

Circular Economy Package

Joint cross-industry packaging value chain¹ recommendations

Packaging plays a positive role in a Circular Economy by optimising resource use, minimising product waste and protecting products all along value chains. Packaging is cross-sectoral and, in order to perform its functions, the full lifecycle of the **packaging, intrinsically connected with the product it contains and value chain must be considered in its entirety**.

Future legislative measures must take account of the multitude of packaged products and complexity and particularities of their (material and sector) value chains. This **holistic approach** is reflected in the Packaging and Packaging Waste Directive (PPWD), which integrates both product and waste measures, covering all packaging materials, packaging types and packaging systems in a non-discriminatory manner. Along with the Internal Market as its sole legal base, the **PPWD should remain *lex specialis* and is different in scope from pure EU waste stream directives**.

Our industries support a long-term strategy and an enabling EU policy framework that facilitates sustainable resource use from a full lifecycle perspective, incentivises economies of scale and takes into account value chains at all levels with each of their different needs, supply and demand realities.

To further enable our industries to transition towards a resource-efficient and competitive Circular Economy, the related legislative proposal should:

1. **Safeguard the free movement of packaging and packaged goods** in the EU Internal Market, thereby providing businesses with the security to invest and roll-out innovations on a large scale. The role of the PPWD in safeguarding against protectionist measures, market distortions and fragmentation must be maintained.
2. **Ensure full implementation and enforcement** of existing EU laws, particularly the Waste Framework Directive and PPWD;
3. **Strengthen the legal framework for Extended Producer Responsibility (EPR) for used packaging:**
 - **Introduce a clear definition** of EPR in the PPWD. EPR means the producer's full or partial financial and/or operational responsibility for a product, extended to the post-consumer state of a product's life cycle, as a means for Member States to meet EU recycling and recovery targets.
 - **Stipulate binding EU minimum performance requirements** for EPR schemes to enable (a) more **transparency** in types of packaging material collected, material flows, cost, tendering procedures, geographic scope, (b) more **accountability** delivered by monitoring, reporting, audits, financial solidity and nationally defined roles and responsibilities for all actors involved in packaging waste management and (c) better **enforcement** by requiring Member States to implement and enforce authorisation procedures for all EPR schemes;
 - **Provide EU guidance** to Member States that use EPR, on the roles and responsibilities of each and all actors involved in packaging waste management (i.e. producers, private and public waste management operators, consumers, local, regional and national authorities and EPR schemes);
 - **Retain flexibility for Member States** in implementing EPR in a way that reflects national, regional and local realities, in line with the subsidiarity principle and without hindering the free circulation of packaging and packaged goods.
4. **Establish a solid, comparable and harmonised calculation method** for measuring and reporting national packaging recycling rates that is feasible to implement for all packaging materials i.e. based on the input into a final recycling process after sorting operations have been completed.²

¹ This statement does not preclude each of the undersigned organisations from issuing individual positions that are more focused on their specific sectors.

5. **Set realistic and achievable packaging recycling targets**, after setting a clear starting point to ensure that changes would bring real economic and environmental benefits. Assess the impact of a new and harmonised methodology and definitions on existing targets, and ensure that potential new targets take into account new starting points, different packaging waste management infrastructure, different packaging waste generation and implementation capacities of the 28 Member States;
6. **Promote the diversion of packaging materials from landfill** in favour of recycling and/or energy recovery.

The undersigned organisations are prepared to work constructively with the EU Institutions to help ensure that, in line with the Better Regulation agenda, the Circular Economy package is evidence-based and delivers tangible and sustainable benefits for European citizens, businesses and society as a whole.

Signed by the following industry organisations (in alphabetical order):



ACE - The Alliance for Beverage Cartons and the Environment



AIM - European Brands Association



A.I.S.E. - The International Association for Soaps, Detergents and Maintenance Products



ARA - Altstoff Recycling Austria AG Packaging Compliance Scheme, Austria



Cosmetics Europe



DSD - Der Grüne Punkt Dual System for Packaging Recycling, Germany



EAA – European Aluminium



Eco-Emballages – Packaging Recovery Organisation, France



EDANA - The International Association Serving the Nonwovens and Related Industries



Elipso - French Plastic and Flexible Packaging Association



EPRO - European Association of Plastics Recycling and Recovery Organisations

² [cyclos/HTP \(2014\) Impact assessment: The European Commission's Proposed Changes to the Calculation Method for National Packaging Recycling Rates](#), Brussels: EUROPEN

europaean
bioplastics



The European Organization for Packaging and the Environment

European Bioplastics e.V.

EUROPEN – The European Organization for Packaging and the Environment



EXPRA - Extended Producer Responsibility Alliance aisbl



FEA – European Aerosol Federation



FEVE – The European Container Glass Federation



FLEXIBLE PACKAGING EUROPE

FPE – Flexible Packaging Europe



IK Industrievereinigung
Kunststoffverpackungen e.V.

IK Industrievereinigung Kunststoffverpackungen e.V.



INCPEN – The Industry Council for Research on Packaging and the Environment



INTERGRAF - European Federation for Print and Digital Communication



MPE - Metal Packaging Europe



Pack2Go Europe – Europe's Convenience Food Packaging Association



PlasticsEurope – Association of Plastics Manufacturers



REKOPOL – Recovery Organisation S.A., Poland



Repak – Packaging Recovery Organisation, Ireland



SERVING EUROPE - Branded Food and Beverage Service Chains Association



Sociedade Ponto Verde, S.A. – Packaging Recovery Organisation, Portugal



TIE - Toy Industries of Europe



UNESDA - Union of European Soft Drinks Associations



Valpak - Environmental Compliance, Recycling and Sustainability Solutions, UK