

# Transforming EPR

## The Future of Circular Packaging in Europe

# AGENDA

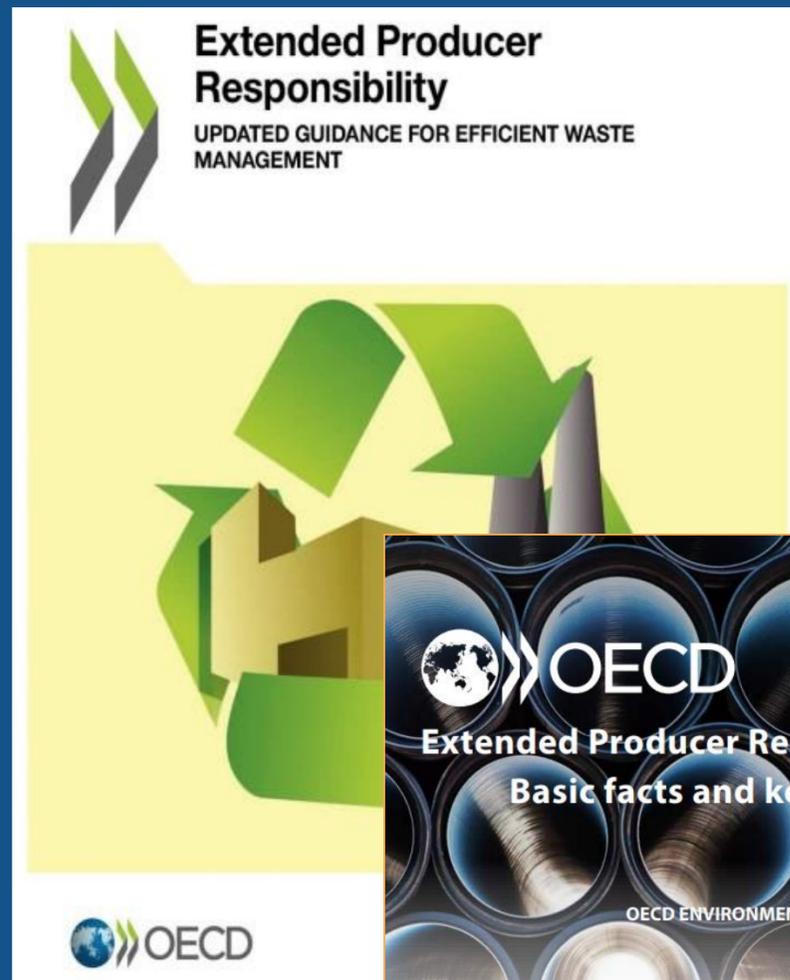
- 08:00 – 08:30** Welcome coffee
- 08:30 – 08:40** Opening Remarks
- Antonello Romano, Board Member, EUROOPEN
- 08:40 – 08:55** Extended Producer Responsibility: Basic facts and key principles, followed by a Q&A
- Peter Börkey, Circular Economy Lead, Environment Directorate, OECD
- 08:55 – 09:45** New Circular Economy Act: Delivering functioning EPR schemes and an EU market for secondary raw materials, followed by a Q&A
- Marco Musso, Deputy Manager Circular Economy, EEB
  - MEP Rasmus Nordqvist (The Greens, Denmark)
  - Francesca Stevens, Secretary General, EUROOPEN
- 09:45 – 10:00** 'High-Performing EPR Systems in the European Union', Presentation of the Circpack-EUROOPEN study findings, followed by a Q&A
- Filipe Vieira de Castro, Manager Recycling Intelligence, Circpack by Veolia
- 10:00 – 10:50** Better leveraging and improving the functioning of EPR schemes in Europe: Key learnings and best practices, followed by a Q&A
- Amanda Fuso Nerini, Head of Regulatory and International Affairs, CONAI
  - Francis Huysman, Managing Director, Fost Plus-Valipac

