

Feedback on the Packaging and Packaging Waste Regulation proposal from Plastic Change (Denmark)

Plastic Change warmly welcomes the proposal from the EU Commission on the Packaging and Packaging Waste Regulation (PPWR). The proposal takes important steps towards ambitious waste prevention by setting specific targets on waste prevention as well as targets for reuse. It also emphasises the fact that well-designed reuse systems can lead to significant environmental benefits including reduced CO₂e-emissions as well as reduction of resource, energy and chemicals use.

Furthermore, by introducing specific initiatives for restricting unnecessary packaging formats (Annex V), the proposal will ensure member states to begin a shift from the current single use culture to a more sustainable way of living where we limit our consumption and reuse products again and again and again instead of turning them into trash after a very short time of use. Packaging is a big step in this shift in culture and change of behavior because packaging is a big part of our everyday life and in many cases it is a consumption pattern we as consumers do not have a lot control over. Therefore the proposal also makes the sustainable choice easier accessible for consumers, which we find to be a big benefit of the proposal.

We do also have some critical points on the proposal. Although the proposal is prioritizing waste prevention and reuse, the targets are not ambitious enough and falls short on the objective to achieve 100% reusable or recyclable packaging by 2030. Also, the proposal offers too many loopholes and exemptions from the specific initiatives in Annex V. Sadly, it also fails to secure the elimination of harmful chemicals in packaging. In the upcoming negotiations it is highly important that the level of ambition is heightened and not lowered, if the EU member states are serious about achieving their Circular Economy and Green Deal goals.

In the following we elaborate on the above-mentioned main improvements that we recommend working on in the proposal: More ambitious prevention and reuse targets, less exemptions to initiatives on unnecessary packaging, and upgrading of the proposal on tackling chemicals in packaging.

Waste prevention targets should be more ambitious

The targets set in the proposal are an important milestone from a regulatory perspective but are nowhere near ambitious enough. Reversing at least the 20% increase in packaging volumes that happened over the last decade should be the initial prevention target. In line with climate and resource protection ambitions, packaging volumes must decrease drastically. With the Commission's current targets, limiting packaging waste generated per capita to a similar level as in 2009 (149.9kg of packaging waste per capita) is not possible before 2040. It is necessary to take countermeasures earlier and to set the ambitious target of achieving a reduction equal to the increase of the last 10 years as early as 2030, meaning a 15% instead of 5% waste prevention target per capita by 2030. In order to avoid driving simple substitutions between single-use applications made

of different materials (from heavier to lighter packaging materials), material-specific sub-targets should be set, e.g., for packaging made of plastics, composite material, paper, glass and metal.

Reuse targets should be more ambitious and expanded to other key sectors

Reuse targets should also be expanded to other key sectors and product groups, such as the retail sector (non-perishable foods), cosmetics, cleaning products, personal hygiene products, and milk. The targets proposed apply only to a limited number of product groups, and are less ambitious compared to those already in place in some Member States. The targets set in the regulation must be higher in order to achieve reuse at scale. Their achievement should be monitored via interim targets and an annual progress report. It is incomprehensible that - in particular, the reuse targets for beverage bottles - are very low, as there is already substantial experience in this area in a number of Member States. In Germany, for example, reuse targets for beverage bottles of over 40% have been achieved for decades.

Proposal should tackle hazardous chemicals in packaging

We find that the PPWR proposal is too vague on substances of concern and does not incentivize the elimination of harmful chemicals in packaging. The proposal should include a clear link to the REACH restrictions process when an unacceptable risk to human health or the environment is identified, arising from the use of a substance in the manufacture of packaging or packaging components, or from a substance present in packaging or packaging components when they are placed on the market, or during their subsequent life cycle stages, including the waste phase. All substances recognised in the EU as substances of concern and very high concern should be restricted from use in packaging, including the substances detected by Food Packaging Forum¹.

Moreover, the current proposal prohibits to regulate the presence of substances in packaging for reasons relating to chemical safety as part of the recyclability requirements that will be established pursuant to Article 6. This is not in agreement with the ambitions set out in the EU Chemicals Strategy for Sustainability, and the Commission's commitment to extend the generic approach to risk management to ensure that consumer products do not contain hazardous chemicals.

To maximise health benefits in the EU from reduction in the exposure of citizens to substances of concern, a preventive approach across all legislations must be applied, including in the PPWR.

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¹ <https://www.sciencedirect.com/science/article/pii/S0304389422009578?via%3Dihub>, (Supplementary Material, Table 2).