

High ambition of revised Packaging Waste Regulation and its targets must be preserved

This is our feedback on a [public consultation](#) about the proposed [regulation on Packaging and Packaging Waste](#) (COM(2022)677) presented by the European Commission on 30.11.2022.

The European Sustainable Business Federation - Ecopreneur.eu - **welcomes the proposed regulation on Packaging and Packaging Waste** as presented by Vice President Frans Timmermans on November 30. We particularly appreciate the provision of specific **mandatory targets for waste reduction, recycled content, reuse and refill** within the suggested timeline for implementation as well as the introduction of **mandatory deposit-return-schemes** and a **grading system** to define the level of recyclability performance, based on eco-design, to be used for eco-modulated EPR schemes.

We also consent to only **counting post-consumer recycled content** towards recycled content targets rather than post-industrial recycled packaging material.

Finally, we welcome the obligation for Member States to designate competent authorities responsible for **implementation and enforcement** of the regulation with its targets and timeline.

For consumers, the new regulation will make reusable packaging options more common, reduce overpackaging, and provide clear labels for correct recycling. For the industry, it will create new business opportunities and employment, especially for smaller companies, decrease the need for virgin materials, boosting Europe's recycling capacity as well as making Europe less dependent on primary resources and external suppliers. As a result, it will put the packaging sector on track for climate neutrality by 2050.

Considering the extraordinary stakes, impact and risks from packaging waste for both humans and the environment, we strongly advise all legislators involved in the final legislation process to **preserve the level of ambition** of the proposed PPW regulation and its targets and **withstand attempts to watering them down any further**.

Corresponding to the principles of the EU Waste Hierarchy, the regulation must **privilege consistent reduction and reuse targets** over recycling and composting. Lower reuse targets, particularly for 2030, could make reuse systems too hard to establish.

We call on the Commission to ensure through a delegated act the **phasing out hazardous materials and additives** that compromise the quality of recycling and further reuse.

That is why it is crucial that **all companies from inside and outside the EU** that put packaging products onto the common market **need to comply** to the Packaging and Packaging Waste Regulation and its defined targets, - including e-commerce. Otherwise, they will need to accept elevated costs from higher recycling fees and environmental taxes, for example.

Without regulating the top tiers of the waste hierarchy in the manner outlined in the Proposal, the goals of the Circular Economy Action Plan and the Green Deal might get compromised. To meet the goals, we need a regulatory framework that **facilitates and rewards investment and innovation in circular packaging solutions** and circular business models in general.

Recycling should only apply to of packaging formats that reach the end-of-life stage, with **mechanical recycling being the primary option** and chemical recycling being the very last. To increase the collection, sorting and quality of mechanically recyclable packaging waste, we call for regulatory instruments that encourage ecodesign and the shift from plastics to bio-based materials, especially **eco-modulated EPR schemes and financial incentives**.

About Ecopreneur.eu

[Ecopreneur.eu](https://ecopreneur.eu) is the European Sustainable Business Federation of currently seven national associations representing about 3000 sustainable companies - mostly SMEs. A member of the Coordination Group of the European Circular Economy Stakeholder Platform, Ecopreneur.eu is the only cross-sectoral EU business organisation committed to ambitious measures, rules and regulations for a low-carbon circular economy. We advocate a new economic framework in which sustainability is promoted, the environment respected, and ecological principles are followed. Ecopreneur.eu and our members bring concrete experience from pioneering companies into the political debate, show best practice examples and represent the needs of green SMEs in a credible way.

Contact

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