



EU Circular Economy Package Joint Position Paper “Reuse”



On 2nd December 2015 the European Commission, led by Jean-Claude Juncker, released its new Circular Economy Package (CEP), which contains a series of legislative amendments on several waste-specific Directives including the directives on waste and packaging¹. The legal proposals are complemented by a communication setting out an EU action plan for the Circular Economy. On 14th March 2017 the Members of the European Parliament voted for a strengthening of resource efficiency and signaled a strong political support for the transition towards a Circular Economy. The Council of the European Union is expected to take a position on the CEP in the upcoming months, but most likely will formally adopt its position not before the meeting of the EU environment ministers on June 19th 2017. However, informal talks with MEPs could start already in May 2017. The Conciliation Committee, the so-called triologue negotiations, will most likely be convened in summer this year, composed of the Council and an equal number of MEPs, observed by the EU Commission. Presuming a final consent, the CEP will then be adopted.

Environmental Action Germany (Deutsche Umwelthilfe), the European Federation of Associations of Beer and Beverages Wholesalers (CEGROBB), the Association of Small and Independent Breweries (S.I.B.) and Reloop criticise that the proposal in fact lacks in ambition especially as it provides no targets to reduce resource consumption and waste generation, and attenuates previously proposed recycling targets. Reuse schemes contribute significantly to waste prevention in many Member States and should be particularly promoted in order to make the transition to a Circular Economy a reality. In this statement, we outline steps that must be taken in order to strengthen reusable packaging in Europe and in order to move Europe towards a sustainable economy with closed loop material cycles.

What really needs to be done to make packaging circular:

1. Set clear targets to **reduce resource consumption**
2. Introduce mandatory **waste prevention targets** for packaging waste
3. **Promote reuse** through separate reuse targets for sales packaging, transport packaging and beverage packaging, and by a compulsory labelling of beverage packaging as refillable or non refillable
4. **Increase recycling targets** for municipal waste to 70 % and for packaging waste to 80 % by 2030 and introduce a **transparent calculation methodology** for recycling targets that doesn't allow non-recycled residues to be counted as recycled
5. Implement an **EU-wide deposit system** for one-way beverage packaging in order to reduce littering, enable a closed loop recycling and provide take-back systems
6. Safeguard the achievement of set targets by installing an **Early Warning System** and by making official **public reports** on attained results and data quality compulsory

¹ amended directives are: Waste Framework Directive, Packaging and Packaging Waste Directive, Landfill Directive, Waste Electrical and Electronic Equipment Directive, End-of-Life Vehicles Directive and Batteries Directive

1. Reduce resource consumption

On the whole, far more resources are currently consumed than can ever be regenerated. A Circular Economy on the other hand could conserve natural resources by utilising waste for the production of new goods. Governing bodies not only need to introduce measures to promote a Circular Economy with regards to waste, but should also tackle the increasing resource consumption. The clear goal should be to establish equilibrium between the amount of resources used and the amount of resources regenerated. In order to achieve this, Europe must introduce binding targets to reduce resource consumption. These targets are not only essential for environmental protection, but also for an increased resource efficiency and the competitiveness of the European economy.

2. Set waste prevention targets

Even though waste prevention should be the primary focus of action in moving towards a Circular Economy, tangible measures to prevent waste are absent in the CEP. A clear target to reduce municipal and packaging waste is an essential basis for subsequent actions to prevent waste or promote reuse. For residual waste, a cap of 150 kg in 2025 and 130 kg in 2030 per year and capita should be implemented. For packaging waste, a cap of 120 kg in 2025 and 90 kg in 2030 per anno and capita is realistic.

3. Promote reuse

Preparation for reuse gives products and packaging multiple rotations (many lives) and thus reduces waste generation. Moreover, reuse of products and packaging consumes far less resources and energy, and causes less greenhouse gas emissions compared to the production of new products and packaging. It should be particularly promoted. However, a combined target for recycling and preparation for reuse, as proposed by the European Commission in 2015, is not conducive. On the one hand, it would not lead to more recycling, since already existing reuse systems would ease the attainment of the target. On the other, it would create no specific incentives for an increase in reuse. Hence, we support the proposal of the European Parliament to establish separate reuse and recycling targets. To promote reuse, Member States have to set separate reuse targets for sales packaging, transport packaging and beverage packaging. For these packaging types, the targets have to increase the share of reused packaging put on market by 10 % until 2025 and by another 20 % until 2030 compared to the level of 2018.

