

A circular economy for food & drink packaging

POSITION PAPER

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The EU food and drink industry support the European Commission in its ambition to unlock the circular economy, tackle plastic pollution, and ensure that all packaging becomes reusable or recyclable by 2030.

Rethink, reduce, reuse, recycle.

This paper provides guidance to EU and national legislators on how to create a full circular economy for food and drink packaging. We have concrete recommendations on how to revise the EU Packaging and Packaging Waste legislation. The EU should create a level-playing field for circular packaging and promote packaging reduction, reuse, and recycling, as well as the use of recycled content. We also present the framework conditions that are needed to make food and drink packaging more circular.

GENERAL PRINCIPLES

The EU Packaging & Packaging Waste legislation should:

- Contribute to the EU's climate neutrality goal and Green Deal objectives and align with the United Nations Sustainable Development Goals
- Be coherent and consistent with other packaging-related legislation, such as the Waste Framework legislation, the Single-Use Plastics Directive and the Food Contact Materials legislation, and make sure food safety remains paramount
- Ensure realistic timelines to enable a smooth transition to the enforcement of new rules throughout the packaging value chain and consider the needs of SMEs, which form 99% of the EU food and drink sector
- Foster effective cooperation among all packaging value chain actors, including packaging producers, packaging users, retailers, waste management operators, public authorities and consumers

- 1 Create an EU-level playing field**
The EU packaging legislation should create an EU level-playing field for economic operators across the European Union. It should bolster a strong Single Market and the free movement of packaging materials, packaging, packaged goods, and packaging waste across the EU. Legislators should ensure that new rules are applied and implemented consistently across the EU Member States.
- 2 Ensure smart objectives**
Any new circularity objectives or targets should be based on a full life-cycle assessment and a robust cost-benefit analysis. They should also ensure an appropriate transition period considering supply chain changes and investment necessary to meet such objectives.
- 3 Foster effective reuse**
Packaging reuse can help build a circular economy for packaging when it makes sense from a life-cycle perspective. Any reuse measures should be set at the European level, consider all kinds of reusable solutions and promote innovation.
- 4 Make packaging recyclable**
All packaging should be recyclable by design by 2030. This necessitates a common EU-wide definition of recyclability based on the potential of packaging materials to be recycled considering existing and emerging waste management infrastructure and technologies. The EU should also develop EU 'Design for Recycling' guidelines building on successful experiences of the packaging value chain.
- 5 Develop Deposit Return Schemes**
Well-functioning Deposit Return Systems (DRS) can boost collection rates for certain packaging categories, such as non-alcoholic beverage bottles. The EU should develop guidelines to provide minimum requirements for the introduction or revision of DRS, as it exists for EPR schemes.
- 6 Improve EPR schemes**
The EU should improve the functioning of Extended Producer Responsibility schemes (EPR) in a harmonised way. They should also ensure effective modulation of EPR fees based on the environmental footprint of packaging, following EU-common guidelines.
- 7 Harmonise sorting instructions**
The EU should develop EU-harmonised sorting instructions to enable consumers to separate waste packaging appropriately. This will boost waste collection and recycling, keeping packaging materials in the loop for as long as possible. The information should be clear, concise, easily understandable and actionable by all citizens. More recommendations [here](#).
- 8 Increase recycling rates**
The EU should increase the EU's recycling targets for packaging to help meet the EU's circularity objectives. Higher recycling targets will encourage the collection of larger volumes of packaging waste and contribute to a larger availability of recycled materials.
- 9 Develop infrastructure & technologies**
Member States must improve waste management infrastructure based on EU-common minimum quality requirements. Investments, as well as research and development, in infrastructure and recycling technologies should also be increased at EU and national levels.
- 10 Consider new recycling technologies**
The EU should clarify the role and legal status of new recycling technologies to produce food quality recycled materials. This will help provide legal certainty for investments in innovative technologies, like depolymerisation or feedstock recycling.
- 11 Realistic recycled content targets**
Recycled content targets should reflect the availability, quality, and cost of recycled plastics. Such targets should be realistic and forward-looking, with consideration for different challenges of different sectors and materials.

ABOUT FOODDRINKEUROPE

FoodDrinkEurope represents Europe's food and drink industry, one of Europe's largest manufacturing sectors in terms of turnover, employment and value added.

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