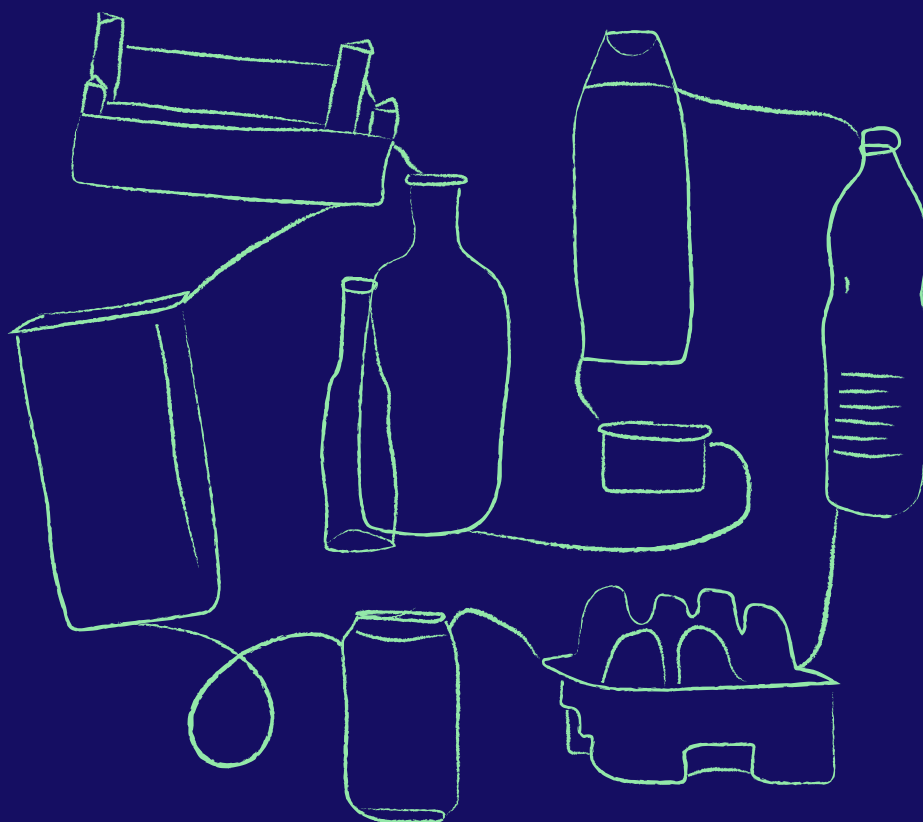


# Packaging Fit for Purpose

Tailored solutions to safeguard products and prevent waste

6<sup>th</sup> June 2023 | European Parliament, Brussels



Organised by the Permanent  
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## Executive Summary

On 6 June 2023, the event “Packaging Fit for Purpose” was held at the European Parliament to discuss the European Commission’s proposal for a Regulation on Packaging and Packaging Waste Regulation (PPWR). The main goal of the event was to foster an insightful conversation among policy makers, industry stakeholders, and packaging experts on the risks and opportunities stemming from the revision of the existing Packaging and Packaging Waste Directive (PPWD), while raising awareness on the need to ensure tailored solutions for packaging in order to safeguard products, prevent waste, and promote a circular economy.

Key discussions revolved around packaging’s role in economic growth, food hygiene, and consumers’ safety, as well as the importance of packaging sustainability and waste reduction. Participants highlighted the importance of adapting solutions to the unique characteristics of different economic sectors and socio-economic realities, and emphasised the significance of packaging innovation and recycling to achieve sustainability goals.

The strong message that characterised the discussion was the call for collaboration and co-operation among policymakers, industry players, and Member States to establish an effective regulatory framework for packaging and packaging waste. In particular, it was recognised that there is no one-size-fits-all solution for packaging, and that flexibility is essential to ensure the success of the PPWR as well as preserve and enhance well-performing systems. Finally, the event highlighted the need for a well-balanced and flexible approach to the revision of the PPWD, as well as for scientific substantiation and sector-specific considerations to ensure the PPWR delivers a successful circular economy for packaging in all Member States.



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## Opening Remarks

### Speakers:

-  **Hon. Pina Picierno** – Vice President of the European Parliament
-  **Amb. Stefano Verrecchia** – Deputy Permanent Representative of Italy to the European Union

### Key messages:

- Emphasising the Parliament's dedication to Green Deal policies, speakers highlighted the significant role of the packaging sector for European economy, and the need to set ambitious environmental goals while safeguarding the economic and social aspects of the industry.
- Speakers advocated for leveraging the strengths of Member States in tackling environmental challenges, acknowledging the diversity of approaches throughout Europe and expressing some concerns over the Commission's proposal for a Packaging and Packaging Waste Regulation (PPWR), which in some cases risks to inadvertently overlook these specificities and needs, disrupting efficient systems.
- Doubts and questions arose regarding the mandatory introduction of Deposit and Return Systems (DRS) proposed by the European Commission within the PPWR. Member States advocated for a technologically neutral approach that would allow them to choose the best option for their socio-economic specificities, while maintaining a level playing field among materials and solutions. Moreover, this was identified as a crucial aspect in order to protect employment and qualified workers.
- Clear choices must be made concerning single-use packaging and different product categories within the context of restrictions, assessing the feasibility of shifting towards reuse against hygiene, environment, and food waste concerns, without penalising recycling.
- Speakers also discussed the importance of properly assessing the best way to achieve targets set at EU level, with an emphasis on considering diverse packaging solutions, such as biobased and biodegradable options.
- Among best practices, Italy's example was highlighted for the effectiveness and efficiency of its Extended Producer Responsibility (EPR) scheme to reach national collection and recycling targets ahead of EU deadlines. In general, the EU was recognised as having a leading role in the global stage in targeting the issue of packaging waste, within its climate strategy. In this sense, collaboration and sharing best practices among Member States is critical to support the establishment of an effective legislative framework.

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## Part I – Key Insights

### (I) Packaging as enabler of economic growth, food hygiene and consumers' safety

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#### Speakers:

-  **Francesca Mariotti** – Director General at Confindustria
-  **Joanna Nathanson** – Policy Advisor at Freshfel Europe
-  **Roberto Calugi** – Director General at FIPE

#### Key messages:

- Various PPWR measures proposed by the European Commission lack scientific backing, which may result in negative impacts on sectors such as pharma, agriculture and cosmetics, as well as on the environment. In particular, speakers underlined the vital role played by packaging in limiting food waste and in protecting consumers' safety and health, both in terms of transportation and important information it carries (i.e., allergens, sorting instructions, expiry date, etc). In this sense, the need to reduce packaging's impact on the environment shall not compromise other important factors that might lead to unintended yet concerning consequences.
- Speakers identified various problems linked to the banning of single-use packaging due to the role it plays in particular sectors. The proposed alternative, reusable packaging, entails as well negative consequences for the environment due to high water consumption and hygiene concerns, potentially turning it into a less sustainable choice compared to disposable packaging. Overall, reuse and recycling are to be promoted as complementary solutions rather than alternatives, as they both play a relevant role in the decarbonisation of the sector.
- The HORECA sector calls for its complexities to be taken into further account, claiming that the PPWR Impact Assessment and market analysis were not carried out exhaustively. HORECA cannot rely on a one-size-fits-all approach at EU level and needs instead flexibility to tailor each option depending on the situation.
- Stakeholders did not find common agreement on the nature of the legislative instruments to regulate the European packaging industry: on one side, a Regulation is considered more appropriate to provide a common framework and avoid "patchwork legislations" across the EU; on the other, Member States prefer to autonomously decide the most appropriate approach for their socio-economic realities, requiring the EU legislative bodies to adopt a technologically neutral approach.

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## (II) Packaging sustainability and waste reduction

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### Speakers:

 **Edoardo Croci** – Professor at Bocconi University in Milan




### Key messages:

- Packaging sustainability and waste reduction are achieved through efficient circular economy systems, involving cooperation between industry and public authorities at national and local levels. In this sense, EPR schemes have demonstrated to be successful in managing packaging and packaging waste.
- A specific research study assessed the economic efficiency of different EPR systems in Europe: CONAI, the Italian EPR system, showed positive characteristics, such as transparency in data gathering and reporting, efficiency, and effectiveness, especially as local authorities are involved.
- Finally, the research highlighted how recycling effectiveness is not necessarily associated with higher EPR system costs, and a single PRO in a non-competitive system performs better with high recycling rates and lower costs compared to multiple PROs in a competitive system.

## (III) Packaging innovation and recycling

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### Speakers:

 **Roberto Ferrigno** – Head of EU Affairs at European Bioplastics  
 **Tytti Peltonen** – Vice President EU Corporate Affairs at Metsa Group (EPPA)  
 **Francesca Stevens** – Secretary General of EUROPEN

### Key messages:

- Bioplastics play a key role for the development of a sustainable packaging sector as they are already contributing to achieve recycling goals of biobased streams. In this sense, liberalisation of the biobased and compostable plastics sector is necessary within the PPWR to foster innovation and allow the technology to contribute to decarbonisation efforts.
- Once again, speakers criticised the proposed radical shift from recycling to reuse that emerges in the Commission's PPWR. Reuse has proven to be less environmentally friendly than single-use options in terms of CO2 emissions and clean water consumption, as well as food safety. Efforts should instead be devoted to improving collection and recycling systems in Member States, also through a mandatory collection target as proposed by a number of Members of the European Parliament.
- The issue of closed-loop recycling for packaging was also discussed, as the problematic nature of this concept would not allow it to be applied to all sectors and all materials, but only to a limited number of cases and applications.
- To promote the understanding of packaging as a resource rather than waste, speakers also called on EU institutions to consider including clearer definitions for the terminology adopted in the PPWR text, and to foster the creation of a single market for secondary raw materials.
- Stakeholders considered the requirement to make all packaging recyclable by 2030 as a positive objective, yet with difficult implementation chances due to the lack of infrastructure and investments needed for the transition. Moreover, such an objective requires more options to be taken aboard, such as chemical recycling.