	<ul style="list-style-type: none"> <li>• Mike Jefferson, Consultant, CEFLEX</li> <li>• Filipe Vieira de Castro, Manager Recycling Intelligence, Circpack by Veolia</li> </ul>
<b>10:50 – 11:15</b>	Coffee Break
<b>11:15 – 11:40</b>	Lifting barriers to the Single Market: EPR and the Terrible Ten, followed by a Q&A
	<ul style="list-style-type: none"> <li>• Robert Wein, DG GROW, Unit E-2, Enforcement II, European Commission</li> <li>• Francesca Stevens, EUROOPEN</li> </ul>
<b>11:40 – 12:30</b>	Enabling effective waste management through data governance, followed by a Q&A
	<ul style="list-style-type: none"> <li>• Juan Manuel Banez Romero, Head of Brussels/EU Sustainability Policy, Amazon Europe</li> <li>• Feliks Bezati, Global Circular Packaging Director, Mars</li> <li>• Paul Christiaens, Legislation and Business Development, Verpact</li> <li>• Chris Sherrington, Head of Environmental Policy &amp; Economics, Eunomia</li> </ul>
<b>12:30 – 12:50</b>	EPR at risk: the emergence of state-run schemes – the case of Poland, followed by a Q&A
	<ul style="list-style-type: none"> <li>• Krzysztof Baczynski, President of the Management Board, EKO-PAK</li> <li>• Katarzyna Barańska, Konfederacja Lewiatan</li> <li>• Joachim Quoden, Managing Director, EXPRA</li> </ul>
<b>12:50 – 13:00</b>	Concluding remarks
	<ul style="list-style-type: none"> <li>• Antonello Romano, Board Member, EUROOPEN</li> </ul>
<b>13:00 – 14:00</b>	Lunch

# Extended Producer Responsibility: Basic facts and key principles



Peter Börkey, Circular  
Economy Lead,  
Environment Directorate,  
OECD



# EPR – Key insights and guidance



**Peter Börkey**  
Circular Economy Lead  
OECD Environment Directorate

Europa, Brussels  
12 November 2025



# What is EPR?

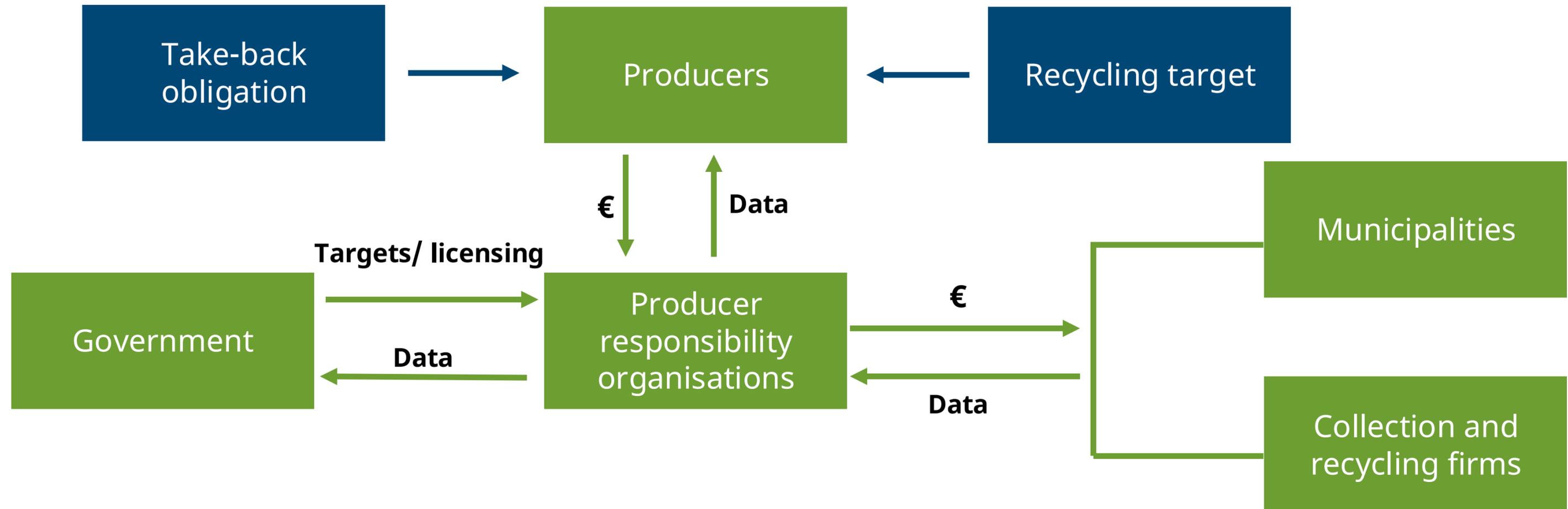


## OECD working definition

“A policy *approach* that makes producers responsible for their products along the lifecycle, including at the post-consumer stage.”

# Typical EPR set-up

*Not a tax, EPR compliance schemes trigger a fee for producers, but the fee pays for a service*



# What does EPR typically cover?

## Most common product groups



Packaging



Electric and electronic equipment



Batteries



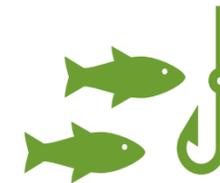
Vehicles



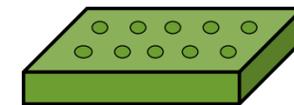
Tyres



## New product groups



Fishing gear



Furniture/ mattresses



Cigarettes



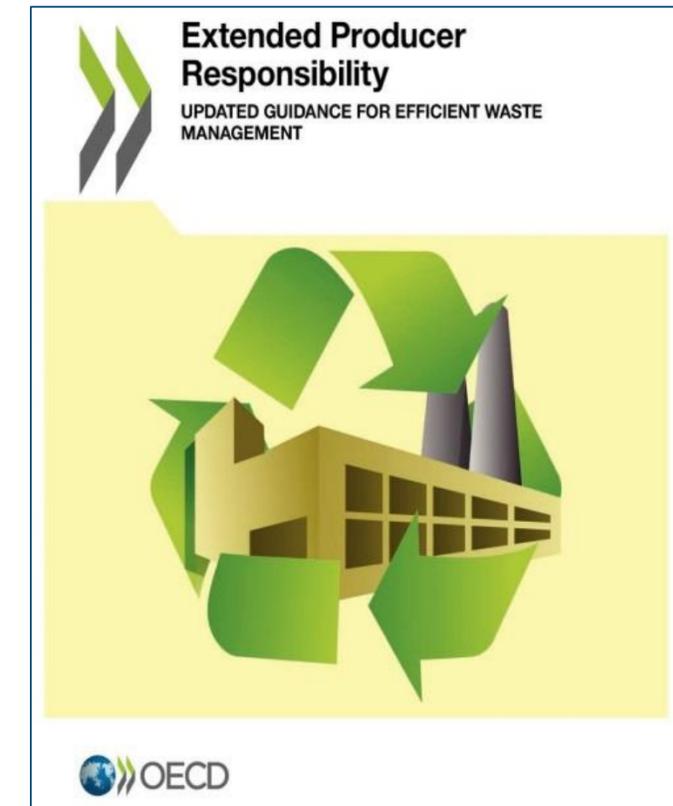
Textiles

# What can EPR do?



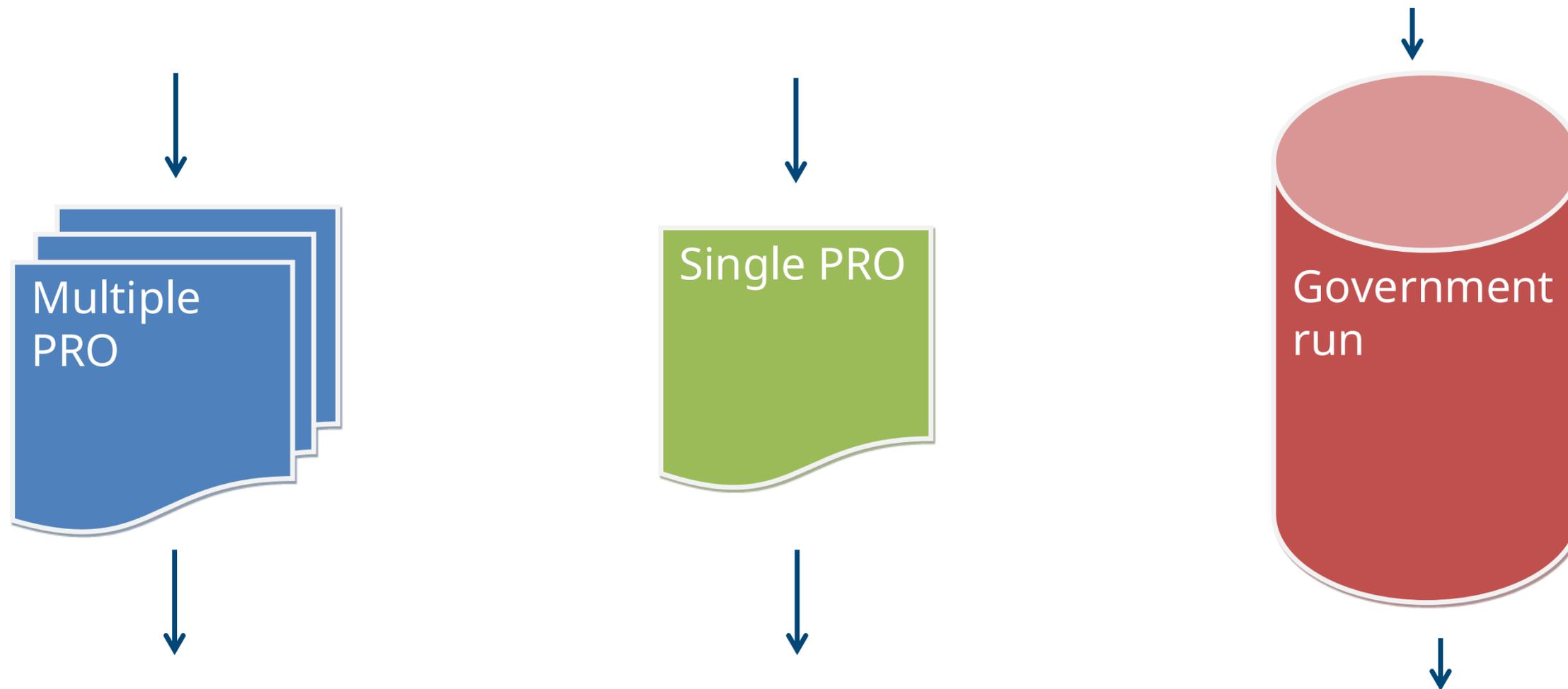
# Key factors in designing EPR

- Clearly define:
  - objectives
  - scope of EPR (i.e. products in scope)
  - who are the « producers »
- Ensure consistency and coherence with related policies
- Consult with stakeholders to ensure acceptability, transparency and effectiveness
- Ensure specific challenges that might arise in the start-up phase can be addressed quickly
- Establish mechanisms for reporting and monitoring
- Ensure appropriate enforcement mechanisms and sanctions

