



FoodDrinkEurope recommendations on a harmonised packaging sorting instructions to reach greater circularity in the EU

Need for a harmonised information system on how to dispose of packaging in the EU

FoodDrinkEurope fully supports the need to build a strong circular economy for packaging allowing to reincorporate recycled materials into new products as well as reducing Green House Gas emissions and avoiding littering. This requires significant investments in, and development of post-consumer waste management systems so as to boost recycling rates across the EU Member States.

The effectiveness of recycling also depends on how packaging waste is sorted by consumers in the first place with the support of brand owners consumer information and awareness campaigns. We thus strongly welcomed the European Commission¹ and European Parliament's² intention to investigate the development of an EU-harmonised scheme on sorting instructions to boost consumer engagement in circularity, as announced in the new Circular Economy Action Plan.

However, in the meantime, schemes are being developed by Member States in an divergent manner³. We regret that these initiatives go against [EU Directive 2018/852](#) which requires that the systems

¹ As reported in COM(2020) 98 final - Communication from the Commission on A new Circular Economy Action Plan For a cleaner and more competitive Europe

² As reported in P9_TA(2021)0040 - European Parliament resolution of 10 February 2021 on the New Circular Economy Action Plan (2020/2077(INI))

³ See, for example:

- France: obligation to use the “Triman logo” and include sorting instructions.
- Italy: obligation to use the alphanumerical codes in Commission Decision 97/129/EC and to include sorting instructions.
- Portugal: obligation to use the alphanumerical codes in Commission Decision 97/129/EC and to include sorting instructions, in particular the colour of the recycling bin. It could also result in a ban of the “Tidy man” logo on recyclable packaging. These requirements could require specific packaging for the Portuguese market. In addition, sorting instructions and colour codes of bins are not harmonised across the EU. This information could be confusing for consumers in other Member States.
- Slovenia: obligation to use the alphanumerical codes in Commission Decision 97/129/EC to identify packaging materials.
- Bulgaria: obligation to use specific sorting instructions

set by Member States for return and collection of packaging waste are designed so as to avoid barriers to trade. As labelling of packaging sorting instructions forms an integral part of such systems, these national initiatives should be coherent and consistent across the EU.

The divergences between national – and sometimes even local sorting instruction systems – also create confusion among citizens. They often lack clear information to allow consumers to know which container to use for each type of used packaging¹. Citizens increasingly travel within and between countries and need to get familiar with many different systems.

The absence of harmonised instructions thus obstructs the effectiveness of waste management services and has negative impacts on the environment. When using one single packaging for several markets, producers avoid unsold stock, maximise efficiency and reduce the environmental impact.

A harmonized labelling system that helps consumers to correctly sort their waste needs to be an integral part of the waste management systems in EU Member States. Since according to the Packaging and Packaging Waste Directive (PPWD) such a system must also apply to imported products and must be designed to avoid barriers to trade, an EU harmonised system for packaging sorting instructions is key.

Our recommendations for a systemic solution

The revision of the PPWD is a great opportunity to include European Commission and European Parliament plans to develop an EU harmonised sorting instructions for packaging.

Such proposal mandate the European Commission to propose a legislative act requesting involved economic operators to provide harmonized information to consumers to ease packaging sorting, including the use of digital solutions that can help provide required information without the need to increase packaging size of repackage. The system has to consider differences of collection systems across member states and allow those countries where deposit return schemes (DRS) are or will be established to use specific labelling for this system, including considering the option to continue using existing labelling/markings, so as to avoid confusing consumers.

In parallel, the work initiated by the Commission to harmonize separate waste collection and sorting, as required by the Waste Framework Directive (Directive 2008/98/EC), will be key to the effectiveness of harmonized sorting instructions requirements. This has been already highlighted in a joint industry letter in June 2021⁴.

Such harmonized sorting instructions labelling system should be based on the following principles:

- The information should aim to make it **easier for citizens** to sort their waste correctly and to encourage them to recycle;
- The information should be **clear, concise, easily understandable and actionable** by all citizens;

⁴ [Joint industry call](#) for an EU approach to packaging waste labelling

- The system needs to be **flexible enough to be adopted in all EU Member States** with their current different waste management infrastructures and systems without creating consumer confusion when the same pack is sold in multiple countries.
- **Matching symbols or pictograms** should be applied at least on both packaging and collection bins **rather than language instructions or colours** (language since this needs to be translated and adapted for each EU Member State and colours due to the different colour schemes already in place for waste management in the different Member States). In the case of incorporation of language or colour, it is crucial that the labels are available in different multipurpose designs (e.g. black-and-white vs. colour; with language instruction vs. without language instruction; horizontal vs. vertical layout) so to ensure that the label can be easily used by the relevant stakeholders such as manufacturers, municipalities and waste operators.
- Additional, more specific information and instructions could be provided **via digital means**;
- **All relevant stakeholders** should be involved in the development of the EU scheme so as to ensure that the symbols will be widely used in a uniform way;

There are already schemes at EU level that meet several of the points in the criteria listed above. On the other hand, mandatory marking not providing concrete instructions to consumers does not help furthering sorting and recycling of packaging.

To achieve a better separate collection rate of (packaging) waste at consumer level, we need to increase the consumer's awareness about the need to sort. Hence, in order to include the consumer as relevant actor in waste management, **an on-pack symbol in combination with an awareness raising campaign could work best.**

In the meantime

The existing EU single market fragmentation on packaging marking and sorting instructions calls for a swift adoption of such harmonised sorting instructions labelling.

Until an EU system is in place, it is urgent to continue to ensure a proper functioning of the Single Market for packaging and avoid consumer confusion.

To this aim, we call for the EC to ensure that national measures on packaging labelling do not include provisions which may get in conflict with other similar national measures or create barriers to the free movement of packaged goods within the EU and the transition towards more sustainable packaging solutions. The Commission, as the guardian of the Treaty, should ensure full compliance with these principles.