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## Part II – How to strike the right balance and ensure the best environmental outcome

### Speakers:

-  **Julie Guilbaud** – Secretary at Reusable Packaging Europe
-  **Ignazio Capuano** – President of CONAI

### Key messages:

- The Commission's proposal has not consistently taken into account sound environmental and social aspects linked to the packaging sector, which requires special consideration to maintain existing well-performing waste prevention systems. Italy especially was mentioned as a high-performing Member State, which is already achieving EU targets set for 2030.
- Mandatory reuse targets within the PPWR were a more controversial issue: on one hand they are effective in driving progress in certain industries (such as transport packaging), on the other hand, they create commercial trade barriers that shall be avoided.

## Open Debate

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### Policymakers' reactions:

-  **MEP Massimiliano Salini (EPP, Italy)** – Environment Committee Shadow Rapporteur for Report
-  **MEP Patrizia Toia (S&D, Italy)** – Industry Committee Rapporteur for Opinion
-  **MEP Virginie Joron (ID, France)** – Internal Market Committee Rapporteur for Opinion
-  **MEP Susanna Ceccardi (ID, Italy)**
-  **MEP Salvatore De Meo (EPP, Italy)** – Agriculture Committee Rapporteur for Opinion
-  **MEP Silvia Sardone (ID, Italy)** – Environment Committee Shadow Rapporteur for Report
-  **MEP Pietro Fiocchi (ECR, Italy)** – Environment Committee Shadow Rapporteur for Report
-  **Wolfgang Trunk** – Policy Officer, DG ENV, European Commission

### Key messages:

- As main point of the discussion, MEPs criticised the mandatory introduction of DRS for specific packaging formats as proposed by the European Commission, as it failed to implement a technologically neutral approach. Moreover, speakers called to acknowledge the complementarity between reuse and recycling to achieve the ambitious objectives of the PPWR. It is thus paramount for the proposal to ensure flexibility to Member States, to give them the necessary leeway to choose their preferred option, according to their different needs.
- The Impact Assessment accompanying the proposal was identified as inaccurate as it failed to take into account several aspects, namely the analysis of the CO<sub>2</sub> emissions arising from the proposed

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measures as well as its economic and social impacts. As a consequence, speakers highlighted the need for a revised Impact Assessment.

- Speakers raised concerns on the closed loop approach of the proposal, which should aim at packaging waste prevention rather than merely reducing the amount of packaging placed on the market.
- Due to the complexity of the issue and the wide-ranging impacts of the legislation on stakeholders, alternative policy options could have been considered, including a double legal basis (Single Market and Environment) and the use of a Directive rather than a Regulation, to allow more flexibility in the approach to be adopted to reach the targets.
- The high number of amendments tabled by MEPs in the different committees of the European Parliament involved in the legislative process showcased the weaknesses of the Commission's proposal, as well as policymakers' willingness to improve it. On a more positive note, this also represented an example of fruitful cooperation among policymakers not only across political parties, but also across Member States, therefore highlighting the sensitivity, complexity and political relevance of the issue.
- On its part, the European Commission replied to the criticisms by reassuring stakeholders that the proposal does not aim at undermining successful national recycling systems. On the contrary, the recyclability measures proposed are designed to increase the economic efficiency of recycling streams, thus supporting the recycling industry. Additionally, reuse has been prioritised as policy option due to a slight decrease in water consumption when compared to traditional approaches, according to the Commission's assessment. In terms of flexibility, the proposal provides various opt-out options from the mandatory implementation of DRS for Member States when it comes to packaging for food and vegetables, therefore providing flexibility.



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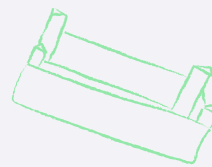
## Final Remarks

### Speaker:

 **Vincenzo Celeste** – Permanent Representative of Italy to the European Union

### Key messages:

- The Permanent Representative stressed the need to find the right balance between EU market harmonisation and leveraging Member States' best practices in order to negotiate a successful PPWR.
- Once again, the complementarity between reuse and recycling was stressed, in light of the objectives of the proposal, namely reducing the sector's emissions and contributing to the fight against climate change.
- It is essential to leverage industry innovations, such as chemical recycling and bioplastics, as they contribute to the achievement of a more circular economy.
- Despite all the criticisms and discussions, the objectives of the PPWR have not been a subject of debate per se, as policymakers agree on their importance. The focus is on how to reach such objectives without compromising Member States' successful experiences.







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