

FoodDrinkEurope's suggestions to the new Packaging & Packaging Waste Regulation

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IN BRIEF

The European Commission (EC) has published the new Packaging and Packaging Waste Regulation (PPWR) with the aim to prevent and reduce the adverse effect of packaging and packaging waste on the environment and human health.

FoodDrinkEurope developed suggestions to help promote packaging circularity in Europe and achieve the intended aims of the Regulation.

INTRODUCTION

FoodDrinkEurope supports the general objectives set in the new Packaging and Packaging Waste Regulation (PPWR) of ensuring a well-functioning Internal Market through fully harmonised rules on packaging while tackling the packaging environmental impact. The European food and drink industry strongly supports the ambition to prevent and reduce the adverse effect of packaging and packaging waste on the environment and human health, and recognise the need of unlocking enabling conditions to ensure that sustainability goes alongside with EU growth and competitiveness

Over the years, the food and drink industry has constructively worked for the enshrinement of recyclability and reuse goals in legislation supported by a holistic view in the context of the European Green Deal. All economic actors have engaged collectively to come with a common trajectory and encourage the swifter development of enabling conditions.

To ensure Europe becomes the leading continent in circularity and green transition globally, long term guidance and predictability to businesses to invest are paramount. It will enable faster and more far-reaching and ambitious actions to prevent packaging waste, confirmed by years of investments in recycling. The sector had achieved undoubtedly considerable results and made Europe an example of green and sustainable policies

Finally, FoodDrinkEurope supports the move towards circularity of packaging, looking at a comprehensive set of complementary actions, including making packaging more recyclable, re-using packaging wherever possible and wherever it provides environmental advantages, exploring ways to reduce packaging from the design phase without compromising on food safety or quality, informing consumers about waste disposal, and helping to boost collection rates, amongst others.

This document provides an overview of key recommendations developed by FoodDrinkEurope to ensure that circularity goes hand in hand with innovation, competitiveness and food safety.

KEY MESSAGES – Our guiding principles

- 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, the Food Contact Materials legislation and ensure food safety is uncompromised;
- Ensure appropriate and practicable timelines allowing for the 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 converters, packaging users, retailers, waste management operators, public authorities and consumers;
- Freedom of material choice to ensure sustainable investments that allow space to innovate and to compete while focusing on improved overall product environmental footprint.

Enablers for a circular economy

1. Recyclability

- Support industry in its commitment to making packaging recyclable;
- Ensure industry provides its expertise and is consulted in the development of Design for Recycling guidelines;
- Assume a material, end-of-life pathway and technology neutral approach;
- Foster a system that helps innovation and safeguard forward-looking policies;
- Improve collection and sorting of packaging waste (e.g., through infrastructure investment; harmonised minimum requirements for an efficient Extended Producer Responsibility, Deposit Return Schemes across Europe);
- Leverage the single market to safeguard efficient waste stream flows;
- Support harmonised labelling (incl. digital solutions) and sorting instructions across all Member States.

2. Reuse

- Consider re-use when demonstrably beneficial for the environment, underpinned by consumer acceptance, hygiene and safety standards along with proven cost-efficiency. Reuse should be considered as complementary with high quality recycling;
- Ensure realistic, evidence-based and proportionate targets only when providing environmental benefit with clear definitions and scope;
- Apply a broad definition of re-use and refill that can help all sectors to be part of the green transition;
- Guarantee infrastructure and funding to ensure smooth (reverse) logistics;
- Ensure high level of food safety and hygiene.

3. Recycled content

- Make sure targets consider availability and costs of the recycled material, as well as the quality of infrastructure and technology available;
- More incentives should be provided to ensure investments in packaging recycling including government investments (shared responsibility);
- Avoid that recycled content is calculated per unit of packaging;
- Ensure a high level of food safety and consistency with other EU legislation;
- Avoid packaging functionality from being undermined;
- Unlock and formally recognise new and innovative recycling technologies (chemical recycling).

About us

The EU food and drink manufacturing industry is made up of 294,000 businesses employing 4.6 million people. It generates €230 billion in value added every year and is the largest manufacturing industry in terms of jobs created. As an industry comprised of 99% SMEs our enterprises are intimately linked with their local communities. FoodDrinkEurope is the organisation of the European food and drink manufacturing sector, committed to achieving more sustainable food systems.