy to achieve this. The main highlight of the strategy, which *'pursues a very specific and ambitious goal'*, is to achieve a recycling rate of 80% of domestic packaging by 2020. As several Greenpeace reports have shown, this objective has clearly failed, given that only 25% of packaging collected through Spain's yellow recycling bins is actually recycled.[36]



Credit: Sonny Tumbelaka

2.2. Reciclos: The latest attempt to kill DRS

At the pinnacle of the organisation's greenwashing attempts, Reciclos was created as part of the research efforts at 'TheCircularLab' or Circular Economy Innovation Centre established by Ecoembes. Reciclos was launched in 2019 but only started operating on 21 May 2020 under the acronym of SDR (Sistema de Devolución y Recompensa) – Return and Rewards System.[37] As Ecoembes has been the strongest opponent to the introduction of a mandatory DRS system, at first glance it seems ironic that Reciclos imitates the principle of DRS: consumers are rewarded for returning their beverage containers to a type of reverse vending machine or putting them in the regular yellow bin. A closer analysis of Reciclos reveals numerous flaws and limitations to the project and the clear intentions of Ecoembes to use this voluntary system as a tactic to undermine the introduction of DRS.

The Reciclos initiative claims to be very technologically innovative, described as a digital recycling system. Using the mobile app, the customer photographs the can or plastic bottle and scans its QR code before placing it in the special machine or in a normal yellow bin, where another QR code has to be scanned. This effort is rewarded with one point per container, known as a 'Reciclos point'. Collecting these allows consumers to participate in raffles, purchase travel tickets, rent bicycles, receive discounts at certain selected stores, etc.[38] However, the initiative has faced a significant backlash from environmental NGOs and even political leaders such as Juantxo López de Uralde – President of the Commision of Ecological Transition in Congress – who asserted that Reciclos is nothing more than another distraction tactic to divert attention from a real solution.[39]

A closer look at the project quickly reveals that it is a true sticking-plaster solution – a short-term distraction to block any real reform of the current system. The use of the smartphone app might seem quite cutting edge, but it effectively impedes access for anybody who might want to recycle but does not own a smartphone. Additionally, the maximum number of 'Reciclos points' an individual can collect is ten per week which means that there is no incentive to recycle all the plastic bottles and cans that a person consumes.[40] Although Ecoembes says that limiting the total number of containers an individual can return disincentivises the consumption of single-use containers, in reality it only reduces the incentive to return empty packages. As the system only relies on photos submitted - without verification – it is also potentially open to fraud, as people could for example just submit different photos of the same bottle.

The small print of the Reciclos scheme reveals further limitations regarding accessibility, convenience and functionality:

- Only three individuals per household can register on the app.
- The collection machines are located in very few cities across the country.
- Citizens under the age of 14 years old are not allowed to use the system.

In response to a letter sent by Changing Markets, Ecoembes said that Reciclos is available in 22 towns across Spain. By the end of 2020, it claimed that 2.7 million inhabitants would have access to the system and it intended to install 100 machines in public transport stations and shopping centres in different parts of the country.[41] This is a trifling effort in a country with a population of 46.94 million citizens and sales of 3.5 billion plastic bottles and 8.5 billion cans per year.



Using the Reciclos app to return the plastic bottle to the yellow bin.

Credit: *Mané Espinosa from La Vanguardia*[42]



Reciclos reverse vending machine to return plastic bottles and cans.

Credit: *Ernesto Ainaud from El Pais*[43]

One of the most controversial aspects of Reciclos is its misleading marketing and self-definition using the designation SDR. The official term for DRS in Spain is SDDR – Sistema de Deposito, Devolución y Retorno – yet Ecoembes chose to call Reciclos an SDR – Sistema de Devolución y Recompensa (Return and Reward System). The name is just another distraction tactic from Ecoembes to generate confusion among citizens and government officials by its similarity to the Spanish term for DRS – a system Ecoembes has opposed for decades.[44] Furthermore, just like in a DRS, Reciclos uses reverse vending machines to accept the return of empty beverage containers, but it does not pay users money for this as a genuine DRS would. Instead, the 'Reciclos points' support collaborative projects, which depend on the goodwill of participating companies and are unlikely to be sustained over the long term. At the time of writing (January 2021), the Reciclos app showed that many parts of the country where the system was supposed to be working had no active collaborative projects and no raffles in which the public could participate.[45]



Official website of Reciclos app showing: 'no active raffles at this time'.

Credit: *Reciclos App[46]*



Official website of Reciclos app saying: 'We are currently working to add new collective projects that can help your municipality. Until then, please keep participating in Reciclos. Check the future raffles you can participate in'.

Credit: *Reciclos App[47]*



Official website of Reciclos app saying: 'We have yet to finalise the community projects. Collaborate so that we can complete them'.

Credit: *Reciclos App[48]*

According to the environmental consultant Alberto Vizcaíno, Reciclos '*does not serve to disincentivise consumption of plastic containers nor to increase the collection capacity, given that in the end the empty containers go in the same yellow bin, which is a system that is already obsolete and that will not increase the recycling figures*'.[49] The General Director of Quality and Environmental Assessment at MITECO, Ismael Aznar, who participated in a recent event organised by the Alianza Residuo Cero (Zero Waste Alliance), acknowledged that the Spanish government is far from meeting its objectives for waste prevention, reduction and reuse. He also said that Reciclos '*wasn't an alternative to DRS, they are very different things*'.[50,51] In addition, the recent legislative proposal by the Valencian Community also de facto rejected the idea of Reciclos, because the proposal required at least 3,000 reverse vending machines to be set up across the territory and that the consumer should receive a cash incentive of at least 2 cents per container. This means that a points-based system with very few special collection machines – our research indicates that Ecoembes only envisages 2,000 of them across the whole of Spain – is not a solution that the Valencian government considers to be in line with the ambitious EU legislation. Furthermore, Ecoembes recently proposed that the costs of setting up this system should be funded by European or post-Covid recovery funds, which directly contradicts the recently adopted SUP, according to which the costs of waste management should be funded by producers. It even contradicts one of the most basic legal principles of the European Union: the polluter pays principle.[52]

In a direct response to Changing Markets, Ecoembes said that the evolution of Reciclos has the support of the industry and that Ecoembes is working with companies and public bodies to develop this model further in order to achieve the new EU objectives. This response once more confirms that Reciclos is a key part of the tactics Ecoembes uses to derail legislation and distract from true accountability for the plastics crisis.



Overflowing yellow bins in the Vall d' Aran in the province of Lleida.

Credit: *Changing Markets Foundation*



Yellow bin in Vall d' Aran with the Reciclos logo and instructions.

Credit: *Changing Markets Foundation*

Box 2.3: **Reciclos is not a new trick – before, there was Greenredeem UK**

Reciclos markets itself as the most innovative project pushing the '*recycling of the future*' that '*rewards citizens for their everyday conscious environmental actions*'.[53] However, this is not the first time there has been an initiative of this kind. In 2019, a similar pilot project was launched in the UK by the company Greenredeem, claiming to represent an effective and economically viable alternative to DRS.[54] The pilot project ran between January and December 2019 across 25 schools in the Royal Borough of Windsor and Maidenhead in England. The project involved the introduction of 'interactive recycling kiosks' or reverse vending machines at each participating school, rewarding pupils with a five-pence donation for every plastic bottle returned that went back to the school. Each participating school had a maximum cap of 40,000 bottles equivalent to £2,000.[55] Promoted using videos, images and fun environmental games, the scheme focused on incentivising recycling through education.[56] At the end of the project, Greenredeem published the results together with a call to the UK government's Department for Environment, Food & Rural Affairs (Defra) to reject DRS, as the pilot supposedly proved that a voluntary '*scalable solution linked to education*' was readily available instead of the government's plan

to introduce '*costly*' DRS in England.[57] Greenredeem and the Institute of Economic Affairs (IEA) claimed that a '*DRS for drinks cans and bottles is expected to cost almost £1 billion to set up (and £814 million per annum thereafter) to collect recyclables worth circa £37 million, based on the projected value of the material by Defra*'.[58]

Ultimately, the UK government did not fall for this false solution promoted by the industry to avoid the introduction of mandatory measures. Defra is currently working to introduce a DRS from 2024 in order to ensure that producers pay the full costs of collecting and managing packaging waste.[59]

While Reciclos looks like a new project in Spain, it is just an imported industry tactic that has been used in other countries, and as in other countries, the industry will try to use this small-scale voluntary project to derail and delay the introduction of mandatory DRS. The Spanish government and progressive companies should see Reciclos for what it is and distance themselves from it, as it can never achieve the ambitious targets in SUP or replace the effective separate collection mechanisms needed to meet the EU legislation.

Box 2.4: **Ecoembes reacts to *Talking Trash***

The *Talking Trash* report, released in September 2020, included a case study on Spain, exposing the efforts of Ecoembes to distract, delay and derail ambitious legislation in Spain. This received broad media coverage and widespread attention across social media, ranging from citizens, politicians and NGOs to waste experts and academics.

As soon as the investigation was published, Ecoembes quickly mobilised its propaganda machine through sponsored content in the Spanish media. For example, El Diario.es, LaSexta.com and ElPaís.com all published sponsored articles reinforcing the importance of recycling through the yellow bin and emphasising the role of Ecoembes in coordinating these measures. Ironically, all of these articles were accompanied by messages about the importance of 'independent journalism'.[60]

Nonetheless, the *Talking Trash* report received widespread coverage from numerous news outlets, including the largest media agencies in Spain: EFE Press Agency[61] and Europa Press.[62] Ecoembes not only intended to downplay the huge media coverage to its members, but in response to the *Talking Trash* report, it sent an email accompanied by a written statement to its more than 12,000 members. The letter downplayed the report's revelations in an effort to assuage the concerns of corporate members and allies, primarily focusing on discrediting the content of the report:

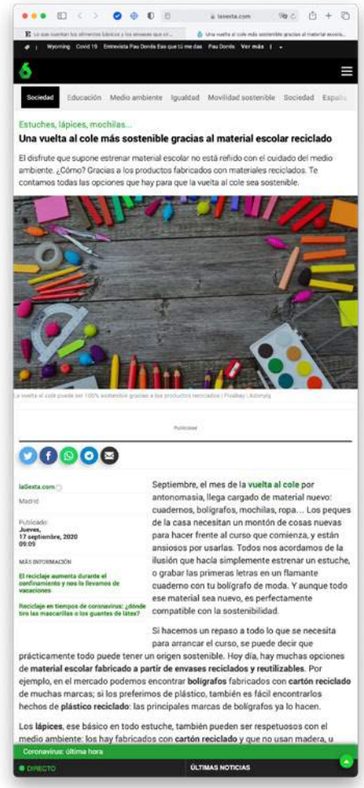
> '*We do not think it is worth going in depth into each one of the statements presented in the report, mainly because they have not said anything that we have not heard from other Spanish environmental organisations in the past, like Rezero. However, when presented and exposed in the manner that it was and seeing all of that information compiled together, it is overwhelming and tough to read, it is certainly a lot for one to handle. At least so far, the report has had very little reach in the traditional media and mainstream social networks, but its own authors are taking care of its dissemination at the institutional level. Therefore, we have put together a statement of our own that will be used proactively to tackle any information requests regarding this report.*'
>
> Letter from Ecoembes to its members.

Ecoembes also reported to its members that it had proactively reached out to decision-makers, with letters sent to both the General Director of Environmental Quality and the Deputy Director General of Circular Economy at MITECO. The letters urged the legislatures to analyse all the information and figures sent by Ecoembes so that '*reliable data*' could be used, as opposed to the data in the Changing Markets Foundation's report.



Sponsored content paid for by Ecoembes published by the news outlet ElDiario.es – 'The hidden business of recycling: A myth or reality?'

Credit: *El Diario.es*[63]



Sponsored content paid for by Ecoembes published by the news outlet LaSexta.com – 'Going back to school is more sustainable thanks to recycled school material.'

Credit: *La Sexta*[64]



Sponsored content paid for by Ecoembes published by the news outlet ElPaís.com – 'What our basic products tell us and the packaging used for their commercialisation.'

Credit: *El País*[65]

Box 2.5: **Ecoembes attacks the media**

Following publication of several critical reports by NGOs and the media, Ecoembes has switched to more aggressive tactics.[66] A shocking article released by Merca2 – an online media outlet– analysed in greater detail '*the other face of Ecoembes*'.[67] The article included numerous criticisms of the monopolistic model used by Ecoembes and revealed the '*exorbitant salaries for its managers*', which have increased by up to 56.4% for a selected few, in addition to accusations of possible tax avoidance issues with the Spanish treasury.[68]

Ecoembes sent a letter threatening legal action and demanding a public retraction, including removal of the controversial articles, by two media outlets – Merca2 and Moncloa.com.[69] Both remained unmoved, assuring that they '*do not have the slightest intention of rectifying the published article*' given that the information '*is truthful*' and the opinions expressed '*are fully subject and adjusted to the exercise of the right to freedom of the press, expression and information*'.[70]

2.3. Ecovidrio: The quiet opponent

As DRS is being considered across many European countries, the glass industry has emerged as one of its key opponents. In many countries the glass industry has been seeking to undermine the introduction of DRS or lobbying for exemptions for glass containers. Glass manufacturers even came up with their own voluntary commitment at the EU level to achieve 90% recycling rates by 2030. In Spain, Ecovidrio is the PRO in charge of managing glass containers – and it is also lobbying against effective solutions to the waste crisis.

