



From the ASA in response to our initial complaint:

Thank you for contacting the Advertising Standards Authority (ASA) with your complaint about an ad for Coca Cola. We have received several different points of complaint about this ad and have considered them all very carefully.

The concern you raised with the ASA was that the claim "single-use plastic bottles are only single-use if they are thrown away" is misleading because it is contrary to the commonly held and legal definitions of the term 'single use', and that such material would be seen as waste even if it is subsequently sent down a recycling waste stream. We understood that, in light of this, you considered that the claim was harmful to the environment, as it removed any negative connotations associated with the term 'single-use plastic'.

Your complaint was one of several similar complaints we received about this ad. We asked our ASA Council, an independent decision-making body, to look at the claim in the context of the whole ad, and its likely meaning to consumers. The Council considered that the term "single-use" would be interpreted as relating to bottles that would normally become landfill, rather than recycled and made into new products. It considered that the ad did not state or otherwise imply that the plastic from the recycled bottles would be necessarily used to make new bottles.

However, while our Council did not think the ad breached the Advertising Code for the particular reason you raised, it asked us to look further at whether the environmental credentials of the product have been exaggerated through the claim "100% recycled". We recognise that this is a slightly different issue to that you brought to our attention, but having reviewed the matter thoroughly, this is the area on which we'll be focusing this time.

If a formal ruling is produced as a result of our assessment, it will be published in the 'Rulings' section of our website, <http://www.asa.org.uk/>. I am unable to give a specific timeframe for when we expect the case to conclude, and so you may wish to consider signing up for a weekly rulings notification, which you can do through our website via the 'sign up' section [here](#).

Although we're not taking forward your specific complaint this time, please rest assured that we will keep a record of it for reference in our future assessments and take it into account in our regular, proactive 'intelligence gathering' sweeps, where we analyse a range of information – including complaints made to us – to spot significant or emerging issues.

Here's how we responded to that:

Thank you for your quick response to our complaint. I know in the lead up to Christmas you must be incredibly busy and so it is really appreciated how fast we received your response. We are also pleased to hear that you are looking into the wider environmental claims made by Coca-Cola in the advert, especially around the "100% recycled" claim it makes – something that we would like to contribute to.

Comments on your response to our initial complaint:



Firstly however, I was hoping to get clarity on some of the points within your response to our initial claim. I have bullet-pointed them below for ease:

- You say that, “The Council considered that the term “single-use” would be interpreted as relating to bottles that would normally become landfill, rather than recycled and made into new products”. Can I ask whether this was based on any external existing definition of single-use? And if not, what is this assumption based on?
- Did the Council take into consideration that [Recycle Now](#), which is managed by the Waste and Resources Action Programme (WRAP) - which Coca-Cola is a member of - highlights that the recyclability of a product does not change whether or not it is ‘single-use’, explaining that ‘*single-use plastics are used only once before they are thrown away or recycled.*’? We accept that we didn’t raise this in our initial complaint.
- When you say “such material would be seen as waste” – did the council consider that this wasn’t just an issue of perception – but also, actual definitions? So, when Coca-Cola say something isn’t single-use, a key point of our response is that not only does this not fit with any current definition of single-use, but their products clearly fit within the boundaries of what is legally defined as ‘waste’.
- Did the Council consider that, even if we accept the definition that you say the Council adopted, that “the term “single-use” would be interpreted as relating to bottles that would normally become landfill, rather than recycled and made into new products”, then even by this definition Coca-Cola bottles are still single-use. We know there is a big difference between something being recyclable and being recycled. The reality is, even [Coca-Cola accept](#) that only a fraction of plastic bottles are recycled. And so, their product ends up in large numbers in landfill or littering our natural environment. With this in mind, even by using this definition, it would only be valid for Coca-Cola to claim their bottles have *the potential* to not be single-use. They don’t say this – they say their bottles are not single-use which is misleading.

Further information for your on-going investigation

In addition, we would also like to contribute to the on-going exploration into the environmental claims around recycling and the idea that their bottles can be ‘sent round in circles’.

Experts agree that plastic bottles can only be recycled back into plastic bottles a limited number of times. ‘Usually polymers in the form of plastic bottles can be recycled a maximum of 10 times.’ ([Simona Maccarrone, Matmatch](#)). Even with the addition of virgin plastic which improves longevity, there is still a limit to how many times you can recycle it back into bottles. ‘I can’t say its 10, 20 or 30 times, but it’s quite a lot. But there is a finite limit on how often you can do it.’ Dr Karl Williams, head of the centre for waste management at the University of Central Lancashire.

According to the Coca-Cola European Partners’ (CCEP) annual [report](#), the company used only 27.6% recycled plastic content in its bottles last year. The likelihood that this recycled



content is derived directly from their own plastic bottles, sold and recycled in the UK, is very difficult to prove, and highly unlikely, yet this is implied by the adverts.

In addition to this, we cannot find evidence to fully support the claim that Coca-Cola bottles are 100% recyclable. The Coca-Cola website states that the bottle caps and the glue used to attach the sleeves are recyclable, however there is no information regarding the recyclability of the sleeve which is glued onto the bottle. And, crucially, even if they are recyclable, we do not have evidence to suggest that are actually routinely recycled.

As stated, before we would also like ASA to take into consideration current recycling rates & recycling infrastructure in the UK. Despite the technical 'recyclability' of a product, many of these products do not actually get recycled. In the UK recycling rates for plastic bottles range from 54% (Wrap) to 74% (British Soft Drinks Assoc). Recycling rates on-the-go are significantly lower with less than half (49%) of the 391 Local Authorities in the UK providing recycling collection units in public spaces ([Recoup 2018](#)). Of the plastic bottles disposed of on-the-go, a 'significant quantity is expected to either be rejected or mixed in with kerbside material to 'hide' high levels of contamination' (Recoup 2018). According to [recyclenow.com](#), the closest recycling point to Victoria Station (where the Coca-Cola adverts appear) is 0.3 miles away - a seven-minute walk out of the station and down Belgrave Road.

We look forward to your response, both on the point so of clarification from our original complaint and then also on these additional points raised.