In order to help consumers choose environmentally friendly refillable beverage containers, beverage packaging must be clearly labelled as refillable or non-refillable. In addition, Member

States have to implement economic incentives for companies and consumers that support reusable packaging. The product price should reflect the negative environmental impact deriving from the type of packaging chosen and therefore be higher for single use products.

Reusable transport packaging contributes significantly to the conservation of resources and should be promoted. Member States have to remove fiscal disadvantages and regulatory barriers and create incentives for reusable transport packaging.

4. Increase recycling targets and introduce transparent calculation methods

The 2015 proposal of the Juncker-led European Commission significantly lowers the recycling targets as proposed by the previous Barroso-Commission and the European Parliament. Lower recycling targets inevitably entail a decrease in economic performance, fewer jobs and considerably more greenhouse gas emissions within the European Union. We strongly call on European legislators to support higher recycling targets: 60 % by 2025 and 70 % by 2030 for municipal waste and 70 % by 2025 and 80 % by 2030 for packaging waste. Member States that currently have low recycling rates must not have lowered targets, but should receive additional support for achieving the targets.

5. Implement an EU-wide deposit system

Disposable beverage containers without a deposit are one of the most littered waste items. If they are washed into the seas, they intensify the problem of marine litter. In order to have non-refillable beverage packaging returned to the shops instead of being littered, they should be furnished with an EU-wide harmonized minimum deposit. In this way separately collected beverage containers have an excellent recyclability and are even suited to be recycled to food-grade packaging.

Deposit-return system (DRS) for non-refillable beverage may not lead a beverage manufacturer to switch to refillables, but it establishes an infrastructure by which containers can be returned, and is one of the most effective ways to support high levels of capture and material quality. It is the same take-back infrastructure necessary to make refilling bottles more economically viable, thereby levelling the playing field for non-refillable and refillable beverage packaging and providing an incentive for reuse.

6. Install an Early Warning System and make public reports compulsory

An effective monitoring framework that allows an early intervention is necessary to safeguard the attainment of the targets and inform the European public about the achievements towards a Circular Economy. Member States should annually publish their data along

with a report on the data quality. This report is to be checked by the European Environment Agency and the result of the inspection is to be published as well. An Early Warning System is to be established that requires the European Commission to publish a progress report for each Member State three years before each time limit. Member States at risk of not meeting the targets should be obliged to publish a compliance plan within six months from publication of the reports about how they intend to achieve the targets in due time.

Short profile of the signatory organizations



European Association of Beverage Wholesalers (CEGROBB)

The European Federation of Associations of Beer and Beverage Wholesalers (CEGROBB) represents over 10.000 small and medium sized companies with a total annual turnover of 39,5 billion Euro created by over 120.000 employees. Beverage wholesalers are in general family businesses since many generations. They are real actors of social and economic life in their regions, invest in local economy, festivities and events and support refillable systems in their countries. CEGROBB consists of member associations in Belgium, Netherlands, Luxemburg, France, Spain, Italy, Switzerland and Germany.



Association of Small and Independent Breweries in Europe (S.I.B.)

The Association of Small and Independent Breweries in Europe (SIB) acts as umbrella organization for the European associations of independent breweries and has members in Germany, Great Britain, Czech Republic, Poland, Denmark, Austria, Switzerland and Romania. SIB lobbies in Brussels and on Member State level for the concerns of small and independent breweries, such as accentuating the local value of beer and promoting the use of refillable bottles.