Unlike plastic and other packaging waste, in Spain there is a long precedent of refillables for glass. A common phrase used by many Spanish citizens when it was the time to return their refillable glass containers used to be 'devolver el casco' ('take back the empties'). Before the approval of the current Container Waste Law of 1997, most of the commercial establishments in Spain – predominantly small neighbourhood shops but also supermarkets – operated a deposit system for certain glass containers (primarily bottles for beer, wine, milk and some soft drinks). After the approval of the new law, in combination with a growing trend for companies to switch to cheap, mainly plastic, single-use packaging, the fate of this system was sealed.

There have been calls in Spain to introduce a DRS that also covers glass bottles, as this would be more conducive to reuse and refill systems. The suitability of glass has been proven by the fact that glass bottles can be refilled up to 25 times as opposed to 15 times for refillable PET bottles.[71] In terms of greenhouse gas (GHG) emissions, further research was also conducted by Utrecht University, Zero Waste Europe (ZWE) and Reloop comparing the environmental impact of reusable and single-use packaging, with reusable glass bottles providing 83.3% fewer GHG emissions than lightweight (750ml) single-use glass bottles.[72]

Established in 1995, Ecovidrio is a smaller PRO, with a total income of €70.4 million in 2019[73] – almost ten times less than Ecoembes.[74] Also operating as a non-profit, and similarly responsible for managing the Green Dot™ for glass containers, Ecovidrio is financed by 8,394 member companies. Of these companies, a total of 5,827 are also members of Ecoembes.[75] Ecovidrio operates on behalf of its member companies, which in turn are also members of the Spanish Federation of Spirits (Federación Española de Bebidas Espiritousas – FEBE), the Spanish Association of Cider (Asociación Española de Sidras – AESI), the Spanish Wine Federation (Federación Española de Vinos – FEV) and the Spanish Brewers (Asociación de Cerveceros de España). These associations hold permanent member positions on the board of directors of Ecovidrio, with the president coming from the Damm group, one of the biggest breweries in the country.[76] The general assembly is composed of 24 of the largest glass packaging companies – ANAREVI, AESI, Ba Vidrio, Bacardi Spain, Codorniu, Spirits Spain, FCC Ámbito, FEV, Freixenet, Grupo Mahou San Miguel, Heineken Spain, Hijos de Rivera, Maxxium Spain, Miguel Torres, OI Europe Sarl, Pernod Ricard Spain, Andalusian Glass Reclaimer, Glass Reclaimer of Barcelona, Damm, Santos Jorge, Valle, Ballina and Fernández, Verallia Spain and Vidrala.

Currently, there are more than 225,000 green recycling bins for glass disposal throughout Spain. This is equivalent to one green bin for every 208 inhabitants, with 50% of the glass containers recovered coming from the hospitality sector.[77] A total of 75% of Ecovidrio's income derives from Green Dot™ licensing fees, while the remaining 25% comes from the sale of recycled glass to companies that manufacture glass containers.

2.3.1. *An array of tactics: From data manipulation to lobbying politicians*

Ecovidrio's business model disincentivises reduction and the reuse of glass containers, in a similar manner to that of Ecoembes. Simply put, the more single-use glass is put on the market, the more money Ecovidrio makes. Ecovidrio is also notorious for its lack of transparency. In its 2019 sustainability report, Ecovidrio claims that, currently in Spain, seven out of ten glass containers that companies put on the market are collected, but provides no data to support this claim.[78]

Ecovidrio has not published glass recycling figures since 2017. It claims that, following the change in the EU guidelines, MITECO is working on modifying the calculation methodology and this is the reason why the organisation has not published more recent data.[79] However, Ecovidrio confirms that it is responsible for supplying the vast majority (81.2%) of the data used to prepare the official recycling rate for glass container waste in Spain.[80] For this reason, it seems strange that it is holding back more recent data.

The *Talking Trash* report exposed a typical industry attempt by the glass industry to distract and derail the introduction of mandatory legislation by publishing a voluntary commitment to '*Close the Glass Loop*' at the end of June 2020.[81] With glass recycling rates currently at 76% in Europe, the glass industry committed to voluntarily increase the average EU collection rate of used glass packaging to 90% by 2030. At the same time, it would also improve the quality of recycled glass, so '*more recycled content can be used in a new production loop*'.[82] The platform works in partnership with various local organisations through 'action plans' which are co-led in Spain by Ecovidrio and the National Association of Glass Container Manufacturers (Asociación Nacional de Fabricantes de Envases de Vidrio – Anfevi). However, a closer look at the strategic plan reveals that this is just another tactic to push for a voluntary approach and prevent glass from being included in upcoming DRS in different EU member states. There are numerous examples of glass industry lobbying in Spain. Beverage and bottling companies exerted massive pressure on the Catalan government in 2015, which forced it to postpone implementing a DRS.[83] In 2016, Ecovidrio publicly stated its rejection of a DRS in Valencia, asserting that the project was not viable, in support of Ecoembes' stance on the matter.[84] Consequently, in 2019, Ecovidrio published an interview with the Managing Director of the Extended Producer Responsibility Alliance (EXPRA) claiming that '*implementing a DRS would destroy a system that works very well*'.[85]

Ultimately, it is impossible to reach levels of over 90% without DRS yet Ecovidrio's strategic plan for 2020–2025 presents the implementation of DRS as the main threat to the glass industry.[86] Using a variety of lobbying tactics, Ecovidrio has also fostered close relationships with political representatives at the highest levels of government, whom it has lobbied in tandem with Ecoembes.

2.3.2. *A chip off the old block: Ecovidrio in the media*

Following in the footsteps of Ecoembes, Ecovidrio maintains a strong relationship with the Spanish media. Ecovidrio has also courted famous figures for collaborations, such as artists (Lolita Flores, Manu Carrasco), athletes (Rafael Nadal, Gerard Piqué) and celebrities (designer Agatha Ruiz de la Prada organising a fashion collection with Ecovidrio).[87] Ecovidrio has even embraced other social causes, ranging from environmentalism to gender equality. For example, in October 2020, Ecovidrio launched the campaign 'Recycle for Them' to commemorate International Breast Cancer Awareness Day. The campaign urged citizens to recycle, and for every container deposited in the special pink bins, Ecovidrio would make a donation to aid cancer research and prevention.[88] While these are all seemingly laudable initiatives, such distraction tactics have been used over and over again by consumer brands and PROs as a strategy to show that they are part of the solution and to make customers think that real change is happening. In reality, end-of-pipe solutions continue to cover up the fundamental issue and undermine real change such as DRS and reuse policies.



Collaboration between Ecovidrio and Agatha Ruiz de la Prada.

Credit: *Agatha Ruiz de la Prada*[89]



Mercedes-Benz Madrid Fashion week 2016 collaboration between Ecovidrio and Agatha Ruiz de la Prada.

Credit: *Living Backstage - Ecovidrio*[90]

Rafael Nadal recycling glass for the campaign 'Recycle Glass for Balls'.

Credit: *Imgur*[91]



In 2019, Ecovidrio spent €4.2 million on '*advertising, marketing and public relations*' and allocated 10.6% of its total income (equivalent to €7.4 million) to '*citizen awareness campaigns, communication and corporate affairs*'.[92] That year, Ecovidrio garnered 8,153 pieces of news coverage, sent 394 press releases, organised 199 press conferences, and bestowed a long list of awards to outstanding journalists, such as Julia Otero (from the Onda Cero radio station). At the time of the awards, the president of Ecovidrio, Luis de Javier Esteban, used the opportunity to remind everyone that '*Spain has managed to reach recycling rates of glass containers close to 70% and, in large part, it is due to the crucial work carried out by the media*' – a clear example of the tight-knit relationship between Ecovidrio and the media.[93] It is worth noting that DRS – a legislative solution that Ecovidrio opposes – frequently reaches rates of 90% separate collection and recycling for glass bottles, while also being a critical precursor for reuse.

2.3.3. Ecovidrio continues to reject and resist real solutions

In a response to a letter from Changing Markets, Ecovidrio confirmed once more that it considers DRS for glass containers in Spain unnecessary at present due to the '*good results of current collection and the recycling rates achieved*'. Ecovidrio claims that Spain's green recycling bins – which only collect glass bottles, excluding all other items made out of glass – allow for the recovery of the highest quality material which can be recycled an infinite number of times. Additionally, Ecovidrio continues to claim that the European experience shows that glass recycling bins make it possible to reach recycling rates for glass containers of over 90% and encourage reuse of all kinds of containers and products when this is the most sustainable option available. The recent study by Reloop, ZWE and Utrecht University shows that single-use glass bottles have the highest overall climate impact compared to alternative materials, but reusable glass bottles perform very well.[94] With its positioning, Ecovidrio is opposing the most environmentally friendly option: reusable glass bottles that are collected and refilled through mandatory DRS.

3. Spanish retailers: Swerving responsibility

As both major users of plastic packaging and the most vociferous opponents of DRS, Spain's retailers are key actors in the debate over DRS and separate collection. However, their brand equity is not as vulnerable to the reputational damage incurred by consumer brands, as their own-brand products do not end up in the environment as litter to the same extent. Thus, even if a retailer sold the products that pollute the environment, they are often not identifiable as belonging to that retailer.

A Greenpeace report, published in December 2019 focusing on the retailers, assessed the plastic-reduction commitments of the eight largest supermarkets in Spain. This report revealed that Spanish supermarkets' ambition is limited, with most of their pledges involving lightweighting or swapping single-use plastic for single-use biodegradable packaging.[95,96] This is consistent with how the EPR schemes and their fee structures have been driving lightweighting instead of increased recyclability or reuse.

Additionally, the supermarket and retail associations exert a huge amount of political influence and have conducted lobbying by proxy via trade associations (which represent industry interests) against DRS at the national level. The Spanish Federation of Food and Beverage Industries (Federación Española de Industria de Alimentación y Bebidas – FIAB) has been particularly vocal about the issue,[97] with the organisation's 2016 annual report publicly stating its opposition to DRS based on the Ariadna Study – a study opposing DRS supported by Ecoembes, Ecovidrio and other industry associations[98]

Mercadona is stil one of the biggest opponents to DRS and effective solutions to the plastic crisis.



– and declaring that the best system is the one in place, provided by Ecoembes and Ecovidrio.[99]

As part of our investigation, the Changing Markets Foundation contacted the 12 largest retail chains in Spain, all of them members of Ecoembes, regarding their policies on plastic. We asked them about their total plastic footprint in Spain and where they stood on the issues of mandatory plastic legislation – such as DRS – and the implementation of other strategies – such as reuse – to tackle plastic pollution.

Out of the 12 retailers we contacted, only two replied to the questions posed. Carrefour, Aldi, Eroski and Leroy Merlins did not respond to any of our communications. Alcampo, El Corte Inglés, Mercadona, Ikea and Toys 'R' Us replied but did not directly answer any of our questions regarding their annual plastic footprint, nor did they detail the company's position on DRS. Inditex directly replied to only one of the four questions. Lidl responded but did not provide specific answers regarding their plastic footprint, nor their official position on DRS. **Dia** was the only retailer that was willing to disclose its total plastic footprint - 556,404kg in 2019 (excluding packaging) – and seemed potentially forthcoming towards the possibility of implementing a DRS as long as '*there is support from all stakeholders involved*'.

- **Alcampo** directed us to a link to its plastic policies which does not give any information on the company's plastic footprint, nor its position on DRS.[100]
- **El Corte Inglés** responded to our email; however, it requested a meeting on a date after the deadline to answer the letter had passed.
- **Ikea** did not respond to any of the questions and stated that it '*did not have the necessary resources at this time to respond*' *to our inquiries*.
- **Toys 'R' Us** replied with what seemed to be an automated email that confirmed it had received our letter and that we would receive an answer in two working days. No answer was received after that.
- **Mercadona** replied but did not answer any of the questions. Its response presented the company's latest commitment, launched in September 2020, called 'Strategy 6.25', which is explored further in the next section. This strategy contains no information on the company's plastic footprint, nor its position on DRS.
- **Lidl** did not provide its total plastic footprint but assured us that it would reduce its use of plastic by 20% by 2025 and guarantee the recyclability of 100% of its packaging by the same date. Lidl did not fully clarify its position on DRS but highlighted that it had implemented the system in Germany.
- **Inditex** pointed out that it has been '*working for years to reduce its use of plastic throughout its value chain*'. It assured us that in 2020 it was working towards the '*total disappearance*' of plastic bags in store and online. Inditex intends to eliminate 100% of single-use plastics by 2023, through its 'Green To Pack' initiative. Regarding support for DRS, it deflected the question and did not provide a concrete answer on its stance.

Of the 12 retailers analysed, most are not transparent about their plastic footprint, nor do they seem to have any tangible plans to reduce single-use plastics by 2025. Failure to respond to our enquiry is simply not good enough as it indicates a total indifference to this important issue and a lack of transparency about operations and policies on single-use plastic. Of the companies that did respond, we mostly received vague, evasive and non-substantive replies, which are equally unacceptable. In summary, these inadequate responses indicate that the majority of retailers in Spain are swerving their responsibilities on plastic pollution.

Given the plastics crisis facing the world at present, the overall unenthusiastic and lacklustre response from these retailers highlights a shameful disregard for their crucial role in tackling the plastic pollution problem. The majority of retailers do not have robust strategies to reduce their plastic footprint, nor the level of transparency needed to see these through. Their lack of response highlights the need for immediate government action.

