



Unbottling greenwashing

Identified practices

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1. Methodology

1.1 Claims made

In order to gather information about the types of claims related to recycling on bottled water products packaged in plastic, BEUC members collected and recorded information on products sold in their national markets in late 2022 and early 2023. They recorded details of the claims and the trader that manufactured the product. In most cases, on-label claims were photographed in stores where the products were sold by members. In some cases, members identified products through online advertising and/or sales channels.

To this, in some cases, we have added images collected of the online advertising or other public materials for bottled water products that the identified traders made regarding these products on their websites or through social media channels (such as Instagram), obtained through conducting a non-exhaustive internet search. In some cases, the recycling claims in such additional materials is more prominent and/or incorporated additional elements and statements that are not present on the product label itself. Where we have not included examples of such additional materials for particular products, this does not necessarily mean that it does not exist, but that we have not located it.

A table summarising and categorising the claims is included in Section 2 below, followed by photographs of the bottles bearing the claims and, in some cases, examples of additional materials in Section 3.

The information included in this document reflects claims that were current at the time they were recorded. We have not verified whether all claims are still being made and whether the form and presentation of the claims has changed in the time that has lapsed.

The traders whose claims are referred to in this document belong to multinational companies operating Europe-wide (Danone, Nestlé Waters/Nestlé and Coca-Cola HBC) and, for these reasons, are the focus of this alert. However, we identified many other claims made by national brands operating in one market only,

to whom we also addressed letters and received responses. We therefore have clear evidence that the highlighted practice is a sectoral issue relevant across Europe (and likely beyond Europe).

1.2 Letters to traders

After collecting examples of these claims, in early 2023, BEUC members sent letters to the companies identified asking them questions about the claims. The purpose of seeking this information was both to gather facts from the companies regarding the claims, assess the accuracy of the claims, understand whether and if so, in what way, the claims were misleading, and to gain insight into the companies' perspectives and intentions when making such claims. As these letters were sent for research purposes and to inform our analysis, we did not ask the companies to comment on and/or respond to our view that the claims were misleading.

More specifically, traders were asked questions regarding:

(i) the recycled content of the beverage bottles, including the origin of the materials used to make the plastic bottles, the methodology used to calculate the recycled content of the body of beverage bottles, whether recycled content is certified by third parties, whether recycled content is sourced from post-consumer plastic waste and whether the caps and labels are manufactured from recycled content; and/or

(ii) how traders substantiated claims relating to recyclability, including how companies verified the 'recyclability' of the packaging, how many times bottles can be recycled, whether the materials can be recycled into materials of equal value, information on the outcome for the materials through multiple cycles of recycling, as well as (in some cases) questions regarding recycling infrastructure in the market where the product was sold.

1.3 Review of responses to letters

Out of 14 traders contacted, 11 responded. The responses varied significantly in quality and detail. We analysed the responses together with our partners from ClientEarth and ECOS. Overall, we found that the traders that responded failed to provide information that adequately substantiated the claims made, and in some aspects, confirmed our reasoning for why the claims are misleading.

In Section 4, we provide an overall summary of the information provided in the traders' responses, and in Section 5, provide a summary of each trader's response. In each case, we include only information relevant to the external alert. In some cases, traders provided additional information (either in response to the questions posed or unsolicited) that we have not included below because it is not relevant to the arguments discussed in the external alert.

2. Overview

Companies	Claim on label	Further details of claim(s) (Use of green imagery or circular imagery)	Date of claim observed	Claim observed in:	Response received from the company
DANONE					
Lanjarón	"100% made from other bottles"	Use of circular imagery	January 2023	Spain	Yes
Font Vella	"100% made from other bottles**"	Use of circular imagery	January 2023	Spain	Yes
Żywiec Zdrój	"We collected 100% plastic and sent it for recycling. 100% recyclable bottle"	Use of circular imagery, use of green imagery and colour	January 2023	Poland	Yes
Evian	"100% recycled bottle" accompanied by an asterisk after the claim, leading to text in smaller print on the back of the bottle, specifying "This bottle is made from 100% recycled plastic, so the colour of the bottle may vary. Caps and label don't yet contain recycled plastic. 100% recyclable. Please recycle."	Use of circular imagery	January 2023	Several European countries, including Italy, France, Belgium, Germany, UK	No (the Italian entity was contacted)
NESTLE					
Henniez	"I am made of 100% rPet" accompanied by an asterisk after the claim, leading to text in smaller print below claim, stating that "rPET = recycled PET".	Use of circular imagery, use of green colour	January 2023	Switzerland	Yes

¹ We were unable to identify text asterisk leads to from photograph and cannot confirm the additional information provided following asterisk.

