

# Towards a competitive, resource-efficient and growth-oriented Circular Economy

## The role of packaging and call to safeguard its sectoral regulatory approach

It is very encouraging to read that a life-cycle approach is explicitly supported in MEP Sirpa Pietikäinen's draft report on *'Resource Efficiency: moving towards a circular Economy'*.

The life-cycle is different for every product and/or material, with variable hotspots, technical and value chain requirements. It exposes the market reality that one size fits all regulatory measures, e.g. related to sourcing, design or end-of-life, will not necessarily deliver more resource efficiency for all. What seems sustainable for a white good, textile or smart phone may not be the right regulatory solution for packaging. Horizontal regulatory measures will therefore still need to be complemented by tailored regulatory approaches, in this article illustrated by packaging, supported by its existing separate EU Packaging and Packaging Waste Directive (PPWD).

Packaging needs to be able to fulfil its enabling role in a Circular Economy by optimising resource use, minimising waste and extending the value in a product and the economy. A life-cycle approach ensures this, taking into account the trade-offs as changes in one part of the value chain will inevitably affect another part. For instance, changing the type, weight and design of packaging may negatively impact the pack's ability to protect, preserve and market a particular product. Packaging should always be considered in the context

of the product it contains, and not solely based on the end of the pack's useful life. For example, packaging design needs to take into account many aspects, e.g. from specific material and product requirements (e.g. product protection, shelf-life extension, food waste prevention), distribution requirements, market and consumer expectations (e.g. safety, convenience, modern lifestyles, tamper evidence) to end of life considerations.

This holistic approach is rightly reflected in the PPWD, which has integrated product and waste policy, covering all packaging materials in a non-discriminatory and effective manner, and safeguarding via its legal base a well-functioning Internal Market for packaging and packaged goods. In the early 90s, ahead of any policy discussions related to the Circular Economy, EUROOPEN's supply chain member companies had understood that by teaming up material and packaging suppliers with brand owners, net environmental improvements could be made for individual packaged product value chains.

Ms Pietikäinen's draft report also rightly calls to strengthen the EU regulatory framework for Extended Producer Responsibility (EPR) by introducing binding EU EPR minimum requirements to ensure transparency and cost effectiveness of all EPR schemes. EUROOPEN strongly supports these

performance requirements for Member States that apply EPR, based on defined national roles and responsibilities for each and all actors involved in packaging waste implementation. This will facilitate better implementation and enforcement of separate collection and sorting of used packaging, which will further help meet current and future packaging recycling and/or recovery targets at the lowest sustainable cost to society.

EUROOPEN looks forward to an EU policy framework that facilitates sustainable and efficient resource use from a full life-cycle perspective, taking into account trade-offs and entire packaging value chain material and sector specificities.



### About EUROOPEN

EUROOPEN -- the European Organization for Packaging and the Environment -- is an EU industry association in Brussels presenting the opinion of the packaging supply chain in Europe, without favouring any specific material or system. EUROOPEN members are comprised of multinational corporate companies spanning the packaging value chain (raw material producers, converters and brand owners) plus national packaging organizations all committed to continuously improving the environmental performances of packaged products, in collaboration with their suppliers and customers.  
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EUROOPEN's policy recommendations for a competitive, resource-efficient and growth-oriented Circular Economy can be downloaded here:  
<http://bit.ly/1LE6QBA>



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