

Public Consultation to inform the review of the requirements for packaging and other measures to prevent packaging waste

Fields marked with * are mandatory.

Introduction

1.1 Background to the consultation

Despite an overall trend towards lighter packaging in many types of packaging in the last three decades, there has been an overall increase in packaging waste generated. According to Eurostat, 89 million tonnes of packaging were placed on the EU market in 2017, compared with 81.5 million tonnes in 2007. In year 2017, packaging waste generation increased to 174 kg per capita in the EU, the highest level ever recorded. The overall increase is due to growing consumption of packaged products, a change from reusable towards single-use packaging, growing online sales as well as the sometimes still excessive quantities of packaging for goods (over-packaging).

Packaging is the biggest source of plastic waste, with around 17.8 million tonnes generated in Europe in 2018 accounting for about 60% of post-consumer plastic waste. Only a limited share of plastic packaging waste is recycled and finds its way back into new products or packaging – in 2017 it was only around 42 %. The remainder was disposed of in landfills or incinerated leading to negative environmental consequences including air pollution and greenhouse gas (GHG) emissions.

In the production of new packaging, the use of recycled materials is still limited. The environmental impacts of packaging manufacture are higher than they could be with a more circular approach to packaging manufacture. Packaging design does not sufficiently consider the difficulties and costs of collection, sorting and processing of packaging waste, which adds to the cost of recycling. There is also a lack of clear legal rules requiring that packaging can be recycled into high quality secondary materials in a cost-efficient way.

[Directive 94/62/EC on Packaging and Packaging Waste](#) (hereafter the 'Packaging and Packaging Waste Directive' or PPWD) regulates the placing on the market of packaging as well as packaging waste prevention and management. All packaging placed on the EU market has to comply with essential requirements relating to its composition and reusable and/or recoverable nature. The ['fitness check' of the Waste Stream Directives](#) carried out in 2014 identified the need for clearer and more specific rules on the composition and the reusable and/ or recoverable, including recyclable, nature of packaging. This review of the Packaging and Packaging Waste Directive also follows up on the [EU Plastics Strategy's](#) commitment to ensure that plastic packaging is reusable or recyclable in an economically viable manner by 2030, and on

the [European Green Deal](#), which broadens this commitment to all packaging, and commits to additional measures to prevent and reduce over-packaging and packaging waste. It also reflects the objectives of the new [Circular Economy Action Plan](#) (CEAP), which further specified these commitments and added that, in addition to the revision of the essential requirements, “the Commission will consider other measures, with a focus on:

- reducing (over)packaging and packaging waste, including by setting targets and other waste prevention measures;
- driving design for re-use and recyclability of packaging, including considering restrictions on the use of some packaging materials for certain applications, in particular where alternative reusable products or systems are possible or consumer goods can be handled safely without packaging;
- considering reducing the complexity of packaging materials, including the number of materials and polymers used.”

Furthermore, the CEAP announced that the Commission will consider introducing in sectoral legislation mandatory requirements for recycled content and minimum mandatory green public procurement (GPP) criteria and targets.

1.2 Introduction to this consultation

In order to implement the new policy objectives defined in the European Green Deal and the new CEAP, the Commission is now conducting an impact assessment to support the ongoing review of the Packaging Directive. This impact assessment will explore possible measures to reinforce the Directive’s essential requirements, to promote packaging waste prevention, to increase the uptake of recycled content in packaging and to establish green public procurement criteria relating to packaging. Its purpose is to assess the need for further EU action in relation to the Packaging Directive, to evaluate policy options and to assess the potential economic, social and environmental impact of those policy options.

The purpose of this consultation is to gather the views of the public on reviewing the rules on packaging and packaging waste in the EU.

The consultation is divided into three parts:

- Part I: The first part asks for some information about you (such as which country you come from).
- Part II: The second part is addressed to the general public. You do not need any specialist knowledge to reply to this.
- Part III: The third part is addressed to experts who wish to comment on the potential measures that the EU considers putting in place to improve recyclability of packaging as well as packaging waste prevention and packaging reuse and contains more detailed and technical questions.