Vittel	<i>"100% Recycled material" accompanied by an asterisk after the claim, leading to "PET".</i>	Use of circular imagery, use of green colour	February 2023	Several European companies including Switzerland and France	Yes (the Swiss entity was contacted)
Korpi ²	<i>"50% recycled content".</i>	Use of circular imagery, use of green imagery and statement (<i>"you too can become our ally in the protection of the planet"</i>)	January 2023	Greece	Yes
Levissima	<i>"Bottle with 100% recycled plastic R-PET"</i>	Use of green colour	January 2023	Italy	No
Naęczowianka	<i>"100% recycled bottle"</i>	Use of circular imagery, use of green colour	January 2023	Poland	No
COCA-COLA					
Römerquelle	<i>"Made from 100% recycled PET bottles" accompanied by an asterisk after the claim, leading to <i>"*does not refer to the label and cap"</i>.</i>	None	December 2022	Austria, Hungary	Yes
Bankya	<i>"100% recyclable"</i>	Use of circular imagery, use of green colour	January 2023	Bulgaria	Yes
Valsler	<i>"Made from 100% recycled PET bottles"</i>	Use of circular imagery, use of green colour	February 2023	Switzerland	Yes
Naturaqua	<i>"I am a 100% recyclable PET bottle"</i>	None	January 2023	Hungary	Yes
Bonaqua	<i>"100% recycled plastic"</i>	Use of circular imagery	February 2023	Finland	Yes

² The claim used by Korpi differs from the other companies in that it does not claim that the bottle is '100% recycled', rather, that it contains '50% recycled content'. We have nevertheless chosen to include it on the basis that it is likely that the 50% claim applies to the PET beverage bottle body only and does not include the other components or otherwise account for the weight of the other components. Moreover, the claim makes use both of circular imagery, green imagery and generic 'green' statements. As such, our arguments as to why these claims are misleading broadly apply to this claim, too.

2. Details of claims

DANONE

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COCA-COLA

<u>RÖMERQUELLE</u>	14
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LANJÁRON (DANONE)

"100% made from other bottles"



Source: BEUC member photograph. "100% made from other bottles".

"100% bottles made from other bottles (we don't care about the brand)". 11 December 2020. Source: [Todas las botellas de Lanjarón serán de plástico reciclado en 2021 \(danoneespana.es\)](https://www.danoneespana.es/botellas-de-Lanjaron-seran-de-plastico-reciclado-en-2021)



"Will be made from 100% other bottles". 4 December 2020.

Source: https://www.instagram.com/s/aGlnaGxpZ2h0QjE3ODYyMjU3MDIzQDQ0NzM2?story_media_id=245674552605054728&igshid=MzRIODBINWFIZA==

FONT VELLA (DANONE)

"100% made from other bottles" [we were unable to identify text asterisk leads to from photograph and cannot confirm the additional information provided following asterisk]"



Source: BEUC member photograph. *"100% made from other bottles"*.

ZYWIEC ZDROJ (DANONE)

"We collected 100% plastic and sent it for recycling. 100% recyclable bottle."⁴



Source: BEUC member photograph. *"We collected 100% plastic*..." "...and sent it for recycling. 100% recyclable bottle". Asterisk leads to text stating "we collected the equivalent of the plastics we placed on the market last year - see more at: www.postronienatura.pl." Website address translates as "on the side of nature".*



"New! This bottle was made of 100% recycled material. New convenient 1l bottle. For the balance of nature". Accessed on Żywiec Zdrój's website Zrównowi_ażona_przez_naturę_Żywiec_Zdrój (zywiec-zdroj.pl)

⁴ Office translation of claim in Polish.

EVIAN (DANONE)

"100% recycled bottle" asterisk leading to text in small print on the back of the bottle specifying "This bottle is made from 100% recycled plastic, so the colour of the bottle may vary. Caps and label don't yet contain recycled plastic. 100% recyclable. Please recycle."*



Source: BEUC member photograph. Asterisk following "100% recycled bottle" leads to text stating "This bottle is made from 100% recycled plastic, so the colour of the bottle may vary. Caps and label don't yet contain recycled plastic. 100% recyclable. Please recycle."

Bottles made from bottles:

Bottles, made from bottles: a key milestone in our sustainability journey to becoming a fully circular brand by 2025.

This new range of evian bottles, available in France, Germany, Switzerland, Belgium and the United Kingdom, are now made from 100% recycled plastic*. This plastic, called "rPET" for short, is made of previously used material that was collected and fed back into the recycling loop, cleaned and transformed to then be used



"Bottles made from bottles ... made from 100% recycled plastic." Asterisk following "100% recycled plastic" leads to text stating "excluding cap and label". 4 December 2020.

Source: [Bottles made from bottles | evian® - evian Natural Mineral Water](#)

HENNIEZ (NESTLE)

*"I am made of 100% rPet**" asterisk leading to text in small print on the back of the bottle specifying "**rPET = recycled PET"*



Source: BEUC member photograph. Asterisk following "100% rPET*" leads to text stating "**rPET = recycled PET" below.

⁵ Office translation of claim in French/German

VITTEL (NESTLE)

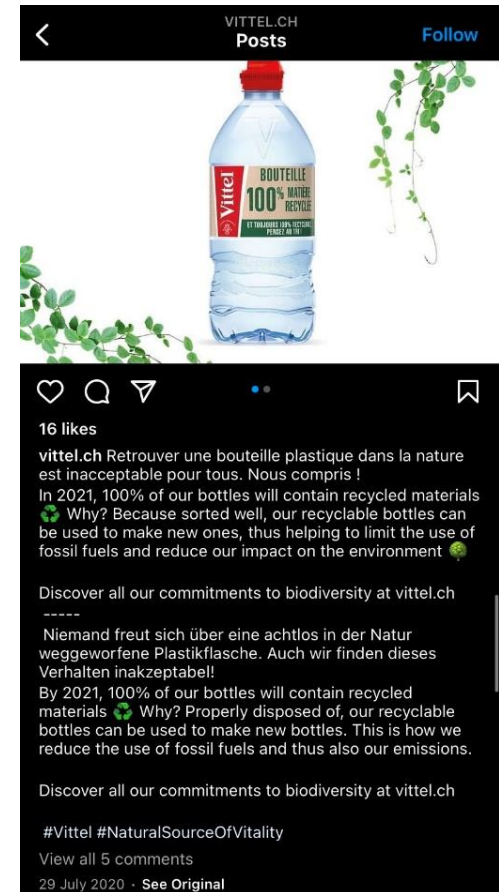
"100% recycled material"



Source: BEUC member photograph. Asterisk following "100% recycled material*" on the front of label leads to "*PET" on the side of label.



Asterisk following "100% of our Vittel bottles are made of recycled plastic" leads to text in small font stating "bottles, excluding caps and labels". Accessed September 2023. Source: [Vittel's Ecological Footprint | Vittel](#)



"In 2021, 100% of our bottles will contain recycled materials", depicting bottle stating, "Bottle 100% recycled material and still 100% recyclable. Remember to sort". 29 July 2020. Source: <https://www.instagram.com/p/CCbbzB6KMYG/?igshid=MzRIODBiNWFIZA==>

KORPI (NESTLÉ)

"Made of 50% recycled plastic. You too become our ally in the protection of the planet".⁶



Source:

<https://www.nestlenoiazomai.gr/korpi/proionta/korpir-hero-05/>.

korpiwater

50% ΑΝΑΚΥΚΛΩΜΕΝΟ ΠΛΑΣΤΙΚΟ

334 views

korpiwater For yet another year the Natural Mineral Water Corpi® celebrates World Water Day but this year with the most eco-friendly disposition and specifically with the new innovative packaging of 50% recycled plastic rPET & 50% rPE. The first packaging of bottled water on the Greek market with such a high content of recycled plastic became a reality by Korpi® with the aim of strengthening recycling and the circular economy. Be part of the change and #MpesStonKyklo!

#Water2Me #korpi #korpiloves2recycle #recycleplastic #rPet #reducedplastic #korpiwater #worldwaterday2021

"...the most eco-friendly disposition and specifically with the new innovative packaging of 50% recycled plastic rPET & 50% rPE". 22 March 2021. Source: <https://www.instagram.com/p/CMuBCTxLN3K/?igshid=MzRIODBiNWFIZA==>

Οι Δεσμεύσεις μας

Η Nestlé Waters δεσμεύεται για την ορθή διαχείριση των φυσικών πόρων και την ένταξη στην κυκλική οικονομία. Προχωρά, παγκοσμίως, σε αλλαγές στις συσκευασίες της, με όραμα καμία συσκευασία της να μην αποτελεί επιβαρυντικό απόρριμμα για το περιβάλλον και να μην καταλήγει σε χώρους υγειονομικής ταφής. Στοχεύει, επίσης, σε:

- Λειτουργία εργοστασίων με 100% μηδενικά απόβλητα (2020)
- 100% ανακυκλώσιμες ή επαναχρησιμοποιούμενες συσκευασίες έως το 2025
- Χρήση κατ' ελάχιστον 35% ανακυκλωμένου πλαστικού rPET στις συσκευασίες της

"Our Commitments: Nestlé Waters is committed to the sound management of natural resources and integration into the circular economy. It is making changes to its packaging globally, with a vision that none of its packaging is a harmful waste for the environment and does not end up in landfills. It also aims to: Operate factories with 100% zero waste (2020); 100% recyclable or reusable packaging by 2025; Use a minimum of 35% recycled rPET plastic in its packaging." Accessed October 2023.

Source: <https://www.nestlenoiazomai.gr/korpi/biosimotita>.

⁶ Office translation of claim in Greek.

LEVISSIMA (NESTLE)

*"Bottle with 100% recycled plastic R-PET"*⁷



Source: BEUC member photograph. *"Bottle with 100% recycled plastic R-PET" and "let's recycle"*.

"Levissima 100% R-PET also arrives in 50cl format... we are 100% committed to the environment", accessed September 2023. Source: [Levissima 100% R-PET arriva anche nel formato 50cl | Levissima](#)

Levissima 100% R-PET arriva anche nel formato 50cl



INSIEME CREIAMO UN IMPATTO POSITIVO

La **plastica PET** è un materiale perfetto per mantenere incontaminata tutta la purezza dell'acqua minerale Levissima, dalla fonte fino a casa tua. Un materiale così duttile e prezioso che può essere riciclato e rigenerato per creare nuove bottiglie. **Un circolo virtuoso per noi e per l'ambiente.**

I PROGETTI LE INNOVAZIONI IL TERRITORIO UNA COMUNICAZIONE SOSTENIBILE

UN TRAGUARDO A IMPATTO POSITIVO

Levissima presenta nel 2021 la **prima bottiglia in Italia fatta con il 100% di R-PET**: un materiale 100% riciclabile e capace di conservare



"PET plastic is a perfect material for keeping all the purity of Levissima mineral water uncontaminated, from the source to your home. A material so ductile and precious that it can be recycled and regenerated to create new bottles. A virtuous circle for us and the environment". Press release 2021.

Source: [Levissima Regeneration ed il riciclo delle bottiglie di plastica](#)

⁷ Office translation of claim in Italian.

NALECZOWIANKA (NESTLE)

"100% recycled bottle"⁸



Source: BEUC member photograph. "100% recycled bottle".



Asterisk following "Made from 100% recycled plastic" leading to "Bottle made from 100% recycled plastic (PET)" and "Nature is important to us, that's why Nałęczowianka bottles with a 1l capacity were made 100% from other bottles", 24 August 2023. Source: https://www.instagram.com/p/CwVOJ_UoU8n/?igshid=MzRIODBiNWFIZA===



"Out of concern for our planet" Asterisk following "Our liter bottle of non-carbonated water is 100% made from other bottles" leading to "Bottle made from 100% recycled plastic (PET)" 19 September 2023. Source: <https://www.instagram.com/p/CxYZtB5lvKf/?igshid=MzRIODBiNWFIZA==>

⁸ Office translation of claim in Polish.

RÖMERQUELLE (COCA-COLA)

*"Made from 100% recycled PET bottles** asterisk leading to text in small print on the back of the bottle, specifying "does not refer to the label and cap""⁹*



Source: BEUC member photograph. *"Made from 100% recycled PET bottles"*.

⁹ Office translation of claim in German.

BANKYA (COCA-COLA)

"100% recyclable"¹⁰



Source: BEUC member photograph. *"100% recyclable"*.

¹⁰ Office translation of claim in Bulgarian.

VALSER (COCA-COLA)

"Made from 100% recycled PET bottles"¹¹



Source: BEUC member photograph. *"Made from 100% recycled PET bottles"*.



*"Made from 100% recycled PET bottles [on bottle labels]
Hello again, Switzerland... See you again soon"*, 4 December 2020. Source: [VALSER - 100% aus der Schweiz. 100% Klimaneutral.... | Facebook](#)

¹¹ Office translation from claim in German/French.

NATURAQUA (COCA-COLA)

"I am a 100% recyclable PET bottle"¹²

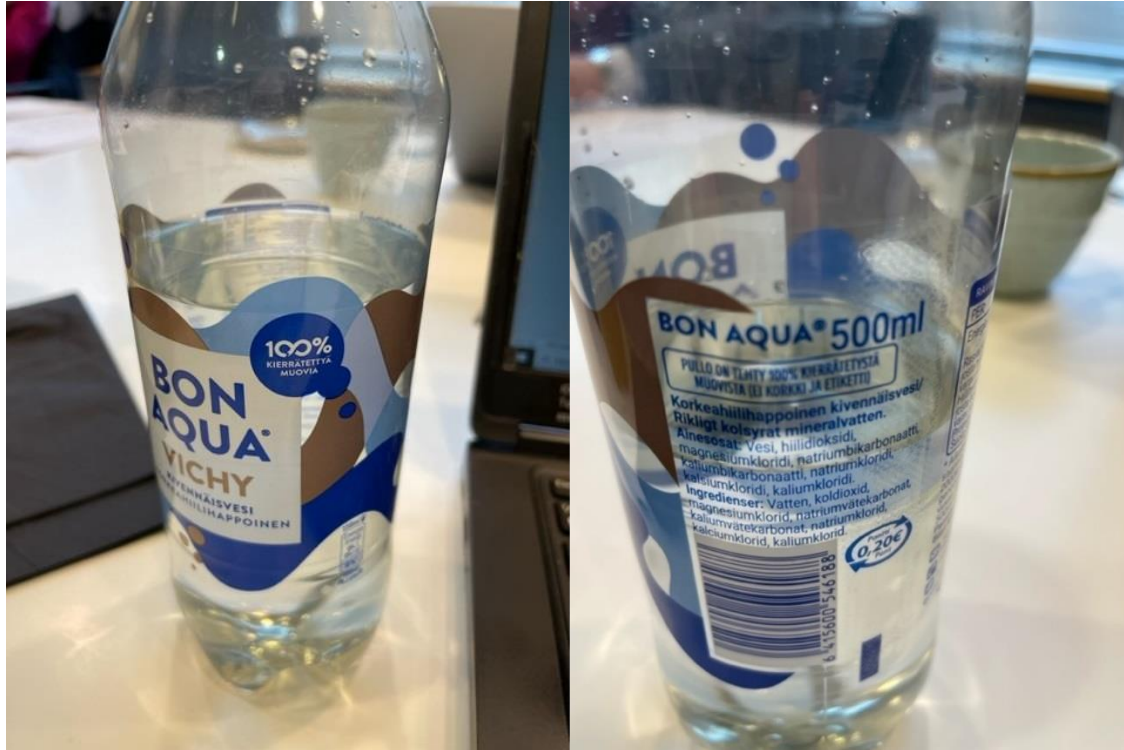


Source: BEUC member photograph. *"Use it again. I am 100% a reusable PET bottle".*

¹² Office translation of claim in Hungarian.

BONAQUA (COCA-COLA)

"100% recycled plastic"¹³



Source: BEUC member photograph. *"100% recycled plastic"*. No asterisk, but on back on label, a box that states, "This bottle is made of 100% recycled plastic (except cap and label)."

¹³ Office translation of claim in Finnish.

4. Summary of trader responses

Of the 14 traders contacted, 11 responded to the letters. The quality of the responses varied significantly. Some companies responded to each question posed to them, with varying degrees of detail. Others did not respond to all questions directly, and in two cases, answered less than half of the questions directly, otherwise providing very general information.

Below, we summarise the information received that is relevant to the external alert. In some cases, traders provided additional information (either in response to the questions posed or unsolicited) that we have not included below because it is not relevant to the arguments discussed in the external alert.

The main conclusion to be drawn from the responses received is that all traders failed to demonstrate that their claims were sufficiently substantiated.

“100% recycled” claims (and variations)

Traders’ responses confirmed that caps and labels not made from (fully) recycled plastic.

Where the traders were asked (and directly answered) the question of whether caps and labels were made of recycled content, all but one confirmed that the caps did not contain recycled plastic. One trader responded that *“caps, shrink films and labels are currently only partly made from recycled materials”*. Since use of recycled plastic in bottle caps is not legally permitted in any of the relevant markets, we presume the trader mistakenly mentioned caps.

All but two traders confirmed that the labels contained no recycled plastic either. One trader added that in their case, labels were made out of paper (though the trader did not indicate that the paper used was recycled). The other trader (referred to above) made reference to labels being made *“partially”* of recycled content.

These responses confirm that when all the components of the beverage bottle are taken into account, the beverage bottles are not manufactured fully from recycled plastic, also confirming our argument as to why ‘100% recycled’ claims and their variations are often factually incorrect and misleading to consumers, as explained in detail in Section 5.4 of the report, “Unbottling Greenwashing”.

Some traders confirmed the incorporation of pre-consumer scraps’ as ‘recycled material’ along with post-consumer recycled plastic in PET beverage bottle bodies.

Other traders confirmed that only post-consumer recycled content is used in PET beverage bottle bodies, but only a few traders confirmed that they held third party certification to confirm this and/or were able to name certification schemes.

As for the recycled content of the PET component of the beverage bottle, two traders confirmed the use of pre-consumer scraps along with post-consumer recycled content in respect of two of the products listed above. As noted in Section 5.4 and Section 4 of the report, “Unbottling Greenwashing”, we consider that pre-consumer scraps of PET do not conform with what an average consumer would understand by recycled plastic (i.e. *“materials that have been previously used, passed through the waste management process and a recycling process, and remanufactured into a new product”*). Therefore, in such cases, a ‘100% recycled’ claim would be even more misleading.

The other traders that responded to this question confirmed (or implied) that the PET beverage bottle bodies were made entirely from post-consumer recycled content. However, only a few traders were able to confirm they had in place an independent certification that could verify this and provide details of the scheme. Another trader stated that they would have certification in place which would confirm that only post-consumer recycled content was used *“in the near future”* (at the time of responding). One stated that

“some of” their suppliers of PET bottle bodies had independent certification in place that could confirm that only post-consumer recycled content was used but not necessarily all of them and one trader stated that it had independent certification in place but did not provide details.

Traders generally confirmed that non-proportional mass balance approaches are not used, but relatively few confirmed that they held third party certification to confirm this.

As to the methodology used for calculating recycled content, the traders that responded to this question confirmed (or suggested) that non-proportional mass balance approaches were not applied to allocate recycled content (indicating that the claims should fairly represent the quantity of recycled content in the PET beverage bottle body, subject to the addition of pre-consumer scraps alongside recycled content in two cases). However, only three traders were able confirm they had in place an independent certification that could verify this and provide details of the scheme. Another trader stated that they would have certification in place “in the near future” (at the time of responding) which would confirm that non-proportional mass balance approaches had not been used, and another stated that the company self-verifies and audits information and does not consider independent verification to be required. Two traders pointed to some of their suppliers of PET bottle bodies having independent certification in place that could confirm that non-proportional mass balance approaches were used but not necessarily all of them.

In the event that non-proportional mass balance approaches are being used by companies (which on the basis of the responses does not appear likely but also cannot be ruled out entirely without each trader providing further details and copies of certification), as explained in Section 5.4 of the report, “Unbottling Greenwashing” this would mean that the PET component of the individual beverage bottles purchased by consumers may contain less recycled content than the ‘100%’ advertised, or even no recycled content at all. If this were the case, the ‘100% recycled’ claim would be even more misleading.

“100% recyclable” claims

Traders appeared to understand such claims to mean that all components of the beverage bottles are “technically recyclable”.

Some traders referred to observing ‘design for recycling’ guidelines in manufacturing beverage bottles.

Traders generally referred to the possibility of PET beverage bottle bodies being recycled back into PET beverage bottle bodies.

Where traders were asked, and directly answered, questions regarding ‘100% recyclable’ claims, they made two main points. First, some traders pointed to products meeting ‘Design for Recycling’ guidelines set by industry/industry adjacent bodies, such as RecyClass. These guidelines are intended to guide manufacturers to produce products that are compatible with recycling systems. Notably, RecyClass does not anywhere propose that it is appropriate to make ‘100% recyclable’ claims to consumers on the basis of a company having observed these guidelines, and in fact, explicitly recommends not referring to percentages for packaging recyclability in claims to consumers “to avoid creating confusion with a recycled content percentage in the product”.¹⁴

Other traders additionally referred to caps and labels also being “recycled”, but without commenting on the extent to which this happens in practice in the markets where their products are sold. As such, it appears that the traders are relying on the idea that caps and labels are “technically recyclable” to justify a ‘100% recyclable’ claim, though this point was not made explicitly by any of the traders. In each case, the traders acknowledged that caps and labels are not recycled back into caps and labels, instead being used in other “lower quality applications”.

¹⁴ <https://recyclclass.eu/get-certified/use-of-claims/>.

Traders generally referred to the possibility of PET beverage bottle bodies being recycled back into PET beverage bottle bodies, in a few cases, traders provided data on the extent to which this happens in practice in the market where their products are sold (by noting the proportion of PET used for bottled beverages sourced from domestically produced recycled PET beverage bottle bodies, which was 50%).

These observations do not respond to our arguments as to why an average consumer may be misled by '100% recyclable' claims, as set out in the report, "Unbottling Greenwashing", since the answers given do not substantiate that the beverage bottles are '100% recyclable' according to how an average consumer is likely to interpret such a claim, as set out in Section 4 of the report "*Unbottling Greenwashing*".

Additional observations

Several traders made additional comments in their responses that are of general interest in highlighting some of the issues related to recycling explained in more detail in Section 5.3 of the report "*Unbottling Greenwashing*":

- One trader acknowledged that the recycled PET used in beverage bottles that they placed on the market was sourced from outside the Member State in which the product was sold, citing concerns around the quality of material on their local market and the absence of a deposit return scheme in that market.
- Several traders explicitly referred to material losses inherent to the PET recycling process, noting that it is necessary to add "*virgin or virgin-like*" material to compensate from these losses.
- Several traders acknowledged – directly or indirectly – that mechanical recycling degrades PET over time. However, some pointed to the fact that since virgin material constantly enters the recycling stream this is not practically an obstacle to producing 100% recycled PET. This reflects the evidence we provide in Section 5.3 of the report, "Unbottling Greenwashing", the amount of recycled PET circulating in Europe is relatively limited and significant quantities of virgin PET are required to make up the shortfall.

5. Summary of individual trader responses

Below, we summarise key information received from traders in response to questions sent by BEUC members. In some cases, traders provided additional information (either in response to the questions posed or unsolicited) that we have not included below because it is not relevant to the arguments discussed in the external alert. Direct quotes are office translations to English from the language of response.

1. Lanjarón

Joint response provided with Font Vella. Trader was asked questions relating to recycled content of beverage bottle. Confirmed pre-consumer scraps included alongside post-consumer recycled content in PET beverage bottle bodies. Confirmed that non-proportional mass balance approaches are not used. Stated independent certification scheme in place (AENOR UNE-EN 15343) which confirms both use of pre-consumer scraps and that non-proportional mass balance not met. Confirmed that cap and label not made of recycled plastic.

2. Font Vella

Joint response provided with Lanjarón. See above.

3. Żywiec Zdrój

Trader was asked questions relating to both recycled content and recyclability of beverage bottle. Trader did not respond to most questions directly and provided information on an additional claim on the packaging *“we have collected 100% of plastic”* – which we have not analysed or included in the external alert. Commented that recycled content came from bottles derived from deposit return schemes from outside Poland, due to *“the lack of deposit system and, at the same time, the lack of such a raw material in Poland”*, did not directly confirm that recycled plastic fully from post-consumer sources and did not respond to question on whether non-proportional mass balance approaches used. Did not state whether independent verification in place or provide details of any such verification. Did not answer question on materials used for cap and label.

4. Evian – No response received

5. Henniez

Trader was asked questions relating to both recycled content and recyclability of beverage bottle. Confirmed that recycled content sourced fully from post-consumer waste and that non-proportional mass balance approaches not used. Stated that certification scheme in place (SQS/PET-Recycling Schweiz). Noted that labels made from paper (but did not comment on whether made of recycled paper) and that caps not made of recycled plastic *“as there is no recycled HDPE validated in Europe or Switzerland for food contact”*.

Additional information provided in attachment written by PET-Recycling Schweiz which describes itself as *“the national trade organization for the recycling of PET beverage bottles”* and of which Henniez, Vittel and Valser are members (through relevant corporate structure) notes (in relation to PET component only) that:

- *“Swiss-produced recycled PET... is virtually equivalent to new PET in terms of quality. From a technical point of view, it is entirely possible to manufacture PET beverage bottles from 100% recycled PET, without any noticeable loss of quality”*, later also noting that:

- “[r]ecycled PET is... composed of PET that has undergone a variable number of recycling cycles” and that “[t]here are some degradation effects” but that these are compensated for “as new materials inevitably enter the bottle cycle”;¹⁵
- PET that is impure or “no longer meet[s] quality requirements” is removed during the recycling process;
- Switzerland achieves a recycling rate for PET beverage bottles of 91%;¹⁶
- an independent certification for PET recycled in Switzerland exists (managed by the Swiss Association for Quality and Management Systems, or ‘SQS’) and confirmed that traders contacted “used SQS-certified PET in 2021” but not necessarily that all PET used by such traders was so certified and whether this continued up until the current date.¹⁷;
- the PET in products produced is made entirely from post-consumer material;
- “[i]n Switzerland and Europe, PET beverage bottles are subject to the “Design for Recycling” guidelines, which guarantee that PET beverage bottles put on the market are indeed recyclable/reusable”;¹⁸ and
- recycled PET from Switzerland represents 50% of PET used for beverage bottles in the Swiss market, with the remainder made up of virgin PET and “recycled PET from abroad”.

6. Vittel

Trader was asked questions relating to both recycled content and recyclability of beverage bottle. Confirmed that recycled content sourced fully from post-consumer waste and that non-proportional mass balance approaches not used. Noted that “some of” suppliers of recycled PET beverage bottles are independently certified by EuCertPlast. Confirmed that caps not made from recycled plastic as “unfortunately there is no recycled polyethylene (PE, the material of the cap) validated in Europe for food contact”. Did not respond to question with regards to label.

Additional information provided in attachment written by PET-Recycling Schweiz, summarised above in respect of Henniez.

7. Korpi

Trader was asked questions relating to recycled content of beverage bottle. Trader did not respond to most questions. Confirmed that recycled content sourced fully from post-consumer waste and that non-proportional mass balance approaches not used. Stated that the recycled content “is accompanied by the necessary certifications” and that “our suppliers have also received certifications for their relevant activities from independent bodies” but did not provide details of relevant certifications. Did not answer question on materials used for cap and label.

¹⁵ As noted in the report “Unbottling Greenwashing”, this is correct but is only demonstrated to be the case when quantities of virgin PET are entering the recycling stream. If the quantities of PET being recycled multiple times were higher, studies indicate that deterioration in quality would occur, necessitating the addition of virgin material after a certain point. This is not contradicted by the response of PET-Recycling Schweiz, which refers to virgin material entering the stream, compensating for the degradation effects.

¹⁶ This rate is indeed high compared to other European countries, but nevertheless, falls short of 100%. Moreover, other sources (including those provided by the Swiss Federal Office for the Environment) indicate that rates may be lower than this (referring to a collection rate of “over 80%” – which would not account for losses in recycling processes). See: <https://www.bafu.admin.ch/bafu/en/home/topics/waste/guide-to-waste-a-z/pet-beverage-containers.html>. The website of PET-Recycling Schweiz also refers to a “recycling rate” of “82%+”. See: <https://petrecycling.ch/>.

¹⁷ We are not aware if this certification can certify at the product level that non-proportional mass balance approaches are not used and that only post-consumer recycled content is used by the companies in question, not least because one of the PET-Recycling Schweiz members contacted (Vittel) also referred to some of suppliers having an alternative certification in place.

¹⁸ The bottles are not ‘reusable’. It is unclear why PET-Recycling Schweiz indicates that they are.

8. **Levissima** – No response received

9. **Naęczowianka** – No response received

10. **Römerquelle**

Trader was asked questions relating to both recycled content and recyclability of beverage bottle. Confirmed that recycled content sourced fully from post-consumer waste and that non-proportional mass balance approaches not used. Did not (at time of writing) have in place independent verification but stated that would have third party verification “*in the near future*” (RecyClass). Regarding recyclability of packaging, trader pointed to caps and labels also being recycled to be used for other, non-bottle applications (but did not comment on actual recycling rates for these materials, either in Austria or the EU). In relation to PET, noted that:

- recycled PET has “*almost the same properties as virgin material*” (our emphasis);
- current system results in the dilution of recycled PET, as recycled PET beverage bottle bodies are mixed in the process with bottles “*which use very different proportions of recycles... from 100% to no recycle at all*”, making “*difficult to calculate*” the actual circulation number of PET beverage bottle bodies; and
- the average recycled content in PET beverage bottle bodies across the Austrian market is 30%.

11. **Bankya**

Trader was asked questions on recyclability of beverage bottle. Pointed to caps and labels also being recycled “*into a lower quality material due to the current lack of circular solutions allowed in the EU*” (but did not comment on actual recycling rates for these materials, either in Bulgaria or the EU). In relation to PET, noted that “[*t*]he recycling of PET allows the material to almost completely restore its original qualities, cycle after cycle” thanks to the technologies used and “*the addition of virgin or virgin-like material*”, which it notes “are needed to compensate for loss in the mechanical recycling process” (our emphasis).

12. **Valser**

Trader was asked questions relating to both recycled content and recyclability of beverage bottle. Regarding recycled content, trader did not respond to all questions. Trader did not respond directly as to whether beverage bottle bodies made exclusively of post-consumer recycled content (but response attached from PET-Recycling Schweiz indicates that this is the case). Response given on mass balance also unclear – trader confirmed that a mass balance approach *is* used but also that “[*f*]or the 100 per cent indicated, we used rPET”. Did not confirm whether independent certification in place, nor provide name of scheme. Noted that “[*a*]t Coca-Cola HBC Suisse SA, caps, shrink films and labels are currently only partially made from recycled materials”.¹⁹

Additional information provided in attachment written by PET-Recycling Schweiz, summarised above in respect of Henniez.

13. **Naturaqua**

Trader was asked questions on recyclability of beverage bottle. Noted that “*recycling of caps and labels generally does not produce the original products (caps, labels) but recycles them to produce lower quality materials*” but did not comment on actual recycling rates for these materials, either in Hungary or the EU). In relation to PET, responded that “*rPET material produced during the recycling*

¹⁹ Since, as confirmed by other traders, caps cannot be manufactured from recycled plastic in the EU or Switzerland, we presume that in fact, caps are not made with any recycled plastic, and that only other components are made “partially” from recycled plastic.

process regains almost all of its original properties”but that “to compensate for the system losses that occur over time during the mechanical recycling process, it is usually necessary to use virgin raw materials in addition to rPET for the production of bottles”(our emphasis).

14. Bonaqua

Trader was asked questions relating to recycled content of beverage bottle. Confirmed that recycled content in PET beverage bottle bodies sourced fully from post-consumer waste and that non-proportional mass balance approaches not used. Stated that did not have in place independent certification and that Coca-Cola Europe verifies and audits information itself. Did not comment on whether other bottle components contained recycled content.

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