

Rethink Plastic alliance: feedback on the Packaging and Packaging Waste Regulation proposal

Introduction

The Rethink Plastic alliance welcomes the European Commission proposal for the Packaging and Packaging Waste Regulation (PPWR). Notably, we welcome the proposed waste prevention and reuse targets, as well as the strengthened measures for tackling packaging waste.

Ambitious waste prevention targets and well-designed reuse systems can bring significant environmental benefits including reducing emissions as well as resource, energy and chemicals use.

Although the proposal goes in the right direction by prioritising prevention and reuse, it falls short on the objective to achieve 100% reusable or recyclable packaging by 2030. Also, the proposal offers too many loopholes and exemptions to effectively reverse the trend of growing levels of packaging waste, and it fails to incentivise the elimination of harmful chemicals in packaging.

In the upcoming negotiations, it will be crucial to build on the proposal and swiftly adopt a robust framework for the packaging sector if the EU is serious about achieving its Circular Economy and Green Deal goals.

We understand the complex context of the negotiations, with strong industry pressure calling for further weakening of the proposal, but it is pivotal to not lose sight of the need for strong binding legislation to drive the circular transition of the packaging sector for the benefit of people and the environment.

The following outlines the Rethink Plastic alliance's main recommendations to support the revision of the EU packaging legislation:

1. No time to waste

To stop the continuous growth of packaging waste, the legislative process must be concluded in this parliamentary term. Unfortunately, the publication of the Commission proposal was delayed by over a year compared to what had been announced in the Circular Economy Action Plan¹.

The proposal also comes after an extensive period of impact assessments and stakeholders consultations (started in 2019), and it is therefore now key to complete this work. Any delays at

¹ https://ec.europa.eu/environment/circular-economy/pdf/new_circular_economy_action_plan.pdf

this stage would make it difficult to finalise the discussions before the end of this legislature creating further legal uncertainty.

The PPWR offers an important opportunity for the much-needed transition towards more circular packaging systems at a time where it is crucial to tackle emissions, pollution and resource use in all sectors. Though we are already witnessing deliberate efforts by laggards in the packaging sector attempting to delay the legislative process, we count on policy makers to prioritise consumer and environmental protection by ensuring a timely adoption of the legislation.

2. Prevention and reuse targets to tackle the waste crisis

a. Legal basis: ensure Member States can take the necessary measures to pursue waste prevention

We welcome the decision to ensure EU harmonisation on aspects such as the definition of recyclability or the standardisation of reusable packaging and systems. However, in the current proposal we see a contradiction between Article 4 on Free Movement which prevents Member States to develop measures to restrict packaging complying with the regulation, and Article 38.2-5 which mandates Member States to develop waste prevention provisions in order to meet their packaging waste reduction targets.

This excessively restricts Member States' possibilities to achieve waste prevention and to minimise the environmental impact of packaging, pursuant Article 38. "Corporate waste management plans" and "voluntary actions", as referred to in the Impact Assessment, are unlikely to deliver tangible results². In absence of stronger harmonised waste prevention measures within the regulation, it must be ensured that more ambitious measures can still be implemented in the Member States, especially those necessary to meet the waste prevention targets and to enable the uptake of reuse.

One solution, given the clear environmental objectives of the regulation, is that Article 191 TFEU (environmental basis) should also be included as a legal basis for this regulation next to Article 114 TFEU (single market), particularly with regard to the provisions of Chapter VII on management of packaging and packaging waste. Alternatively, opening clauses must also be clearly included, wherever necessary, to enable Member States to pursue waste prevention initiatives.

b. Waste prevention targets should be more ambitious

The targets set in the proposal are an important milestone from a regulatory perspective but are nowhere near ambitious enough. Reversing at least the 20% increase in packaging volumes that happened over the last decade should be the initial prevention target.

In line with climate and resource protection ambitions, packaging volumes must decrease drastically. With the Commission's current targets, limiting packaging waste generated per

² [Executive summary of the Impact assessment](#) (30 Nov. 2022), pag. 27-28

capita to a similar level as in 2009 (149.9kg of packaging waste per capita) is not possible before 2040. It is necessary to take countermeasures earlier and to set the ambitious target of achieving a reduction equal to the increase of the last 10 years as early as 2030, meaning a 15% instead of 5% waste prevention target per capita by 2030.

