



Charter for  
**Environmentally  
Sustainable  
Self-Care**



# Transition to **sustainable plastic packaging** for consumer healthcare products

## GSCF position



# Transition to **sustainable plastic packaging** for consumer healthcare products

## CONTENTS

- 3 Objective
- 4 Introduction
- 6 GSCF's vision for more sustainable product packaging solutions
- 7 Key elements of GSCF's vision for more sustainable packaging solutions
- 12 Recommendations for policy makers
- 14 Spotlight on Flexible Packaging
- 15 Conclusion
- 16 References
- 17 CEFLEX
- 18 About GSCF





## Objective

The objective of this position paper is to present views of the consumer healthcare industry on the **transition towards more sustainable product packaging** including plastics for non-prescription medicines and food supplements.

Specifically, this paper is designed to contextualise the **key elements of the transition**, unpack the **challenges associated with consumer healthcare packaging** and explore **potential solutions** delivered through future regulatory, policy and legislative changes and stakeholder coalitions.

Finally, the paper sets out a series of **recommendations for policy makers**.



# Introduction

Current climate discussions are rarely framed in a global health lens, despite the inextricable link between climate change biodiversity loss and health. The consumer healthcare industry is committed to driving more environmentally sustainable self-care, without compromising on health outcomes, product safety, and consumers' access to our products. In 2021, the **Global Self-Care Federation (GSCF)** launched its Charter for **Environmentally Sustainable Self-Care**<sup>1</sup>, the **first industry-wide charter on environmental sustainability**. This forward looking charter focuses on three significant areas where the consumer health industry can have a meaningful impact:



In this position paper, we focus on **plastics and packaging**. Product packaging is essential to ensuring consumer healthcare products meet and maintain quality and safety standards across a product's lifecycle, enabling the delivery of safe, high-quality, contaminant-free and effective consumer healthcare products. Primary

packaging formats and materials go through rigorous testing, as mandated by regulations across the world, to ensure that they maintain their performance qualities. Additionally, packaging delivers important labelling information about product composition, safe use and disposal to consumers and healthcare professionals (HCPs).

Plastics are commonly used as **primary packaging material** with properties that protect product integrity during transport and is stable throughout its shelf life that helps ensure the highest quality standards to support public health.

However, in recognition of the environmental challenges posed by packaging and plastic waste, policymakers across the world are increasingly focussing on making packaging more environmentally sustainable, including by looking at novel approaches to managing the plastics lifecycle.

### **Generally, these policies fall into three main categories:**



**Reducing unnecessary, difficult to recycle, or single use plastics.**



**Improving collection schemes and recycling capacity, supported by labelling requirements and consumer education, to ultimately drive an increase in the volume of recyclable and recycled plastics.**



**Incentivising the use of recycled content to create a circular economy for packaging materials and reduce the use of virgin materials.**

In this context, addressing the impacts of packaging and plastics across the product lifecycle, from product design to end-of-life, is a priority area for GSCF and will require innovation that is aligned with regulatory requirements for the sector.

# GSCF's vision for more sustainable product packaging solutions

With the safety of consumers and the environment being central to our industry's mission, GSCF members are committed to investing in solutions (technological and others) to reduce plastic waste and achieve, in practice and at scale, recyclability in collaboration with adjacent industries and other stakeholders.

## This includes:



**Implementing** initiatives and innovating to reduce unnecessary primary plastic packaging and moving away from halogenated materials (like PVC and PVdC) to non-halogenic, recycle-ready formats when the technology is available.



**Establishing** innovative partnerships between brand owners, retailers, governments and other relevant stakeholders to ensure collection, sorting and recycling solutions are available at scale. This could include making improvements to recycling infrastructure and the development of well-designed extended producer responsibility (EPR) schemes.



**Implementing** educational initiatives to help empower consumers to easily sort different packaging materials can help increase participation in recycling and amplify the overall environmental benefit of an EPR program.



**Incorporating** circular design principles into packaging, and, in situations where circular design is determined to be unfeasible or environmentally disadvantageous, encourage reuse in alternative forms.





## Key elements of GSCF's vision for more sustainable packaging solutions

We support efforts to ensure the environmental impact of packaging is minimised, circularity principles are met, and that regulatory requirements are harmonised with established supporting scientific guidelines.

Additionally, we believe that more environmentally sustainable packaging solutions should safeguard product integrity (during handling, distribution, transport and on-shelf storage), ensure the continued provision of necessary product information and facilitate consumers' access to consumer healthcare products.

With these factors taken into account, GSCF believes that the following elements are crucial for future policy and regulatory frameworks:

### Innovation as a driver of circularity

**Innovation is a key enabler to improve circularity of packaging solutions.**

Policy approaches should also adapt to innovation while considering eco-design principles. To design packaging that caters to consumer, functional and supply chain requirements, the industry needs policy approaches underpinned by flexibility. This could include legislation that streamlines the regulatory approval for innovative and more sustainable sources of packaging materials. This approach will aid the faster deployment of recycled content from advanced recycling methods in consumer healthcare packaging which deliver to quality and safety requirements of products.