Table 3.1: Retailers' responses regarding total plastic footprint and position on the implementation of DRS to Changing Markets Foundation, 2020

Retailers	Total plastic footprint per year in Spain	Retailer's position on the implementation of a DRS in Spain	What other strategies does the company intend to implement to reduce its plastic footprint?
LIDL	NOT DISCLOSED *Reduction of plastic use by 20% and 100% recyclable packaging by 2025	EVADES QUESTION *Implements technical solution that best fits the existing regulation and waste management system in force *DRS is one of the existing options in some of the markets in which Lidl operates, such as Germany	REset Plastic roadmap Initiative: reduce plastic consumption by 20% between 2017 and 2025 100% of the plastic packaging products from Lidl's own label recyclable
El Corte Inglés	NO ANSWER	NO ANSWER	NO ANSWER
Carrefour	NO ANSWER	NO ANSWER	NO ANSWER
Dia	556,404kg in 2019 (excluding packaging) – 100,500kg less than in 2018	YES *Coordinated response of the retail sector required	*Designing new sustainable development strategy to reduce plastic footprint
Alcampo	NO ANSWER	NO ANSWER	NO ANSWER
ALDI	NO ANSWER	NO ANSWER	NO ANSWER
EROSKI	NO ANSWER	NO ANSWER	NO ANSWER
MERCADONA	NOT DISCLOSED	EVADES QUESTION *New Strategy 6.25 does not mention DRS	New Strategy 6.25 introduced September 2020: supermarket plastic reduction better plastic waste management
IKEA	NO ANSWER	NO ANSWER	NO ANSWER
Toys R Us	NO ANSWER	NO ANSWER	NO ANSWER
LEROY MERLIN	NO ANSWER	NO ANSWER	NO ANSWER
INDITEX	NOT DISCLOSED	EVADES QUESTION *Interesting option according to technological advancements that will further allow an organised and efficient system that manages other types of plastic to facilitate their reuse as a raw material in the manufacture of other products	Green To Pack programme: Eliminate 100% of single-use plastic by 2023 through the programme Continue reduction of plastic footprint implemented in recent years Eliminate all single-use plastics that reach the customer by 2023 No waste discarded from any of the group's headquarters, logistics centres or stores, as it will be destined for recycling or total reuse[101] Members of the New Plastics Economy Global Commitment from the Ellen MacArthur Foundation[102]

As some of these retailers operate across different markets in Europe and beyond, it is interesting to observe their different policies and practices in different countries. For example, Carrefour has launched a pilot project in Poland of a system for returning reusable bottles to its stores that gives customers a full refund of their deposit in the form of an electronic coupon with which they can pay for future purchases in the shop.[103] This initiative will be replicated in all of their shops in the country by the end of March 2021; however, Carrefour continues to block the introduction of a DRS in Spain.[104]

Likewise, Lidl supports DRS in Germany and boasts about the benefits and efficiency of the system operating in its stores there,[105] but it takes a different position in countries that do not yet have DRS. Our earlier investigation in Austria showed that Lidl had lobbied against DRS,[106] but following our exposure and a Greenpeace campaign, the company recently came forward in support of DRS, recognising that it is the most '*suitable system to maintain the quality of the material and to minimise litter*'.[107] According to their responses to the retailer questionnaire from the Environment Investigation Agency (EIA) and Greenpeace in the UK, both Aldi and Lidl support the introduction of an all-inclusive DRS system. However, Lidl has done nothing to encourage the introduction of deposits on beverage containers in Spain, and by being part of Ecoembes it is actually participating in the biggest lobby against this progressive policy.

On a pivotal and game-changing issue like DRS, which would significantly reduce plastic pollution, it is both bizarre and unacceptable for retailers to have diametrically opposed positions on its introduction in different countries. If a company believes DRS is beneficial, then this position should be adopted, and steps taken to support DRS in all markets where the company operates. Therefore, we urge Lidl, Aldi and other Spanish retailers to publicly support the introduction of DRS in Spain and to take the first steps towards using refillable beverage packaging.



3.1. Mercadona: One of the biggest opponents of DRS

Among all the supermarkets, one in particular stands out as the biggest opponent of DRS: Mercadona – Spain's biggest supermarket, with a market share of almost 25%.[108] In the company's latest annual report, Mercadona proudly states that it has implemented several measures to reduce plastic across the entire business, such as swapping to biodegradable single-use packaging for its line of premade meals, thus saving 170 tons of plastic in 2019,[109] or obtaining 3,000 tons of recycled plastic through its own integrated system of waste sorting to use in manufacturing single-use bags. However, the company has not disclosed its total plastic footprint and its measures are patchy, as they do not adequately address the root cause of the plastic pollution problem.

Mercadona recently introduced its new Strategy 6.25, which primarily consists of switching to other single-use alternatives and small projects that run on a voluntary basis.[110] A closer look at the key pillars of the company's new strategy reveals that it is mainly focused on recycling, lightweighting and switching plastic packaging for other single-use materials such as paper or, even worse, still using plastic packaging and presenting it as reusable. Furthermore, these initiatives are only being implemented in a few stores while the company continues to sell unsustainable products, such as single-serve condiment sachets for home use.[111]

Mercadona's new Strategy 6.25 consists of switching single-use plastic items for other single-use alternatives or presenting them as reusables.

Credit: *Mercadona*[112]





Plastic cava glasses are sold as a greener reusable alternative but are still made of single-use plastic.

Credit: *Mercadona*[113]

One of Mercadona's latest pilot projects to reduce plastic is the promotion of recycling by installing bins to separate all types of waste – from coffee capsules to compostable bags and other single-use containers – in 72 stores across Spain and Portugal.[114] As part of the Strategy 6.25, these stores have eliminated single-use bags, and single-use packaging contains at least 25% recycled material or has been exchanged for 100% alternative materials, which are either recyclable, reusable, compostable, cardboard or paper. Although announced with great fanfare and publicity, this initiative is tiny – running in only 4.4% of all Mercadona stores across Spain and Portugal. Mercadona owns more than 1,600 stores in Spain alone, and between July 2019 and the end of 2020, it had opened 20 more stores in Portugal alone.[115] Furthermore, the in-store bins are very small and there is no incentive for customers to bring their waste back to Mercadona.[116]

Mercadona has installed bins to separate waste, along with signs that say 'we take our plastics and cartons and turn them into single-use bags and cardboard boxes'.

Credit: *Mercadona*[117]





Mercadona has installed bins to separate waste in only 72 of its stores across Spain and Portugal.

Credit: *Mercadona*[118]

MERCADONA



A pack of 12 single-serve sachets of Hacendado mayonnaise sold on the Mercadona website.

Credit: *Mercadona*[119]

3.1.1. No more hiding: Mercadona's direct lobbying against DRS

At the same time as greenwashing its own small actions to address plastic pollution, Mercadona is leading the battle against the ambitious legislative proposals to introduce DRS – especially through the industry associations the company is part of.[120] The Association of Valencian Entrepreneurs (Asociación Valenciana de Empresario – AVE) was the first to publicly oppose the implementation of a DRS, creating a strong social media campaign against it.[121] AVE devoted all its resources to standing shoulder to shoulder with the large supermarkets. AVE was later joined by MasyMas – one of the biggest and most important retailers in Alicante – and Consum, which, together with Mercadona, are the main retail chains in the region. All three are also members of the Spanish Association of Supermarket and Self-Ser-

vice Distributors (Asociación Española de Distribuidores, Autoservicios y Supermercados – ASEDAS).

In 2016 a group of trade associations, among them the supermarket association ASUCOVA (Mercadona, Consum, MasyMas and Dialprix), the association of large retailers ANGED (El Corte Inglés, Carrefour, Alcampo and Eroski) and the confederation of businessmen CECOVAL, sent a letter to the President of the Valencian Government, Ximo Puig, expressing their opposition to the implementation of a DRS, which was planned for 2018.[122] These retailers argued that the project might violate national legislation on packaging and severely disrupt the market. The former Regional Secretary of Environment and Climate Change for the Valencian Autonomous Community, Julià Álvaro, revealed that Mercadona, Consum and MasyMas had directly petitioned the government to investigate other alternatives instead of implementing the DRS. They argued that its implementation was incompatible with their business model because it would force them to sacrifice space they would otherwise use for sales.[123] Consum, for example, claimed that reverse vending machines would be very costly and a '*huge problem*' for them, despite the leasing options available for such machines.[124] Pedro Reig, the Director of the Association of Supermarkets of the Valencian Community (Asociación de Supermercados de la Comunidad Valenciana – ASUCOVA) stated that – instead of introducing better waste management systems – it was fundamental to educate consumers and create environmental campaigns focused on recycling.[125]

3.1.2. The battle between Mercadona and consumer brands

As we previously revealed in *Talking Trash*, Mercadona and Carrefour also threatened several FMCG companies – also members of Ecoembes – against publicly supporting DRS.[126] Tensions have continued to escalate, with Mercadona threatening to remove dissenting companies' products from its shelves if they continue to speak in favour of DRS. The consumer brands supporting DRS are mostly concerned that they won't have enough reliable sources of recycled material to meet the mandatory recycled content targets. Interestingly, Mercadona recently set its own target of increasing recycled content by 25% by 2025, yet it is unclear how the company plans to meet this without DRS. So far, the battle between retailers and FMCGs has not resulted in any tangible change because it has been much cheaper for all of these companies to remain part of the flawed system set up by Ecoembes and maintain the status quo. However, the revised SUP changes the playing field, and several new legislative obligations make the status quo untenable.

4. A change of heart: The biggest beverage producers support DRS

On 25 September 2020, the European Federation of Bottled Waters (EFBW) and the European Association of Manufacturers of Soft Drinks (UNESDA) issued a joint public statement in favour of the introduction of a '*well-designed DRS in EU countries to meet the collection targets set by the SUP*'.[127] This changes the battlefield for DRS since beverage producers have long been very vocal opponents of this policy.



> *Official UNESDA Twitter account publicising support for DRS – 'UNESDA and EFBW believe that well-designed deposit return schemes can help reach the EU collection targets for beverage bottles and safeguard the quality rPET that our industries need'.*
>
> ***Credit:*** *Soft Drinks Europe*[128]

According to their statement, both UNESDA and EFBW consider '*well-designed DRS an efficient recovery scheme for reaching the European collection targets for beverage bottles and for safeguarding the quality of recycled PET that our industries need. In addition, it can also contribute towards the EU's climate objectives, for example by requiring fewer virgin materials to be used thanks to the closed loop recycling which will result in a lower CO_2 footprint. That is why an increasing number of EU member states are currently considering the introduction of DRS*'.[129]

In light of this recent change in the beverage industry's position, it is surprising that Spanish subsidiaries of big international companies and associations such as the Spanish Federation of Food and Beverage Industries (Federación Española de Industrias de Alimenatción y Bebidas – FIAB) and the Association of Manufacturers and Distributors (La Asociación de Fabricantes y Distribuidores – AECOC) have aligned themselves with Reciclos.[130] Changing Markets Foundation contacted several Spanish trade associations to find out about their stance on the issue. The position of Spanish organisations is especially interesting, because many beverage industry companies are members of Ecoembes and Ecovidrio, which are still fighting against DRS. Our communications to the trade associations also called for them to publicly support the implementation of a DRS combined with ambitious reuse policies as a mandatory measure in Spain and to proactively adopt these measures to achieve the SUP goals.

Of the six groups we contacted, only two replied directly. We contacted the presidents or directors of Ecoembes, the Association of Spanish Supermarket Chains (Asociación de Cadenas Españolas de Supermercados – ACES), ASUCOVA and ASEDAS, however, none of them replied to our letters. Ecoembes sent an automatic response that redirected us to their public response to the Greenpeace report *Ecoembes Miente*, completely disregarding all of our questions.[131] On the other hand, Ecovidrio and the National Association of Large Distribution Companies (Asociación Nacional de Grandes Empresas de Distribución – ANGED) both provided responses confirming that neither associations support the implementation of DRS in Spain.



Coca-Cola bottles in supermarket aisle.

Credit: *Les Stone*

ANGED declines to support the implementation of a DRS in Spain on the premise that it has already been collaborating for years on its own return and reward system (Reciclos), which '*represents a model that offers the maximum consensus for the business agents in the conviction of being the most efficient solution to meet the environmental objectives*' that all companies share '*without generating the negative externalities that other models present*'. The organisation also implied that it has been working and investing on an '*absolutely new technology that allows the establishing of a management model that perfectly suits the Spanish circumstances*'.[132] ANGED failed to provide details of either system or how it intends to meet the 90% collection targets of the SUP through these systems without using a DRS.

It is also crucial to emphasise Spanish organisations' untenable position if they are members of EFBW and UNESDA at a European level and the Spanish trade associations at a national level. This is especially true in the cases of the Association of Refreshing Drinks (Asociación de Bebidas Refrescantes – ANFABRA) and the Spanish Association of Mineral Waters (Asociación de Aguas Minerales de España – ANEABE), which are members of EFBW and UNESDA respectively. The two Spanish associations have publicly proclaimed their support for Reciclos, making it unclear how they plan to reconcile the two drastically different positions on DRS. Besides the financial implications of not being able to meet their SUP targets, there is also potential reputational damage for consumer goods companies in justifying their decision to remain members of associations that oppose DRS in Spain.[133,134] For this reason, investors should continue to scrutinise closely the actions of consumer goods companies that adopt short-term strategies opposing DRS and other solutions to the plastic crisis.

