

March 17, 2025

By Jan Dell, Registered Professional Chemical Engineer in California
The Last Beach Cleanup

Fact Check of Mondelez Press Release on Triscuit Packaging

Mondelez’s September 18, 2024, press release¹ on circular certificate purchases for Triscuit packaging has numerous scientific errors and claims that are arguably illegal in California and in the United States (U.S.). This Fact Check provides a detailed review of claims made by Mondelez.

Mondelez purchases “circular certificates” produced by LyondellBasell² via a two-step process of (1) pyrolysis of plastic waste and (2) steam cracking of pyrolysis oil in a LyondellBasell petrochemical refinery. The plastics industry is promoting the false “advanced recycling” (AR) solution to further promote the plastic recycling myth. Since AR processes are not effective, economic, or scalable, the use of mass balance accounting schemes and circular certificates were invented by industry to falsely label new plastic as having recycled content.

While the plastics industry and Mondelez are promoting pyrolysis of plastic waste as a serious solution to the global plastic crisis, detailed studies have proven that advanced recycling processes are not commercially viable (capacity for less than 0.5% of U.S. plastic waste exists today)³ and the processes are harmful to communities and the environment.⁴

1. Title: **Mondelez International Makes Progress Toward Packaging Goals with Advanced Recycling Technology in Triscuit Packaging***

Fact Check: It is not legal to describe the pyrolysis process used to produce the certificates purchased by Mondelez as “recycling in California.” As detailed in the legal citations in the California lawsuit against ExxonMobil, it is not legal to claim a pyrolysis process or plastic waste to fuel as recycling in California. (Para 277 on page 86 of lawsuit).⁵

¹ Mondelez Press Release, “[Mondelez International Makes Progress Toward Packaging Goals with Advanced Recycling Technology in Triscuit Packaging](#),” September 19, 2024.

² Mondelez Press Release, “[Mondelez International Makes Progress Toward Packaging Goals with Advanced Recycling Technology in Triscuit Packaging](#),” September 19, 2024.

³ The Last Beach Cleanup, [Global Chemical Recycling Plant Counter](#)

⁴ Beyond Plastics, “[Chemical Recycling: A Dangerous Deception](#),” October 2023.

⁵ California Department of Justice, [THE PEOPLE OF THE STATE OF CALIFORNIA, ex rel. ROB BONTA, ATTORNEY GENERAL OF CALIFORNIA, Plaintiff, v. EXXON MOBIL CORPORATION](#), Defendants, September 23, 2024.

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277. Neither the average person, nor California law or federal policymakers, understand this to be “recycling.” The definition of “recycling” in the California Public Resources Code explicitly does not include plastic waste processed via pyrolysis or incineration.¹³⁰ California Public Resources Code section 40180 clearly defines “Recycling” and specifically states that it does not include “Transformation.” Public Resources Code section 40201 states: “‘Transformation’ means incineration, **pyrolysis**, distillation, or biological conversion other than composting.” (Emphasis added.) Likewise, Public Resources Code section 42355.51, subdivision (f), states that “recycling,” “recyclable,” and “recyclability” do not include transformation, as defined in Section 40201, . . . or production of fuels.” In addition, in its Draft National Strategy to Prevent Plastic Pollution, the United States Environmental Protection Agency recently reaffirmed its position that it does not consider plastic waste that is processed into fuels or for energy production as “recycling.”¹³¹

2. Subtitle: “Advanced **recycling** technology enables **recycled plastic** to transform into new cracker packaging*”

Fact Check:

- 1) Claims of “recycled plastic” are not credible. The ISCC mass balance certification program allows zero physical recycled content, as described in California lawsuit against ExxonMobil⁶ and the NGO submittal to the U.S. Federal Trade Commission.⁷

3. Statement: “Through this initiative, the Triscuit brand is contributing to the sourcing of **recycled plastics** via the ISCC mass balance approach, helping to support a more **circular pack economy** in the U.S. and Canada.”

Fact Check: This is a false statement. Based on plastic waste-derived pyrolysis oil fed to a naphtha cracker, the plastic used in the Triscuit bag contains far less than 1% recycled content and potentially no recycled content at all.⁸ According to the USDOE, 86% to 99%

⁶ California Department of Justice, [THE PEOPLE OF THE STATE OF CALIFORNIA, ex rel. ROB BONTA, ATTORNEY GENERAL OF CALIFORNIA, Plaintiff, v. EXXON MOBIL CORPORATION, Defendants](#), September 23, 2024.

⁷ [NGO Submittal to USEPA](#), January 2024.

⁸ ProPublica, [“The Delusion of Advanced Plastic Recycling Using Pyrolysis,”](#) June 24, 2024.

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of the original plastic waste is converted to fuel or lost in the process.⁹ This does not support a circular economy. On the contrary, the purchases of certificates are primarily (86 to 99%) paying to produce new climate warming fuel.

4. Statement: “This contributes to Mondelēz International’s goal of achieving about 5% recycled plastic content by 2025.”

