Packaging & packaging waste

Making waste a resource

Key messages:

1. Packaging design does not sufficiently consider the difficulties of treating and separating packaging waste. This increases sorting costs for city authorities. The new legislation needs to include requirements at the product design phase to make packaging ready for reuse and recycling, ensuring a real shift from waste to products in accordance with a circular economy.

2. All types of packaging placed on the EU market should be reusable or recyclable by 2030, to support the EU's transition to a circular economy and the recycling and reuse targets set in the Waste Framework Directive and Packaging and Packaging Waste Directive.

3. Recycled content targets are needed for packaging: it will boost demand for secondary materials from recycled packaging and reduce the environmental impact of the production of new packaging virgin materials.

4. We encourage the Commission to extend the scope of Extended Producer Responsibility as an essential aspect of efficient waste management. The funding streams should fully cover the costs of meeting packaging recycling targets, the costs of managing the packaging that remains in residual waste, the costs of cleaning up packaging-related litter, prevention and information campaign towards citizens, and the operational costs carried by cities.

The recycling and recovery rates of packaging waste have increased steadily over the last ten years thanks to the Waste Framework Directive and Packaging and Packaging Waste Directive. Unfortunately, it was not enough to curb the overall trend of increased packaging waste. In 2017, all packaging waste materials have increased resulting in 77.5 million tonnes of waste generated, meaning 173.8 kg per inhabitant.[1]

Packaging and packaging waste, in addition to being a burning issue for the planet, is becoming a growing problem for city authorities in terms of treatment, collection, and associated costs.

As part of the transition to a circular economy, packaging must be captured - after being used by consumers - and brought back into the production cycle. This is the only way we can eliminate packaging waste and retain its value as a resource.

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[1] Eurostat https://ec.europa.eu/eurostat/statistics-explained/index.php/Packaging_waste_statistics

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From waste to products

Packaging design does not sufficiently consider the difficulties and costs of separate collection, sorting and treatment of packaging waste, which all increases the cost of recycling. Packaging should be designed to facilitate separate sorting by citizens, and further dismantling for reuse or recycling.

Packaging design fit for dismantling, reuse and recycling requires less complexity in packaging materials. Today, flexible multilayer composite packaging prevents citizens from recognising or correctly handling packaging waste, making further treatment and sorting of waste very complex. Packaging composed of different materials that are not easily separable (by machines or manually), or made from different polymers, poses challenges to most sorting systems in cities.[2] The Commission should encourage producers to use packaging with a single material, or for plastic, a single resin, and associated elements and additives (caps, lids, glue, inks) that do not interfere with sorting, reuse or recycling.

The Essential Requirements for packaging and packaging waste, dating back to 1994, should be reinforced to align with the waste hierarchy[3], to take in account and reduce the complexity of new types of packaging , and to prevent the generation of packaging waste via reuse (e.g. deposit return schemes and refillables) and recycling.

Biodegradable and compostable plastic packaging

The increased use of various forms of biodegradable and compostable plastic packaging can be problematic. Most citizens are not able to distinguish between biodegradable/compostable plastic packaging and more 'conventional' ones, and thus cannot identify if biodegradable/compostable packaging should follow the bio-waste stream. Biodegradable and compostable plastic packaging is likely to increase collection and sorting costs and harm the quality of secondary plastic material. For instance, biodegradable packaging has an immediate effect when it is melted as it melts faster and creates black spots in the plastic film. Longer term, if included in products such as thick construction film, it may biodegrade during use.

On the other hand, recycling of a pure stream of some biodegradable and compostable packaging is technically feasible if correctly separated, but this is not being implemented in Europe on a large scale and will require huge investments in infrastructure.

Overall, cities have real concerns about the feasibility of biodegradable and compostable plastic packaging waste management. The Commission should assess if biodegradable and compostable plastic packaging can benefit the environment or create more littering and hamper waste collection, reuse and recycling.[4]

Reuse and recycle

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2 Effectiveness of the essential requirements for packaging and packaging waste and proposals for reinforcement (2020) https://op.europa.eu/en/publication-detail/-/publication/05a3dace-8378-11ea-bf12-01aa75ed71a1
3 The 'waste hierarchy' is a tool used in the evaluation of processes that protect the environment alongside resource and energy consumption from most favourable to least favourable actions: reduce, re-use, recycling, energy recovery, incineration and then landfilling (the least favourable one)
4 Eurocities statement 'Circular economy offers a path to sustainable recovery' (2020) https://eurocities.eu/latest/circular-economy-offers-a-path-to-sustainable-recovery/

All packaging must be reusable or recyclable by 2030 to support the EU's transition to a circular economy, and the reuse and recycling targets in the Waste Framework Directive. We encourage the Commission to consider separate reuse and recycling targets to reflect the waste hierarchy. This will require a clear definition of 'reusable' and 'recyclable packaging' as currently interpretations of 'reusable' and 'recyclable packaging' can vary and leave too much room for interpretation. Including a clear definition will ensure that producers, consumers, retailers and enforcement agencies know what is required.

The new legislation should also bring forward recycled content targets for packaging: this will boost demand for secondary materials from recycled packaging and reduce the environmental impact of the production of new virgin packaging materials, taking into account that plastic cannot be recycled indefinitely in packaging.

Sharing the cost burden

Cities need financial support under the 'polluter pays' principle to meet the new packaging targets: the funding streams should fully cover the costs of meeting packaging recycling targets, but also the costs of managing the packaging that remains in residual waste, the costs of cleaning up packaging-related litter and the operational costs carried by cities (e.g. door-to-door collections, communal collections, recycling centres or container park facilities, staff and transport and information and prevention campaigns for citizens).[5]

Placing costs on producers gives them an incentive to reduce those costs by eliminating unnecessary packaging (over-packaging, especially in online commerce), ensuring packaging is readily recyclable, funding recycling activities and infrastructure, supporting business models for reusable packaging and using recycled material.

The use of Extended Producer Responsibility (EPR) is necessary to create economic incentives and should be homogenised across EU and national legislations. Currently some member states, such as Denmark, don't have any EPR schemes and there are noticeable differences in EPR schemes between the Waste Framework Directive and the Single-Use Plastic Directive. We encourage the Commission to reinforce the focus on the use of Extended Producer Responsibility in the new packaging and packaging waste legislation.

From passive consumers to active buyers

Public procurement is one of the most valuable tools for public authorities to send a signal to the market and support the creation of innovative, green and circular solutions. However, for the successful procurement of new solutions, local authorities need to establish a dialogue with suppliers, encouraging their R&D efforts and evaluation of circular solutions.[6]

The new legislation should consider EU-wide mandatory labelling to identify packaging as reusable, recyclable or compostable for consumers. It requires a clear, visible and transparent labelling system, similar throughout the EU. The Commission could assess further the use of QR codes or NFC solutions on each packaging item. Consumers could scan their packaging items using their mobile phones and identify the manufacturer, the type of plastics used, the composition for multilayer objects, and the waste stream to follow. This labelling system should be developed in close collaboration between the EU, producers and retailers but also with local

authorities, so the system is adapted to local collecting and sorting situations. Besides providing information on composition and processing of packaging, such solutions would provide tracking and tracing functionalities on the origin and history of (re)used materials, motivating producers to create more sustainable supply chains, encouraging consumers to behave more sustainably and helping them to make informed choices.

Finally, important efforts need to be made to raise awareness on packaging and packaging waste, fostering education and behavioural change. We encourage the Commission to work closely with producers, retailers and cities to set up awareness campaigns to help consumers take simple steps toward healthy and eco-friendly choices, making informed choices when shopping, and to separate waste and dispose of it efficiently.