

EU Waste Package

Joint Statement by Packaging Value Chain Industries

A growth-oriented circular economy for packaging and packaged goods in the Internal Market

The undersigned organisations¹ represent industries in the packaging value chain, which agree with the overall objectives of the Circular Economy package, but also share three key concerns (see below) relating to the proposed revision of the Waste Framework Directive (WFD) and Packaging and Packaging Waste Directive (PPWD).

The undersigned organisations are prepared to work constructively with the European Parliament, Council and Commission to improve these provisions so that future EU legislation is clear, workable and proportionate for the packaging value chain in Europe, and the growth and environmental objectives of the EU waste review may be realised.

The undersigned associations call on the European Parliament and Council to improve the European Commission's proposal amending the WFD and PPWD, and in particular to:

1. Packaging targets:

- **Fully assess with a cost/benefit analysis the impact of any changes to the way packaging recycling targets are measured before discussing new and restructured targets.**
- **Set a clear and enforceable harmonised method for measuring and reporting packaging recycling rates.** The point of measurement for packaging recycling within this method must remain based on input: measuring the output of a recycling process is neither technically nor administratively feasible². The point at which packaging recycling is measured should be defined as the “*input into a final ‘preparing for re-use’ or recycling process, after sorting operations have been completed*”. This suggested definition would: (1) work for all packaging materials, which is the scope of the PPWD; (2) meet the Commission's intention to avoid double-counting or miscounting earlier in the collection/sorting process; (3) meet the Commission's objective of simplification as the definition precludes the need for technically/administratively unrealistic “one-size-fits-all” provisions to subtract the weight of materials discarded (materials not intended to be present in a sorted bale of material for recycling); (4) meet the technical feasibility and administrative realities of packaging recycling processes and would not contradict existing material and/or industry standards (specifications).
- **Maintain the current method of counting recycling of composite packaging towards the rates and targets of the predominant material.** Packaging composed of different materials is put into final recycling processes and separated into its respective material fractions during the recycling process. The percentage material share of such packaging is often unknown when it enters a recycling process. Therefore, it is neither technically nor administratively feasible to count the recycling of material components of

¹ This statement does not preclude each of the undersigned organisations from issuing individual positions that are more focused on their specific sectors.

² cyclos/HTP (2014) Impact assessment: The European Commission's Proposed Changes to the Calculation Method for National Packaging Recycling Rates, Brussels: EUROOPEN

composite packaging (or “*packaging composed of different materials*” as suggested in the Commission’s proposal) coming out of a recycling process towards their individual material recycling rates. In addition, counting such materials separately is unlikely to have any significant impact on overall packaging material recycling rates.

2. Extended Producer Responsibility

- **Develop EU packaging-specific guidance on the roles and responsibilities of all stakeholders involved in implementing extended producer responsibility (EPR) for used packaging** (producers and importers placing goods on the market of the Union, compliance schemes, local authorities, private or public waste operators and social economy actors where applicable).
- **Ensure that any financial contribution assigned to producers/importers placing goods on the market of the Union is consistent with their defined roles and responsibilities.** The proposed obligation for these producers/importers to finance the “entire cost of waste management” is not proportionate, particularly in the absence of clarity about the role of all other stakeholders involved in the implementation of EPR.
- **Establish EU binding minimum performance requirements for EPR systems for used packaging.** We welcome the Commission’s proposal to introduce minimum performance requirements, which are generically applicable to all EU waste streams with EPR systems in place. Additionally, minimum requirements specifically for used packaging will help reinforce EPR as a key policy tool to meet current and future packaging recycling targets.

3. Internal Market

- **Safeguard the Internal Market by avoiding national packaging design requirements.** The Packaging and Packaging Waste Directive is a fundamental legal instrument for guaranteeing the free movement of packaging and packaged goods in the EU Internal Market. The role and legal base of the Directive in safeguarding against protectionist measures and market distortions and fragmentation must be maintained.

Signed by the following organisations (in alphabetical order):



ACE – The Alliance for Beverage Cartons and the Environment



AIM – European Brands Association



A.I.S.E. – The International Association for Soaps, Detergents and Maintenance Products

Association Internationale de la Savonnerie, de la Détergence et des Produits d'Entretien
International Association for Soaps, Detergents and Maintenance Products



ARA - Altstoff Recycling Austria AG Packaging Compliance Scheme, Austria



Belgium Packaging Platform



CEPI - Confederation of European Paper Industries



CITPA - The International Confederation of Paper and Board Converters in Europe



Cosmetics Europe



DSD - Der Grüne Punkt Dual System for Packaging Recycling, Germany



EAA – European Aluminium Association



Éco-Emballages – Packaging Recovery Organisation, France



Edana – The International Association Serving the Nonwovens and Related Industries



EMRA – The European Modern Restaurants Association



European Bioplastics



EuPC – European Plastics Converters



EUROPEN – The European Organization for Packaging and the Environment



EXPRA – Extended Producer Responsibility Alliance



FEFCO – European Federation of Corrugated Board Manufacturers



FPE – Flexible Packaging Europe



Intergraf – European Federation for Print and Digital Communication



MPE – Metal Packaging Europe



Pack2Go Europe – Europe's Convenience Food Packaging Association



Sociedade Ponto Verde, S.A. – Packaging Recovery Organisation, Portugal



REKOPOL – Recovery Organisation S.A., Poland



TIE – Toy Industries of Europe



UNESDA – European Soft Drinks Industry



Valpak - Environmental Compliance, Recycling and Sustainability Solutions, UK