At the end of the questionnaire, the opportunity is provided to opt-in for targeted stakeholder interviews and to upload one document supporting and detailing your views and opinions. Once you have submitted your answers, you will be able to download a copy of your completed questionnaire.

All of the responses to this consultation will be assessed and the results will be included in the analysis supporting next steps. We will also produce a stand-alone factual summary on the input received, as well as a more detailed analysis of all consultation activities.

This public consultation will be complemented by targeted interviews with stakeholders and by a series of dedicated workshops. One was already carried out this year and several more planned for autumn/ winter of 2020 and early 2021.

If you have any questions, please contact the European Commission via ENV-WASTE-PACKAGING@ec.europa.eu

Your opinion matters and we are grateful to you for taking the time to complete this consultation.

For more information about this review, please see the Inception impact assessment roadmap for this initiative:

<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12263-Review-of-the-requirements-for-packaging-and-feasibility-of-measures-to-prevent-packaging-waste>

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- Gaelic
- German
- Greek
- Hungarian
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian

- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Arthur

* Surname

ten Wolde

* Email (this won't be published)

info@ecopreneur.eu

* How many individual members / employees do you represent (= your direct paying members or the employees / paying members of your affiliated organisations) ?

- 10 million and above
- 1 million to 9.999.999
- 100.000 to 999.999
- 10.000 to 99.999
- Less than 10.000
- Don't know

* Organisation name

255 character(s) maximum

Ecopreneur.eu

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

495144126378-48

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|---|--|--|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini | <input type="radio"/> Mali | <input type="radio"/> Seychelles |
| <input type="radio"/> Argentina | <input type="radio"/> Ethiopia | <input type="radio"/> Malta | <input type="radio"/> Sierra Leone |
| <input type="radio"/> Armenia | <input type="radio"/> Falkland Islands | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore |
| <input type="radio"/> Aruba | <input type="radio"/> Faroe Islands | <input type="radio"/> Martinique | <input type="radio"/> Sint Maarten |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
-
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo

- Heard Island and McDonald Islands
- Burkina Faso
- Honduras
- Norfolk Island
- Tokelau
- Burundi
- Hong Kong
- Northern Mariana Islands
- Tonga
- Cambodia
- Hungary
- North Korea
- Trinidad and Tobago
- Cameroon
- Iceland
- North Macedonia
- Tunisia
- Canada
- India
- Norway
- Turkey
- Cape Verde
- Indonesia
- Oman
- Turkmenistan
- Cayman Islands
- Iran
- Pakistan
- Turks and Caicos Islands
- Central African Republic
- Iraq
- Palau
- Tuvalu
- Chad
- Ireland
- Palestine
- Uganda
- Chile
- Isle of Man
- Panama
- Ukraine
- China
- Israel
- Papua New Guinea
- United Arab Emirates
- Christmas Island
- Italy
- Paraguay
- United Kingdom
- Clipperton
- Jamaica
- Peru
- United States
- Cocos (Keeling) Islands
- Japan
- Philippines
- United States Minor Outlying Islands
- Colombia
- Jersey
- Pitcairn Islands
- Uruguay
- Comoros
- Jordan
- Poland
- US Virgin Islands
- Congo
- Kazakhstan
- Portugal
- Uzbekistan
- Cook Islands
- Kenya
- Puerto Rico
- Vanuatu
- Costa Rica
- Kiribati
- Qatar
- Vatican City
- Côte d'Ivoire
- Kosovo
- Réunion
- Venezuela
- Croatia
- Kuwait
- Romania
- Vietnam
- Cuba
- Kyrgyzstan
- Russia

- Curaçao
- Laos
- Rwanda
- Wallis and Futuna
- Cyprus
- Latvia
- Saint Barthélemy
- Western Sahara
- Czechia
- Lebanon
- Saint Helena Ascension and Tristan da Cunha
- Yemen
- Democratic Republic of the Congo
- Lesotho
- Saint Kitts and Nevis
- Zambia
- Denmark
- Liberia
- Saint Lucia
- Zimbabwe

*** Publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

I agree with the [personal data protection provisions](#)

Part 2 - Questions to all stakeholders

In this section, we seek the general public's as well as different stakeholder's views on packaging, packaging waste and reuse options to help inform the assessment of the Packaging and Packaging Waste Directive.