## Improved collection infrastructure to support transition to sustainable packaging

**There has been a growing demand for recycled materials, which has led to increases in costs.**

The availability of materials of sufficient quality to include in primary medicinal packaging continues to be limited due to challenges associated with the variability of recycling infrastructure globally. To increase the amount of quality and safe recycled materials, significant development of recycling infrastructure is needed, including:

**Processes to recycle packaging should always be optimally designed to deliver tangible environmental benefits in comparison to using virgin materials.**

**Recycled materials used in product packaging should meet quality, safety and performance standards equivalent to virgin materials.**

**Consumer education should be undertaken by stakeholders across the value chain.** Effective labelling and communication can be used to help consumers understand their role in waste collection and disposal of used packaging, especially where packaging still contains the medicinal product.

**These improvements should be underpinned by a robust, reliable and sufficient supply of quality recycled packaging materials.** To establish a functioning supply chain for recycled materials, investments in improved collection, sorting, and recycling infrastructure for all packaging is required. There is a need for a structured dialogue between the medicine regulators, policy makers, industry, waste management, recyclers and other regulatory oversight authorities to explore and facilitate the adoption of recycled content in medicinal primary packaging where quality, safety and performance standards are met.



## Well-designed Extended Producer Responsibility (EPR)

**Globally, policymakers are strengthening EPR schemes through the use of economic incentives, an expanded product scope and instituting financial penalties for use of materials that are not widely recyclable.**

Eco-modulation (an approach by which EPR fees are calculated based on increase in packaging recyclability and efficient use of materials) can be a useful tool, given it reflects the actual costs of recycling in a territory in real time. Key principles for eco-modulation from the Consumer Goods Forum are applicable to the self-care sector.<sup>2</sup>

**These include:**

**Eco-modulation systems should be simple in design and ensure practical implementation.**

**Eco-modulation objectives should clarify the improvements in the waste management and recycling system they are targeting to steer towards better design and technology.**

**Eco-modulation should focus on the net cost of collection, sorting and recycling of a given material stream, with the aim of incentivizing design and production of recyclable packaging.**

**EPR Fees collected from non-prescription medicines and food supplement packaging should be used to support the development of their collection, sorting and recycling.**

**To ensure transparency and consultation, rules of the ecomodulation system should be fully transparent to all stakeholders and defined through dialogue with the industry.**

**Consistent criteria for eco-modulation should be developed and implemented across markets and jurisdictions wherever possible to create a harmonized level playing field.** Given the global nature of supply chains, measuring impact in one country is hard. A global harmonized measurement and reporting would help measure impact and reduce administrative burden associated with reporting.

## Harmonized terminologies, definitions and labelling rules

**Establishing definitions which are harmonized across regions can support moving towards more sustainable packaging by creating a common standard developed using recycling guidelines (e.g. RecyClass in EU, APR in US and CEFLEX D4ACE).**

Key terms supporting requirements of regulatory actions should be internationally accepted with clear and harmonised definitions to ensure consistency and facilitate compliance. Definitions should be scientifically robust, enable enforcement, ensure legal certainty, and be aligned with definitions used in existing standards or legislation.

**An actionable, forward-looking definition of recyclability for medicines packaging must foster evolution of innovative packaging, safe recycling technologies and infrastructure.**

Moreover, for this definition to work, it is important that it is sufficiently future-proofed, allowing for innovation, and for new packaging solutions to demonstrate their recyclability at scale and in practice over a reasonable transitory period.

As such, we encourage policy makers to leverage the long-standing definition of recyclability provided in the Ellen MacArthur Foundation's New Plastics Economy Global Commitment: "a packaging or packaging component is recyclable if its successful post-consumer collection, sorting, and recycling is proven to work in practice and at scale".<sup>3</sup>

**Additionally, there is currently no widely agreed-upon scientific method for measuring the amount of recycled content in packaging.**

Policymakers therefore should consider a harmonised mass balance approach to calculate and verify any recycled content claims.



## E-labelling

**While compliance with the current regulatory framework on labelling requirements is of paramount importance, we call on regulators to further support the development of digital labelling.**

Delivering information to consumers through e-labelling has several advantages for both consumers and health systems and helps limit paper waste and reduce CO<sub>2</sub> emissions per piece, given more boxes can be transported at once.<sup>4</sup>

**Additionally, e-labelling can facilitate easier communication with consumers on waste packaging deposition, as essential information for appropriate product use takes up most of the space on physical packs, leaving limited space for text on recycling.**



## Recommendations for policy makers

1



**Support research into innovative end of life treatment technologies** and encourage end-to-end supply chain alliances to facilitate the supply of PCR and standardise its quality through harmonized global test methods and streamlined regulatory requirements, ensuring product safety is not compromised due to the presence of contaminants in recycled plastic materials and the transition is smooth and efficient.