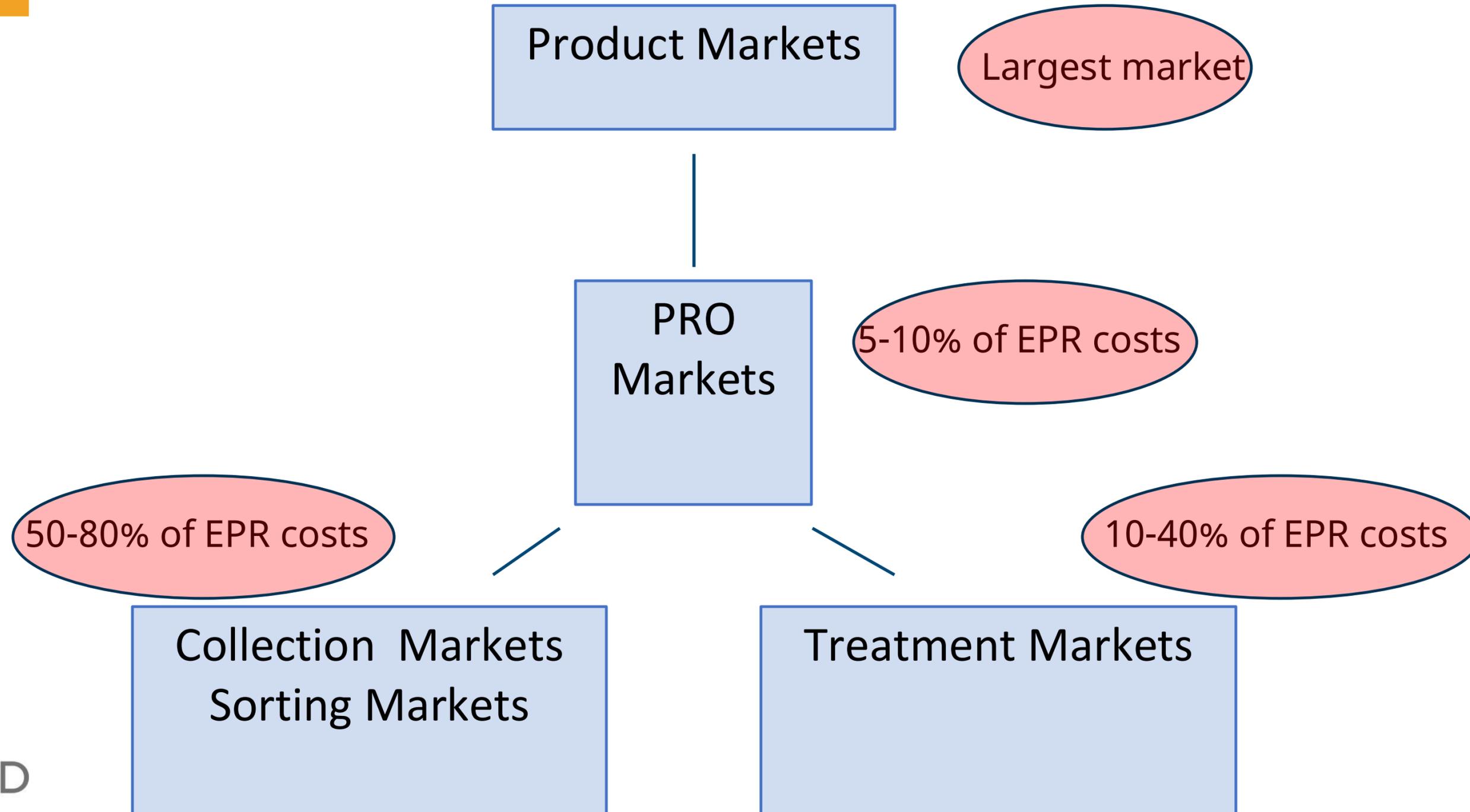


# EPR governance

- 3 models with advantages and disadvantages



# Key markets with competition concerns



# EPR and product design

- So far little impact on product design due to use of collective producer responsibility (CPR) rather than individual producer responsibility (IPR)
- Modulation of fees according to design is now being used to overcome this, but administrative costs need to be assessed
- Full cost recovery important to maximise incentive effect, but small magnitude of price signal is an issue



*Explore OECD work on the circular economy*

**oe.cd/circular**



**Questions? [Peter.Borkey@oecd.org](mailto:Peter.Borkey@oecd.org)**

# New Circular Economy Act: Delivering functioning EPR schemes and an EU market for secondary raw materials



MEP Rasmus Nordqvist, the Greens, Denmark



Marco Musso, Deputy Manager Circular Economy, EEB



Francesca Stevens, Secretary General, EUROOPEN

# Q&A

# **'High-Performing EPR Systems in the European Union', Presentation of the Circpack-EUROOPEN study findings**



Filipe Vieira de Castro,  
Manager Recycling  
