PAGB position on waste from single-use plastics

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With increasing support from consumers, governments around the world are looking for ways to reduce the negative environmental impact of plastic waste. The UK Government's 25-year environment plan "*A Green Future: Our 25 Year Plan to Improve the Environment*" sets a target of eliminating avoidable plastic waste by end of 2042[1]. PAGB supports this in principle.

Plastic materials used in the packaging or measuring devices for over-the-counter (OTC) medicines, self care medical devices and food supplements (hereinafter referred to as OTC products) are important in ensuring safety and stability. PAGB believes that these should not be considered in the same category as items such as disposable plastic water bottles, straws and coffee cups.

For reasons of public health it is vital that OTC products are packaged in a way that prevents contamination, maintains product quality and supports patient safety. Strict regulatory requirements are therefore in place to safeguard the integrity of OTC products throughout manufacture, distribution and shelf life.

These products are important for people to treat symptoms of self-treatable conditions and support their wellbeing. This enables them to carry on with their daily lives, go to work, look after children and fulfil caring responsibilities. Maintaining availability of these products is necessary to support self care and reduce unnecessary demand on GP and A&E services.

Why plastic?

For OTC products, the use of plastic materials in packaging and measuring devices is designed to ensure a product is delivered to the end user which meets the necessary safety and quality standards. In many cases additives are added to plastics used in the packaging of OTC products. All packaging for these products must comply with relevant legislative requirements, including the Packaging and Packaging Waste Directive[2].

The use of plastic packaging:

- ensures the product specification is maintained throughout its shelf life
- can maintain sterility and prevent potential contamination or degradation
- prevents tampering and can protect children from accidental exposure
- can support compliance and unit pack dispensing
- can offer additional safeguards to prevent or identify counterfeit products

Plastics are also important during the manufacture of medicines. Bulk materials are often dispensed into plastic bags for containment and transit around the manufacturing site. Plastic is often selected as the most appropriate container for this purpose since it provides adequate protection against the environment and is cost-effective. It is also lighter in weight than the alternative, stainless steel, which aids materials handling.

During distribution, plastic films are used to secure containers to pallets or outer trays; similarly, shrink wrap is used to secure the retail units. This use of plastic ensures the security of the product during shipping, distribution and retail of OTC medicines.

Single-use plastic

Single use plastics are defined by the European Commission as plastic items which are usually thrown away after one brief use, they are rarely recycled and are prone to end up as litter in the natural environment[3].

The majority of OTC products are purchased by an individual and used several times before the pack is empty. It is important people retain the packaging of these products as use and dosage instructions and warning statements are printed on the packaging. Therefore, PAGB would argue that consumer healthcare product packaging, such as blister packs, reopenable bottles and dose measuring devices, such as medicine spoons, do not fall into the category of single-use plastics as they are used multiple times by the end user before being disposed of.

There are a number of OTC products which are packaged in single-use plastics, for example medical plasters, wipes and sachets containing a single dose. In addition to meeting the safety and quality standards outlined above, this provides appropriate and effective dose measurement, ensure sterility (for example in eye drop vials) and offers convenience to the public who may need to use the products away from the home. These single-use plastics should not be considered in the same category as other disposable consumable plastic products.

Alternative materials

All materials used in the packaging of OTC products need to fulfil strict regulatory, quality and safety criteria and be fit for purpose.

The OTC industry is supportive of looking for alternatives to plastic use where appropriate. Considerations for alternative packaging materials include:

- Can the material fulfil all the regulatory requirements?
- Will product shelf life be reduced?
- Will the change increase the cost of products?
- Will people be able to dispose of used packaging easily and safely?
- Will the packaging interact with or affect the product?
- Will the packaging adequately protect the product from light, moisture and contamination?
- Is the material robust and portable?
- Does the material offer protection against tampering and provide child-proof opening?
- How does the alternative material impact the environment and contribute to the overall carbon footprint?

There are currently a number of technical barriers to increasing the use of recycled plastics in packaging for OTC products.

Glass is often not a suitable alternative. It is not a suitable material for certain types of dosage forms and is not always inert or compatible with medicinal products. Glass is more expensive than plastic, its manufacture uses significantly more energy than plastic production and it weighs more, which would increase energy costs and impact on the environment during transportation.

Recycling and reducing the plastic burden

OTC packaging is complex and often contains a mix of plastic and other materials such as foil. This makes it technically difficult to recycle.

There are controls in place for the disposal of medicines[4,5], which prevent waste medicines and medicines packaging from being recycled because of the potential for contamination of recycled materials by the pharmacologically active ingredients of medicines. For some products, there may be special disposal requirements, such as incineration.

Any changes to the recycling information required on packaging would, for OTC medicines, require approval from the Medicines and Healthcare products Regulatory Agency (MHRA) which regulates packaging for medicines in the UK[6].

PAGB supports the action being taken by the OTC industry, which is already engaged in taking a responsible approach towards the environment and where possible and appropriate, seeking alternatives and reducing the use of single-use plastics.

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References:

[1] HM Government, A Green Future: Our 25 Year Plan to Improve the Environment https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf
[2] European Parliament and Council Directive 94/62/EC on packaging and packaging waste https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:01994L0062-20150526&from=EN accessed July 2018
[3] European Commission Fact Sheet: Questions and Answers: A European strategy for plastics http://europa.eu/rapid/press-release_MEMO-18-6_en.htm accessed July 2018
[4] RecycleNow https://www.recyclenow.com/what-to-do-with/medicines-0 accessed October 2018.
[5] #MedsDisposal http://medsdisposal.eu/#united-kingdom accessed October 2018
[6] While the UK remains a member of the European Union, EU requirements would also need to be met.