

Waste prevention: EXPRA's reaction to Eunomia's Assessment of options to reinforce the Packaging and Packaging Waste Directive

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This paper outlines EXPRA's views on Eunomia's summary paper and its related Webinar organized on 26 May 2020 on waste prevention in the context of the preparation of the European Commission's future review of the Packaging and Packaging Waste Directive (PPWD – Directive (EU) 2018/852).

EXPRA's consideration on Eunomia's views on waste prevention

The Extended Producer Responsibility Alliance (EXPRA), representing industry-owned, non-profit packaging and packaging waste recovery and recycling organizations, welcomes the opportunity to provide its inputs to improve waste prevention. The paragraphs below address EXPRA's position and main concerns with regard to Eunomia's background document proposal on the measures to reduce generation of packaging waste.

- **Role of EPR in waste prevention measures**

Eunomia's assessment fails to acknowledge the important role EPR Organisations play in waste prevention. While Eunomia considers EPR Organizations relevant only for fee modulation on the basis of reusability requirements, EPR Organizations play a much wider role in promoting waste prevention in EU member states as well as in monitoring and enforcing waste prevention measures.

In this regard, EPR organizations undertake a wide range of activities, including:

- The definition of prevention plans at national level;
- Tools and LCA studies on packaging design to incentivize waste prevention on the basis of the concept of "packaging functionality";
- Information and communication activities to promote waste prevention;
- Data gathering on the input of packaging in the market and on recycling and reuse. These data are then used to develop eco-design tools to assess the environmental impact of packaging.

Further information on the waste prevention activities carried out by EXPRA members can be found at the following link:

<http://www.expra.eu/uploads/EXPRA%20WG%20Sustainability%20and%20Packaging%20Leaflet%202018.pdf>

- **Introduction of mandatory targets**

Eunomia deems it necessary to introduce mandatory targets for packaging reuse as well as on packaging waste generation intended as equivalent to packaging placed on the market. EXPRA disagrees with such approach, especially given that the assumptions are based on inaccurate data and cost-benefit analysis and the estimations presented are based on non-comparable or equivalent items. This is the case, for example, of the comparison between single-use items and reusable packaging from different materials. Also, demographic considerations used by Eunomia do not take into account a number of relevant factors, such as the number of tourists/emigrants in some countries /geographical areas, and rather it focuses only on data of residents in a specific country or region.

Finally, the introduction of mandatory targets would ultimately fail to understand the purpose of packaging itself and the importance of taking into account the packaging functionality for a specific product and consumer services in safe conditions, as well as life-cycle environmental considerations on the design of packaging.

- **Material shift and light-weighting in waste prevention**

Eunomia suggests to promote a material shift in order to reduce the quantity of packaging waste. In EXPRA's view, such approach would not only be in contradiction with the principles of the EU internal market, but it would also fail to acknowledge the importance of "packaging functionality".

In this regard, it is important to underline that there is a direct link between the packaging and the product it contains: producers choose a specific packaging on the basis of its function, notably to protect a specific product. By doing so, producers are able to assess the overall environmental performance of packaging by taking into account the product it contains. This is particularly important in cases where packaging has a lower share of the total environmental impact compared to the product it contains.

Furthermore, Eunomia strongly supports to abandon light-weighting, as it is considered a factor in increased littering. While there is a lack of data to support such claim, it is important to stress that the reduction in material use and light-weighting are important factors in waste prevention, which is strongly promoted by EPR organisations. On the contrary, increased littering is linked to the lack of structures as well as consumers' behaviour, which requires instead increased communication activities to discourage littering.

Finally, Eunomia also seems to be favouring an approach to waste prevention which relies on reusable OR recyclable packaging, rather than both.

- **Increase in packaging waste generation**

Eunomia points out that despite the decline in weight of the individual packaging unit across different packaging formats, there has been an almost constant increase in the overall packaging waste generation. In our view, before defining such a development a "problem", it would be important to assess the key factors in a scientific manner. While Eunomia tries to identify a number of factors responsible for such increase, they are not only inaccurate but also lack the support of scientifically sound data. These include:

- Packaging functionality: packaging has a function to protect the product and to extend its shelf life. As products change in their nature, packaging may have to change too. While there can be new ways to increase the functionality, a small sacrifice in terms of packaging weight would have to be taken.
- Demographics have changed in such a way that there are more 1-person households. These consume products in smaller quantities and they come with a relative increase of packaging weight per product unit. However, the magnitude and the impact of such increase should be thoroughly investigated in a scientific manner.
- Consumer behaviour has shifted towards an increase of on-the-go consumption. This change leads to an increase of packaging use per person. Same as above, Eunomia fails to quantify this effect, which should be assessed in a scientific manner.

Finally, we are of the opinion that the increase of food waste and consumer behaviour are the real problems and they should represent the main goal of reduction. Instead, Eunomia focuses on the means needed to transfer the product from the producer to the consumer, namely packaging. With the proposed option on packaging, there is a risk that the goal of reducing food waste and shifting consumer behaviour will not be met, which would have far worse consequences.

- **Inaccuracy of data**

EXPRA noticed a number of gaps in the analyses conducted by Eunomia. We believe that the claims made in the assessment should be qualified as scientifically sound and statistically representative, which is not always the case. To give some concrete examples:

- Eunomia presents examples from one or two member states: this is not geographically representative of the entire EU;
- Eunomia makes a number of links to reach conclusions which are inaccurate. For example, not only there is no evidence that ties the shift toward plastic packaging in vegetable packaging with an increase in household food waste generation. It is also inaccurate to consider vegetables as the majority of food waste; as a matter of fact, there may be a decrease of vegetables waste, whilst a larger increase in other food waste.

Finally, we believe that the claims made need to be weighted both from a geographical perspective, and quantified both in terms of magnitude and geography, and that the identification of problems needs to be scientifically assessed ahead of reaching potentially misleading conclusions.

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