In order to avoid driving simple substitutions between single-use applications made of different materials (from heavier to lighter packaging materials), material-specific sub-targets should be set, e.g. for packaging made of plastics, composite material, paper, glass and metal.

c. Lack of a weight optimisation approach

The overall objective of the legislation should be to reduce the environmental impact of packaging systems. This includes optimising packaging circularity with its weight. The current Essential Requirements for packaging have proven to be ineffective due to their unenforceability. The qualitative criteria, stipulated in Annex II of the Packaging and Packaging Waste Directive, require extensive research to prove cases of non-compliance. We know that national authorities do not have sufficient capacities to enforce these qualitative requirements, leading to a situation where non-compliance remains unsanctioned. Although the Commission has proposed to limit the qualitative criteria in the performance criteria listed in Annex IV, the enforceability issues remain unresolved in absence of supporting quantitative criteria.

As already identified in the preparatory study, there are many packaging formats on the market which are unnecessarily heavy³ - driving resource use and secondary impacts (e.g. transport emissions). Clearer and enforceable rules are thus needed to effectively drive packaging optimisation. We therefore call on the co legislators to include quantitative criteria that ensure the enforceability of the packaging minimisation provisions. A possibility could be to define maximum weights relative to the content and tailored to the packaging material used for certain common types and formats: for example, a glass wine bottle really does not have to weigh more than 350 grams⁴. Alternatively, the Commission could request the European standardisation organisations to update the harmonised standard for establishing maximum weight limits for certain common packaging types and formats in order to prevent overweighting of packaging.

Although Article 9 is supposed to set standards for the prevention of unnecessary packaging, the current approach contains loopholes that will strongly undermine its effectiveness. For example, we do not support exemptions for the packaging of products subject to geographical indications of origin. Giving such products a free pass on optimising the sustainability of their packaging for marketing purposes (“including double walls, false bottoms and unnecessary layers”) is contradictory and reduces the impact that stricter packaging minimisation rules could have to reduce the packaging sector’s material footprint.

3. Reuse

³<https://recyclingnetwork.org/fr/2019/11/13/les-producteurs-enfreignent-les-regles-de-prevention-des-dechets-depuis-des-annees-pour-des-raisons-de-marketing/>

⁴ Ibid.

a. Definition of ‘Systems for re-use’ should include an incentive to return the packaging

Reusable packaging will not deliver environmental savings without well designed reuse systems. This should not be left to chance. It is positive that the proposed text has defined ‘systems for re-use’ meaning the organisational, technical /or financial arrangements, which enable the re-use either in a closed loop or open loop system. Although the need to set rules for effective and efficient collection is referred to in Annex VI part A, the need for incentives for return must also be clearly stipulated as a requirement in Article 45. Incentives for reuse are essential to ensure the efficiency of systems and avoid “pseudo” reusable packaging.

In this way, we strongly support the definition set in the German Law⁵: *“Reusable packaging is packaging that is intended to be reused several times for the same purpose after use and whose actual return and reuse is made possible by adequate logistics and promoted by suitable incentive systems, usually by a deposit.”*

The return rate is a crucial element of a reuse system, and the ‘incentive to return’ is the only tool to ensure that the packaging is actually returned, so the system can run effectively and smoothly. Incentives should be high enough to ensure reusable packaging return rates are above 90%. In addition, the terminology of the requirements for systems for reuse from Annex VI must be adapted, as the terms from recycling are transferred to reuse systems. The proposal refers to ‘open loop’ and ‘closed loop’ systems for reusable packaging, whereas the correct terms are pool systems and individual systems.

b. Reuse targets should be more ambitious and expanded to other key sectors

Reuse targets should also be expanded to other key sectors and product groups, such as the retail sector (non-perishable foods), cosmetics, cleaning products, personal hygiene products and milk. The targets proposed apply only to a limited number of product groups, and are less ambitious compared to those already in place in some Member States. The targets set in the regulation must be higher in order to achieve reuse at scale. Their achievement should be monitored via interim targets and an annual progress report. It is incomprehensible that - in particular the reuse targets for beverage bottles - are very low, as there is already substantial experience in this area in a number of Member States⁶. In Germany, for example, reuse targets for beverage bottles of over 40% have been achieved for decades.

