

Changing Markets Foundation
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Mr Ulf Mark Schneider
A5-606,
Avenue Nestlé 55,
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Switzerland

London, 29 October 2020

RE: Talking Trash: the corporate playbook of false solutions to the plastic crisis

Dear Mr Schneider,

We are writing to you in regard to our recent investigation and report entitled [Talking Trash: the corporate playbook of false solutions to the plastic crisis](#), released on 17th September 2020.

The report investigates industry tactics in the face of an unprecedented plastic pollution crisis and growing pressure to address it. We critically analysed the voluntary commitments to tackle plastic pollution of the ten most plastic polluting companies (Coca-Cola, Colgate-Palmolive, Danone, Mars Incorporated, Mondelēz International, Nestlé, PepsiCo, Procter & Gamble, Perfetti van Melle and Unilever), as well as several other major group initiatives around the world. This, in combination with research and investigations into industry lobbying in 15 countries across 5 continents, where plastic legislation was proposed, revealed a global trend of corporations trying to undermine proven legislative solutions to the plastic crisis.

We chose Nestlé as one of the biggest consumer goods companies with packaging that consistently ends in the environment – you were found to be the second worst plastic polluter according to Break Free from Plastic Brand audit in 2019. Our analysis of Nestlé noted that, although it supports mandatory Extended Producer Responsibility, it does not specifically call for legislation for mandatory separate collection of 90% separate collection of plastic bottles – a move that is paramount to reducing plastic pollution and creating clean streams of high quality recyclate for turning into new bottles.

We also noted Nestlé as one of the companies with a disappointing track record of missed commitments, including a 2008-2018 commitment to double recycling of PET bottles in North America to 60%. Elsewhere, promises to create a ‘one tonne in, one tonne out’ principle for plastic sachets in countries with high leakages of plastic into the environment lack specificity or accountability, which lead us to be concerned that they are only paper promises.

In terms of commitments to recycled content, we note that, despite your goal to achieve 25% recycled content by 2025, current rates are only 2% across your plastic packaging portfolio, and 5% in PET bottles. With little over four years to go, there is a worryingly large amount of ground to make - without first concentrating on increasing collection rates and supporting

systems to achieve this. We are also concerned by Nestlé's investment into bio-plastic without any clear sustainability criteria for the sourcing of bio-based materials. We would encourage Nestlé to properly analyse what is, and what isn't, a good use of bio-based, biodegradable or compostable plastic, and to ensure any of this material that is used does not cause competition for land or exacerbate deforestation. We would also encourage you to scale up systems of reuse, as this is the best strategy to avoid plastic pollution.

We noted your response to our report in the media, and your highlighting of your efforts to cut virgin plastic use, which is a step in the right direction. We would encourage you to level up your ambition to tackling the crisis by considering a series of recommendations for companies in our report:

- Ensure commitments are more ambitious than existing, or proposed, legislation to address plastic pollution. Openly express support of – and call for – progressive legislation to address the plastic crisis, encourage peers to do the same and leave any industry initiatives that oppose, delay or undermine progressive legislation – including its implementation. While we note that Nestlé is a member of EFBW, which recently came out in favour of a well-designed DRS to meet the Single Use Plastics Directive, we are calling you to support DRS globally, as these systems are key to reducing litter and increasing the levels reuse and effective recycling.
- Be transparent about the company's full plastic footprint (including products and packaging) and progress against targets on plastic, setting out a holistic approach to discourage 'virtue signalling' with tokenistic gestures (e.g. products from ocean plastic). Ensure such reporting includes achievements across all markets and brands, and is based on independently verified data.
- Commit to meaningful measures that would lead to a significant reduction in single-use plastics and other single-use materials. These measures need to be specific, measurable, time-bound and independently verified, and should include ambitious targets for reuse and refill, redesign of products and effective recycling.¹
- 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, including clear sustainability criteria that prevent deforestation or competition with food. Such positions should not mislead or confuse consumers or undermine current recycling systems.
- 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.

In your company's Creating Shared Value report, Nestlé identifies plastic and packaging as having both a significant business impact and of holding a high degree of stakeholder interest. To truly scale ambition to tackle the plastic crisis, we are calling on the company to publicly advocate for legislative solutions to the crisis and also leave trade groups and other organisations that were set up and continue to oppose legislative solutions.

¹ This is sometimes also called closed-loop recycling, where for example a plastic bottle can be recycled multiple times into a plastic bottle and not down-cycled into, for example fibres for the carpet and fashion industry. Some plastic polymers, such as PET and HDPE, can be mechanically recycled into new plastic products multiple times, if collected through clean waste streams.

We would appreciate it if you could respond to this letter by 19th November 2020, and we remain at your disposal for any additional information.

Yours sincerely,



Nuša Urbančič, Campaigns Director, Changing Markets Foundation

CC: Rob Cameron, Global Head of Public Affairs
Pindelwa Mda, Deputy Head of Global Affairs

This letter is also endorsed by:

