

Recycle at Boots Take-Back Scheme: Accessibility & Transparency Statement

Background

In September 2020, Boots and No7 introduced a pioneering take-back scheme in 50 Boots stores where customers can bring empty beauty, health, wellness and dental products, from any brand, that cannot be recycled at home. From the very outset of the rollout of the scheme, Boots has sought to be fully open and transparent about how the scheme operates and where materials are taken for recycling.

As the scheme expands from the initial 50 stores trial into scaling across the UK, Boots and No7 Beauty Company have worked with OPRL (On-Pack Recycling Label) to develop a set of criteria for ‘difficult to recycle’ packaging take-back schemes. The aim is to ensure we continue to live up to the accessibility and transparency expectations of our customers and wider stakeholders. More background about the criteria can be found in Appendix 1. We hope and would encourage this to be adopted by others in the development of their own take-back schemes to provide greater consistency, clarity and transparency for consumers across the UK.

In the next section we set out how our Recycle at Boots scheme meets the criteria outlined in Appendix 1.

How the Recycle at Boots scheme meets the Difficult to Recycle Packaging Take-Back Criteria:

In September 2021, Boots & No7 commissioned an independent specialist audit against the criteria set out in Appendix 1. This is a summary of the findings.

The Difficult to Recycle Packaging Take-Back Scheme:	
1. Is widely accessible	<p>The ‘Recycle at Boots’ scheme is available in 700 stores UK wide. Participating store location is available on the Boots.com website as well as via the Scan2Recycle app. We are also in dialogue with WRAP to include all store locations and information about the scheme on the ‘Recycle Now’ Recycling Locator.</p> <p>The scheme is available in all participating stores during the store opening hours as the boxes are permanently placed on the shop floor. As part of customer communications, we have made it clear that the boxes are located in the No7 area. They are accessible to all customers, including those with disabilities as they are placed in a public location on the shop floor.</p> <p>We assessed the geographical provision of Recycle at Boots facilities by UK local authority. Boots have taken the 700 nominated Recycle at Boots store locations and matched each of these to their respective local authority area using ESRI mapping software. Where a local authority area has at least one Recycle at Boots store located within it the total population of that local authority, area has been included in Boots’ total population coverage statistics. In total there are 356 local authority areas which contain at least one Recycle at Boots store location. The combined population of these 356 local authority areas provides a coverage of 64.7 million people (c95.6% of the UK population) using data provided by Experian/ONS. There are only 35 local authority areas which do not have a Recycle at Boots store located within them, some which do not have a Boots store e.g. Isles of Scilly.</p> <p>We would like to note that this only represents Recycle at Boots locations and there may be other ways in which consumers can recycle non-kerbside recyclable health and beauty items including collections put in place by other brands which meet the criteria set out in Appendix 1.</p>

<p>2. Causes no conflict with household (kerbside) waste collection</p>	<p>The Boots/No7 take-back scheme is technology enabled (Scan2Recycle technology), which allows us to control the types of items that are accepted via the scheme. We also clearly communicate via the Terms & Conditions that we will not accept packaging that can be placed in the local authority collections, as well as via FAQs and the customer facing communications on the Boots website. All attempts are being made to reduce the collection of kerbside recyclable materials, but it is not possible to prevent customers depositing them in the boxes, should they choose to do so.</p>
<p>3. Is not restricted to a particular brand or product</p>	<p>We clearly state in all customer communications that the scheme is not limited to Boots or No7 products. During the trial of the scheme, we have collected over 10,000 different brands.</p>
<p>4. Requires no purchase</p>	<p>The scheme is free to use for any member of the public. The use of the technology function is optional, and customers can deposit packaging in the collection boxes even without registering an account or scanning the items. Although the reward is based on a 'spend and save' mechanic (where the customer needs to spend £10 to receive 250 Advantage Card points) the participation is not linked to spending and the customer can choose not use collect the reward (therefore not spending).</p>
<p>5. Provides full transparency over the collection and recycling of materials</p>	<p>The scheme encourages customers to bring back 'difficult to recycle' packaging to the participating Boots stores. Once the collection boxes are full, they will be sent back via reverse logistics through the Boots network to our Nottingham depot. When a sufficient quantity has been received, our recycling partners, MyWaste Group, will come and pick up the bags. This is then transported to their processing facility in Hull, where the collected materials will be sorted, removing widely recycled materials such as glass and metals and the plastic will be processed into a material called Stormboard. Where applicable, higher quality plastics will be diverted to other recycling routes.</p> <p>Stormboard is a plastic MDF material that is suitable for many products, such as outdoor furniture, planters, boards and signage, etc. MyWaste Group own the processing and marketing of Stormboard.</p> <p>In September 2021, Boots/No7 commissioned an independent audit to determine the waste flows and end routes for the materials collected and the audit has identified that the materials collected from the participating customers are transformed into Stormboard. Nothing goes to landfill or incineration (except where there are contaminants that cannot be included in Stormboard).</p>

Appendix 1 – Difficult to Recycle Packaging Take-Back Criteria

Introduction

With increased focus on the environmental impact of plastic and other packaging waste there has been a growth in the provision of take-back schemes for used packaging. These are schemes where consumers can bring empty packaging back to a collection point for recycling. The collection points are usually located in a store or public area. Collection points could be in the form of bins, reverse vending machines or counters where used packaging is accepted. In the main, take-back schemes have been designed to accept packaging that would not otherwise be accepted in household (kerbside) recycling collections.

To date there have been no recognised standards in place for take-back schemes to ensure consistency, clarity and transparency for such schemes across all industries and sectors. Apart from a handful of instances (e.g. coffee cups and carrier bags) organisations are also limited over the recyclability claims that can be made.

On Pack Recycling Label (OPRL) was established to deliver a simple, consistent and UK-wide recycling message on retailer and brand packaging - whatever the sector - to help consumers reuse and recycle more material correctly, more often. That simple consistent message is now recognised by more than 3 in 4 consumers, with over 650 members now using it.

Drawing on OPRL's existing criteria, Boots and No7 Beauty Company collaborated with OPRL to develop a set of criteria for the design and operation of take-back schemes that can be adopted by a wide range of organisations or sectors and provide users with greater confidence and transparency over the use of such schemes.

In time it is hoped that a label will be developed by OPRL that will be available to guide consumers to recycle packaging that cannot be accepted by local authority collections through take-back schemes that meet agreed criteria. The summary of the criteria can be found below:

Difficult to Recycle Packaging Take-Back Criteria

To enable difficult to recycle packaging within the targeted scope of a take-back scheme to be considered 'recyclable' within a UK context all the following must be met in order to meet ISO 14021¹ and OPRL requirements:

The Difficult to Recycle Packaging Take-Back Scheme:

1. Is widely accessible

- a. The consumer must be able to access information on the location of collection points
- b. Collection points must be accessible to at least 75% of the UK population which is determined through a robust methodology and reflect a reasonable travel distance to the collection point via a range of transport options including walking (**Note:** In reality, consumers will use a mix of transport options such as driving and walking)
- c. Collection points must be clearly signposted and accessible including to those with disabilities
- d. Collection points should be accessible during normal business hours

2. Causes no conflict with household (kerbside) waste collections

- a. Although there is a possibility that some kerbside recyclable material may be deposited in collection points, schemes should take steps to discourage this
- b. When available, a Take-back OPRL label can only be awarded to materials not considered kerbside recyclable by OPRL
- c. Every effort should be made to link with local authority packaging collection schemes through appropriate cross messaging

¹ Environmental labels and declarations — Self-declared environmental claims (Type II environmental labelling)

3. Is not restricted to a particular brand or product

- a. All difficult to recycle packaging formats within the targeted scope of the take-back should be accepted regardless of brand
- b. Restricting the scope of the scheme too much will restrict its accessibility

4. Requires no purchase

- a. Users must not be required to provide proof of purchase before using the collection points as this will restrict accessibility

5. Provides full transparency over the collection and recycling of materials

- a. To ensure the recycling facilities are available to accommodate the collected materials, and the packaging for which the claim is made is being collected and recycled, the system should meet the following conditions:
 - i. The collection and reprocessing route(s) must at least be identified and provided to the labelling body (OPRL)
 - ii. There must be a defined end use market for the reprocessed material into a new product
 - iii. A reprocessing route for residues must be defined
 - iv. The recycling route must be capable of being audited to account for the tonnes of material reprocessed and converted into new end uses