Questions 1-5 - Packaging in general

- * 1. What is your general opinion on the current amount of packaging around products placed on the EU market?

- Far too much
- Too much
- Just about right
- Too little
- Far too little
- No opinion

1.1 If you would like to provide further explanation for your choice you can do so in this text box.

450 character(s) maximum

The main reasons for the excessive and growing amount of packaging are 1) missing level playing field for more sustainable packaging formats due to the availability of cheap, virgin, fossil-based materials, 2) lack of regulation making producers accountable for externalities by integrating impact costs to the environment and society, 3) lack of financial incentives and (4) lacking support for SMEs to adapt circular packaging models and products

2. Considering your visits to stores in the EU in the past 12 months, please choose a description from the options below that best matches your general impression about the amount of packaging for the listed items. You also have the option of indicating that you do not have an opinion. Please check 'No opinion' if you do not have experience of purchasing this product in the last 12 months.

	Far too much	Too much	Just about right	Too little	Far too little	No opinion
* Fresh fruit and vegetables	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Cosmetics	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ready meals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Cleaning products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Beverages (alcoholic and soft drinks)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Dried foods such as rice and pasta	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Electronic goods including headphones, mobile phones, laptops	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Sports equipment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Clothes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Shoes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Fashion accessories	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Children's toys	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Gardening equipment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Household electric items such as toasters, kettles, fridges	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Pharmaceutical products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Meat – poultry, beef, pork, etc	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Other – please specify in text box below	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

2.1 If you selected 'other' and/ or would like to provide further explanation for your choices you can do so in the text box below.

450 character(s) maximum

If you have **photographs** of packaging that you consider to be 'too much' or 'far too much' please upload these at the very end of the survey.

* 3. Considering any **online purchases** in the last 12 months, please choose a description from the options below that best matches your general impression about the amount of packaging. Please check 'No opinion' if you do not have experience of purchasing product online in the last 12 months.

- Far too much
- Too much
- Just about right
- Too little
- Far too little
- No opinion

4. What is your view on each of the following statements regarding the consumption of packaging? You can also choose 'No opinion'.

Statement	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	No opinion
* I buy items free of packaging wherever they are available as an option	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* If items are available in both packaged and unpackaged forms, I choose based on price or brand	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* If items are available in both packaged and unpackaged forms, I choose the one with least packaging	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* If the same product has multiple packaging options, I would choose the packaging with the highest recycled content	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Purchasing biodegradable/compostable plastic packaging is better for the environment than buying packaging made from conventional plastic	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* I would be prepared to bring my own reusable packaging along to the shop in order to avoid relying on single use packaging	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* I would be willing to bring reusable packaging back to the shop so it can be cleaned and refilled	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Customer' reusable packaging should be accepted in shops, including for perishable food.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Packaging around food protects it and prolongs its shelf life thereby preventing food waste	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* When purchasing medication, I want to be able to purchase only the prescribed amount, to minimise pharmaceutical packaging waste	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* It is acceptable to me to have less convenience when shopping if it reduces packaging waste.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>* It is acceptable to me to have less convenience when consuming food and drink on the go if it reduces packaging waste.</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>I am prepared to accept slight damage to the packaging of a product purchased online to avoid further cardboard packaging being used if the product itself was undamaged</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4.1 If you would like to provide further explanation for your choices you can do so in this text box.