Table 4.1: Response of trade associations regarding their position on DRS and reuse targets

Organisation/Association	Position on the implementation of DRS in Spain	Position on reuse in Spain
Ecovidrio	DRS for glass is not necessary in Spain at this time	Supports reuse for all kinds of packaging and products as long as it is the most sustainable solution
ECOEMBES	Does not support DRS *Supports voluntary initiative Reciclos (return and reward system).	EVADES QUESTION
ACES	NO ANSWER	NO ANSWER
ASUCOVA	NO ANSWER	NO ANSWER
ANGED	Does not support DRS *Supports voluntary initiative Reciclos (return and reward system) to 'complement the current recycling model to achieve the targets of the SUP'.	EVADES QUESTION
ASEDAS	NO ANSWER	NO ANSWER

REVOLVING DOORS BETWEEN DIFFERENT INDUSTRY INITIATIVES IN SPAIN

EU ASSOCIATION · PRODUCER RESPONSIBILITY ORGANISATION · INDUSTRY ASSOCIATION · NO TRANSPARENCY ON MEMBERS

PROs

SPANISH INDUSTRY ASSOCIATION

EU INDUSTRY ASSOCIATION

FMCGs

RETAILERS

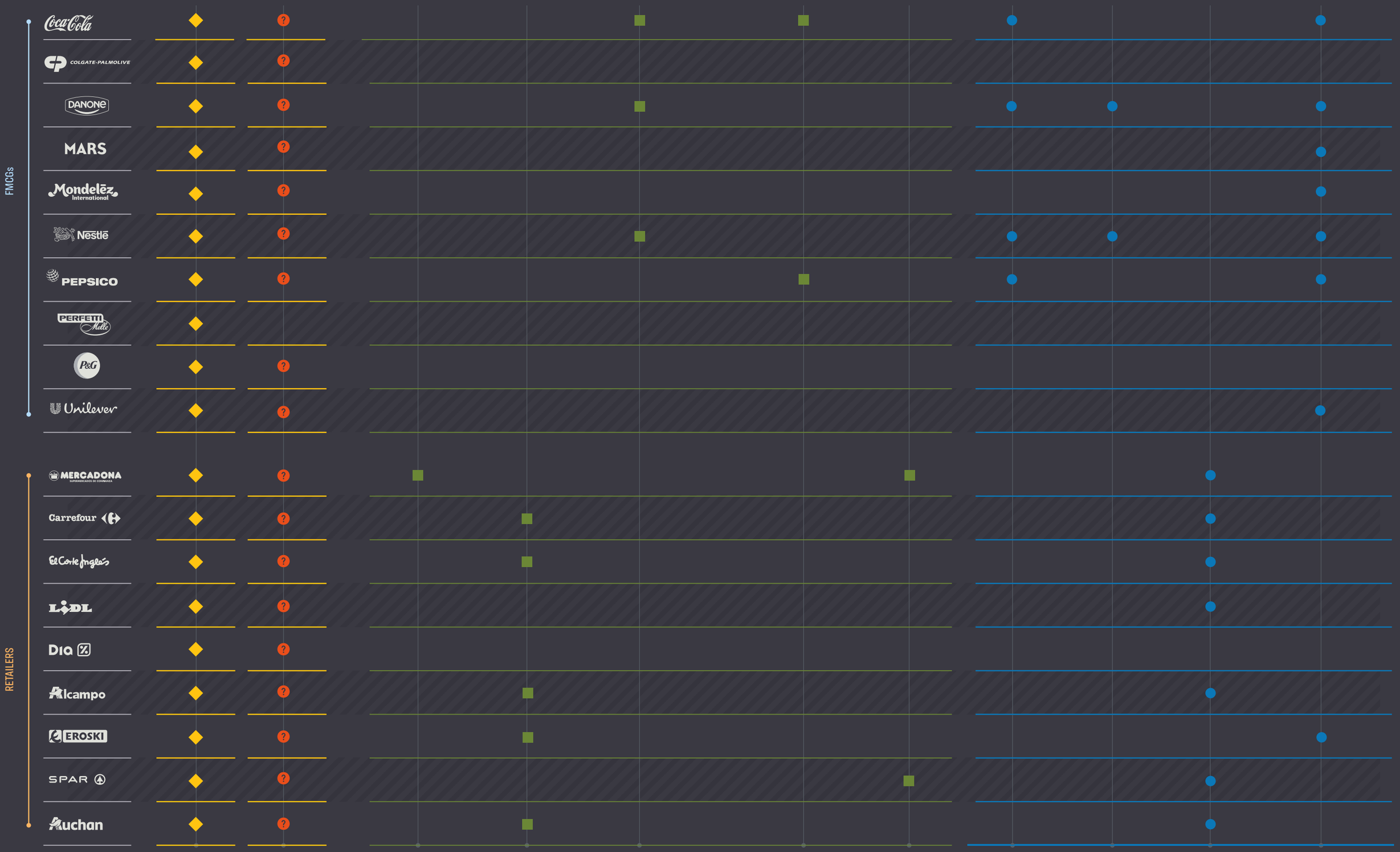


Figure 4.1: Revolving doors between different industry associations

5. Delaying and derailing legislation at the regional and national level

In the Changing Markets Foundation report *Talking Trash*, we investigated the industry lobbying around proposed or adopted legislation to address plastic pollution in different Spanish regions. In Valencia we observed how the combined efforts of Mercadona, and overall industry pressure undermined the introduction of DRS and prompted the dismissal of Julià Álvaro, the former Regional Secretary of Environment and Climate Change for the Valencian Autonomous Community. In Catalonia, where the clear benefits of a mandatory DRS system had been confirmed by an independent government study, we exposed how the industry – especially ACES – managed to delay publication of the study, while trying to discredit it. And in Navarra we saw how the industry lobbied against waste law reform and the implementation of DRS, and succeeded in delaying the deadline for banning single-use plastics in the region until 2021.[135] In this report we investigate the situation in the Balearic Islands, which have managed to pass the most ambitious waste law of all Spanish regions and are now at the key point in its implementation.

5.1. The Balearic Islands: Best-in-class legislation

On 29 January 2019, the Balearic Islands Law on Waste and Contaminated Soils was approved. Greatly acclaimed by Spanish NGOs and environmental experts, this law has the potential to set an ambitious new benchmark in Spain.[136] The law established binding waste reduction targets for a 10% reduction in waste generated by 2021, and a further 20% cut by 2030 compared to the 2010 baseline. This new regional law also stipulates a minimum 50% reduction in food waste and an increase in recycling rates for packaging to more than 75% by 2030.[137] Article 2 of the law established ambitious reuse targets with specific objectives on reuse for drink containers more specifically in the hotel, restaurant and catering sector (HORECA) to be achieved by 2030 – with reuse targets reaching 40% for bottled water, 80% for beer, 70% for soft drinks. Outside of the HORECA sector, an additional target for reuse of drink containers was set at 15% to be met by 2030. This law also included all the key measures of the SUP that had to be transposed by July 2021.[138]



A 'performance' simulating the burial of single-use plastic took place after the law was approved by the parliament. Representatives of all the political parties supporting the law also joined the performance.

Credit: *Ultimahora.es*[139]

Such ambitious targets have triggered strong industry opposition, and Ecoembes has mobilised against the law. Tense confrontations have been reported between Jordi Pietx – manager of Ecoembes in Catalonia and the Balearic Islands – and Sebastià Sansó – General Director of Waste and Environmental Education for the Balearic Islands.[140] Ecoembes denounced the bill because it '*did not have sufficient consensus among the industry players*', nor did it give clarity on how to achieve the objectives imposed, creating '*legal uncertainty*'. Sansó gave assurances that the law allows for various levels of participation to achieve the targets and asked Ecoembes whether it intended to '*create fear among the rest of the municipalities*'.[141]

The Councillor of the Environment for the Balearic Islands – now a member of the Senate– Vicenç Vidal declared that the main motivations of the regional government in passing this law were to reduce waste generated and increase transparency. The Ministry of the Environment and Territory of the Balearic Islands analysed all the available data on the municipal waste management system in the Islands. [142] The study also analysed the available data about packaging on the islands and showed that contrary to Ecoembes' claims only 25% of light packaging waste was recycled in 2019. The study has been dubbed a 'historic move' as this the first government study calling into question Ecoembes' inflated claims about recycling rates and confirming earlier findings by Greenpeace and other NGOs. As the study confirmed that current recycling targets are not being met, the Government of the Balearic Islands was justified in adopting disruptive measures to achieve these objectives. Among the new measures are a charge for the disposal of municipal waste destined for landfill and incineration (with or without energy recovery) from 1 July 2021, and the establishment of a complementary system for the management of packaging waste, namely DRS.[143]

The case of the Balearic Islands is also significant because it proves that much of the packaging that Ecoembes claims to recycle is actually incinerated. According to a recent Greenpeace report exposing Ecoembes (*Ecoembes Miente*), in 2017 the Environmental Technologies Park of Mallorca received 21,486.81 tons of packaging, of which almost 8,000 tons went directly to the incinerator.[144] This means that practically 40% of the packaging that was meant for recycling was burnt. For this reason, the new law includes a section dedicated to transparency and access to information that obliges all relevant entities to supply information on production and waste management.[145]

Table 5.1: Treatment of lightweight packaging

Treatment of lightweight packaging (yellow bin)	Year			
	2018	2019	2021	2030
Incineration	58%	56%	–	–
Landfill	20%	19%	–	–
Recycling	22%	25%	Reach 50%	Reach 65%

Former councillors Vicenç Vidal and Sebastià Sansó have both at different times denounced the pressure from numerous lobbies –including those of the pen and printer manufacturing industries – but have especially highlighted the pressure from Ecoembes, which lobbied fiercely against the law, arguing that it was a project 'without enough industry consensus, nor is it clear how they will be able to achieve its objectives'.[146] This was not the case for the HORECA sector – a very important player in the tourism sector in the Balearic Islands – which showed more willingness to collaborate towards eliminating single-use plastics.

The plastics industry was also quick to use the Covid-19 pandemic as an excuse to continue lobbying against the implementation of this new law. At the beginning of Covid-19 crisis, the Balearic Islands government lowered some of the new law's requirements to allow companies to adapt to the new reality. Once again, Ecoembes did not hesitate to take advantage of the situation and sent letters to various parliamentarians criticising the waste law and requesting further modifications. The letters demanded that the parliamentarians '*take advantage of the opportunity to harmonise the Balearic legal framework in parliament with the national regulations and the community frameworks, thus guaranteeing greater legal certainty and regulatory effectiveness*' – in other words to water down the most ambitious piece of legislation in the country.

Despite the intense industry lobbying, the General Director of Waste and Environmental Education, Sebastià

Sansó, is proceeding with the implementation of the waste law. The results of the *Analysis of the municipal waste management system in the Balearic Islands* commissioned by the Balearic Islands government – considered to be the most complete study on the subject in Spain to date – concluded that the objectives set by the 2008 Waste Framework Directive for the year 2020 have not been met and that there is still a long way to go if the new objectives of the Balearic Islands Waste Act and revised European legislation on waste (Waste Framework Directive 2018) are to be achieved. The analysis showed that recycling of light packaging needed to increase by 26% by 2020 and 50% by 2030, and municipal and commercial waste being sent to landfill needed to reduce by 26% by 2030.[147]

According to its Waste Act, the Balearic Islands government is entitled to establish complementary systems for the management of packaging waste, such as a DRS, if the targets set by the Act or by more restrictive state or European regulations were not met by 2020. The establishment of a DRS would be subject to a pilot project lasting at least a year. Recently the Government of the Balearic Islands announced that €500,000 will be allocated for a DRS pilot in Formentera. The pilot project will last for three years and includes specific stages to plan the implementation of the system, inform the population, acquire the necessary resources to implement it and then review the results.[148]

By taking these first steps towards more transparency and accountability, the Balearic Islands is playing a pivotal role in the implementation of the Waste Framework and SUP Directives in Spain, and in the political and legal sphere surrounding this issue. It is essential that a mandatory DRS is designed for reuse from the start and that other supportive policy mechanisms, such as differentiated deposits for refillables, are built into policies from the outset. Recognised as an iconic destination for tourism, the Balearic Islands have an obvious need to protect their beaches and nature; however, successful implementation of the legislation will act as a crucial precedent for the whole of Spain.

5.2. A response from the government

The Changing Markets Foundation and Break Free From Plastic movement sent a letter to MITECO asking about the ministry's position on the implementation of a DRS and the expansion of reuse targets as part of the transposition of the SUP and Waste Framework Directives. On 6 November 2020, the ministry informed us that *'this issue [the introduction of DRS] will not be addressed in the draft Law on Waste and Contaminated Soils currently in process, but in the future draft of the Royal Decree on Containers and Container Waste, still in the elaboration phase, without any decisions on the matter having been adopted so far'.*

The government's response comes at a time of great concern, principally due to the substantial criticism of the draft text of the new waste law being prepared. The close ties between the government and the industry that have been reported in the media are deeply concerning. For example, Moncloa.com reported that the sister-in-law of the Minister of Ecological Transition – the minister in charge of preparing the new waste law – also acts as an advisor to Ecoembes.[149] On 20 November 2020 during the official presentation of the Recovery, Transformation and Resilience Plan for the Spanish Economy, the President of the Spanish Government publicly praised Ecoembes' 'TheCircularLab' initiative, as the European champion in waste management and the circular economy.[150,151] The draft text of the law perpetuates the current system's lack of transparency and remains largely favourable towards the industry as it stands,[152] failing to demand any greater transparency on the amount of packaging placed on the market. Transparency is a crucial first step to resolve the country's data discrepancies and the inflated recycling rates reported by Ecoembes.

The government's response stating that the implementation of DRS will be decided via a Royal Decree is also of great concern. Drafting this legislation under a Royal Decree prevents public debate, as it means this decision does not have to go through parliament. Keeping such an important decision behind closed doors means that the industry could again have significant influence on critical reform of the system.