Intelligence, Circpack by  
Veolia

# High-performing EPR systems in the European Union

Evidence from EU-27 analysis + 5  
case studies (BE, DE, ES, IT, HU)

Filipe Vieira de Castro  
Manager Recycling Intelligence



**europen**

SHAPING A SUSTAINABLE  
FUTURE FOR PACKAGING

# Introduction



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# Core takeaways



## Model types

Single PRO, multiple, or state-run **doesn't decide performance on its own**

- Single run systems **usually report better data** and higher recycling rates
- State-run systems perform worst for plastics
- Systems with multiple PROs see significant **variability**

## Data quality

Countries with **more detailed data** report **higher recycling rates** ( $r \approx 0.61$ )

## Cost vs performance

- There is **no consistent link** between higher system costs and higher recycling rates
- Countries with design-for-recycling support achieve better performance **without higher costs per tonne**

### Significant drivers

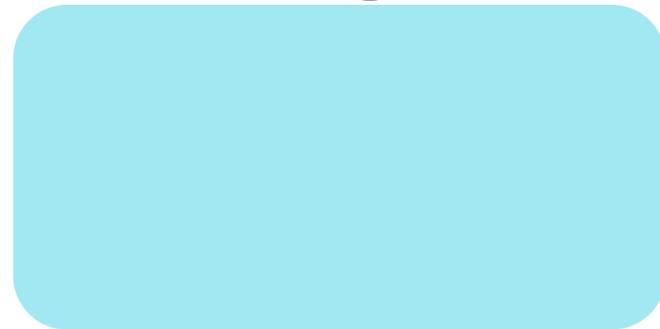
1. Eco-modulation
2. Design for recycling support
3. Infrastructure quality
4. Transparency