Fact Check: This is a false claim. The USEPA does not recognize mass balance certificates as recycled content.¹⁰

5. Statement: “In the past, soft plastic packaging has been considered a single-use material. By adopting this advanced recycling technology, Triscuit fans can snack easier knowing that the brand is playing a role in helping reduce plastic waste.”

Fact Check: This is a false claim and one that the company cannot possibly substantiate, as required by California law.

- 1) The feedstock for pyrolysis units is not household plastic waste such as Triscuit bags. It is clean post-commercial plastic waste such as pallet film wrap and post-industrial scrap. Many Pyrolysis companies and pyrolysis experts state this. One of the few small pyrolysis plants in commercial operation, the Nexus pyrolysis plant in Georgia admitted that they can’t process much mixed household plastic waste and primarily use “post-industrial and commercial” plastic film waste to create pyrolysis oil.¹¹
- 2) There is no credible mechanism to collect Triscuit flexible packaging from consumers for recycling. Flexible plastic packaging is not accepted in curbside recycling bins because the plastics clog equipment and harm workers.¹²

6. Statement: “As part of this effort, up to 50% of the plastic used in the protective bag-in-box liner films can be attributed to plastic sourced from advanced recycling technology through the ISCC PLUS certified mass balance approach.”

Fact Check: As described in the ZWE Leaky Loop report¹³ and the California lawsuit against ExxonMobil,¹⁴ the maximum recycled content possible from pyrolysis and naphtha

⁹ Uekert, et. al, “[Technical, Economic, and Environmental Comparison of Closed-Loop Recycling Technologies for Common Plastics](#),” USDOE/NREL, Jan. 13, 2023

¹⁰ ProPublica, “[Biden EPA Rejects Plastics Industry’s Fuzzy Math That Misleads Customers About Recycled Content](#),” August 29, 2024.

¹¹ Resource Recycling, “[How a chemical recycling firm handles EnergyBag plastics](#),” February 2, 2021.

¹² Greenpeace, [Circular Claims Fall Flat Again](#), 2022.

¹³ Zero Waste Europe, [Leaky loop recycling](#), October 2023.

¹⁴ California Department of Justice, [THE PEOPLE OF THE STATE OF CALIFORNIA, ex rel. ROB BONTA, ATTORNEY GENERAL OF CALIFORNIA, Plaintiff, v. EXXON MOBIL CORPORATION](#), Defendants, September 23, 2024.

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cracking is 2% due to contaminant additives in plastic waste. It is scientifically impossible for Triscuit plastic packaging to physically ever have more than 2% recycled plastic, therefore it is misleading to consumers to claim that the Triscuit packaging has 50% recycled content.

7. Statement: “Through this investment, the Triscuit brand aims to divert over one million pounds of plastic waste from landfills per year.”

Fact Check: According to the USDOE, 86% to 99% of the original plastic waste is converted to fuel or lost in the pyrolysis and steam cracking process.¹⁵ Mondelez is primarily paying for the 86 to 99% production of fuel, not recycled plastic. The purchase of certificates for 1 million lbs of plastic, pays for 860,000 to 990,000 lbs of plastic converted to fuel that is then combusted and emitted as climate-warming carbon emission.

8. Statement: “By embracing advanced recycling technology for our product, we are not only helping to reduce reliance on fossil materials.”

Fact Check:

- 1) Mondelez purchase of circular certificates primarily paying for the production of climate-warming fossil fuels. The production of new plastic from pyrolysis and steam cracking has a HIGHER carbon footprint than the production of new plastic by conventional plastic. Full product life cycle assessments conducted by plastic producers BASF¹⁶ and SABIC¹⁷ consistently show that the total carbon footprint for producing new olefins through pyrolysis of plastic waste and naphtha steam cracking exceeds that of virgin hydrocarbons.
- 2) The pyrolysis process employed to make the certificates is totally reliant on production of fossil fuels in petrochemical refineries because the pyrolysis oil must be processed through naphtha steam crackers.¹⁸ Purchase of mass balance circular certificates does nothing to reduce reliance on petrochemical refineries producing fossil fuels. b

9. Statement: “We believe that sourcing material linked to advanced recycling technologies (mass balance) helps send a signal to the broader industry and can help to drive collection, sortation, and processing of more plastic waste.”

¹⁵ Uekert, et. al, “Technical, Economic, and Environmental Comparison of Closed-Loop Recycling Technologies for Common Plastics,” USDOE/NREL, Jan. 13, 2023
<https://pubs.acs.org/doi/10.1021/acssuschemeng.2c05497>

¹⁶ BASF, [Life cycle assessment \(LCA\) for ChemCycling® and measurement program for pyrolysis oil](#)

¹⁷ SABIC, [CERTIFIED CIRCULAR POLYMERS VIA ADVANCED RECYCLING OF PLASTIC WASTE](#), March 2021

¹⁸ ProPublica, [“The Delusion of Advanced Plastic Recycling Using Pyrolysis,”](#) June 24, 2024.

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Fact Check: While peer product companies have wisely elected to NOT BUY mass balance certificates and make deceptive claims on recycled content, Mondelez has signaled to the public that the company is the leading promoter of the plastic industry's latest plastics recycling myth.