

Joint civil society position on the four nations commitment to plastic film collections

Executive Summary

The four nations commitment to introduce mandatory separate collections of plastic film and flexible packaging by 31 March 2027 is a significant opportunity to address a problematic waste stream. However, collection alone will not deliver circularity. Without complementary safeguards, expanded collection risks increasing incineration, downcycling and plastic waste exports, entrenching a high-carbon, linear system rather than reducing plastic production and harm.

To ensure this policy contributes to the UK's circular economy and climate goals, implementation must:

- Prioritise prevention and reduction of single-use, including hard-to-recycle flexible plastics;
- Align collection expansion with safe, economically viable domestic mechanical recycling capacity;
- Introduce time-bound measures to phase out plastic waste exports and ensure full end-destination transparency;
- Prevent lock-in to incineration and exclude unproven chemical recycling and mass-balance accounting from recycled-content policy;
- Establish evidence-based recyclability and chemical-safety criteria grounded in real-world UK conditions;
- Accelerate investment in reuse and refill systems.

Mandatory film collection must sit within a broader structural shift that reduces plastic production, strengthens domestic infrastructure, and delivers a genuinely circular, low-carbon and non-toxic plastics system.

Introduction

The four nations commitment to introduce mandatory separate collections of recyclable plastic film and flexible packaging by 31 March 2027 is an important opportunity to address a highly problematic waste stream. However, without complementary measures to reduce plastic production and consumption, expand domestic processing capacity, and restrict harmful disposal and export practices, this policy risks increasing environmental, social, and carbon-intensive harms.

Flexible plastics are overwhelmingly not recycled back into new products. Many are incinerated, landfilled, or exported, often through opaque routes, with documented cases of illegal dumping in the UK and abroad and severe environmental and social justice impacts in recipient communities.^{1,2,3} The UK does not currently have sufficient domestic infrastructure to safely or practically manage these materials at scale, which reinforces the need for upstream reduction and robust domestic recycling solutions.

The upcoming UK Circular Economy Growth Plan in 2026 provides a key opportunity to ensure these challenges are addressed. Mandatory film collection should be designed in a way that directly supports this strategy, delivering not only reductions in waste and pollution but also tangible public benefits, including cleaner streets, countryside and seas, reduced exposure to toxic emissions from disposal, and meaningful cuts in carbon and climate impacts. Embedding these outcomes from the outset will help ensure that film collection contributes to a genuinely circular, low-carbon and non-toxic plastics economy.

1. Prioritising waste prevention and plastic reduction

Collection for recycling must not be a substitute for the primary objective of reducing plastic production and consumption, particularly single-use and hard-to-recycle flexible plastics. In line with the waste hierarchy, embedding prevention and reduction measures from the start of collection plans will help maximise their social and environmental benefits. Measures should include:

- Expansion of reuse systems and related investment in the necessary shared infrastructure for their success
- Implementation of regulatory measures and economic incentives to require producers and retailers to eliminate unnecessary plastic packaging

- Establishment of product design criteria for plastic packaging to restrict the use of non-recyclable and harmful plastic polymers and design with recyclability in mind
- Introduction of policy measures and retailer engagement strategies to facilitate and, where appropriate, require increased availability of loose and packaging-free produce in supermarkets
- Packaging Extended Producer Responsibility (pEPR) fee eco-modulation that strongly disincentivises flexible plastics, making producers responsible for the full net costs of managing packaging waste and funding domestic reuse and recycling infrastructure⁴

Focusing on upstream reduction ensures that the volume of flexible plastics entering households and collection systems decreases, rather than perpetuating reliance on downstream disposal.