2



**Ensure that the scope and implementation timelines of any legislation mandating a minimum level of PCR content or imposing a tax on the basis of recycled content, reflects the availability of sufficient quality PCR** and the existence of regulatory requirements which do not hamper its inclusion. They should also reflect the time required by industry to meet regulatory requirements such as validation and stability testing, thus ensuring that human safety and product integrity are not compromised. Where availability, quality, safety or regulatory considerations preclude the use of PCR, provisions for exclusions should be available.

3



**Continue incentivising the use of recyclable packaging through well-designed EPR schemes** with eco-modulation of fees, optimise recycling processes at local, country and regional levels and, in the case of consumer healthcare products, ensure alignment with regulatory requirements and guidance for their approval and use.



4



**Promote standardised definitions and testing standards** (and subsequent inclusion in pharmacopeias) across legislation/regulation and regions/countries, which is key to achieving the objectives of environmental policies on a global scale, mitigating uncertainty and supporting market creation for the appropriate plastics.

5



**Incentivize investment for collection, sorting and recycling infrastructure**, promote consumer education and awareness-raising components, and separate packaging waste collection services.



## Spotlight on Flexible Packaging

GSCF's TF on Blister Packs is committed to transitioning to newer generation of recycle ready blisters looking at appropriate waste management and recycling streams.

Specificities for flexible packaging (including blisters) are highlighted through the following position statements:

**Accelerating the circular economy for flexible packaging –  
a recommendation for recyclable mono-materials**

**Collection Systems for Flexible  
Packaging in a Circular Economy**

**Recycling Capabilities for Flexible  
Packaging in a Circular Economy**

## Conclusion

# GSCF welcomes the move towards more **environmentally sustainable packaging.**

This is one of the environmental health challenges the industry is addressing, as climate change continues to threaten health and well-being at a global scale. Our industry supports **evidence-based policies and regulations** that drive the recycling of product packaging and the use of recycled plastics in the manufacture of new product packaging, while including provisions to safeguard the safety, quality and integrity of consumer healthcare products. These policies and regulations should incentivise **innovative sustainable packaging solutions** and accommodate the regulatory and practical challenges of transitioning to **more sustainable packaging**. Given the complexities and strict regulations our sector complies with, any new legislative or regulatory action should take this into account and allow for reasonable transition time or exemptions where needed. **It is crucial that we build a climate-resilient health sector to ensure the resilience of global health systems.**

# References

1. Charter for Environmentally Sustainable self-care. Global Self-Care Federation. November 2021. ([link](#))
2. Guiding Principles for the Ecomodulation of EPR Fees for Packaging. Consumer Goods Forum. February 2022. ([link](#))
3. Global Commitment 2022. Ellen MacArthur Foundation. 2022. ([link](#))
4. Delivery Information To Consumers Through e-Labeling. Global Self-Care Federation. July 2022. ([link](#))





**CEFLEX—the Circular Economy for Flexible Packaging—** is a collaborative initiative bringing the entire flexible packaging value chain together to tackle the complex technical and business barriers to making flexible packaging circular i.e. recyclable and recycled at scale.

**We are glad to welcome GSCF in our consortium and look forward to supporting the consumer healthcare sector on its journey to sustainable plastic packaging.**

This requires an environmentally and economically sustainable model, which we have developed and are now implementing. By accessing our understanding and technical knowledge and aligning with the CEFLEX goals, GSCF and its members can effectively embrace the practical steps that are needed to achieve the aim as described in their position paper.

## About GSCF

GSCF is dedicated to a world where self-care provides individuals, families, and communities with the ability to manage their health and prevent diseases with or without the support of a health-care provider.

Successful self-care provides individuals with greater choice of healthcare options and more accessible entries to care—e.g., through pharmacies; greater value for care when treating ailments and chronic conditions; and can lead to long-term better health outcomes. It also can decrease the burden on healthcare systems and professional medical personnel; increase freedom for innovation in healthcare; and make progress toward universal health coverage.



Environmental sustainability of self-care products is an component of the consumer health industry. GSCF launched the **Charter for Environmentally Sustainable Self-Care**, the first industry wide climate action on behalf of the consumer health-care industry to support environmental sustainability, without compromising on health outcomes, product safety, and access to consumers.

The Charter provides a robust framework for us to make impactful and collective action in consultation with key external stakeholders working actively in this area. The charter focus on three areas with the largest impact on the self-care industry (Plastics & Packaging, Pharmaceuticals in the Environment and CO<sub>2</sub> Footprint). Identifying these three areas can help the charter achieve tangible results for the self-care industry.

GSCF members have committed to the charter in form of **pledges**, depending on where they are along the environmental continuum. All the commitments of companies and associations are done on a voluntary basis and a flexible manner.





Charter for  
**Environmentally  
Sustainable  
Self-Care**



GLOBAL  
**SELF-CARE**  
FEDERATION

[www.selfcarefederation.org](http://www.selfcarefederation.org)

✕ [@Selfcarefed\\_org](https://twitter.com/Selfcarefed_org)

☎ [+41 \(22\) 362 5384](tel:+353223625384)

[in @selfcarefederation](https://www.linkedin.com/company/selfcarefederation)