450 character(s) maximum

5. What is your view on each of the following measures and their potential to help promote more sustainable (use of) packaging? You can also choose 'No opinion'.

Measures	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	No opinion
* Stores should be banned from giving away free any individually packaged goods (such as condiments e.g. ketchup sachets) where reusable packaging options are available.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There should be EU wide restrictions or bans on packaging where packaging is unnecessary to protect the product or ensure hygiene	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There should be EU wide restrictions or bans on single use, disposable packaging when reusable alternatives are readily available	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Packaging should be compostable when the packaging is very likely to end up in separately collected organic (food) waste (eg fruit stickers, tea bags)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Packaging should be compostable when this could facilitate separate collection of organic waste (eg disposable coffee capsules)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There should be a requirement for all recyclable packaging to be clearly labelled as recyclable.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* There should be a requirement for all compostable packaging to be clearly labelled as compostable.	<input checked="" type="radio"/>	<input type="radio"/>				
There should be a requirement for all reusable packaging to be clearly labelled as reusable.	<input checked="" type="radio"/>	<input type="radio"/>				
* There should be EU target(s) for Member States to reduce or limit packaging waste generation	<input checked="" type="radio"/>	<input type="radio"/>				
* There should be a requirement according to which, for certain product categories (e.g. fruit and vegetables), a certain percentage of products sold in a shop should be sold without packaging e.g. loose.	<input checked="" type="radio"/>	<input type="radio"/>				
* There should be EU target(s) for Member States on reusable packaging in sectors where this is feasible such as refill quotas for beverages, food boxes, pallets, cleaning products etc.	<input checked="" type="radio"/>	<input type="radio"/>				
* There should be a national advisory body promoting and helping businesses assess the environmental, economic and social benefits of reusable products and packaging in my country.	<input checked="" type="radio"/>	<input type="radio"/>				
* There should be dimension limits for packaging used to deliver goods bought online to minimise unnecessary empty space.	<input checked="" type="radio"/>	<input type="radio"/>				
* There should be a requirement on public authority buyers to purchase products using reusable, recyclable and returnable packaging options for specified purposes/goods within the public sector as a minimum in all instances rather than this being a voluntary option e.g. drinking water, catering services.	<input checked="" type="radio"/>	<input type="radio"/>				

* There should be a requirement for public sector buyers to purchase products with packaging which contains recycled content to build sustainable markets for plastic waste that is collected for recycling.	<input checked="" type="radio"/>	<input type="radio"/>				
There should be taxes on single use packaging in my country to incentivise using less or reusable packaging.	<input checked="" type="radio"/>	<input type="radio"/>				
* There should be a requirement on EU Member State to require companies/ organisations to have packaging waste prevention plans in place.	<input checked="" type="radio"/>	<input type="radio"/>				
* Targets for mandatory recycled content for specific packaging formats should be set, such as a minimum content of recycled plastic for specific packaging items.	<input checked="" type="radio"/>	<input type="radio"/>				

5.1. If you would like to provide further explanation for your choices you can do so in this text box.

450 character(s) maximum

Ecopreneur.eu is in favour of establishing "circular acceleration houses" in all EU regions with support from the European Commission. These "houses" or "hubs" should support SMEs with circular models, including promoting and helping businesses assess the environmental, economic and social benefits of reusable products and packaging

In the next section, we are interested to understand what actions you currently undertake, if any, to reduce the use of packaging.

Question 6-9 - Reusable Packaging

* 6. Do you do use reusable packaging?

- Yes
- No
- I don't know

*

7. How strongly do you agree or disagree that you would be happy to use reusable packaging for goods purchased online (this could mean bringing your packaging to a collection point or leaving it outside your residence for collection)?

- Strongly agree
- Agree
- Undecided
- Disagree
- Strongly disagree
- No opinion

* 8. Do shops or other providers of food and drinks exist in your area that provide the option for you to use your own re-useable container?

- Yes
- No
- I don't know

* 9. In the last year have you actively looked for shops or other food and drink providers that provide the option for you to use your own re-useable container?

