

13 November, 2023

Recognising the complementarity of reuse and recycling does not mean lacking ambition

Ahead of the plenary vote on the Packaging and Packaging Waste Regulation (PPWR), the signatories to this letter would like to share some of their concerns regarding the approach adopted by the Parliament's Environment Committee (ENVI) on 24 October.

While we recognize the good progress made on the text in a number of areas which will help the industry to achieve its circular ambitions, we are highly concerned with the amendments to Art. 26 of the draft PPWR which have been adopted by the ENVI Committee, and in particular:

1. The possibility provided to Member States to go beyond the proposed increased reuse targets without any justification needed.
2. The absence in the proposal of a mechanism which would allow for single-use recyclable packaging as an alternative to packaging for reuse if a better overall environmental outcome on the basis of a waste management or life cycle assessment can be achieved.

The first point goes directly against the objective of the European Commission to promote harmonization and risks fragmenting the EU Single Market by creating a patchwork of national targets that will have a considerable impact on Europe's competitiveness. This would also increase the complexity of the implementation of the targets, would result in an unworkable situation for our companies and act as a barrier to the Single Market as different targets would make it impossible to achieve a level-playing field. Furthermore, it is worrying to see that the text does not seem to require any form of impact assessment being performed by Member States to justify going beyond the EU targets.

Our second point refers to the ITRE opinion adopted in July 2023 and alternative compromise amendments proposed ahead of the vote in ENVI. These correctly recognize that reusable and refillable solutions will not bring environmental benefits in all situations and for all packaging, and it is therefore important to provide for an alternative option if economic operators can prove that the use of single-use recyclable packaging is environmentally more sustainable than the re-use of packaging. The adopted opinion and the alternative compromise amendments propose the possibility of using a lifecycle assessment, a recycling rate or a collection rate as justifications for qualifying for an exemption from the reuse targets. Facilitating complementarity is of critical importance to support the achievement of our sectors' climate objectives and ensure that operators have to invest in reusable packaging formats only when it actually makes more sense than single-use recyclable packaging from an environmental perspective.

We therefore ask you to:

1. reject any proposal that would allow an increase of the targets under Article 26 above the levels proposed by the European Commission.
2. support plenary amendments that propose mechanisms which would support the complementarity of single-use recyclable packaging and reusable packaging.

We thank you in advance for your attention and respectfully request the opportunity to meet with you at your earliest convenience to discuss this matter further.

Kind regards,

Signatories:

EU



Austria



Belgium



Bulgaria



Czech Republic



Denmark



Estonia



Finland



France



Germany



Greece



Iceland



Ireland



Latvia



Lithuania





Malta Beverage
Producers
Association



Netherlands



Norway

**BRYGGERI OG
DRIKKEVAREFORENINGEN**



VIRKE



Poland



Portugal



Romania





Asociácia výrobcov nealkoholických nápojov
a minerálnych vôd na Slovensku



Slovenia



Zbornica kmetijskih
in živilskih podjetij

Spain



Sweden



Swedish Food
Retailers' Federation

Switzerland

VERBAND SCHWEIZERISCHER
MINERALQUELLEN UND
SOFT-DRINK-PRODUZENTEN



ASSOCIATION SUISSE DES SOURCES
D'EAUX MINÉRALES ET DES
PRODUCTEURS DE SOFT DRINKS