# Systemic differentiation



**Operational PRO**  
*Directly manages or tenders collection and sorting activities, taking operational control, not just financing*

## Single



## Multi

  
**Germany**  
*For-profit, multiple operational schemes competing*

## State-

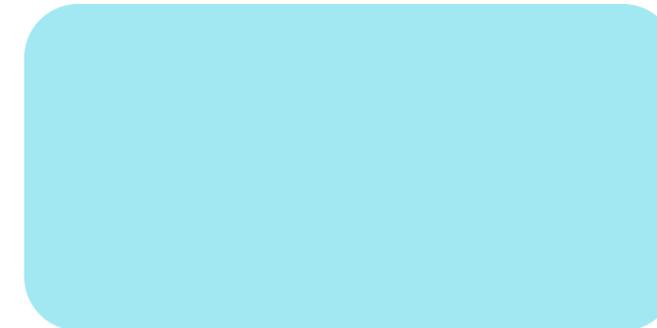
  
**Hungary**  
*State concession, operational*

**Financial PRO**  
*Mainly finances collection/sorting via fees and municipal reimbursements; local authorities or operators actually run the system*

  
**Belgium**  
*Fost Plus non-profit, financial coordination*

  
**Italy**  
*CONAI + consortia non-profit, financial with strong DfR services*

  
**Spain**  
*Ecoembes/Coovidrio Financial model, moved into competition in 2025*





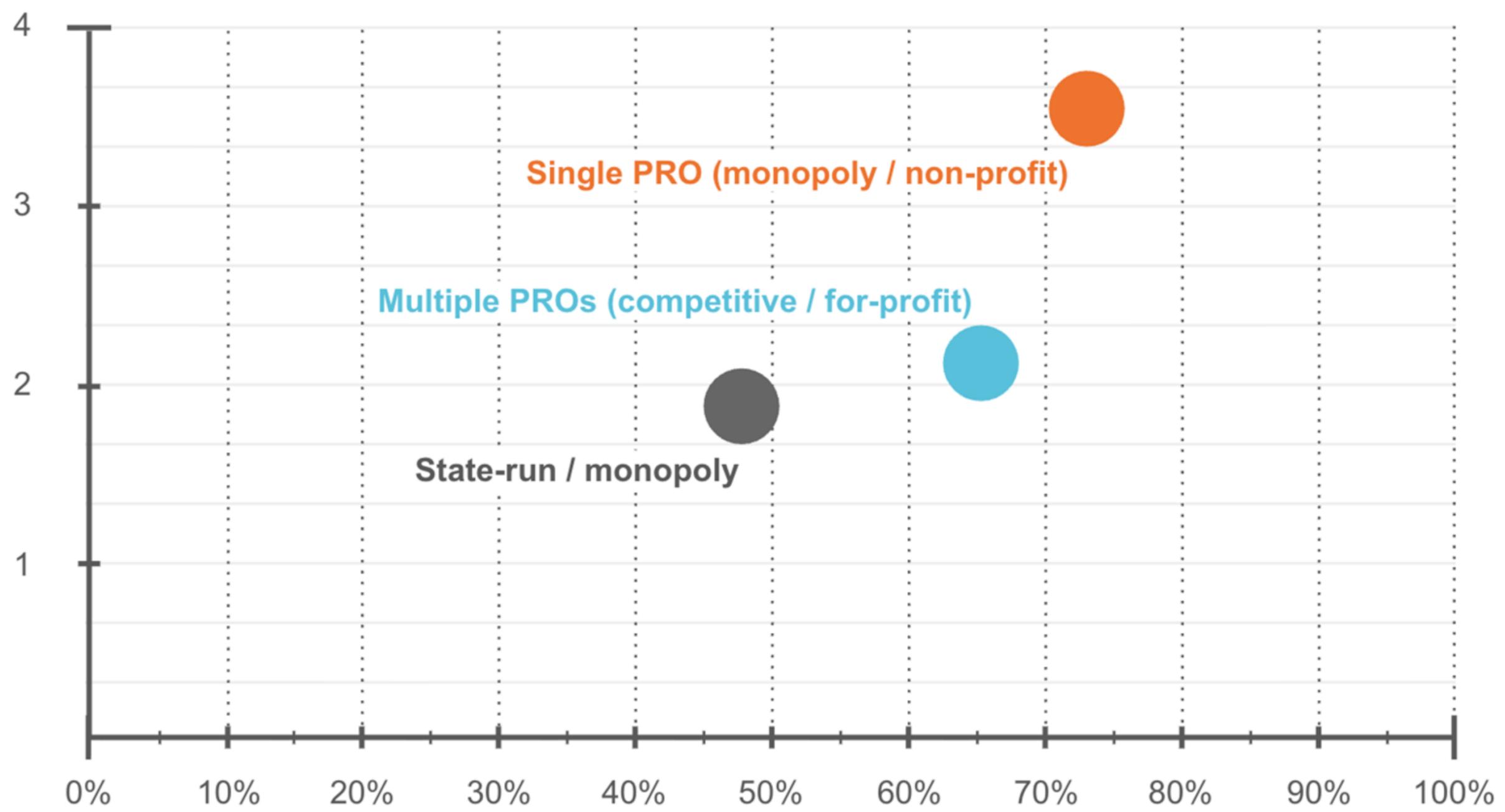
# Results



# Model types & performance



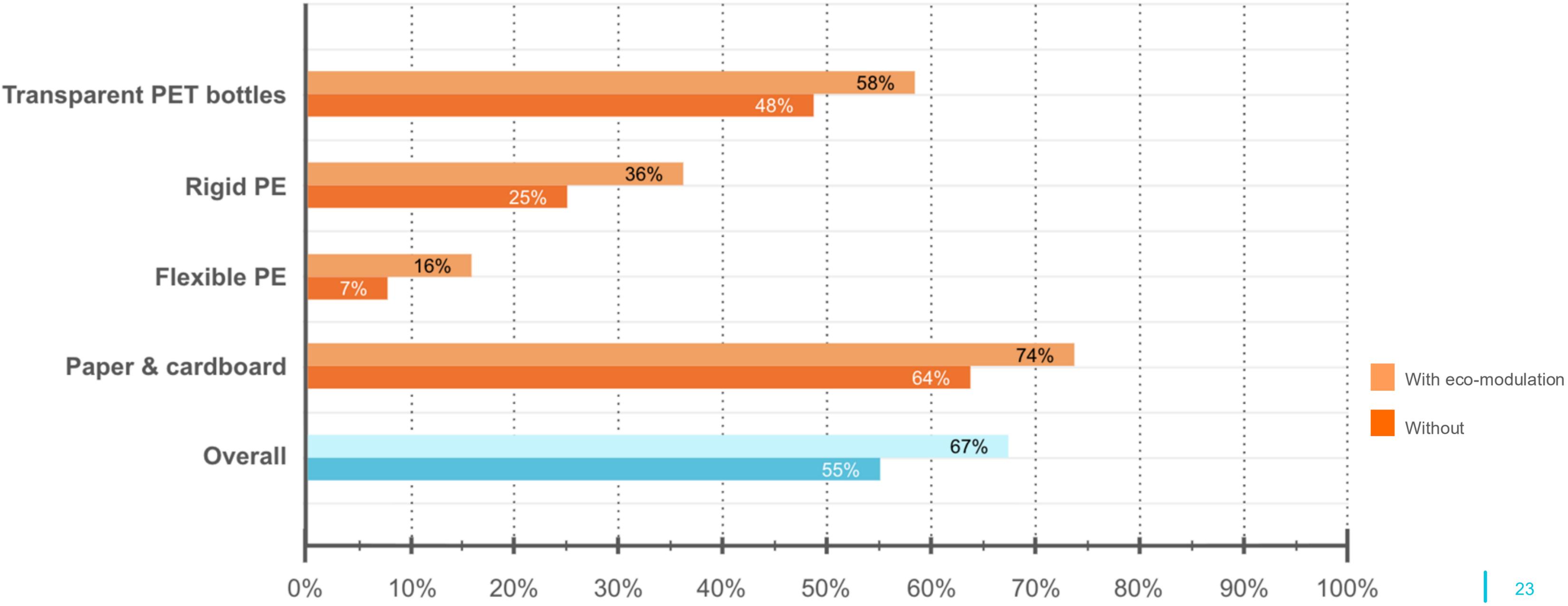
*National systems: Data Granularity vs Recycling Performance*