- Yes
- No
- I don't know

In the next section, we are interested to understand your views on the recyclability and labelling of packaging.

10. Regarding the recyclability and labelling of packaging, please indicate your view of the following statements:

Statement	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	No opinion
* A lot of packaging I buy is not recyclable.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* A lot of plastic packaging I buy is not recyclable.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* I want all packaging to be recyclable.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* I'm willing to separate elements of a piece of packaging at home (e.g. removing plastic film	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

from cardboard) to increase its recyclability (further question below on this issue).						
* I find the labelling that contains instructions on whether the packaging is recyclable is easy to find and clear to understand.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* I find the labelling that contains instructions on whether the packaging is compostable is easy to find and clear to understand.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* I would be willing to spend more time separating packaging materials (eg. plastic from cardboard) to increase the amount of packaging recycled	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* I often find myself trying to separate a packaging item into the different materials it is composed of in order to recycle and struggle because the packaging is not designed to be separated into its individual components. (You may indicate for what products in this section's final text box).	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Thank you for spending time completing part 2 of this questionnaire. Your answers are valuable in helping us to understand your views on this issue. If you wish to expand on any of your answers or to add comments, please do so in the box below.

1500 character(s) maximum

See attached documents

Any documents you may want to share can be uploaded at the very end of this questionnaire.

If you would like to submit your replies to the questionnaire at this stage, please go to the end of the expert part and click on the "submit" button. You do not need to fill in the questions in the part for experts unless you would like to do so.

Part 3: Questions targeted at expert stakeholders

Question 11. Policy and operational objectives and related measures targeting packaging

In addition to the general considerations above, we invite your views on a number of policy and operational objectives as well as related measures that are being considered to address the problems that have been identified.

Please indicate to what extent you agree with particular emphasis being placed on the following objectives in the context of this review.

Background to objective 1: Almost all products placed on the market require some form of packaging. Requirements for packaging thus have an enormous impact on the free flow of goods within the EU. Essential requirements set a complex mesh of different conditions. To ensure continued success of the internal market, EU should step up its ambition to secure harmonized requirements and uniform implementation.

Objective 1: To increase level playing field and harmonization of requirements for products placed on the internal market

- Strongly agree
- Agree
- Undecided
- Disagree
- No opinion

Background to objective 2: Packaging waste has continued to rise over time in absolute terms and in per capita terms. Greenhouse gas emissions are closely linked to packaging waste generation. Decoupling the generation of packaging waste from economic activity and consumption supports the circular economy and may support greenhouse gas reduction targets depending on the nature of the resultant changes.

Objective 2: To limit and/or reduce the packaging waste generated across the EU

- Strongly agree
- Agree
- Undecided
- Disagree
- No opinion

Background to objective 3: The share of reusable packaging has been declining in recent years in relative and absolute terms, particularly for consumer packaging. Reusable packaging can support reductions in packaging waste generation and can lead to decreased greenhouse gas emissions.

Objective 3: To promote the use of reusable packaging whenever logistically feasible with a view to reduce packaging waste generation

- Strongly agree
- Agree
- Undecided
- Disagree
- No opinion

Background to objective 4: As more complex packaging designs have been developed and placed on the market – for various reasons – this has had a negative impact on the recyclability of some packaging waste streams. Designing the packaging for recyclability is key to increasing packaging recycling rates.

Objective 4: To increase the recyclability of packaging

- Strongly agree
- Agree
- Undecided
- Disagree
- No opinion

Background to objectives /measures 5-7: There are no harmonised definitions on biodegradable and compostable packaging and this has an impact on legal certainty and free movement of goods. Plastics that are labelled 'compostable' or 'biodegradable' are not necessarily suitable for home composting. Appropriate and harmonised labelling of packaging is required to ensure consumers are aware of the recyclability, reusability and /or compostability of the packaging to ensure adequate disposal in particular to prevent the contamination of organic waste with conventional plastics and of the conventional plastic recycling streams with biodegradable plastics. Restrictions on the use of compostable packaging could prevent contamination of the non-compostable waste stream.