Given the challenges that the country is facing, reform of the current system and the implementation of legislation that mandates at least 90% separate collection of plastic waste through mandatory DRS and reuse targets are the only proven and effective ways to achieve the required levels of collection and litter reduction. DRS will not only bring environmental benefits, but it will enhance the supply of clean waste streams of high-quality recyclables, reduce municipal costs for waste management and litter clean-ups and provide new local jobs. All of these will be key factors in a green recovery from the Covid-19 pandemic through the creation of local jobs and the transition towards a more circular economy.

Box 5.1: DRS: Less plastic, more jobs

The implementation of a DRS – already in place in over 40 jurisdictions around the world – is not only conducive to achieving a circular economy, but according to the latest study from the Reloop Platform, it creates more jobs than both kerbside recycling and landfill waste disposal. An in-depth analysis of 13 different studies and reports examining the jobs created by implementing or expanding a DRS for beverage containers concluded that implementing such a system **creates between 11 and 38 times more jobs than any other waste management option**.[153]



A DRS system allows for the recovery of the greatest number of containers of a specific material, ensuring a higher quality of recycled material and reducing the number of containers sent to landfill or incinerated. A greater volume of recovered containers leads to the creation of a larger number of jobs in collecting, sorting and transporting them to recovery facilities as opposed to collecting, hauling and landfilling garbage (where there are fewer jobs tonne for tonne). This does not include the additional jobs created by keeping material in the circular economy, through reuse, recycling and re-manufacturing.

A best-in-class DRS that generates the highest number of jobs depends on the type of beverages and containers included in the system, the number and convenience of the redemption points – including retailers – and a high deposit value to incentivise returns, ensuring high quantities of materials for bottle-to-bottle recycling.

Due to the Covid-19 crisis, by the end of 2020, Spain reached a total figure of 3.71 million people unemployed – an unemployment rate of 16.13%.[154] Job creation is crucial, and by implementing an all-inclusive DRS, the Spanish government has an opportunity to support a green recovery through the creation of green jobs.



The single-use plastic funeral, following the adoption of ambitious waste legislation on Balearic islands.
Credit: *Retorna*

6. Conclusions and recommendations

Plastic pollution is a serious crisis that requires immediate action with proven legislative solutions, like measures to reduce single-use products, targets and incentives to promote reuse and DRS. We don't have time to wait for another five years until voluntary schemes, such as Reciclos, have clearly failed. Spain needs to rapidly implement European legislation, including the requirements set out in the SUP mandating EPR schemes for beverage containers and separate collection of bottles, through binding and enforceable legislation. In addition, it should follow other countries, such as Portugal and Austria, in setting ambitious reuse targets. In addition, Germany and the Netherlands are expanding their DRS to include other types of beverage containers, for example the Netherlands included small plastic bottles and cans.

As shown in this report, achieving these goals directly conflicts with the vested interests and business models of Ecoembes, Ecovidrio, retailers and consumer goods companies, who tightly control an opaque and inefficient waste management system. It is this system which stands in the way of a real circular economy and real reductions in plastic consumption and plastic litter in Spain. Reform of the current system will not only bring environmental benefits, but also reduce the municipal costs of waste management and litter clean-ups and provide new local jobs – all of which will be key to a green recovery post-Covid-19 pandemic.

But in order to get there, the Spanish government first has to distance itself from the powerful corporate interests that control the current failing system. Evidently, the political and economic influence of Ecoembes, Ecovidrio and its members in Spain makes it difficult to pass any progressive regional and national laws to address reductions in plastic waste, such as the implementation of DRS and reuse policies.[155] It is crucial that the Spanish government sees through the playbook of tactics and false solutions that have prevented them from tackling plastic pollution for decades. We call again on companies that have committed to the implementation of DRS at the EU level to publicly support the introduction of such systems in Spain and to distance themselves from Ecoembes, Ecovidrio and other associations that oppose this system.

DRS is an effective solution that has already been adopted in over 40 jurisdictions around the world with significant environmental benefits, cost savings for taxpayers and strong public support. Twelve other jurisdictions have already laid the legal foundations for implementing DRS and around ten others are considering this – many of them in the EU. The Portuguese government will launch DRS for single-use beverage containers (plastic, metal and glass) on 1 January 2022. In addition to DRS, Portugal is firmly committed to promoting refillable containers for water, soft drinks, beers and wines. Consequently, by 2025, at least 20% by volume of the beverages sold in the country must be packaged in reusable packaging, with this proportion rising to at least 50% by 2030.[156]

The Spanish government should commit to the implementation of a modern DRS in combination with reuse targets. This will lead to reduced costs on litter clean-up, which currently costs taxpayers up to €744 million per year. A clear commitment to legislation to accelerate the circular economy will also lead to the creation of more jobs and increased investment in reuse and recycling infrastructure in Spain.

6.1. Recommendations

6.1.1. Policymakers

This report shows that FMCG companies and retailers continue to use voluntary initiatives and commitments as a tactic to distract, delay and derail legislation in Spain. Policymakers have a unique opportunity to decide the future of Spain's plastic pollution crisis by significantly reforming the current failing waste management system.

They should propose and adopt legislation based on the following key elements:

- Introduce a mandatory all-inclusive DRS for all beverage containers (glass, plastic, Tetra Paks, cans, etc.), which is the only proven and effective way to achieve high levels of collection (above 90% as stipulated by the EU legislation), litter reduction, reuse and effective recycling.
- Introduce binding reuse targets. While the reuse targets should be sector-specific and apply across all segments of plastic packaging, it is especially straightforward to introduce refillable targets for beverage containers, as these could be built into the DRS design from the start. Follow the examples of Portugal and Austria, which have committed to high levels of refillables.
- Introduce a tax on virgin plastic, which is an effective mechanism to encourage the use of recycled materials over virgin plastic. This should be accompanied by a clear position on the use of alternative materials, such as bio-based, biodegradable and compostable plastic, with justifications for what is – and what is not – a good use of these materials.
- Urgently reform EPR schemes, which are currently dominated by the monopolies of Ecoembes and Ecovidrio. This reform should include eco-modulated fees to encourage the uptake of reuse and high levels of recycling. EPR schemes should also cover the full costs of litter clean-up, transportation, processing and awareness-raising campaigns. Also ensure that scheme operators adhere to a high level of transparency with clear targets for waste reduction and independent reporting and monitoring of performance.
- Implement minimum recycled content targets in the production of packaging and containers of at least 50% for beverage containers and at least 30% for other items, as a starting point. This creates a market for effective plastic recycling and maintains plastic in a closed loop without downcycling the material.
- Address the issue of hazardous chemicals, and ensure companies design products from the start that can be reused and recycled in a toxic-free closed loop. Prioritise reusable alternatives and act to avoid regrettable substitutions – for example, replacing single-use plastic with other single-use materials, such as bio-based, biodegradable or compostable plastic – which do not fix pollution problems and may also lead to other environmental issues.
- Do not fall for voluntary industry initiatives such as Reciclos that are only delaying real progress. Real, proven solutions must be enshrined in legislation because voluntary measures promoted by the industry have failed to address the issue.

For more specific recommendations to governments on the implementation of SUP, we recommend this briefing:

https://www.breakfreefromplastic.org/2019/10/10/moving-away-from-single-implementation/

6.1.2. Companies and retailers

- Publicly call for progressive legislation to be implemented by the government to address the plastic crisis, including DRS and binding reuse/refill targets.
- Ensure that any voluntary company commitment goes beyond the ambition of existing EU legislation to address plastic pollution.
- Be transparent about the company's full plastic footprint (including products and packaging) and progress towards targets on all aspects of plastic use, as part of a holistic approach. Ensure that reporting covers achievements across all markets and brands, and is based on independently verified data and in accordance with EU legislation.
- Commit to meaningful measures that lead to significant reductions in single-use plastics and other single-use materials. These measures need to be specific, measurable, time-bound and independently verified, and should include support for reuse, redesign of products and effective recycling. Ensure transparency in reporting progress on numbers of units.
- Outline clear positions on the use of alternative materials, such as bio-based, biodegradable and compostable plastic, with justifications for what is – and isn't – a good use of these materials. Include clear sustainability criteria that prevent deforestation or competition with food.
- Ensure commitments are enacted consistently across all markets in which the company (and its subsidiaries) operates; that is, ensure there is no contradiction between how a company acts on the issue of plastic pollution in one market compared to how it acts in another.
- Denounce and leave any industry initiative – such as Ecoembes – that opposes, delays or lobbies to undermine progressive legislation, including its implementation. Encourage your peers to do the same and demand a change in the system.
- Reduce the quantity and toxicity of consumer products. Eliminate disposable plastic products, and ensure containers have no chemical additives that might endanger human health.

6.1.3. Spanish citizens and consumers

Spanish citizens have a responsibility to further reduce their plastic consumption and other overconsumption habits by seeking out products and brands that promote reusability. However, solving this problem as a consumer is hard when consumer brands and retailers have sole control over their packaging and do not offer plastic-free solutions. It is essential to recognise that, as consumers, we can only act as sustainably as the system allows us to; this recognition will enable us to place the responsibility on those who control the system and make them truly accountable. The need for systemic change in Spain is more evident now than ever, but the change should be propelled by legislators and implemented by corporations. Individuals are responsible for demanding that legislators stop falling for industry lobbying tactics and start holding corporations accountable for their waste.

In the meantime, consumers can also demand:

- The possibility to return cans, plastic bottles and other packaging containers to stores, supermarkets and large retailers.
- Access to reusable packaging and reusable systems, as well as access to systems for buying in bulk.

To help you make changes as an individual, you can find recommendations on how to reduce your plastic footprint and take political actions to challenge the system here:

https://www.breakfreefromplastic.org/campaigns/goingforzerowaste/

https://www.breakfreefromplastic.org/we-choose-reuse/

7. References

1 Break Free From Plastic Movement (2020) The Brand Audit Report 2020 [ONLINE] Available at: https://www.breakfreefromplastic.org/globalbrandauditreport2020/

2 GRID-Arendal (2018) Global plastic production and future trends. [ONLINE] Available at: https://www.grida.no/resources/6923

3 The Pew Charitable Trusts (2020) Una investigación concluye que los flujos de plástico al océano podrían triplicarse para el año 2040, pero una acción inmediata podría controlar la tendencia en más de un 80 %. [ONLINE] Available at: https://www.pewtrusts.org/es/about/news-room/press-releases-and-statements/2020/07/23/research-finds-plastic-flows-into-the-ocean-expected-to-triple-by-2040

4 Anarpla y Cicloplast (2018) Cifras y datos clave de los plásticos y su reciclado en España [ONLINE] Available at: http://www.cicloplast.com/descargas/Cifras_plasticos_2018_WEB.pdf

5 Colorado, M. (2019) El Mediterráneo es el mar más “plastificado” del mundo. France 24, 25 October 2019. [ONLINE] Available at: https://www.france24.com/es/20191025-medio-ambiente-mediterraneo-plastico-mayor-contaminacion

6 WWF (2018) Una trampa de plástico: Liberando de plástico el Mediterráneo [ONLINE] Available at: https://wwfes.awsassets.panda.org/downloads/trampa_plastico_wwf_definitivo.pdf?47062/Segn-WWF-el-Mediterrneo-est-en-peligro-de-convertirse-en-una-trampa-de-plstico

7 WWF (2018) Una trampa de plástico: Liberando de plástico el Mediterráneo [ONLINE] Available at: https://d80g3k8vowjyp.cloudfront.net/downloads/wwf_trampa_plasticook.pdf

8 Oakdene Hollins Research & Consulting (2018) Raise the glass – summary [ONLINE] Available at: https://feve.org/wp-content/uploads/2018/11/Raise-the-Glass-Study-Executive-Summary-FINAL.pdf

9 Changing Markets Foundation (2020) Talking trash: The corporate playbook of false solutions [ONLINE] Available at: https://talking-trash.com/wp-content/uploads/2020/09/TalkingTrash_FullReport.pdf

10 Changing Markets Foundation (2020) Talking trash: The corporate playbook of false solutions [ONLINE] Available at: https://talking-trash.com/wp-content/uploads/2020/09/TalkingTrash_FullReport.pdf

11 Changing Markets Foundation (2020) Talking trash: The corporate playbook of false solutions [ONLINE] Available at: https://talking-trash.com/wp-content/uploads/2020/09/TalkingTrash_FullReport.pdf

12 Ecoticias (2020) La industria del plástico se lamenta ante el gobierno de España, 3 June 2020. [ONLINE] Available at: https://www.ecoticias.com/residuos-reciclaje/202535/industria-plastico-lamenta-ante-Gobierno-Espana

13 Ecoticias (2020) La industria del plástico se lamenta ante el gobierno de España, 3 June 2020. [ONLINE] Available at: https://www.ecoticias.com/residuos-reciclaje/202535/industria-plastico-lamenta-ante-Gobierno-Espana

14 European Court of Auditors (2020) Review no 4: EU action to tackle the issue of plastic waste [ONLINE] Available at: https://www.eca.europa.eu/Lists/ECADocuments/RW20_04/RW_Plastic_waste_EN.pdf

15 Greenpeace España (2020) Ecoembes miente: Desmontando los engaños de la gestión de residuos de envases domésticos [ONLINE] Available at: https://es-.greenpeace.org/es/wp-content/uploads/sites/3/2020/10/Informe-ECOEMBES-MIENTE_fin.pdf

16 Changing Markets Foundation (2020) Talking trash: The corporate playbook of false solutions [ONLINE] Available at: https://talking-trash.com/wp-content/uploads/2020/09/TalkingTrash_FullReport.pdf