# Eco-modulation



*Eco-modulation and Average Recycling Rates*



# Do operational vs financial PRO models change outcomes?



## ➤ Structure matters, but it is not a core driver: governance + incentives are

### No single model guarantees higher recycling

1. Single PRO countries tend to show **slightly higher overall rates** (esp. paper & plastics) and **better data granularity**
2. Multi-PRO countries can perform well **if oversight is strong**
3. State-run systems are generally associated with **lower plastics performance**

### What actually moves outcomes across models

1. Eco-modulated fees for recyclability
2. Practical DfR support
3. Granular monitoring/KPIs
4. For reuse: deposits + explicit reuse incentives.

# What works and what doesn't



## ➤ Low granularity & opaque methods block accountability balance oversight

### Granularity correlates with better reported performance

Top performers (BE, IT, ES) publish more granular, regular data; Germany is a noted exception where competitive sensitivity limits publication.

### Balanced monitoring beats market count

Transparency improves when governments and producers share monitoring roles; the number of PROs alone has limited effect on transparency.

### What fails today

Partial or missing methodology disclosures / inconsistent update frequency / fee allocation opacity

*Competitive markets often hide cost and fee data, which results in weak comparability and potential free-riding*

### What to implement

Harmonised eco-modulation and reporting by material & origin with clear methods (PPWR alignment), as well as national producer registries (e.g., Spain's RPP) to close data gaps. **Simplicity is the way forward.**

# Cost-effectiveness



## ➤ Spending pattern has more influence than spending level

### Treatment cost ≠ circular outcomes

Across our five case studies and EU-27 dataset, how fees are structured and spent is more consistently associated with performance than how much is spent. High or low treatment costs alone do not explain circular outcomes.

### Fee level (€/kg) alone doesn't prevent waste

These show weak relationships to waste generation once context is considered. Fee structure (eco-modulation, and unit-based elements where used) is the clearer lever for upstream prevention.

### Positive, repeatable associations in our dataset

1. Eco-modulation for recyclability results in **higher municipal & packaging recycling and as D4R support**
2. Deposits and explicit reuse incentives results in **outperformance of pure recyclability for reuse**
3. Higher recycling rates and granular data results in **more stable performance**

### Positive associations

#### Eco-modulation for recyclability

Higher recycling rates observed across plastics & paper.

#### Design for Recycling support

Higher municipal & packaging recycling rates observed.

#### Granular and available data

Accessible data supports better monitoring and more stable results.

### Neutral associations

#### Fee level (€/kg)

On its own, not a reliable predictor of prevention or performance

#### Government presence

Alone, limited enforcement/transparency doesn't move outcomes

#### Low/high cost per tonne

Was not associated as a sole determinant of outcomes.



# THANK YOU!

Filipe Vieira de Castro  
Manager Recycling Intelligence



# Q&A

# Better leveraging and improving the functioning of EPR schemes in Europe: Key learnings and best practices



Amanda Fuso Nerini,  
Head of Regulatory  
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Affairs, CONAI



Francis Huysman,  
Managing Director,  
Fost Plus-Valipac



Mike Jefferson,  
Consultant, CEFLEX



Filipe Vieira de  
Castro, Manager  
Recycling  
Intelligence,  
Circpack by Veolia

# Q&A

# COFFEE BREAK

# Lifting barriers to the Single Market: EPR and the Terrible Ten, followed by a Q&A

Francesca Stevens,  
Secretary General,  
EUROPEN

Robert Wein, DG GROW,  
Unit E-2, Enforcement II,  
European Commission

# Q&A

# Enabling effective waste management through data governance



Juan Manuel Banez  
Romero, Head of EU  
Sustainability Policy,  
Amazon Europe



Feliks Bezati, Global  
Circular Packaging  
Director, Mars



Paul Christiaens,  
Legislation and  
Business  
Development,  
Verpact



Chris Sherrington,  
Head of  
Environmental Policy  
& Economics,  
Eunomia

# Q&A

# EPR at risk: the emergence of state-run schemes – the case of Poland



Krzysztof Baczynski,  
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EKO-PAK



Katarzyna Barańska,  
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Konfederacja  
Lewiatan



Joachim Quoden,  
Managing Director,  
EXPRA

# Q&A

# Transforming EPR

## The Future of Circular Packaging in Europe