



Brussels 9th of October 2018

Subject: Single-Use Plastics – alternative proposal to address littering of beverage caps

Dear Minister,

The signatories of this letter – **The Coca Cola Company, Danone, Nestlé and PepsiCo** – have all taken far-reaching commitments on the recyclability and collection of their PET beverage containers and caps as well as for the uptake of recycled content (see footnote¹). These commitments will be instrumental in reducing the impact of plastics on the environment.

The European Commission proposal for a Directive ‘on the reduction of the impact of certain plastic products on the environment’ introduces mandatory tethered caps for beverage containers.

We fully support the objective of the European Commission to address littering of bottles and their caps. Available data shows that performant collection schemes for beverage bottles such as Deposit Return Schemes² (e.g. Germany) or well-performing Extended Producer Responsibility Schemes³ (e.g. Belgium) are the best guarantee to avoid littering of both bottles and their caps.

As explained by our companies to the EU Institutions, investment in mandatory tethered caps will not necessarily lead to the required outcomes.

We believe that **investments should be directed into technology and infrastructure that will achieve collection of 90% of bottles and their caps by 2025** and we therefore ask to reserve the obligation for tethered caps only if the targets outlined below will not deliver.

Our 4 companies are committed to work with all partners and within the local context to improve the effectiveness of current collection schemes allowing to collect bottle and cap at similar level whichever scheme is established at local level. This could involve exploring new technical solutions. Based on those efforts and investments we will prove that a 90% collection target is possible.

¹ [The Coca Cola Company](#) / [Danone](#) / [Nestlé](#) / [PepsiCo](#)

² In countries where Deposit Return Schemes (DRS) are in place (8 countries today, 2 additional shortly), estimates show that at least 90% of collected bottles are returned with their caps. In Norway 98,7 % of bottles are brought back with lids on.

³ In countries where other Extended Producer Responsibility (EPR) Schemes are implemented, estimates show that the collection rate of bottles and caps are equal.

For **Deposit Return Schemes:**

- We are committed to monitor and report, through independent third party, the proportion of returned caps with new measurement technology in at least 2 countries (e.g. the Netherlands, Germany) by March 2019 to demonstrate the effectiveness of these schemes.
- If data shows that less than 95% caps from returned bottles are collected, we will work together with our partners to upgrade reverse vending machine software in at least 2 countries (e.g. the Netherlands, Germany) to ensure consumers return caps with bottle by end of 2021, eventually through financial incentive. Suppliers of reverse vending machines have confirmed that this is technically possible within a short timeframe (see Annex). Results will be monitored and reported, through an independent third party, by end of 2021.
- If successful, those upgrades would be scaled up to all Member States with Deposit Return Schemes to ensure at least 90% collection of bottles and their caps by 2025.

For **Extended Producer Responsibility Schemes:**

- We will strive towards similar performance as achieved through DRS.
- The collection of bottles and caps will be reflected in the design of EPR-fees that have to be paid by beverage producers e.g. higher EPR-fees so that producers whose bottles come back without caps are incentivized to address the issue, upon positive decision of the Board of the EPR scheme.
- Extensive introduction of digital solutions giving consumers clear incentives to dispose efficiently bottle and cap. Pilots in 2 key markets (with CITEO in France and ECOEMBES in Spain; pending the respective government approval) will be launched by end of 2019. Results will be monitored and reported, through an independent third party, by end of 2021. See Annex for a concrete example of digital solution.
- If successful, those solutions would be rolled out to all Member States with Extended Producer Responsibility Schemes to ensure at least 90% collection of bottles and their caps by 2025, upon positive decision of the Board of the EPR schemes.

On top of this we will develop **pan-European consumer education** including common labelling to ensure proper disposal of bottle & cap together and digital tools to reinforce and incentivize right consumer behaviors.

In the light of these commitments **we suggest that tethered caps will only become mandatory if our proposed alternatives do not prove to be effective by end of 2021.**

If this proposal is accepted we will start introducing the above-mentioned commitments immediately.

Yours sincerely



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