17 Ecoembes (n.d.) Tarifas Punto Verde. [ONLINE] Available at: https://www.ecoembes.com/es/empresas/ingresos-punto-verde/tarifa-punto-verde-por-material

18 Comisión Nacional de la Competencia (2011) Resolución: Expte. S/0206/09, Ecoembalajes España [ONLINE] Available at: https://www.cnmc.es/sites/default/files/38023_7.pdf

19 Joint Research Centre (2017) Top marine beach litter items in Europe: A review and synthesis based on beach litter data [ONLINE) Available at: https://publications.jrc.ec.europa.eu/repository/bitstream/JRC108181/technical_report_top_marine_litter_items_eur_29249_en_pdf.pdf

20 Newtral (2020) Ránking de gastos en Limpieza viaria. [ONLINE] Available at: https://transparentia-municipal.newtral.es/ranking/2020/G/functional/amount/163?utf8=%E2%9C%93&f%5Baarr%5D=&commit=Explorar

21 Amigos de la Tierra (2016) En lata y en botella: Cuáles son los residuos que más se abandonan [ONLINE] Available at: https://www.tierra.org/wp-content/uploads/2016/11/Informe_en_lata_y_en_botella.pdf

22 eLitter (n.d.) Garbage collection. [ONLINE] Available at: https://elitter.org/recogidas

23 KIMO (2010) Economic impacts of marine litter [ONLINE] Available at: http://www.kimointernational.org/wp/wp-content/uploads/2017/09/KIMO_Economic-Impacts-of-Marine-Litter.pdf

24 European Commission (2018) Assessment of measures to reduce marine litter from single use plastics: Final report and annex [ONLINE] Available at: https://ec.europa.eu/environment/waste/pdf/Study_sups.pdf

25 Marine Conservation Society (n.d.) Deposit return scheme. [ONLINE] Available at: https://www.mcsuk.org/clean-seas/drs

26 Ecoembes (n.d.) Proyecto libera. [ONLINE] Available at: https://www.ecoembes.com/es/ciudadanos/sobre-nosotros/informacion-corporativa/responsabilidad-social-corporativa/accion-social/proyectos/proyecto-libera

27 Proyecto Libera (n.d.) Cienca libera. [ONLINE] Available at: https://proyectolibera.org/ciencia-libera/

28 Ecoembes (2016) Ecoembes. Nada es lo que parace: SDDR. [ONLINE] Available at: https://www.ecoembes.com/es/planeta-recicla/blog/ecoembes-nada-es-lo-que-parece-sddr

29 Ecoembes (n.d.) Tarifas Punto Verde. [ONLINE] Available at: https://www.ecoembes.com/es/empresas/ingresos-punto-verde/tarifa-punto-verde-por-material

30 Greenpeace España (2020) Ecoembes miente: Desmontando los engaños de la gestión de residuos de envases domésticos [ONLINE] Available at: https://es-.greenpeace.org/es/wp-content/uploads/sites/3/2020/10/Informe-ECOEMBES-MIENTE_fin.pdf

31 Statista (2021) Average annual wages in Spain from 2000 to 2019 (in euros). [ONLINE] Available at: https://www.statista.com/statistics/419513/average-annual-wages-spain-y-on-y-in-euros/

32 Greenpeace España (2020) “Ecoembes miente”. Greenpeace presenta un informe evidenciando el fracas de su gestion. [ONLINE] Available at: https://es.greenpeace.org/es/sala-de-prensa/comunicados/ecoembes-miente/

33 Greenpeace España (2020) “Ecoembes miente”. Greenpeace presenta un informe evidenciando el fracas de su

gestion. [ONLINE] Available at: https://es.greenpeace.org/es/sala-de-prensa/comunicados/ecoembes-miente/

34 Ecoembes (n.d.) Plan estratégico 2016-2020: Conectados, concienciados, sostenibles [ONLINE] Available at: https://www.ecoembes.com/sites/default/files/plan-estrategico-2016-2020.pdf

35 Ecoembes (2020) Comunicado de Ecoembes ante el informe de Greenpeace España. [ONLINE] Available at: https://www.ecoembes.com/es/ciudadanos/sala-de-prensa/comunicado-de-ecoembes-ante-el-informe-de-greenpeace-espana

36 GOIB (2020) Anàlisi del Sistema de gestió dels residus municipals a les Illes Balears: Transitant cap als objectius de la llei 8/2019. [ONLINE] Available at: https://es.greenpeace.org/es/wp-content/uploads/sites/3/2020/10/Informe-residus-municipals-2018-2019-definitiu.pdf

37 Ecoembes (n.d.) Reciclos: Ecoembes y el reciclaje del future. [ONLINE] Available at: https://www.ecoembes.com/es/ciudadanos/sobre-nosotros/proyectos-destacados/reciclos

38 Ecoembes (n.d.) Reciclos: Ecoembes y el reciclaje del future. [ONLINE] Available at: https://www.ecoembes.com/es/ciudadanos/sobre-nosotros/proyectos-destacados/reciclos

39 De Benito Hernández, J. (2020) Podemos y Greenpeace: “No se está reciclando bien y Ecoembes trata de taparlo”. Moncloa, 15 October 2020. [ONLINE] Available at: https://www.moncloa.com/podemos-greenpeace-ecoembes/

40 Reciclos (n.d.) Reciclos: El primer sistema de reciclaje digital que cuida la sostenibilidad del planeta y de tu ciudad. [ONLINE] Available at: http://www.reciclos.com/es/

41 Ecoactiva (2020) Comienza la implantación en España de máquinas que recompensan por reciclar, 22 November 2020. [ONLINE] Available at: https://www.ecoactiva.es/llegan-a-espana-las-maquinas-que-recompensan-por-reciclar/

42 Polo, J. (2019) Una aplicación impulse el reciclaje con recompensas. La Vanguardia, 12 October 2019. [ONLINE] Available at: https://www.lavanguardia.com/vida/20191012/47909634359/reciclaje-recompensa-aplicacion-ecoembes.html

43 El País (2020) ¿Quieres mejorar la vida de tu ciudad? Recicla con el móvil. 9 July 2020. [ONLINE] Available at: https://elpais.com/sociedad/ecoembes-espacio-eco/2020-07-09/quieres-mejorar-la-vida-de-tu-ciudad-recicla-con-el-movil.html

44 AECOC (n.d.) C84: Los riesgos del SDDR. [ONLINE] Available at: https://www.aecoc.es/articulos/los-riesgos-del-sddr/

45 Changing Markets Foundation captured screenshots of the Reciclos applications.

46 Reciclos (n.d.) Reciclos: El primer sistema de reciclaje digital que cuida la sostenibilidad del planeta y de tu ciudad. [ONLINE] Available at: https://www.reciclos.com/es/

47 Reciclos (n.d.) Reciclos: El primer sistema de reciclaje digital que cuida la sostenibilidad del planeta y de tu ciudad. [ONLINE] Available at: https://www.reciclos.com/es/

48 Reciclos (n.d.) Reciclos: El primer sistema de reciclaje digital que cuida la sostenibilidad del planeta y de tu ciudad. [ONLINE] Available at: https://www.reciclos.com/es/

49 Interview for Changing Markets Foundation with Alberto Vizcaino. 14 and 18 November 2020.

50 Alianza Residuo Cero (2020) Evento “Reflexiones Ley Residuos” jornado 2 mesa 2 claves de la ley. [ONLINE] Available at: https://www.youtube.com/watch?v=OON-7wnH3g1c&feature=emb_logo

51 Amigos de la Terra (2020) Diferentes sectores piden más ambición al actual proyecto de Ley de Residuos del ministerio de Teresa Ribera, 4 December 2020. [ONLINE] Available at: https://www.tierra.org/diferentes-sectores-piden-mas-ambicion-al-actual-proyecto-de-ley-de-residuos-del-ministerio-de-teresa-ribera/

52 Rivas, P. (2021) Ecoembes pretende que su iniciativa para frenar un sistema de retorno de envases SDDR se pague con dinero público. El Salto, 1 February 2021. [ONLINE] Available at: https://www.elsaltodiario.com/ecoembes/ecoembes-pretende-iniciativa-frenar-sistema-retorno-envases-pague-dinero-publico

53 Ecoembes (n.d.) Reciclos: Ecoembes y el reciclaje del future. [ONLINE] Available at: https://www.ecoembes.com/es/ciudadanos/sobre-nosotros/proyectos-destacados/reciclos

54 Greenredeem (n.d.) Money back for our empties… The recycling solution for our plastic bottles? [ONLINE] Available at: https://www.greenredeem.co.uk/wp-content/uploads/2015/12/Moneybackforourempties-final.pdf?utm_medium=email&_hsmi=87983142&_hsenc=p2ANqtz--NwHlG2J_nV8UNNpCjlHdeZD-vPq8q0i2nNet4af-xZ4Ba9njEbAQHJOiAF3WOhN-vBeNlgkaYtLhh2QJP81pDmWd2QE_w&utm_content=87983142&utm_source=hs_automation

55 Greenredeem (n.d.) Money back for our empties… The recycling solution for our plastic bottles? [ONLINE] Available at: https://www.greenredeem.co.uk/wp-content/uploads/2015/12/Moneybackforourempties-final.pdf?utm_medium=email&_hsmi=87983142&_hsenc=p2ANqtz--NwHlG2J_nV8UNNpCjlHdeZD-vPq8q0i2nNet4af-xZ4Ba9njEbAQHJOiAF3WOhN-vBeNlgkaYtLhh2QJP81pDmWd2QE_w&utm_content=87983142&utm_source=hs_automation

56 Greenredeem (n.d.) Money back for our empties… The recycling solution for our plastic bottles? [ONLINE] Available at: https://www.greenredeem.co.uk/wp-content/uploads/2015/12/Moneybackforourempties-final.pdf?utm_medium=email&_hsmi=87983142&_hsenc=p2ANqtz--NwHlG2J_nV8UNNpCjlHdeZD-vPq8q0i2nNet4af-xZ4Ba9njEbAQHJOiAF3WOhN-vBeNlgkaYtLhh2QJP81pDmWd2QE_w&utm_content=87983142&utm_source=hs_automation

57 Cole, R. (2020) Greenredeem calls on Defra to reconsider DRS. Resource, 20 May 2020. [ONLINE] Available at: https://resource.co/article/greenredeem-calls-defra-reconsider-drs

58 Greenredeem (n.d.) Money back for our empties… The recycling solution for our plastic bottles? [ONLINE] Available at: https://1ur6751k3lsj3dro-h41tcsra-wpengine.netdna-ssl.com/wp-content/uploads/2020/05/Money-back-for-our-empties-20-May-2020.pdf

59 Defra (2019) Consultation outcome: Introducing a deposit return scheme (DRS) in England, Wales and Northern Ireland: Executive summary and next steps. [ONLINE] Available at: https://www.gov.uk/government/consultations/introducing-a-deposit-return-scheme-drs-for-drinks-containers-bottles-and-cans/outcome/introducing-a-deposit-return-scheme-drs-in-england-wales-and-northern-ireland-executive-summary-and-next-steps

60 Bautista, J.A. (2020) Ecoembes está activando toda su maquinaria propagandística para tapar esta investigación internacional de @ChangingMarkets, que revela cómo persiona a gobiernos nacional y autonómicos para no perder el monopolio del reciclaje (600 millones al año). Twitter, 20 September 2020. [ONLINE] Available at: https://twitter.com/JoseAntonio_BG/status/1307637290278236160

61 Agencia EFE (2020) Acusan a tiendas y marcas alimentación de favorecer plástico de un solo uso, 17 September 2020. [ONLINE] Available at: https://www.efe.com/efe/espana/destacada/acusan-a-tiendas-y-marcas-alimentacion-de-favorecer-plastico-un-solo-uso/10011-4344964

62 Europa Press (2020) ONG acusan a la industria de sabotear soluciones contra contaminación por plásticos de un solo uso come el SDDR, 17 September 2020. [ONLINE] Available at: https://www.europapress.es/sociedad/medio-ambiente-00647/noticia-ong-acusan-industria-sabotear-soluciones-contra-contaminacion-plasticos-solo-uso-sddr-20200917172741.html

63 Amigo, P. (2020) El negocio oculto del reciclaje ¿mito o realidad? elDiario, 20 September 2020. [ONLINE] Available at: https://www.eldiario.es/edcreativo/reciclandoadiario/negocio-oculto-reciclaje-mito-realidad_1_6229991.html

64 La Sexta (2020) Una vuelta al cole más sostenible gracias al material escolar reciclado, 17 September 2020. [ONLINE] Available at: https://www.lasexta.com/noticias/sociedad/vuelta-cole-mas-sostenible-gracias-material-escolar-reciclado_202009165f630ba9d0cd87000114cbb2.html

65 Ahijado, M. (2020) Lo que cuentan los alimentos básicos y los envases que sirven para su comercializacion. El País, 17 September 2020. [ONLINE] Available

at: https://elpais.com/sociedad/ecoembes-espacio-eco/2020-09-17/lo-que-cuentan-los-alimentos-basicos-y-los-envases-que-sirven-para-su-comercializacion.html

66 Private correspondence from Ecoembes lawyers to Moncloa.com and Merca2.

67 Ruiz, P. (2020) La 'cara B' de Ecoembes: Monopolio con sueldos de infarto y líos con Hacienda. Merca2, 24 September 2020. [ONLINE] Available at: https://www.merca2.es/ecoembes-oscar-martin-reciclaje-hacienda-envases-monopolio/

