EGD, PPWD, SUPD... What does it all mean to me?

Tom Parker Chairman, Cambre Associates 11 May 2021

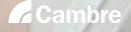


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EU agenda 2019-2024

Highly ambitious introducing a paradigm shift in EU policy

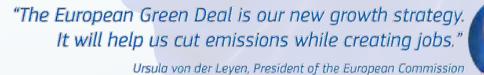
Dedicated Green Deal Commissioner

- 1. A European Green Deal
- 2. An economy that works for people
- 3. A Europe fit for the digital age
- 4. Protecting our European way of life
- 5. A stronger Europe in the world
- 6. A new push for European democracy

6 focal areas of which Green Deal is a top priority Founded on political equilibrium where shift to centre left means agenda has strong support

THE EUROPEAN GREEN DEAL

- Green Deal embeds sustainability across all EU policy fields and sectors.
- Target of climate neutrality by 2050
- Revisions of key EU legislation address different aspects of sustainability (circular economy, food waste, chemicals, industrial emissions, due diligence...).
- Aims to make all packaging in EU market reusable or recyclable by 2030.





"We propose a green and inclusive transition to help improve people's well-being and secure a healthy planet for generations to come."

Frans Timmermans, Executive Vice-President of the European Commission

The Circular Economy Action Plan



Sustainable Product Policy Framework

- •Designing sustainable products
- •Empowering consumers & public buyers
- •Circularity in production process
- •SPI initiative: review of Ecodesign Directive; Green Claims Initiative.



Key Product Value Chains / Packaging

- Reducing overpackaging & packaging waste
 Design for reusable & recyclable packaging
 Reducing packaging complexity
- Tackling microplastics
 Review of PPWD: measures on microplastics



Less Waste More Value

- •Enhanced waste policy in support of waste prevention and circularity
- Toxic-free environment
 Well-functioning internal market for secondary raw materials
- Address EU waste export
 Updates to Waste Framework Directive



Crosscutting & global actions

- •Circularity in sustainable corporate governance and environmental accounting
- •Global agreement on plastics
- •Global Circular Economy Alliance
- •Circular economy in FTAs & external policy funding



PACKAGING & PACKAGING WASTE DIRECTIVE



Packaging & Packaging Waste Directive (PPWD)

- The PPWD covers all packaging placed on the European market and all packaging waste
- It sets **recovery** and **recycling targets** that EU countries must meet, depending on the packaging material:

OVERALL TARGETS

E SERVE PACKETS

02 (2.8 G) PACKETS 1 0.8 02 (22.4 G)

- at least **65%** by weight of all packaging waste to be recycled by 2025
- at least **70%** by weight of all packaging waste to be recycled by 2030

2025 SUB-TARGETS

- 50% of plastic
- 25% of wood
- 70% of ferrous metals
- 50% of aluminium
- 70% of glass
- 75% of paper and cardboard

2030 SUB-TARGETS

- 55% of plastic
- 30% of wood
- 80% of ferrous metals
- 60% of aluminium
- 75% of glass
- 85% of paper and cardboard



Essential Requirements

- PPWD lays down the essential requirements on the composition and the reusable and recoverable including recyclable nature of packaging.
- Proposal for a revision of the PPWD will be put forward in Q4 2021, including <u>amending the essential</u> requirements for packaging
- Clearer, more enforceable, requirements revised to drive design for reuse and recyclability and prevent packaging waste

Additional revision measures :

- Requiring all packaging to be reusable or recyclable and providing an enforceable definition of 'recyclable packaging';
- Restricting the use of some packaging materials to certain applications
- Reducing the complexity of packaging materials (e.g. number of material and polymers used);
- Introducing recycled content targets for specific packaging formats;
- Introducing minimum mandatory green public procurement (GPP) criteria and targets for packaging.



PPWD: What matters to you

. Review of essential requirements

- Complex packaging & overpackaging will be addressed
- Recycled content mandatory (when safety is ensured, especially in FCM)
- Single use packaging to be avoided if suitable alternatives exist

2. Minimum mandatory GPP criteria for more sustainable packaging could be an opportunity for paper-based packaging



WASTE FRAMEWORK DIRECTIVE



Waste Framework Directive (WFD)

EU rules to ensure proper waste management, safe to both human health and the environment, emphasizing **resource efficiency and circular economy** and based on 'waste hierarchy' and 'polluter pays principle'.



Extended Producer Responsibility (EPR)

Under EPR schemes, producers have financial responsibility for the end-of-life management of products and packaging (Art. 8 WFD).

EPR schemes are implemented at national level

European Commission to develop general common minimum requirements for EPR schemes

- The roles and responsibilities of all the relevant actors involved
- Quantitative targets and/or qualitative objectives for the EPR schemes;
- Collection of data.

An important aspect of the guidance will be the **eco-modulation of EPR schemes**. Eunomia study (April 2020) suggests **possible criteria for eco-modulation**

- Recyclability;
- Recycling rate;
- Reusability;
- Recycled content

More 'environmentally-friendly' products and packaging are charged at a lower rate than those that are less 'environmentally friendly' to incentivise eco-design".