Objective 5: Develop clear definitions of biodegradable and compostable packaging

- Strongly agree
- Agree
- Undecided
- Disagree
- No opinion

Objective 6: Harmonise the labelling of biodegradable and compostable packaging

- Strongly agree
-

- Agree
- Undecided
- Disagree
- No opinion

Objective 7: Set criteria for the use of compostable packaging in order to restrict the types of packaging that can be designed for composting

- Strongly agree
- Agree
- Undecided
- Disagree
- No opinion

Background for objective 8: For some packaging types/materials the level of recycled content is low. This inhibits recycling markets as the demand for secondary raw materials made from recycled packaging is low. Establishing recycled content targets and increasing the level of recycled content in packaging for certain types/materials where the markets are not yet developed could increase the demand for such secondary materials and support the recycling industry.

Objective 8: Increase the level of recycled content in packaging

- Strongly agree
- Agree
- Undecided
- Disagree
- No opinion

Background to objective 9: The existing essential requirements were found to be weakly enforced. To ensure all of the above policy objectives are met it is important to ensure effective enforcement mechanisms are developed to ensure compliance. However, the administrative burden of any reporting and monitoring tools for industry and member states should be minimised to the extent possible.

Objective 9: Ensure that the mechanisms to enforce compliance with the essential requirements for packaging are effective whilst minimising administrative burden

- Strongly agree
- Agree
- Undecided
- Disagree
- No opinion

Question 12. Policy Measures

In addition, we invite your views on a number of potential policy measures that could contribute to meeting the objectives set out above. These have been grouped according to various key themes.

For each measure, please indicate their anticipated level of effectiveness and efficiency.

12.1. Waste prevention measures

Level of effectiveness and efficiency

	It would not reduce packaging waste and/ or would not reduce negative environmental impacts	It would reduce packaging waste and/ or would reduce negative environmental impacts, but costs would outweigh the benefits	It would reduce packaging waste and/ or would reduce negative environmental impacts and costs would be acceptable	No opinion
EU wide restrictions or bans on packaging for specific types of products where packaging is unnecessary to protect the product or ensure hygiene	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Member State level packaging waste generation reduction targets or limits relative to population (e.g. maximum amount of kg per capita) apply	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Member State level packaging waste generation reduction targets or limits relative to Gross domestic product (GDP) (e.g. maximum amount per unit of GDP or in relation to final household consumption)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Requirement according to which, for certain product categories, a certain percentage of products should be sold loose/without packaging.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
EU wide targets on reusable packaging placed on the market in sectors where this is feasible	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

such as refill quotas for beverages, food boxes, pallets, cleaning products etc.				
Requirement on mandatory use reusable packaging for some transport packaging e.g. pallets.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Development of guidance on effective reuse systems through reference to a European Standard.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Establishment of a national advisory body promoting and helping businesses assess the environmental, economic and social benefits of reusable products and packaging in my country.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Requirement on mandatory dimension limits for packaging used for online purchases to minimise unnecessary empty space.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Requirement on public authorities to purchase reusable packaging for specified purposes within the public sector e.g. drinking water, catering services.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Country level taxes on single use packaging to incentivise using less or reusable packaging.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Each EU Member State must require companies and organisations to create packaging waste prevention plans.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Requirement on producers to reduce overpackaging by reporting to a central registry on the volume, weight and planar area ratios of packaging to product if, for either one of these three measures, the packaging exceeds a specific threshold ratio	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Requirement for packaging not to exceed any of a set of threshold ratios of packaging to	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

product established in terms of volume, weight and surface area.				
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12.2. Measures to reinforce the essential requirements to improve design for reuse and promote high quality recycling and strengthen their enforcement

To develop a better understanding of the measures listed in the table below you may want to consult the [Scoping study on reinforcing the essential requirements for packaging](#) in the context of which these measures were identified.