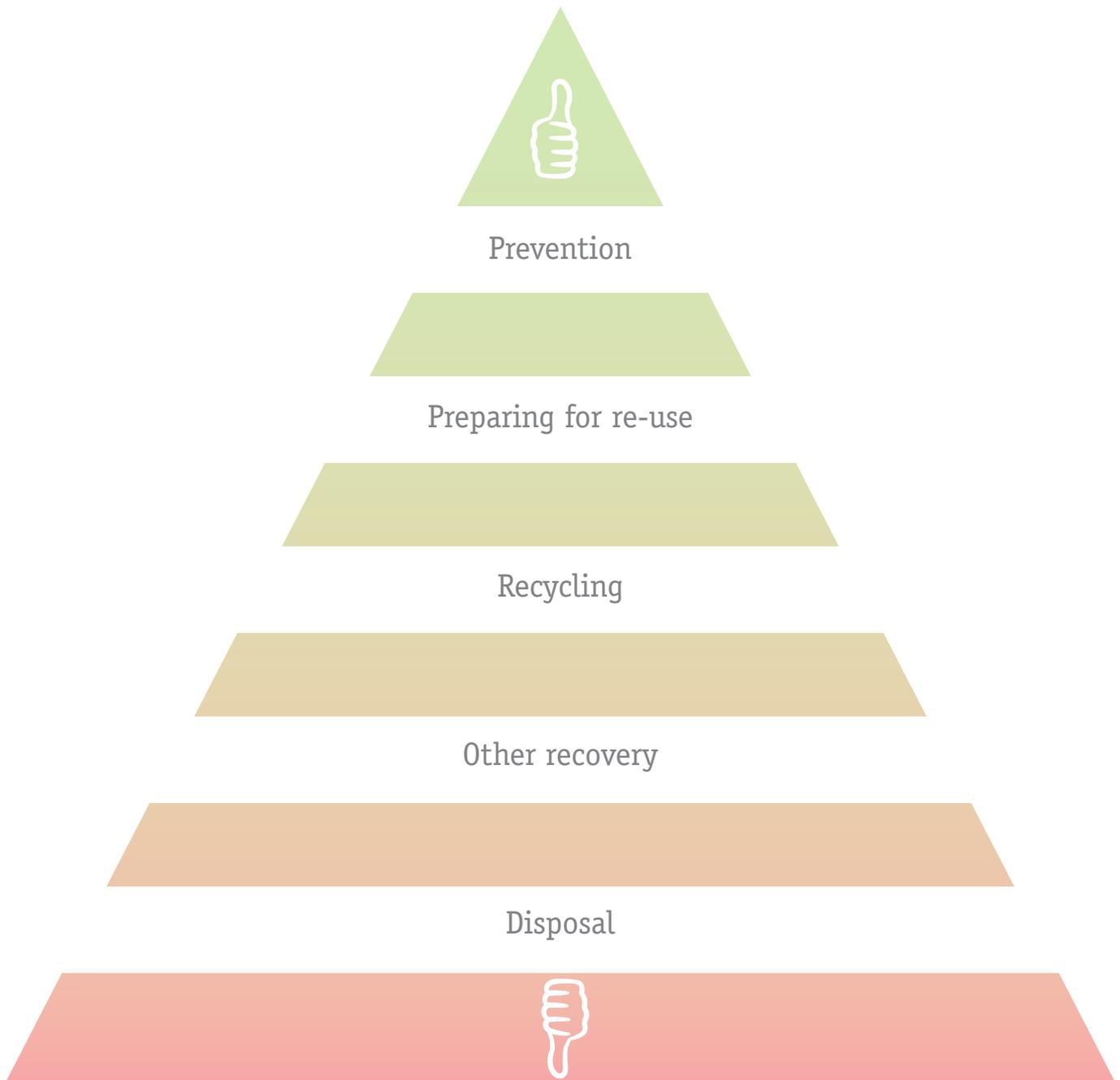
Environmental Action Germany

Environmental Action Germany (Deutsche Umwelthilfe) is a German independent environmental and consumer protection organization and member of the European Environment Bureau (EEB). Within their waste unit they promote waste prevention and high standards for recycling for the purposes of resource conservation and environmental protection. They are renowned for their role in uncovering the Diesel Scandal; establishing a deposit system for non-refillable beverage containers in Germany and their campaigns against the littering of plastic bags and disposable cups.



Broad platform of like-minded interests that share a common vision for a Circular Economy

The founding members of the organization bring together industry, government, and non-governmental organizations to form a network for advances in policy that create enabling system conditions for circularity across the European economy. With members coming from different sectors across Europe, the platform aims to work as a catalyst in order to generate economic and environmental opportunities for all stakeholders in the value chain. This includes producers, distributors, recyclers, academia, NGOs, trade unions, green regions, or cities.



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