⁵ Section 3 (3) of the German Packaging Act (VerpackG)

⁶ Reuse targets set by some Member States:

- Austria: reuse targets of 25% by 2025 and at least 30% by 2030 for beverage packaging;
- France: 5% of all packaging to be reusable by 2023 and 10% by 2027;
- Germany: reuse target of 70% for beverage packaging;
- Romania: 5% packaging to be reusable by 2020, plus a 5% annual increase until 2025.
- Portugal: 30% of all packaging to be reusable by 2030;
- Sweden: increase of reusable packaging by at least 20% by 2026 and by at least 30% by 2030.

c. Sector specific reuse targets should be achieved only through ‘systems for reuse’ and ‘refill’ should be counted as part of the waste prevention targets

As recognised in Article 3 on definitions, reuse and refill are different approaches to packaging. Due to their clear differences and distinct levels of maturity of data collection, the targets for achieving one or the other should not be mixed up in order to avoid the risk of huge margins of error and unreliable data.

The action of **refill**, as defined in the proposal, means an operation by which an end user fills its own container. In this sense, the container is in fact not a packaging but a consumer owned product. Therefore, the action of refill by a consumer should be considered as a **packaging waste prevention measure**.

The Commission should define this concept as “bring your own” rather than “refill” because the property of the container is what differentiates this concept from reusable packaging systems. The term “refill” can lead to confusion as reusable packaging returned by consumers is refilled as well before it is being reused.

The proposed requirements for refill stations are too restrictive. The Commission suggests that economic operators who offer refill (“bring your own”) need to introduce “refill stations” that include weighing devices. However, take-away beverages and food prepared on the spot for immediate consumption (e.g. coffee) are mostly sold by the unit, not by weight. This requirement places a disproportionate burden on operators allowing customers to bring their own containers. By default, economic operators preparing cold and hot beverages and food for immediate consumption on the go should enable consumption by “bring your own” containers. Exceptions should be well justified.

On the other hand, as laid down in the proposal, the action of **‘re-use’** means an operation by which a reusable packaging is used again for the same purpose for which it was conceived.

A reusable packaging must be also part of a system for re-use, which is defined as an organisational, technical /or financial arrangement, which enables the re-use either in a closed loop or open loop system - respectively, as explained above, in a pool or individual system. Therefore, it is clear that **a reusable packaging is an asset owned by the system operator**, which will ensure it is collected, washed and refilled. This process is what should be considered as **reuse**⁷.

These two different processes should not be confused or mixed-up as they target two different levels of the waste hierarchy. When it comes to implementation and enforcement this is even more important.

Risks of combining ‘refill’ and ‘reuse’ targets: With the exception of targets for transport and e-commerce packaging, in the current proposal, the targets for takeaway food and beverages for

⁷ Further detail on the differentiation between refill and reuse can be found here: <https://zerowasteurope.eu/wp-content/uploads/2022/06/Packaging-Reuse-vs-Packaging-Prevention.docx-1.pdf>

the Horeca and for the beverage sector (soda drinks, water and wine) could be achieved either via 'systems for reuse' or either 'refill'. The issues with that are:

(i) The calculation methods and metrics for reuse and refill are not the same. Reusable packaging in systems for reuse is easily traceable by units with a serial number (how much it was placed on the market, how much was returned, how many times it was refilled, etc.). However, it is very difficult to measure refills through consumer owned products (how many kilos/litres of a certain product the consumer is refilling and how many times, etc.) **Therefore, mixing prevention and reuse will lead to a huge margin of error and the data will not be robust.**

(ii) How will market operators ensure that the reuse/refill targets are not being reached with single-use packaging being provided on the side? Even though it would not be provided for free, there would still be possible to have single-use packaging being provided on the side and this could risk erroneous inclusion towards the reuse/refill targets, which will make the data even less reliable.

4. Consumer safety and hazardous chemicals in packaging

We support calls from other stakeholders to carefully consider consumer safety in the context of the proposal. This should be done in a holistic way, also considering the role of chemicals and their impacts on the environment, consumer health and circularity. This echoes the work of the Commission in the Chemicals Strategy for Sustainability which calls for non-toxic material cycles and minimising the presence of substances of concern in products including packaging and food packaging⁸.