Level of effectiveness and efficiency

	It would not improve packaging design and/ or would not reduce negative environmental impacts	It would improve packaging design and/ or would reduce negative environmental impacts, but costs would outweigh the benefits	It would improve packaging design and/ or would reduce negative environmental impacts and costs would be acceptable	No opinion
Requirement that all packaging shall be reusable or recyclable (as defined through the following possible approaches).	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The term 'recyclable' in the requirement above is defined by qualitative statements.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The term 'recyclable' in the requirement above is defined by a design for recycling based approach implemented through a technical committee.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The term 'recyclable' in the requirement above is defined by use of a recycling rate threshold (i.e. determine minimum threshold to be achieved for a packaging format to qualify as 'recyclable') – facilitated through utilisation of digital watermarking technologies.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Requirement that all reusable packaging must be recyclable unless there is a demonstrated robust case for an exemption.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
In addition to the requirement to be reusable or recyclable, the packaging shall be designed not to exceed the minimum volume and weight necessary for its functionality under critical areas (limited to product protection, hygiene, safety, legally required information and recyclability functions). In addition to amending the wording of the Annex II, point 1, this measure would include amending Standard EN 13428 to refine/remove the critical areas that limit further reductions in the volume or weight of packaging.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Requirement mandating the reduction in the use of polymers used in packaging in order to increase recycling rates.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Update of CEN Standard 13432 to further specify the concepts of compostable and biodegradable packaging and to ensure actual composting conditions are taken into account.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Requirement mandating of compostable packaging when the packaging is very likely to end up in separately collected organic (food) waste (e.g. fruit stickers, tea bags).	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Requirement mandating compostable packaging when this could facilitate the collection of organic waste (e.g. disposable coffee capsules).	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Requirement mandating a ban on compostable/biodegradable packaging for certain applications or when not related to food waste capture.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Requirement for all recyclable packaging to be clearly labelled as recyclable.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Requirement for all non- recyclable packaging to be clearly labelled as non-recyclable.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Requirement for all compostable packaging to be clearly labelled as compostable.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Requirement for all reusable packaging to be clearly labelled as reusable.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
EU guidance on dimension limits for packaging used for online purchases to minimise unnecessary empty space.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

12.3. Measures related to increasing recycled content in packaging to ensure a well-functioning market for secondary raw materials

Level of effectiveness and efficiency

	It would not increase demand and/ or would not reduce negative environmental impacts	It would increase demand and/ or would reduce negative environmental impacts, but costs would outweigh the benefits	It would increase demand and/ or would reduce negative environmental impacts and costs would be acceptable	No opinion
Inclusion of a requirement in the Essential Requirements for a new CEN Standard setting out a mandatory process to be followed to assess the potential to include recycled content in plastic packaging.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Inclusion of a requirement in the Essential Requirements for a new CEN Standard setting out a mandatory process to be followed to assess the potential to include recycled content in all packaging types.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The setting of recycled content targets for specific plastic packaging formats.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The setting of recycled content targets for packaging formats made of materials other than plastic.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

12.3.1. Which packaging types / formats / materials do you believe are most suitable and/or in need of mandatory recycled content targets being set?

1000 character(s) maximum

Ecopreneur.eu is of the opinion that mandatory recycled content targets should be set across the board for all packaging types / formats / materials for which this yields a net positive life cycle sustainability assessment (LCSA) result.

Of these, the packaging types / formats / materials most suitable and/or in need of mandatory recycled content targets being set, are those that do not provide a specific functionality necessary to comply to

hygiene, security or environmental standards and for which no alternatives with the same functionality but a lower environmental footprint exist (other than replacing virgin by recycled content).

