

CTPA Take-Back Schemes for Cosmetic Product Packaging

Position Statement

December 2022

CTPA strongly believes that all items of packaging for cosmetic products placed on the market must be ultimately recyclable, either via kerbside collections or through the provision of Take-back Schemes.

Introduction

Currently, certain types of cosmetic packaging are not recycled, in particular small items of packaging. While the cosmetics industry is working towards reducing or removing unnecessary packaging, and the adoption of reuse and refill models where appropriate, the challenge of this unrecycled packaging must be addressed.

Whilst many members have or are considering Take-back Schemes, where consumers return the packaging to dedicated collection points, CTPA recognises that with a more industry-wide approach, the awareness of such schemes and quantity of packaging recovered can be increased and maximum value added to the material that is recovered. This work builds on the CTPA's [Sustainability Strategy](#) 'Driving Towards a Net Positive Cosmetics Industry'.

What is the Issue?

Take-back Schemes will likely operate within the Extended Producer Responsibility ([EPR](#)) obligations. Defra (the Department for Food, Environment and Rural Affairs) has indicated that operators of such schemes who can prove that they have recycled items that are not recyclable kerbside, and which otherwise would have gone to landfill, will be eligible for 'offsetting' against their household costs obligations. Take-back Schemes do not make cosmetic packaging any easier to recycle kerbside but having such a scheme would mean that operators are removing this packaging from household waste, and therefore should not be charged EPR fees on the packaging that they are already paying to recover.

The UK Government is expected to appoint the Scheme Administrator in 2023. With this appointment the Government can finalise the rules and detailed guidance, details on recyclability and sustainability assessments, EPR modulated fees methodology and how EPR fees and rebates will be determined. All of this is expected in 2023/2024. We are also waiting for precise details of how mandatory national labelling with 'Recycle' or 'Do not Recycle' will operate, which is due to be introduced in 2026.

Some of these schemes are known to be adopting the [OPRL](#) (On-Pack Recycling Label Ltd) protocol and principles, ensuring that there is a level of consistency under the common framework of the OPRL principles. Conforming to such a framework enables the use of a specific label to direct users to dispose of their used packaging through a Take-back Scheme. Without such a label, under future policy commitment, such packaging would be labelled as 'Do Not Recycle'.

The Recycle Now Recycling Locator Tool (recyclenow.com/recycling-locator) contains the locations of participating Take-back Schemes for cosmetics and personal care products packaging. This means that consumers can easily find online the nearest place they can take back small/complex items that cannot be recycled kerbside.

The Recycle Now team at WRAP, working with CTPA, will aim to increase the number of cosmetics brands that are highlighting this opportunity to their consumers and encouraging this form of recycling for currently unrecycled cosmetic packaging.

What is CTPA's Position

CTPA is committed to helping the cosmetics and personal care industry succeed with Take-back Schemes.

- Any company that wishes to set up its own Take-back Scheme can and should do so, recommending it aligns with the OPRL Protocol.
- For postal Take-back Schemes, it is recommended that these are reviewed as to whether their overall impact is better for the environment. The possibility of leakage while in the mail system also needs to be considered. This may also apply to online marketplaces postal take-back.
- A key action is to drive consumer use of the Take-back Schemes. Therefore, companies should promote their schemes, and all companies should actively communicate to customers and consumers that they should use Take-back Schemes and can find them through the Recycle Now Recycling Locator tool. We need to be aware that this is a new behaviour for consumers, and companies will require information on what kind of interventions and messaging help improve consumer uptake.
- To facilitate this, it is important that all companies with cosmetic packaging Take-back Schemes work with WRAP and Recycle Now to formalise the positions of their bins and for companies to keep this information up-to-date.
- CTPA will act as a catalyst and a convener, advocating, alongside the membership, for Take-back Schemes to increase their availability and their volume of usage by consumers.
- CTPA will seek to spread best practice and lessons learned from all existing Take-back Schemes in operation, as well as working with operators of schemes, to see if there are additional economies of scale that can be created in terms of pooling volumes of post-consumer recyclate for reprocessors.
- CTPA and the industry should engage further with Defra and OPRL to seek assurances that companies who do not have their own Take-back Scheme but do actively communicate and encourage their consumers to use Take-back Schemes, CAN use the appropriate 'recycle at xxx' label once it is developed and when mandatory labelling comes in, expected 2026. CTPA would also seek to ensure that smaller Take-back Schemes that cannot reach 75 per cent of the population, can receive discounts and rebates as long as they have clear overall environmental benefits and consumers can also go to other Take-back Schemes for the same waste.
- CTPA will help the industry engage with policy makers, WRAP, UK Plastics Pact, and trade associations and industry bodies, including INCPEN, BPF, BRC in addition to other groups such as Recoup etc. to review this policy annually and, in particular, when Defra and the appointed Scheme Administrator finalise the rules and provide detailed guidance on EPR.

If at some point in the future, there is a clear and compelling rationale, as well as willingness from companies to support, a single unified scheme run by a single operator or contractor or body (legally separate from CTPA), then this should be actively considered and progressed at that time.

Why is this Important?

Driving up the amount of packaging waste captured that cannot be recycled kerbside and would otherwise go to landfill, incineration or be littered, is the key environmental objective and the priority for building a more circular economy. It demonstrates that the industry is taking the issue seriously, delivering environmental benefits by helping consumers to recycle items that cannot be recycled kerbside.

Increased volumes of material captured should also help to increase the level and quality of the markets for the recycled waste.