

EUROPEN's recommendation for a growth- and innovation-oriented Circular Economy

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Packaging is an integral and essential part of the product supply chain, from the production to the consumption stage. The packaging supply chain, represented by EUROPEN, plays a central role in contributing to a resource efficient and circular economy by optimising resource use, minimising product (and food) waste and protecting products all along the value chains. Our members are continuously innovating to deliver on their sustainability commitments, while preserving the integrity and safety of the products for citizens and businesses.

By putting the accent on the combined goal of increasing sustainability and economic growth, the new Circular Economy Action Plan (CEAP 2.0) sets the basis for an innovation-driven policy agenda, which must encourage both ambitious and economically viable solutions to scale up the circularity of the EU economy.

To enable the packaging supply-chain making bigger leaps towards a more circular economy, any new packaging-related policies and regulations must be guided by the following general principles:

- Preserve the **integrity of the Internal Market**, to strengthen the implementation of packaging and packaging waste targets across the EU and avoid competitive distortions that risk undermining those same targets.
- Protect the **functionality of packaging** ensuring its intended use is fulfilled, thus preserving product integrity and safety, and reduce product waste.
- Embrace a **life-cycle approach to circularity**, where climate and environmental performance is assessed throughout the entire life cycle of packaging and product.
- Support **innovation and investments** in circularity through the deployment of incentive schemes and financing tools that are adequately funded, better streamlined and more easily accessible.



Building a strong foundation for a streamlined and climate-neutral circular economy

- Monitor the effective transposition and implementation of previous EU packaging-related legislation (i.e. Packaging and Packaging Waste Directive, Waste Framework Directive and Single-Use Plastics Directive) to guarantee both the achievement of the environmental targets and the integrity of the Internal Market, before adding new measures.
- Ensure policy coherence with already established measures on packaging and measures of the CEAP 1.0, which are yet to be implemented.
- Base all future measures on packaging on a solid legal and regulatory baseline, to prevent undermining the integrity of the Internal Market, and on robust evidence-based impact assessments to avoid negative impacts on the climate, on food and product safety and on waste prevention.
- New policy and regulatory measures must be driven by the recognition of circularity as a key enabler for climate neutrality and thus better link climate and circular economy policies.



Supporting innovation in packaging design while preserving its functionality

- Safeguard the holistic character of the Essential Requirements (ER) in their legislative revision, ensuring that they remain relevant for all packaging types and formats.
- Design the ER with the packaging functionalities in mind, including: products' protection; increasing shelf-life; contributing to waste reduction; facilitating transport, handling and distribution; promoting the packaged product and providing information and convenience to consumers.
- Maintain industry-led eco-design measures and conduct proper socio-economic and environmental impact assessments of the potential restrictions of use of some packaging materials for certain applications as well as of recycled content requirements.
- Accelerate the approval mechanism for Food Contact Materials through EFSA and the Commission.
- Favour a voluntary approach to the uptake of recycled content in packaging. Necessary framework conditions must be in place before considering introducing any mandatory requirements: 1. Integrity of the Internal Market; 2. Full transposition and application of the Net Cost principle for Extended Producers Responsibility schemes; 3. Functioning EU approval process for use of recycled plastic in Food Contact Materials; 4. Availability of Secondary Raw Materials at competitive prices and of appropriate quality ensuring consumer and product safety.
- Respect the deadline for targets set for some packaging producers under the SUP Directive for the mandatory recycled content uptake and examine the results before issuing new requirements.



Working towards less waste, more value and empowering consumers

- Before examining measures to further reduce packaging waste, assess the amounts of packaging waste going to final disposal as the baseline, and project the decreasing trend in this waste on the basis of the EU meeting the recycling targets set for 2025 and 2030.
- Allow for sufficient time for a harmonised transposition of the SUP Directive and a proper assessment of the environmental burden shift from the uptake of reuse, before adopting new measures on single-use packaging.
- Pursue the harmonisation of separate waste collection systems, in close cooperation with Member States and stakeholders, ensuring the existence of adequate infrastructures to support the implementation of the PPWD.
- Establish minimum requirements on harmonised end-of-life infrastructures for waste collection, sorting and recycling across the EU and support innovative measures on digital passports and watermarking to further improve sorting and recycling of used packaging.
- In the context of Product Environmental Footprint (PEF) methodology, packaging must be considered as intrinsically linked to the (packaged) product and cannot be seen in isolation. Further development of PEF methods and databases is still needed before they can be implemented in a legislative framework.
- Need for transparent application of PEF and for extensive related awareness-raising campaigns, which would ensure consumer acceptance.