In contrast, the PPWR proposal is **too vague on substances of concern and does not incentivise the elimination of harmful chemicals in packaging**. The proposal should include a clear link to REACH restrictions process when there is an unacceptable risk to human health or the environment identified, arising from the use of a substance in the manufacture of packaging or packaging components, or from a substance present in packaging or packaging components when they are placed on the market, or during their subsequent life cycle stages, including the waste phase. All substances recognised in the EU as substances of concern and very high concern should be restricted from use in packaging.

Moreover, the current proposal prohibits to regulate the presence of substances in packaging for reasons relating to chemical safety as part of the recyclability requirements that will be established pursuant to Article 6. This is not in agreement with the ambitions set out in the EU Chemicals Strategy for Sustainability, and the Commission's commitment to extend the generic approach to risk management to ensure that consumer products do not contain hazardous chemicals.

⁸ European Commission, [Chemicals Strategy for Sustainability Towards a Toxic-Free Environment](#) (2020), pag. 6

To maximise health benefits in the EU from reduction in the exposure of citizens to substances of concern, a preventive approach across all legislations must be applied, including in the PPWR. Complementarity between legislation should be encouraged recognising that REACH only provides a baseline of protection, as stated in the 7th Environment Action Programme⁹. Additionally, although the Food Contact Material Regulation should in principle address chemicals in certain applications of packaging, the review of this legislation is facing unprecedented delays (more than 6 years) and the harmonised rules do not address the biggest packaging material group: paper and board. Therefore, a holistic approach to chemicals in packaging is needed.

We call for more ambitious measures in the PPWR regarding the restriction on the use of substances of concern in packaging or packaging components, to protect consumers and notably vulnerable groups. This must also include **stricter requirements on chemicals (including mandatory reporting on chemical content) and strong mechanisms for phasing out the most harmful substances** such as those proposed in the Chemicals Strategy for Sustainability (i.e chemicals that cause cancers, gene mutations, affect the reproductive or the endocrine system, or are persistent and bioaccumulative). This is even more crucial given the high attention in the proposal to reuse, recycling and recycled content.

5. Regulatory certainty and governance

a. Strengthen enforcement and remove unnecessary derogations/exemptions

One of the major limitations of the Packaging and Packaging Waste Directive was that many of its requirements were not enforceable or too broadly defined - such as permitting overpackaging for the purpose of consumer acceptance or marketing. As a result, its requirements had limited effectiveness and cases of non-compliance from market surveillance were rare to non-existent.

In a similar way, this proposal foresees various derogations and exemptions for several requirements which create unnecessary and potentially counterproductive loopholes, such as:

- I. Exempting 'innovative packaging' from meeting any recyclability requirements for 5 years creates a loophole that could allow the placing of non-recyclable packaging on the EU market well after 2030 (art. 6(9));
- II. A number of unjustified exemptions from the Deposit and Return Systems regime are foreseen (art. 44);
- III. Broadly defined derogations from the market restrictions on unnecessary or avoidable packaging formats (set in art. 22 and detailed in Annex V);
- IV. Only referring to "single-use plastic packaging" in Annex V rather than simply "single-use packaging";

⁹ Paragraph 50 (objective 2)
<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013D1386&from=EN>

- V. The possibility of derogating via delegated acts from the minimum recycled content requirements where justified by the lack of availability or excessive prices of specific recycled plastics (set in art. 7(10)).

These broad derogations and unnecessary exemptions might lead to regulatory uncertainty and an overall reduction in the transformative potential of the Regulation. Therefore, it is imperative that these are limited as much as possible in the proposal, otherwise it will be easy to circumvent the requirements limiting their enforceability.

b. The role of delegated acts

The proposal leaves the definition of several substantial aspects (such as recyclability, recycled content, requirements for reuse, DRS, etc.) to be defined only in secondary legislation by means of Commission's delegated and implementing acts. Notably, the proposal calls for delegated acts in at least ten articles, with no limit on how many will be needed for the legislation to deliver on its goals and, in most cases, without setting clear deadlines for the Commission to publish these acts.