68 Ruiz, P. (2020) La 'cara B' de Ecoembes: Monopolio con sueldos de infarto y líos con Hacienda. Merca2, 24 September 2020. [ONLINE] Available at: https://www.merca2.es/ecoembes-oscar-martin-reciclaje-hacienda-envases-monopolio/

69 Private correspondence from Ecoembes lawyers to Moncloa.com and Merca2.

70 Private correspondence from Moncloa.com and Merca2 lawyers to Ecoembes.

71 Eunomia (2020) California: Environmental and social impacts of a failing bottle bill [ONLINE] Available at: https://www.eunomia.co.uk/reports-tools/california-bottle-bill/

72 Zero Waste Europe and Reloop (2020) Reusable vs single-use packaging: A review of environmental impacts [ONLINE] Available at: https://www.reloopplatform.org/wp-content/uploads/2020/12/zwe_reloop_report_reusable-vs-single-use-packaging-a-review-of-environmental-impact_en.pdf.pdf_v2.pdf

73 Ecovidrio (n.d.) Informe de sostenibilidad 2019 [ONLINE] Available at: https://www.ecovidrio.es/sites/default/files/2020-07/ECOVIDRIO_INFORME_SOSTENIBILIDAD_%202019_INTERACTIVO.pdf

74 Ecoembes (n.d.) Resumen ejectivo 2019 [ONLINE] Available at: https://www.ecoembes.com/sites/default/files/archivos_publicaciones_ecoembes/resumen-ejecutivo-2019.pdf

75 Ecovidrio (n.d.) Informe de sostenibilidad 2019 [ONLINE] Available at: https://www.ecovidrio.es/sites/default/files/2020-07/ECOVIDRIO_INFORME_SOSTENIBILIDAD_%202019_INTERACTIVO.pdf

76 Alimarket (2021) Jorge Villavecchia, nuevo presidente de Ecovidrio, 20 January 2021. [ONLINE] Available at: https://www.alimarket.es/envase/noticia/326152/jorge-villavecchia--nuevo-presidente-de-ecovidrio

77 Ecovidrio (n.d.) Informe de sostenibilidad 2019 [ONLINE] Available at: https://www.ecovidrio.es/sites/default/files/2020-07/ECOVIDRIO_INFORME_SOSTENIBILIDAD_%202019_INTERACTIVO.pdf

78 Ecovidrio (n.d.) Informe de sostenibilidad 2019 [ONLINE] Available at: https://www.ecovidrio.es/sites/default/files/2020-07/ECOVIDRIO_INFORME_SOSTENIBILIDAD_%202019_INTERACTIVO.pdf

79 Ecovidrio (n.d.) Informe de sostenibilidad 2019 [ONLINE] Available at: https://www.ecovidrio.es/sites/default/files/2020-07/ECOVIDRIO_INFORME_SOSTENIBILIDAD_%202019_INTERACTIVO.pdf

80 Ecovidrio (n.d.) Informe de sostenibilidad 2019 [ONLINE] Available at: https://www.ecovidrio.es/sites/default/files/2020-07/ECOVIDRIO_INFORME_SOSTENIBILIDAD_%202019_INTERACTIVO.pdf

81 Changing Markets Foundation (2020) Talking Trash: The corporate playbook of false solutions [ONLINE] Available at: https://talking-trash.com/wp-content/uploads/2020/09/TalkingTrash_FullReport.pdf

82 Close the Glass Loop (n.d.) European action plan. [ONLINE] Available at: https://closetheglassloop.eu/action-plans/

83 Miguel, E. (2015) El lobby de les begudes al despatx de Santi Vila. Rádio Barcelona, 5 November 2015. [ONLINE] Available at: https://cadenaser.com/emisora/2015/11/05/radio_barcelona/1446723958_647788.html

84 Valencia Plaza (2016) Ecovidrio amaga con reducir sus inversions en la Comunitat si el Consell implanta el SDDR, 27 October 2016. [ONLINE] Available at: https://valenciaplaza.com/ecovidrio

85 Hablando en Vidrio (2019) "El SDDR destruiría un sistema que funciona muy bien", 4 January 2019. [ONLINE] Available at: https://hablandoenvidrio.com/implantacion-sddr-destruiria-sistema-sostenible/

86 Close the Glass Loop (2020) Action plan for Spain [ONLINE] Available at: https://closetheglassloop.eu/wp-content/uploads/2020/06/ES-SAG-Ecovidrio_National-Action-Plans-to-close-the-glass-loop.pdf

87 Agatha Ruiz de la Prada (n.d.) Ecovidrio. [ONLINE] Available at: https://www.agatharuizdelaprada.com/colabs/ecovidrio/

88 Huelva Información (2020) Ecovidrio se suma al Día del Cáncer de Mama con la campana 'Recicla vidrio por ellas', 16 October 2020. [ONLINE] Available at: https://www.huelvainformacion.es/huelva/Ecovidrio-Dia-Cancer-Mama-Recicla_0_1510949219.html

89 Ecovidrio (n.d.) Informe de sostenibilidad 2019 [ONLINE] Available at: https://www.ecovidrio.es/sites/default/files/2020-07/ECOVIDRIO_INFORME_SOSTENIBILIDAD_%202019_INTERACTIVO.pdf

90 Living backstage (n.d.) La sostenibilidad y el reciclado presentes en la nueva colección de Agatha Ruiz de la Prada [ONLINE] Available at: https://living-backstage.com/wp-content/uploads/2017/02/ecovidrio-15.jpg

91 Imgur (2016) [ONLINE] Available at:https://i.imgur.com/yqD5TVc.jpg

92 Ecovidrio (n.d.) Informe de sostenibilidad 2019 [ONLINE] Available at: https://www.ecovidrio.es/sites/default/files/2020-07/ECOVIDRIO_INFORME_SOSTENIBILIDAD_%202019_INTERACTIVO.pdf

93 EFEverde (2014) Julia Otero, entre los premiados en la XV edición de los Premios de Ecovidrio, 2 December 2014. [ONLINE] Available at: https://www.juliaotero.net/web/otros-articulos/2126-julia-otero-entre-los-premiados-en-xv-edicion-de-los-premios-de-ecovidrio

94 Zero Waste Europe and Reloop (2020) Reusable vs single-use packaging: A review of environmental impacts [ONLINE] Available at: https://www.reloop-platform.org/wp-content/uploads/2020/12/zwe_reloop_report_reusable-vs-single-use-packaging-a-review-of-environmental-impact_en.pdf.pdf_v2.pdf

95 Greenpeace (n.d.) Ranking de supermercados según su huella plástica. [ONLINE] Available at: https://es.greenpeace.org/es/trabajamos-en/consumismo/plasticos/ranking-de-supermercados-contra-el-plastico/

96 Agencia EFE (2019) Greenpeace: Las "falsas soluciones" a la polución plástica solo la empeoran, 1 October 2019. [ONLINE] Available at: https://www.efe.com/efe/america/tecnologia/greenpeace-las-falsas-soluciones-a-la-polucion-plastica-solo-empeoran/20000036-4076777

97 FIAB (n.d.) Memoria anual 2016 [ONLINE] Available at: http://fiab.es/nuevo_fiab/wp-content/uploads/2017/12/MEMORIA-2016.pdf

98 Changing Markets Foundation (2020) Talking Trash: The corporate playbook of false solutions [ONLINE] Available at: https://talking-trash.com/wp-content/uploads/2020/09/TalkingTrash_FullReport.pdf

99 FIAB (n.d.) Memoria anual 2016 [ONLINE] Available at: http://fiab.es/nuevo_fiab/wp-content/uploads/2017/12/MEMORIA-2016.pdf

100 Alcampo (2019) Comprometidos con la reducción de plásticos [ONLINE] Available at: https://www.alcampocorporativo.es/wp-content/uploads/sites/7/2019/09/POLITICA_PLASTICOS_ALCAMPO_0920.pdf

101 Inditex (2019) Pablo Isla anticipa la estrategia hacia la sostenibilidad global de Inditex, 16 July 2019. [ONLINE] Available at: https://www.inditex.com/es/article?articleId=630055&&title=Pablo+Isla+anticipa+la+estrategia+hacia+la+sostenibilidad+global+de+Inditex

102 Inditex (n.d.) Memoria anual 2019 [ONLINE] Available at: https://www.inditex.com/documents/10279/645708/Memoria+Anual+Inditex+2019.pdf/27465242-da48-b63a-a5f9-9afca6032cf0

103 Revista Info Retail (2021) Carrefour experimenta con los envases retornables, 2 January 2021. [ONLINE] Available at: https://www.revistainforetail.com/noticiadet/carrefour-experimenta-con-los-envases-retornables/28e6f18efca3527e09959da6831277a2

104 Vizcaíno López, A. (2021) Según @InforetailNews Carrefour estaría experimentando con los envases retornables en Polonia revistainforetail.com/noticiadet/car… ¿Por qué en España bloquean la implantación del retorno de envases? ¿Hola @CarrefourES? Dentro hilo. Twitter, 4 January 2021. [ONLINE] Available at: https://twitter.com/alvizlo/status/1346102651394662400

105 OTS (2020) Lidl Austria supports one way deposit, 16 December 2020. [ONLINE] Available at: https://www.ots.at/presseaussendung/OTS_20201216_OTS0120/lidl-oesterreich-befuerwortet-einwegpfand

106 Changing Markets Foundation and Break Free From Plastic (2020) Plastic pollution lobby: A coalition against the introduction of a deposit return system in Austria [ONLINE] Available at: http://changing-markets.org/wp-content/uploads/2020/05/CM_PLASTIC-POLLUTION-LOBBY_FinalEN.pdf

107 APA-OTS (2020) Lidl Österreich befürwortet Einwegpfand, 16 December 2020. [ONLINE] Available at: https://www.ots.at/presseaussendung/OTS_20201216_OTS0120/lidl-oesterreich-befuerwortet-einwegpfand

108 Osorio, V.M. (2020) Mercadona, Carrefour y Dia pierden cuota de mercado en el año, mientras Lidl crece. Expansión, 17 September 2020. [ONLINE] Available at: https://www.expansion.com/empresas/distribucion/2020/09/17/5f63215ae5fdea067f8b4584.html

109 Mercadona (n.d.) Memoria anual 2019 [ONLINE] Available at: https://info.mercadona.es/document/es/memoria-anual-2019.pdf

110 Mercadona (n.d.) Memoria anual 2019 [ONLINE] Available at: https://info.mercadona.es/document/es/memoria-anual-2019.pdf

111 Greenpeace (2019) Supermercados, eliminad vuestro maldito plástico: Evaluación de supermercados según sus compromisos contra el plástico [ONLINE] Available at: https://es.greenpeace.org/es/wp-content/uploads/sites/3/2019/12/supermercados.pdf

112 EActíVate (2020) Así es la Estrategia 6.25 de Mercadona. [ONLINE] Available at: https://www.youtube.com/watch?v=Q2MzqeRKchQ

113 EActíVate (2020) Así es la Estrategia 6.25 de Mercadona. [ONLINE] Available at: https://www.youtube.com/watch?v=Q2MzqeRKchQ

114 La Nueva España (2020) Mercadona lo ha vuelto hacer: Así es su nuevo supermercado de Gijón del que habla todo el mundo, 29 October 2020. [ONLINE] Available at: https://www.lne.es/gijon/2020/10/29/mercadona-vuelto-nuevo-supermercado-gijon-21997770.html

115 Food Retail & Shoppers (2020) Los números de Mercadona en Portugal: Supermercados, trabajadores y fidelización, 18 December 2020. [ONLINE] Available at: https://www.foodretail.es/retailers/mercadona-expansion-portugal-supermercados-empleo-fidelizacion_0_1502849716.html

116 Orús, A. (2020) Evolución anual del número de tiendas de Mercadona en España entre 2010 y 2019. Statista, 9 December 2020. [ONLINE] Available at: https://es.statista.com/estadisticas/541156/numero-de-tiendas-de-mercadona-en-espana/#:~:text=Cifra%20de%20establecimientos%20Mercadona%20en%20Espa%C3%B1a%202010%2D2019&text=Desde%20su%20fundaci%C3%B3n%20en%201977,por%20todo%20el%20territorio%20nacional

117 Martínez Rull, E. (2020) El supermercado se libera del plástico, 16 October 2020. [ONLINE] Available at: https://www.larazon.es/medio-ambiente/20201016/ijoytchb6rcujkufn254rl3ljq.html

118 La Nueva España (2020) Mercadona lo ha vuelto hacer: Así es su nuevo supermercado de Gijón del que habla todo el mundo, 29 October 2020. [ONLINE] Available at: https://www.lne.es/gijon/2020/10/29/mercadona-vuelto-nuevo-supermercado-gijon-21997770.html

119 Mercadona (n.d.) Mayonesa en sobres individuales Hacendadao. [ONLINE] Available at: https://tienda.mercadona.es/product/17096/mayonesa-sobres-individuales-hacendado-pack-12

120 La Vanguardia (2016) El coste del retorno de envases de Valencia será de 170 millones para la distribución y el comercio, 27 October 2016. [ONLINE] Available at: https://www.lavanguardia.com/vida/20161027/411374997587/economia--el-coste-del-retorno-de-envases-de-valencia-sera-de-170-millones-para-la-distribucion-y-el-comercio.html

121 Moret, X. (2016) Supermercados y grandes marcas contraatacan con una campaña online contra el sistema de envases, 11 October 2016. [ONLINE] Available at: https://valenciaplaza.com/la-patronal-de-la-distribucion-y-las-grandes-marcas-contraatacan-con-una-campana-online-contra-el-sddr

