

EXPRA's key messages on the EU Waste Target Review and the revision of related waste directives

It is of key importance to ensure that EU waste legislation is fit for purpose and up to date, and that EU waste management targets are ambitious, yet realistic. EXPRA (Extended Producer Responsibility Alliance) welcomes the EU Waste Target Review as an important exercise in this regard.

Waste management and material recycling can make a key contribution to the circular economy, where waste is considered as a premium resource. EXPRA is convinced that Extended Producer Responsibility (EPR) is a crucial waste management tool in this regard, as it makes companies responsible for ensuring their used packaging is managed in a cost-effective and environmentally sound manner.

In light of this, you will find below five of EXPRA's key messages on the EU Waste Target Review.

1. *Need for explicit reference and minimum requirements for EPR in the PPWD*

- As Producer Responsibility Organisations (PROs) have important roles to play when it comes to fulfilling EU waste targets (in particular for household packaging) **EXPRA calls on the Commission to put forward proposals that would contribute to promoting the optimal use of EPR schemes**, which is currently being worked on under a separate, but linked Commission initiative.
- **EXPRA also considers it crucial to include an explicit reference and minimum requirements for EPR in the EU Packaging and Packaging Waste Directive (PPWD) *inter alia*** so as to ensure that producer responsibility systems are transparent in their operations and governance principles and also that they operate in the interest of obliged industry.
- **Clearly defined roles and responsibilities of the actors involved in waste management and EPR is of key importance** in order to avoid inefficiencies, non-optimisation and conflicts of interest. Legislators need to ensure that legislation is clear and well-defined. Industry and their EPR schemes should take financial and coordination responsibility. Industry should also be actively involved in the EPR scheme by controlling the operational implementation. It is also essential that PROs and municipalities work closely together in order to ensure effective and efficient EPR. They also share a responsibility for appropriate communication to the inhabitants as it is the role of the citizen to collect, separate and recycle. The operator (collection, sorting company or recycler) also has a key role to provide high quality services.
- **It needs to be ensured that industry and PROs are not put in a position where they are asked bear the financial responsibility for costs caused by factors out of the scope of their responsibility and influence.** A clear example is littering, which is caused by misbehaviour of citizens.

2. *Harmonised definitions, reliable data collection techniques and calculation methods need to be in place before assessing higher targets*

- EXPRA is in favour of **further assessing higher targets for different waste streams**, but considers that a prerequisite for a realistic and credible analysis is to first **ensure that the necessary conditions such as harmonised and consistent definitions, reliable data collection techniques and calculation methods are in place.**
- At present, it is however **not possible to fully compare the quality of recycling results between Member States.** The recent 'EPR Data Verification Study' performed by 15 packaging recovery

organisations on how Member States collect and consolidate the data reported to Eurostat on packaging statistics showed that a fully comparable and reliable picture of the current state of packaging recycling does not exist. However, some countries have proven to have very effective procedures in place. Before setting higher targets, it is EXPRA's view that it should first be possible to easily compare Member States' recycling / recovery performance. Currently it seems uncertain if higher targets can realistically be met by each Member State in practice. EXPRA would welcome additional measures by the Commission to align the level of quality of Member State reporting to the European Commission.

3. Target levels need to be economically and environmentally justifiable

- EXPRA is of the view that introducing a 60% preparing for reuse and recycling target for plastic packaging by 2025 would neither be economically nor environmentally justifiable. Instead, it would be extremely financially burdensome for both industry and consumers. According to an analysis carried out by EXPRA's technical working group on a potential increase of the recycling target for plastic is one example showing that a **target increase to 50% by 2025 could imply a cost increase of up to 50%, for some systems even doubling the costs**, of course strongly depending on the cost structure of each Member State. EXPRA would prefer that a step-wise approach is taken to ensure that the necessary adjustments and preparations can be made by the Member States.

4. Ensure that there is no negative impact on the internal market

- It is also of key importance to ensure that there are no provisions introduced in EU waste legislation that could negatively impact the functioning of the internal market. For example, to encourage issues such as national preparing for re-use targets or national packaging design requirements could result in different design requirements across the Member States and significant logistical challenges for packaging producers. In any way, targets for preparing for re-use and recycling should not be mixed.

5. Point of measurement should be where the sorted material is put into recycling

- When it comes to the calculation of the targets, it is of key importance to maintain and enforce the existing measurement point, i.e. the sorted material that is put into recycling. A change in the point of measurement would impact the target analysis and not be in line with a target increase in the directive (for example if output recycling would be calculated the current target levels would require an increase in recycling in order to be met).

About EXPRA

Founded in 2013, is the alliance for packaging and packaging waste recovery and recycling systems which are owned by obliged industry and work on a not-for-profit basis. EXPRA acts as the authoritative voice and common policy platform representing the interests of all its member packaging recovery and recycling organisations founded and run by or on behalf of obliged industry. For additional information, please visit www.expra.eu

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