It is clear that the Commission and national authorities already face a substantial staffing gap and delays in a number of areas. Additionally, many other policies handled by the same Directorates (e.g. Batteries Regulation, Eco-design Regulation, Single Use Plastics Directive) will also rely heavily on secondary legislation in the coming years. With this in mind, **co legislators should, as much as possible, agree on the key aspects already over the course of the ordinary legislative process, reducing the need for delegated acts and the consequent regulatory uncertainties.**

A clear example is the need to define already in the legal text the barriers to recycling (e.g. by developing a negative list of recycling disruptors); an area where extensive research has already been conducted in the preparatory work which can now inform robust immediate action. Voluntary industry-led and national initiatives have also engaged for several years in harmonising recyclability guidelines and identifying recycling disruptors.

Where secondary legislative acts are still needed to implement the regulation, the Commission should commit to clear deadlines to avoid situations where these are finalised too close to the introduction of targets, such as those on recyclability or reuse targets. We believe this will also create a clear pathway for the packaging sector, preventing any delay in the investments necessary to comply with the new sustainability requirements.

c. Proven recyclability before collection targets

While collection of packaging should be seen as a necessary step to enable recycling, setting collection targets for non-recyclable packaging (which will ultimately be incinerated or landfilled) risks placing an unnecessary burden on municipal authorities and recyclers. A necessary first step should be to define what can be recycled at scale into high quality secondary raw materials on the basis of state-of-the-art collection, sorting and recycling processes (pursuant Article 6 setting design for recycling criteria). A second step could then be

to set mandatory separate collection targets for recyclable packaging on the basis of the established recycling streams.

It should also be recognised that for many packaging formats (e.g. beverage bottles) experience shows that the most appropriate tool for achieving high collection rates are Deposit Refund Schemes. Also, the establishment of collection targets should not be used as an excuse for non-recyclable packaging to remain on the market.

d. Penalties

The penalties section of the proposed Regulation (Art. 62) is too vague and does not signal to the Member States or market participants the immense importance of compliance with the PPWR for the correct functioning of the single-market or the protection of the environment.

We suggest that the proposed Regulation is adopted with provisions that mirror the penalties section in Article 23 of the latest version of the proposed Deforestation Regulation¹⁰, which include:

Specific requirements for the **financial penalties** imposed

- The penalties should ensure that they effectively deprive those responsible of the economic benefits derived from their infringements.
- In the case of a legal person, the maximum amount of the penalty shall be set at least at 4% of the operator's or trader's total annual Union-wide turnover in the financial year preceding the fining decision.
- Confiscation of the relevant products concerned from the operator and/or trader
- Confiscation of revenues gained by the operator and/or trader from a transaction with the relevant products concerned.
- Temporary exclusion for a maximum period of 12 months from public procurement processes and from access to public funding, including tendering procedures, grants and concessions.
- Temporary prohibition from placing or making available relevant commodities and products on the Union market, or exporting them, in the event of a serious infringement or of repeated infringements.

An obligation on the Commission to **publish a list** of final judgements with findings of non-compliance with the regulation, listing

- The name of the legal person found in breach
- The date of the final judgement
- A summary of the activities for which the legal person was found in violation of this Regulation; and
- The nature and, where financial, the amount of the penalty imposed.

¹⁰ Proposal for a Regulation of the European Parliament and of the Council on the making available on the Union market as well as export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010, <https://data.consilium.europa.eu/doc/document/ST-16298-2022-INIT/en/pdf>

6. Standards in the PPWR

The European Commission proposes that packaging manufacturers can presume conformity with sustainability requirements (i.e., substances of concern, recyclability, recycled plastic content, packaging minimization, requirements for compostable and reusable packaging) as well as with labelling obligations by following existing European standards.

However, certain standards would have to be revised to align with the proposed regulation (EN13428:2004 (Reduction), EN 13429:2004 (Reuse), EN 13430:2004 (Recycling), 13432:2000 (Compostability)). The European Commission will need to prepare a request to revise or adopt new standards. In this context, the level of environmental ambition should be the result of the democratic process and therefore be clearly specified in the regulation. This includes certain technical specifications, impacting the environmental ambition, such as weight limits of certain packaging applications, durability of reusable packaging (number of trips for specific packaging applications), duration of decomposition processes of compostable packaging.

