



Changing Markets Foundation
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Mr David S. Taylor
Procter and Gamble
Route de Saint-Georges 47,
1213 Petit-Lancy,
Switzerland

London, 29 October 2020

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

Dear Mr Taylor,

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.

P&G repeatedly comes out as one of the worst plastic polluters according to Break Free From Plastic brand audits, coming in at number seven in 2019, which is why we decided to analyse your companies' commitments to address the plastic pollution crisis. We were concerned by the lack of transparency whereby your plastic footprint was only made publicly available after questioning by As You Sow. We also note that the deadline for your commitment to make your packaging fully recyclable falls a full 5 years after the other companies analysed (2030 instead of 2025), and that your recycled content target is a lowly 8% by 2025 – a modest increase from 6.3% in 2018 and far lower than other companies analysed.

Rather than committing to supporting proven solutions to the plastic crisis, such as mandatory Extended Producer Responsibility, deposit return systems and refill and reuse targets, Procter & Gamble instead highlights flagship project such as your use of marine derived plastic in Head & Shoulders shampoo and Fairy washing-up liquid bottles. This is touted as "the most significant solution to marine plastic that we have ever seen in the world" – one of the worst examples of greenwash that we have uncovered in our analysis. Our research also points to the fact that this was used in a misleading way to make consumers believe that P&G plans to use 25% recycled content from marine plastic in some of its

brands. We strongly urge you to put your weight behind real solutions over marketing gimmicks.

Elsewhere we are concerned by your company's track record of changing the goalpost on its voluntary commitments, for example a 2010 target to replace petroleum-based plastics with renewable materials by 2020 (which has not been reported on since), and for which the wording was significantly altered to water down the ambition. Overall, Procter & Gamble's approach to the plastic crisis appears to be more about generating attention-grabbing headlines than substantively addressing the issue.

We have noted with interest your lack of response to our report in the media and are disappointed at your company's lack of engagement on this issue. Nevertheless, 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. In this instance, we are asking P&G to publicly support deposit return systems globally, as these are precursors to reduction of litter and key instruments to set up reuse and recycling infrastructure.
- 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.

If Procter & Gamble truly wishes to tackle the plastic crisis it must 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: Virginie Helias, Chief Sustainability Officer
Gian De Belder, Technical Director, Packaging Sustainability

This letter is also endorsed by:

