

ECMA - the European Carton Makers Association

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**Single Use Plastics Directive (2019/904/EU) – article 7: Marking requirements
for beverage cups**

5 November 2020.

The European Carton Makers Association (ECMA) request the following comments are taken into consideration in respect to the Single Use Plastics Directive, concerning the Implementing Act on the marking of beverage cups.

ECMA share the Commission's concerns regarding inappropriate disposal of beverage cups and the associated environmental consequences and we continue to work with the entire fibre value chain to enhance the collection and recycling infrastructure for these products and reduce littering.

We hope that when the European Commission's Waste Technical Adaption Committee meets on 6 November and discusses these marking requirements, that the consequence of proceeding with the proposed negative messaging (concerning the negative effects of incorrect disposal and its negative effect on the environment) will be fully considered and whether more positive messaging would better serve the intended purpose. ECMA are concerned that the proposed messaging does not inform the consumer that paper beverage cups, consisting primarily of high quality paperboard, can be recycled and that there is demand for the recycled paper fibre – ECMA feel more positive messaging would reduce consumer confusion on whether the product is recyclable, ensuring consumers continue to place the beverage cups in paper bins for recycling, enabling the paper fibre to be recovered and re-used. We would remind the Committee that paper packaging is the most recycled in Europe (more than all other packaging materials combined) at 85.6% (Eurostat 2017).

We also wish to inform the Committee, that the proposed marking requirements will place an additional financial and operational burden on manufacturers, at a time when Covid-19 is causing unprecedented challenges. Manufacturers will need to print the proposed markings in up to 15 European languages – this will increase production costs (through the requirements for additional printing plates), reduce production efficiency (through shorter production run lengths) and increase warehousing costs (through the marking in each language, needing to be held in stock).

ECMA hope that the Committee will fully consider our opinions, take into account the financial consequences of their implementation and also if proceeding, consider the use of more positive messaging (which was considered at the consultation stage) to help increase consumer understanding of recycling and in doing so ensure the quantity of beverage cups being recycled continues to increase.

Regards



Mike Turner
Managing Director