2. Domestic capacity and strengthened export controls

The UK remains structurally dependent on exporting plastic with at least 598 million kilos of plastic waste exported in 2024 alone.⁵ Large volumes of plastic are shipped overseas each year, with documented illegal dumping and mismanagement both in the UK and abroad, and significant environmental and social justice impacts for communities in recipient countries.^{6,7} Current Packaging Recycling Note (PRN) and Packaging Export Recycling Note (PERN) systems can unintentionally incentivise exports over domestic recycling, with limited requirements for contamination control and weak enforcement.⁸

To address these challenges:

- Ensure domestic mechanical recycling capacity is strengthened and encourage strict product design criteria for materials which cannot be handled through existing domestic non-toxic recycling processes
- Phase out UK plastic exports to non-OECD countries immediately, with a clear time-bound plan for OECD countries⁹
- Introduce mandatory digital tracking and end-destination reporting for all collected flexible plastics within a fixed implementation deadline, ensuring it supports and does not delay the rapid reduction and phase-out of exports.
- Enforce low contamination thresholds and stronger inspection and enforcement to reduce illegal or mismanaged shipments

Film collection scale-up should be matched to domestic mechanical reprocessing capacity to prevent further export-related harm and viewed as part of a comprehensive package of policies aimed at reducing the overall volume of film and flexible packaging placed on the market. This is particularly important because even when plastic film is collected for recycling, it is rarely recycled back into new film and is instead typically downcycled into lower-value products such as plant pots, benches and picnic tables, which does not reduce demand for new plastic film and therefore fails to deliver genuine circularity.^{10,11}

3. False solutions and harmful end of life pathways

Solutions to manage plastic film waste must be based on reliable, existing technology as far up the waste hierarchy as possible. Waste-to-energy incineration and chemical recycling are consistently promoted as alternatives to landfill, yet both entrench a linear, high-carbon system and divert resources away from prevention, reuse and genuine mechanical recycling. Recent analysis shows that chemical recycling is energy-intensive, polluting, and largely theoretical, with most life-cycle assessments omitting key stages such as hazardous waste generation, chemical inputs and purification, systematically underestimating its real-world impacts.¹² Waste-to-energy similarly locks in long-term feedstock demand and increases carbon emissions.¹³ These pathways are therefore false solutions that delay the transition to a genuinely circular plastics system.

To address these challenges:

- Immediate development of a meaningful and effective moratorium on new incineration and waste-to-energy capacity in England and closing loopholes in Scotland's incineration moratorium
- Adoption of residual waste reduction targets across all four UK nations that are at least as ambitious as the UK-wide goal of halving residual waste per capita by 2042, with appropriate interim milestones. Targets should clearly define the household waste proportion and be embedded in waste procurement and planning to ensure that incineration is not the default pathway.
- In Wales, local authority targets should align with an 80% recycling ambition by 2033, supporting the trajectory toward zero waste.¹⁴

- Escalate fiscal measures on disposal, building on the 2026 Landfill Tax increase and the inclusion of waste incineration in the UK Emissions Trading Scheme from 2028, to ensure incineration does not become the default outlet for collected film and to shift the financial burden of high-carbon disposal from councils onto producers.
- Prohibit chemical recycling and mass-balance methods from qualifying as recycled content under the PPT from April 2027, given their unproven performance and risk of generating misleading circularity claims.
- No public investment in chemical recycling projects, such as those proposed as part of Project Willow in Grangemouth.

These measures ensure that collection infrastructure does not lock in high-carbon, hazardous, or non-circular disposal practices but instead supports a genuine shift toward prevention, reuse and safe mechanical recycling.¹⁵

4. Recyclability and chemical safety criteria

Recyclability must be based on what can be collected, sorted and mechanically recycled at scale in the UK today, rather than on theoretical or future processes. Most flexible plastics cannot meet this threshold in practice, and relying on technical or claimed recyclability misrepresents real-world outcomes. Plastic film is typically downcycled rather than recycled back into new film, meaning it does not reduce demand for virgin materials or mitigate associated harms. Recent evidence also shows that many current recyclability classifications are undermined by misleading claims: UK and EU consumer-law analysis finds that recycling labels and symbols frequently imply closed-loop circularity that does not exist in reality, particularly for soft plastics, creating a false impression of environmental benefit and weakening waste-prevention efforts.¹⁶

At the same time, significant chemical-safety gaps exist in assessments of alternative end-of-life pathways. Life-cycle analyses of chemical-recycling technologies routinely omit critical stages such as hazardous-waste generation, toxic emissions, purification requirements, and extensive chemical and energy inputs, resulting in systematic underestimation of their environmental and health impacts.¹⁷

To address these risks and ensure recyclability criteria reflect real-world outcomes, key recommendations include:

- Evidence of compatibility with existing UK mechanical recycling systems.
- Compliance with strict chemical safety standards to prevent hazardous additives re-entering the economy.
- Transparency for consumers and producers, including clear, standardised recyclability labelling, to avoid greenwashing and support the shift up the waste hierarchy.
- Alignment with pEPR design criteria so producers cannot market materials as recyclable without meeting these real-world conditions.