The European Commission equally proposes that economic operators that make use of reusable packaging can presume conformity of their system for re-use by following a European standard. The current standard EN1349:2004 (Reuse) therefore would need to be revised to align with the new requirements of systems for re-use specified by Annex VI of the regulation.

7. Deposit Return Systems

The minimum requirements for Deposit Return Systems (DRS) set up in Annex X set relevant criteria to ensure an harmonised and efficient implementation of DRS across Member States. The obligation to establish Deposit Return Systems for single-use plastic bottles and beverage cans will drastically reduce environmental litter. Nevertheless, given that operators will need to meet reuse targets for the beverage packaging sector, and that the infrastructure base of a reuse system is also DRS, the minimum criteria should also establish that new DRS must be set-up to accommodate reusable packaging from the outset. If the regulation obliges the beverage sector to implement DRS for single-use and to achieve reuse targets, this requirement should be included in order to ensure the same system encompasses both options. It would be more convenient for consumers as well. Many countries, including Germany and most of the Scandinavian ones, already facilitate both reusable and single use containers in successful DRS systems and the technology and infrastructure is already well-established.

The proposal also includes the option for Member States to apply for exemption from the obligation to establish deposit systems – provided they achieve a collection rate of at least 90

percent. We foresee that this exemption will lead to unnecessary delays. Additionally, [the lack of transparency](#) and verification concerning current collection and recycling targets, can lead to unreliable reporting. We can therefore not be sure that the environmental goals of the targets (reduced environmental pollution and use of virgin resources) would be met without the use of DRS. Furthermore, as explained above, the reuse transition also requires well-functioning DRS. The possibility to derogate from setting DRS systems should therefore be deleted.

8. Extended Producer Responsibility

The limited provisions related to Extended Producer Responsibility (EPR) should be strengthened to favour more circular products and business models, including by ensuring better public access to the information reported to and from producer responsibility organisations on the amount of packaging placed on the market and on the levels and quality of recycled materials, and ensure actionability by public authorities. We also urge the Commission to broaden the scope of the Waste Framework Directive revision in order to define more clearly the roles and responsibilities of producer responsibility organisations, thereby increasing the effectiveness of the EPR-provisions stipulated in the PPWR.

Fund for change: EPR schemes should dedicate a minimum of 10% of their budget to finance reuse infrastructure (systems for reuse). So far, existing EPR schemes have served to partially fund the collection of some waste streams but have had little or no success in pushing for better eco design of packaging. Therefore, in addition to the eco modulation of EPR fees that can enable the shift towards more recyclable packaging and higher uptake of recycled content, a 'Fund for Change' to support this transition should also be created to support pioneering businesses implementing reuse at scale.

Due to the current lack of level playing field with single-use packaging, raising revenues to create a 'Fund for Change', could ensure financial support for reuse systems to overcome barriers to entry, such as capital investments for collection vehicles or washing facilities. They could also be used by municipalities and communities to invest in waste prevention/reuse local systems. For instance, CITEO (the French PRO) dedicates part of its budget to meet the 5% target of reusable packaging in accordance with the French Circular Economy Law¹¹.

Litter clean-up costs: We also call on co-legislators to include a requirement for producer responsibility schemes to cover the costs of management and clean-up of litter caused by packaging as well as the costs of awareness raising measures to prevent and reduce such litter. This requirement should be applied for the packaging formats that are particularly prone to be littered and to not be separately collected (e.g. take-away food packaging and packaging for on the go consumption). A similar obligation has already been introduced at EU level for some types of single-use plastic packaging (Single-Use Plastic Directive, art. 8). The current revision

¹¹ LOI n° 2020-105 du 10 février 2020 relative à la lutte contre le gaspillage et à l'économie circulaire

of EU rules on packaging now offers the opportunity to better apply the polluter pays principle for all packaging formats which are among the main sources of littering (mirroring the approach of the Single-Use Plastic Directive), thus shifting the financial responsibility from public authorities and taxpayers to producers.

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Rethink Plastic is an alliance of leading European NGOs, representing thousands of active groups, supporters and citizens in every EU Member State. We are part of the global Break Free From Plastic movement, consisting of over 11,000 organisations and individuals worldwide demanding an end to plastic pollution.

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