

EXPRA's feedback on the EU public consultation on "Empowering Consumers for the Green Transition" 1 October 2020

The Extended Producer Responsibility Alliance (EXPRA), representing industry-owned, non-profit packaging and packaging waste recovery and recycling organisations, welcomes the opportunity to provide feedback on the initiative on Empowering Consumers in the Green Transition, as part of the EU consultation on the New Consumer Agenda.

EXPRA actively supports the European Commission's efforts to incentivise consumers to make greener, recyclable choices. In order to achieve a circular economy, consumers will need to be given the necessary tools and information to make sustainable choices of products. Green claims should therefore be substantiated by science-based facts and Producer Responsibility Organisations (PROs) are best placed to ensure recyclability claims are checked. Greenwashing, products with shorter lifespan than expected, planned obsolescence, are all issues that also need to be addressed to make products more sustainable.

In its legislative initiative on Substantiating Green Claims, the Commission is working on the adoption of a framework for such environmental claims based on environmental footprint methods, namely PEF and OEF. EXPRA supports the harmonisation of tools for making green claims, notably through PEF and OEF. We nevertheless call on the Commission ensure that these methods will be applied in an appropriate way. The PEF should indeed be at the centre of a harmonised policy framework on how to make standardised environmental information available, towards consumers but also towards businesses. In this sense, we invite the Commission to safeguard the consistency of legislation, by securing a robust alignment between the various interlinked initiatives in this field, notably between the ones on Substantiating Green Claims and Empowering Consumers in the Green Transition.

Furthermore, EXPRA strongly believes that Extended Producer Responsibility (EPR) - the efficient system to protect the environment through which producers assume responsibility for their products once these become waste - should be at the core of an environmentally and economically sustainable recycling society. Communication with consumers is a key prerequisite for a successful EPR organization, as selective collection cannot perform up to standard without the consumers' understanding and involvement. For that purpose, EXPRA members are constantly engaging with consumers with targeted public awareness and [communication campaigns](#). Our members, industry-owned, not for profit Producer Responsibility Organisations (PROs), have been engaged over the past 25 years in raising awareness about proper disposal of used packaging, thus fighting littering as well as its respective sorting and recycling. They have been promoting environmentally friendly behaviour among citizens, as well, as organizing and providing support for educational programmes with National and Local authorities. Whether it is through advertisements on TV or billboards, or trainings at schools starting at a young age, we try to reach all citizens to explain the importance of separate collection, sorting, what becomes of their waste and especially the environmental benefits as limiting CO2 emissions and saving raw materials. This allows us to have a privileged relationship with both citizens, municipalities and producers.

Finally, we invite the Commission to be cautious about introducing new mandatory labelling when it comes to a product's recyclability. A multitude of labels already exist across Member States and adding to that would not contribute to solving the issue and provide consumers with clearer information. EXPRA is of the opinion that consumer information on separate collection and recycling should come from PROs together with local authorities, as they can provide the most suitable and targeted information, also taking local circumstances into consideration.

About EXPRA

EXPRA is the Extended Producer Responsibility Alliance – the organisation for packaging and packaging waste recovery and recycling systems which are owned by obliged industry and work on a not-for-profit or profit not for distribution basis. EXPRA acts as the authoritative voice and common policy platform representing the interests of its members, which are all founded and run by or on behalf of obliged industry. For more information, please visit www.exptra.eu