WFD: What matters to you

- Eco-modulation of EPR schemes: higher environmental standards will be introduced
 Threat for more complex packaging (e.g. multilayer mixing carton & plastics films)
 Opportunity due to the high recyclability potential of carton
- Waste hierarchy: future reviews of WFD will focus on waste prevention over recycling
 - Overpackaging should be addressed
- **New waste reduction targets** may be introduced in future revisions



PLASTICS

SUP Directive

- Introduces several measures to address marine litter (10 most found items on beaches)
- However, implementation and guidelines are extending the scope
 - Paper-based items that use polymers as a coating under scope
 - Paper- and board-based single-use products made only from paperand board-based material and without a plastic lining or coating are out of scope

1	Cotton buds	Ban on single use cotton buds made with plastic, to be replaced on the market with sustainable alternatives.
JA -	Cutlery, plates, straws & stirrers	Ban on single use cutlery , plates , straws and stirrers made with plastics, to be replaced with more sustainable alternatives.
\mathcal{O}	Sticks for balloons and balloons	Plastic sticks for balloons to be banned and replaced with sustainable alternatives. On balloons , producers to contribute to awareness-raising, clean-up, collection, waste treatment and introduce new labelling on the environmental impact of the product and recycling options for consumers.
	Food containers	Significant national consumption reduction of plastic food containers. Producers to contribute to awareness- raising, clean-up, collection and waste treatment.
Ø	Cups for beverages	Significant national consumption reduction of plastic cups for beverages . Producers to contribute to awareness- raising, clean-up, collection and waste treatment.
AND A	Beverage containers	Producers to contribute to awareness-raising, clean-up, collection and waste treatment of beverage containers ; product design requirements to attach caps and lids to beverage containers; 90% separate collection target for plastic bottles .
	Cigarette butts	Producers to contribute to awareness-raising, clean- up, collection and waste treatment of cigarette butts and other plastic tobacco product filters.
I	Bags	Producers to contribute to a wareness-raising, clean-up, collection and waste treatment of lightweight plastic carrier bags , in addition to existing measures in the existing Plastic Bags Directive.
1.10	Crisp packets/ sweet wrappers	Producers to contribute to a wareness-raising, clean-up, collection and waste treatment of plastic packets and wrappers .
CARD	Wet wipes and sanitary items	New labelling requirements for sanitary towels and wet wipes to inform consumers on environmental impact of the product and how to dispose of it properly. Producers to contribute to awareness- raising, clean-up, collection and waste treatment of wet wipes.

Microplastics

Two ongoing procedures

- 1. **REACH Restriction of intentionally added microplastics**
 - **Targeted products**: cosmetics; medical devices; paints & inks; fertilizers etc..
 - Measures: ban with some derogations or measures as labelling and reporting
 - **Timeline:** European Commission currently drafting a legislative proposal to be voted by Member States and not rejected by European Parliament and Council / new rules expected in end 2021-early 2022

2. EU Regulation to reduce the impact of unintentional release of microplastics into the environment

- **Targeted products:** textiles; tyres; pellets mainly
- **Measures**: labelling, standardisation, certification and regulatory measures
- **Timeline:** study on costs/benefits ongoing / Commission aims to adopt new measures by Q4 2024



Plastics – What matters for carton

Single-Use Plastics

- Risk that some paper-based packaging falls under the scope of SUP directive
- Risk that ban extends beyond plastics, especially if alternatives are available
- SUP Directive is not only about the ban: many other measures (EPR, separate collection, awareness raising, marking requirements, ecodesign, etc..). This may inspire action in other packaging sectors

Microplastics

New technologies (e.g. dispersion coatings) could lead to new problems (e.g. degradation into microplastics that cannot be filtered) through potential regulation of unintentional releases



ADDITIONAL TOPICS



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Farm to Fork Strategy

Aims to make food systems fair, healthy and environmentally-friendly, including **by** reducing the environmental impact of food processing and retail sectors taking action on transport, storage, packaging and food waste.



Deforestation

1. EU Forest Strategy (Q2/Q3 2021)

Encompassing the whole forest cycle with focus on **protection, restoration, and sustainable management.**

- Creating a roadmap for afforestation;
- Fostering rural development, in order to explore the multiple functions of forests;
 - Promoting innovative forest-based substitutes of products and services with high carbon footprint; Optimizing the structure and use of forests in alignment with the bioeconomy.
- 2. Legislative proposal on due diligence & deforestation (June 2021)

Policy options under consideration:

- Improved due diligence requirements;
- Benchmarking of countries;
- Mandatory public certification;
- Mandatory labelling;

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• A deforestation free requirement.

While overpackaging is a concern, packaging is also key in helping to reduce waste.



Conclusions

- 1. **Paradigm shift in EU policy requirement** driven by climate neutrality and resource efficiency objectives
- 2. Further promoting eco-design requirements for recycling and reuse
 - Reduce complexity of packaging and over packaging
 - To increase reusability & recyclability over incineration and landfilling
- **Ban of single use products** (beyond plastics) when there are alternatives and if a product can be safely sold without packaging.
- 4. **Response to (consumer) expectation** for less packaging and more sustainable solutions (especially due to increasing e-commerce)
- 5. Increasing focus on tackling deforestation & restoring biodiversity

Paper based products are well acknowledged for being a more sustainable alternative to other materials. Need to make this clear with policy makers

However, complex packaging and over packaging will be still addressed, even if paper based



Timeline

Q3 2021 Q4 2021 2024 Q2 2021 2022 2023 **SUP Directive** PPWD WFD WFD Guidelines to be Proposal Q4 2021 Assess the feasibility of Possible review of adopted end EU-wide labelling that WFD to harmonise April/early May facilitates the correct separate collection separation of packaging systems waste at source **Deforestation &** due diligence Forest strategy - Q2/Q3 2021 **Microplastics Microplastics** Restriction of Intentionally added (2021/2022)(Q4 2024) WFD WFD EPR Commission is working on guidelines to propose criteria for Possible new waste reduction targets Cambre harmonisation of EPR at national level. 2021 (delay) 2022/2023

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THANK YOU!

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