122 Moret, X. (2016) Manifiesto empresarial para exigir a Ximo Puig que frene el plan de envases retornables, 24 August 2016. [ONLINE] Available at: https://valenciaplaza.com/el-plan-de-envases-retornables-del-consell-une-a-comercio-y-distribucion-en-su-contra

123 Álvaro, J. (2013) Mercadona pretende rematar al comercio de barrio. El Bloc de Juliá Álvaro, 28 October 2013. [ONLINE] Available at: http://www.juliaalvaro.com/search?q=mercadona

124 Food Retail & Shoppers (2017) Consum considera "un problemón" las máquinas de retorno de envases, 5 May 2017. [ONLINE] Available at: https://www.foodretail.es/retailers/Consum-considera-problemon-maquinas-retorno_0_1105989399.html

125 Reig, P. (2016) Entrevista el pasado lunes en @lasprovincias #SDDR #ASUCOVA @ASEDAS_ORG @igmagarzo. Twitter, 12 September 2016. [ONLINE] Available at: https://twitter.com/pedroreig/status/775251510695428096

126 Changing Markets Foundation (2020) Talking trash: The corporate playbook of false solutions [ONLINE] Available at: https://talking-trash.com/wp-content/uploads/2020/09/TalkingTrash_FullReport.pdf

127 UNESDA and EFBW (2020) DRS [ONLINE] Available at: https://www.unesda.eu/wp-content/uploads/2020/09/UNESDA-EFBW-joint-paper-DRS.pdf

128 UNESDA (2020) UNESDA & @efbw_eu believe that well-designed #DepositReturnSchemes can help reach the EU collection targets for beverage bottles & safeguard the quality rPET that our industries need. @EU_ENV, @VSinkevicius, @TimmermansEU. Twitter, 25 September 2020. [ONLINE] Available at: https://twitter.com/UNESDA/status/1309472124390846465?s=20

129 UNESDA and EFBW (2020) DRS [ONLINE] Available at: https://www.unesda.eu/wp-content/uploads/2020/09/UNESDA-EFBW-joint-paper-DRS.pdf

130 Food Retail and shoppers (2021) Devolución y Recompensa: el futuro del reciclaje de envases. 02 Febrero 2021. [ONLINE] Available at: https://www.foodretail.es/industria-auxiliar/reciclaje-envases-recompensa-devolucion-tendencias_0_1516648345.html

131 Ecoembes (2020) Nota informative de Ecoembes ante el informe de Greenpeace, 29 October 2020. [ONLINE] Available at: https://www.ecoembes.com/es/ciudadanos/sala-de-prensa/nota-informativa-de-ecoembes-ante-el-informe-de-greenpeace?_cldee=eGltZW5hLmJhbmVnYXNAY2hhbmdpbmdtYXJrZXRzLm9yZw%3d%3d&recipientid=contact-1b24ae21901aeb119434005056b10bd1-fbe78571360c4ccba29afed20cc16654&esid=7bb25459-981a-eb11-9434-005056b10bd1

132 ANGED (n.d.) Informe de sostenibilidad 2018 [ONLINE] Available at: https://www.anged.es/wp-content/uploads/2019/12/INFORME-SOSTENIBILIDAD_ANGED.pdf

133 CincoDías (2020) Ecoembes instala las primeras máquinas que recompensarán por reciclar, 16 November 2020. [ONLINE] Available at: https://cincodias.elpais.com/cincodias/2020/11/15/companias/1605459397_756150.html

134 Expansión (2021) Nuevos sistemas de reciclaje de envases con premio. 03 February 2020. [ONLINE] Available at https://www.expansion.com/empresas/distribucion/2021/02/03/601a9c85468aeb00688b45eb.html

135 Changing Markets Foundation (2020) Talking trash: The corporate playbook of false solutions [ONLINE] Available at: https://talking-trash.com/wp-content/uploads/2020/09/TalkingTrash_FullReport.pdf

136 Parlament de les Illes Balears (2019) El Parlament approva la Llei de residus i sóls contaminants de les Illes Balears. [ONLINE] Available at: http://www.parlamentib.es/webdocs/NoticiaPIB.aspx?id=2929

137 BOE (2019) Ley 8/2019, de 19 de febrero, de residuos y suelos contaminandos de las Illes Balears [ONLINE] Available at: https://www.boe.es/buscar/pdf/2019/BOE-A-2019-5577-consolidado.pdf

138 BOE (2019) Ley 8/2019, de 19 de febrero, de residuos y suelos contaminandos de las Illes Balears [ONLINE] Available at: https://www.boe.es/buscar/pdf/2019/BOE-A-2019-5577-consolidado.pdf

139 Blasco, T. (2019) El Parlament aprueba este martes la ley que adelanta el fin del plástico en Baleares. Ultima Hora, 29 January 2019. [ONLINE] Available at: https://www.ultimahora.es/noticias/local/2019/01/29/1054083/parlament-aprueba-este-martes-ley-adelanta-fin-del-plastico-baleares.html

140 Serra, J.J. (2018) Enfrentamiento de Govern y Consell con Ecoembes por Llei de Residus. Ultima Hora, 24 October 2018. [ONLINE] Available at: https://www.ultimahora.es/noticias/local/2018/10/24/1033603/enfrentamiento-govern-consell-ecoembes-por-llei-residus.html

141 Serra, J.J. (2018) Enfrentamiento de Govern y Consell con Ecoembes por Llei de Residus. Ultima Hora, 24 October 2018. [ONLINE] Available at: https://www.ultimahora.es/noticias/local/2018/10/24/1033603/enfrentamiento-govern-consell-ecoembes-por-llei-residus.html

142 GOIB (2020) Estudios de residuos. [ONLINE] Available at: http://www.caib.es/govern/sac/fitxa.do?codi=3609542&coduo=919&lang=es

143 GOIB (2020) Estudios de residuos. [ONLINE] Available at: http://www.caib.es/govern/sac/fitxa.do?codi=3609542&coduo=919&lang=es

144 Greenpeace España (2020) Ecoembes miente: Desmontando los engaños de la gestión de residuos de envases domésticos [ONLINE] Available at: https://es.greenpeace.org/es/wp-content/uploads/sites/3/2020/10/Informe-ECOEMBES-MIENTE_fin.pdf

145 Interview for Changing Markets Foundation with Vincenc Vidal, 8 October 2020.

146 Serra, J.J. (2018) Enfrentamiento de Govern y Consell con Ecoembes por Llei de Residus. Ultima Hora, 24 October 2018. [ONLINE] Available at: https://www.ultimahora.es/noticias/local/2018/10/24/1033603/enfrentamiento-govern-consell-ecoembes-por-llei-residus.html

147 GOIB (2020) Estudios de residuos. [ONLINE] Available at: http://www.caib.es/govern/sac/fitxa.do?codi=3609542&coduo=919&lang=es

148 La Islas Baleares Sostenibles (2019) Prueba piloto de un sistema de depósito devolución y retorno de envases en una de las Islas Balerares. [ONLINE] Available at: http://www.illessostenibles.travel/proyecto-its/es/illesbalears/prueba-piloto-de-un-sistema-de-deposito-devolucion-y-retorno-de-envases-en-una-de-las-islas-baleares

149 Méndez, A.G. (2020) Teresa Ribera, con un familiar en Ecoembes, facilita su opacidad desde el Gobierno. Moncloa, 19 November 2020. [ONLINE] Available at: https://www.moncloa.com/2020/11/19/teresa-ribera-asesora-ecoembres-ministra/

150 The Circular Lab (2020) @sanchezcastejon sitúa a #TheCircularLab, el centro de innovación abierta de @ecoembes, en la punta de lanza europea en la gestion de residuos y la #economíaCircular Un modelo de producción y consumo defendido @desdelamoncloa + @AytoLogrono + @lariojaorg @ConchaAndreu. Twitter, 20 November 2020. [ONLINE] Available at: https://twitter.com/TheCircularLab/status/1329770853823885315

151 Nuevecuatrouno (2020) Sánchez pone a Aresol, Bosonit y Arsys como <<fundamentales>> para el future de España, 20 November 2020. [ONLINE] Available at: https://nuevecuatrouno.com/2020/11/20/rioja-gobierno-espana-presidente-sanchez-empresas-futuro-pais/

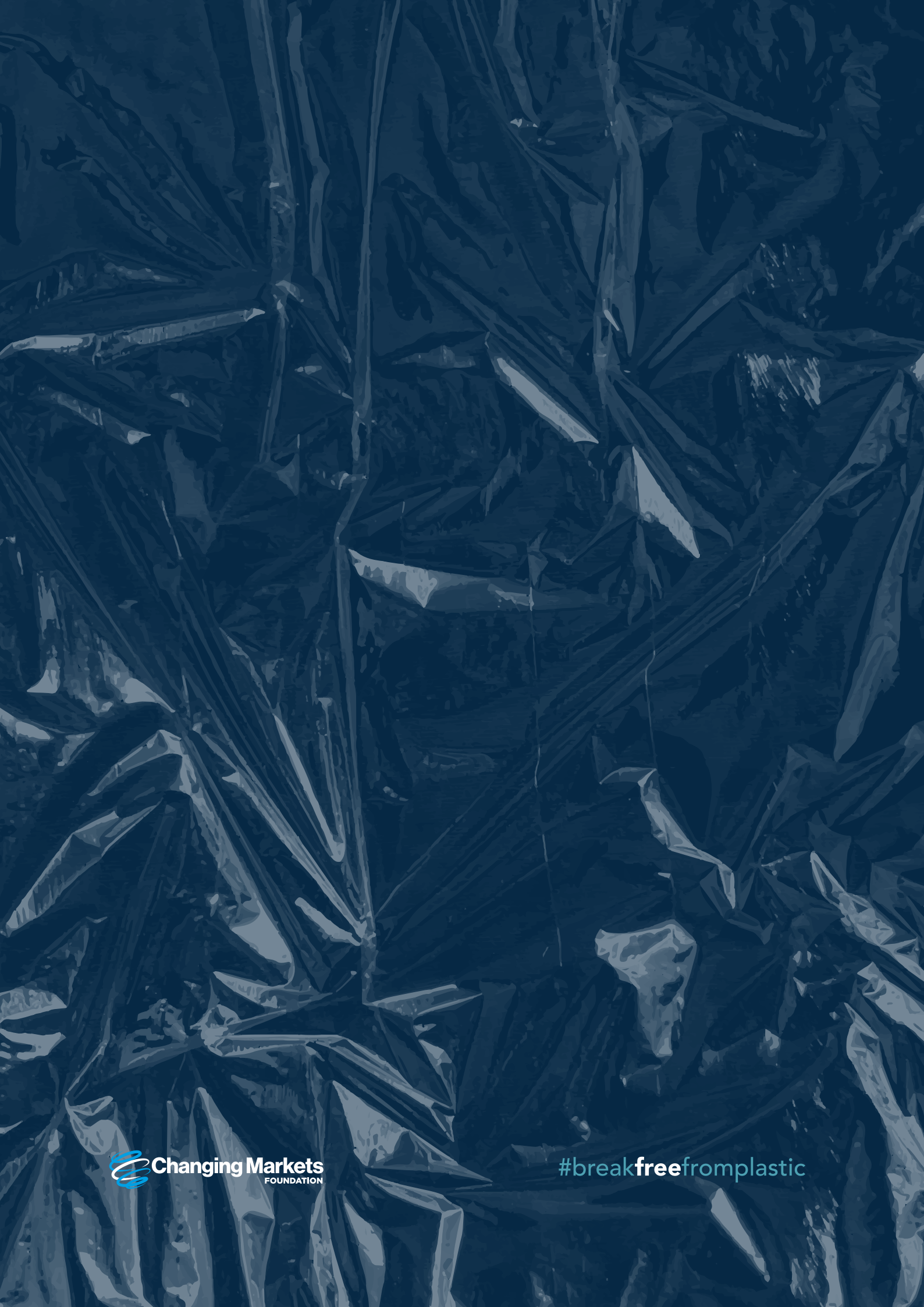
152 Álvarez Barba, Y. (2020) Alberto Vizcaíno: “Si lo que hace Ecoembes se hiciera bien, el reciclaje generaría el triple de empleo”. El Salto, 3 November 2020. [ONLINE] Available at: https://www.elsaltodiario.com/ecoembes/alberto-vizcaino-contenedor-amarillo-sa-reciclaje-triple-empleo

153 Reloop (n.d.) Fact sheet: Deposit return systems create more jobs [ONLINE] Available at: https://www.reloop-platform.org/wp-content/uploads/2021/01/DRS-Fact-sheet-Jobs-27Jan2021.pdf

154 Gómez, M.V. (2021) España destruyó 622.600 empleos y la tasa de paro aumentó hasta el 16,13% en el año de la pandemia de coronavirus. El País, 28 January 2021. [ONLINE] Available at: https://elpais.com/economia/2021-01-28/espana-destruyo-622600-empleos-y-la-tasa-de-paro-aumento-hasta-el-1613-en-el-ano-de-la-pandemia-de-coronavirus.html

155 Changing Markets Foundation (n.d.) Deposit return systems explained [ONLINE] Available at: https://talking-trash.com/wp-content/uploads/2020/08/Talking-Trash_2_DRSExplained.pdf

156 País ao Minuto (2020) Regime de gestão de resíduous e aterros publicado em Diário da República, 11 December 2020. [ONLINE] Available at: https://www.noticiasaominuto.com/pais/1644951/regime-de-gestao-de-residuos-e-aterros-publicado-em-diario-da-republica



Changing Markets FOUNDATION

#breakfreefromplastic