12.4. Measures related to Green Public Procurement (GPP) to promote reusable packaging or recycled content in packaging

Level of effectiveness and efficiency

	It would not be effective and/ or would not reduce negative environmental impacts	It would be effective and/ or would reduce negative environmental impacts, but costs would outweigh the benefits	It would be effective and/ or would reduce negative environmental impacts and costs would be acceptable	No opinion
The use of GPP criteria to require the use of reusable options for specified purposes within the public sector e.g. drinking water, catering services.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The introduction of mandatory GPP criteria at national and sub national level relating to minimum levels of recycled content in packaging.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Question 13

13. What additional EU level measure(s), if any, would you recommend to meet any of the policy objectives set out above?

1000 character(s) maximum

(see attached document)

1. Extended Producer Responsibility (EPR) internalise externalities in the price of specific product groups
2. Combine EPR schemes with eco-modulation of fees in all waste-intensive sectors
3. A tax shift from labour to resources
4. No or low VAT for circular products and services across EU
5. Increase of CO2 pricing to make GHG intensive products more costly
6. Additional demand side incentives beyond GPP

Question 14

14. Which are the most important reasons for you to have decided that you do not support specific measures above (for example loss of flexibility, administrative costs, risks, ongoing industry-led initiative will resolve the issue)? Please substantiate your statement with quantitative data as much as possible. You can add information by using the option of attaching a document to your response (see end of survey)

1000 character(s) maximum

While strongly committed to the reduction of plastic waste in the environment, reducing the use of polymers for packaging is not always the best solution. Packaging solutions should always be based on a multicycle life cycle sustainability assessment. We DO however advocate to address the potential for reducing the use of plastic for all those applications where this is both viable and environmentally beneficial.

Question 15 - Research and development & innovation potential

15. Which one of the following drivers do you consider has the potential to make a large contribution to increasing the recycling of packaging and its cost-effectiveness within the next 10 years?

Ability to increase the recycling of packaging

Drivers	Strongly agree	Agree	Neither agree nor disagree/ undecided	Disagree	Strongly disagree	No opinion
Further optimisation of mechanical recycling	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Tracer based sorting technologies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital watermarking for labelling on packaging to facilitate sorting	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-mechanical recycling e.g. chemical recycling	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing the number of polymers in use for packaging	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Compostable plastics	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other – please specify	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

15.1 If you selected 'Other' please provide further explanation for your choices you can do so in the text box below.

- Address the potential for reducing the use of plastic for all those applications where this is both viable and environmentally beneficial
- Substitution of synthetic polymers by sustainably sourced natural fibres
- Shift to and promotion of mono-materials through eco-design
- Using monolayers, fewer types of plastics, and less additives or pigments
- incentivise the reuse and recycling of post-consumer plastics

Questions 16 - 18 - Impacts of Covid-19

16. In your experience, has COVID-19 pandemic impacted the demand for packaging? Please check one box.

- Yes
- No
- I don't know

16.2 If yes, what changes do you expect to persist beyond 2021? Please check from the list of below answers. You can check multiple boxes.

- More packaging in general
- More plastic packaging for food
- More plastic packaging for hygiene products
- Less consumption overall so less packaging
- Continued growth of online purchases into the future leading to more online delivery packaging
- Other - please specify

17. Has COVID-19 pandemic affected the recycling of packaging waste? Please check one box.

- Yes
- No
- I don't know

18. Have the packaging production supply chains been disrupted by the COVID-19 pandemic? Please select only one answer.

- Yes
- No
- I don't know

Question 19 - Interviews

19. Please indicate here whether you would be interested and willing to take part in follow-up interviews to gather more information and views about the PPWD?

- Yes
 No

Final remarks

Should you wish to provide additional information (for example a position paper) or raise specific points not covered by the questionnaire, you can upload your additional document here.

Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this open public consultation. The document is an optional complement and serves as additional background reading to better understand your position.

Please upload your file

The maximum file size is 1 MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

You may provide any hyperlinks in the box below:

www.ecopreneur.eu

Background Documents

[PPWD_Consultation_Strategie](#)

Contact

[Contact Form](#)