These safeguards ensure that recyclability claims do not mislead the public or undermine waste-prevention objectives.

5. Four nation implementation and minimum safeguards

Film collection reforms intersect with distinct regulatory frameworks across England, Scotland, Wales, and Northern Ireland.

Effective implementation requires:

- Minimum UK-wide safeguards on exports, end-of-life pathways, and reporting
- Alignment with devolved strategies, without reducing higher national ambitions
- Coordination to ensure producer responsibility funding supports consistent, high-quality collection and sorting in both the immediate and long term

6. Just transition and global responsibility

Shifting away from hard-to-recycle plastics and reducing exports will impact workers in manufacturing, waste management, and related sectors.

Measures should include:

- Meaningful inclusion of workers, communities and environmental groups in plastic film collection development plans

- Reskilling and training programmes to support workers into secure, well-paid circular economy jobs
- Use of Extended Producer Responsibility (EPR) funding to create domestic employment in reuse, repair, remanufacturing, and high-quality recycling
- Recognition of social and environmental impacts overseas, ensuring UK policy does not perpetuate harm or inequity in recipient countries

This ensures that environmental and economic objectives are pursued together.

Conclusion

Mandatory flexible plastic film collection can only support a credible circular economy if it is implemented alongside strong reduction measures, alignment with safe domestic mechanical recycling capacity, firm export controls, and clear safeguards against incineration and unproven chemical recycling pathways.

Without these complementary policies, expanded collection risks increasing disposal, downcycling and the export of environmental harm while overstating recycling progress. With them, it can contribute to reduced plastic production, lower carbon emissions, improved public and environmental health, and a genuinely circular, low-carbon and non-toxic UK plastics system.



Bibliography

1. EIA & Everyday Plastic (2024). *The Hard Truth About Soft Plastics*. Available [here](#).
2. EIA (2024). *Dirty Deals: Part One*. Available [here](#)
3. EIA (2024). *Dirty Deals: Part Two*. Available [here](#).
4. Wildlife & Countryside Link (2025). *Packaging EPR – what it is, why we need it now and how to make it better*. Available [here](#).
5. Basel Action Network (2024). *United Kingdom Export Data 2024 annual summary*. Available [here](#).
6. BBC News. (2025). *Hundreds of illegal waste sites found across England*. Available [here](#) (Accessed 5th March 2026)
7. Human Rights Watch (2022). *“It’s As If They’re Poisoning Us” The Health Impacts of Plastic Recycling in Turkey*. Available [here](#).
8. EIA (2024). *Dirty Deals: Part Two*. Available [here](#).
9. EIA (2025). *The UK’s Dirty Secret*. Available [here](#).
10. Tesco PLC (n.d.). *Packaging and plastics*. Available [here](#) (Accessed: 5 March 2026).
11. Packaging Europe (2024). *Soft plastic packs from Tesco converted into furniture and tools for NHS gardens*. Available [here](#) (Accessed 5 March 2026).
12. Singla, V. (2026). *Major Gaps in Life Cycle Assessments (LCAs) for Chemical Recycling Technologies*. Natural Resources Defense Council (NRDC). Available [here](#).
13. Zero Waste Europe (2023). *Enough is enough: The case for a moratorium on incineration*. Available [here](#).
14. Welsh Government. (2 March 2021). *Beyond recycling: wellbeing assessment*. Gov.Wales. Available [here](#).
15. Wildlife & Countryside Link (2023). *Plastic Packaging Tax – chemical recycling and adoption of a mass balance approach– 10 October 2023*. Available [here](#).
16. ClientEarth (2024). *Plastic recycling claims are misleading consumers: An analysis of EU and UK consumer protection law*. Available [here](#).
17. ClientEarth and ECOS (2025). *Recycling claims: How to identify greenwashing*. Available [here](#).

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