

European Environment Agency report “Effectiveness of packaging waste management systems in selected countries: an EEA pilot study”

PRO EUROPE comments

PRO EUROPE welcomes the European Environment Agency (EEA) initiative to evaluate the effectiveness of packaging waste management systems in five EU Member States (Austria, Denmark, Ireland, Italy and the UK).

Taking stock of the various packaging waste management systems in realising the objectives of Directive 94/62/EC is crucial at this time in light of 10 years of application of the Directive and the EU enlargement process, which means that some countries are making important choices on the packaging waste management system they will ultimately put in place.

However, the pilot study still lacks key data that prevents any meaningful comparative evaluation of the systems analysed, and reaching objective conclusions or policy recommendations. These shortcomings should be tackled by extending the remit of this assessment to:

- All, or at least a more representative sample of, EU Member States including those that have longer experience in running their packaging waste management systems, notably Belgium and France, as they have provided successful models for the systems implemented in a considerable number of European countries.
- Filling significant data gaps, notably on the overall costs of the system operating in Denmark.

Following review of the study, PRO EUROPE wishes make the following specific comments:

Limitations in data used

PRO EUROPE believes one of the main limitations of the EEA study is missing data. The study itself acknowledges that there is no data available for the overall costs of Denmark's system for the management of its packaging waste (chapter 5, Denmark, pg 32). This gap therefore makes it impossible to make the “*comparative evaluation*”, which the study refers to (Executive Summary, pg 5). PRO EUROPE would therefore consider the study as a broad overview of the different packaging waste management systems in place, rather than a meaningful comparison between the five models.

Moreover, the unavailability of data on costs for Denmark - the one country which does not have a producer responsibility scheme in place - prevents Danish consumers and industry from accessing key environmental information on the overall amount of money spent in the management of packaging waste in Denmark. PRO EUROPE would point to the information on the costs of the Danish system contained in the Annex to this paper.

The study also fails to take into account the results achieved by a given system since its establishment. The Austrian scheme for example had been in operation even before the Packaging Directive came into force. PRO EUROPE would suggest that the starting point of each comparison should be one year prior to the system's introduction. Otherwise, latecomers are clearly favoured, given the potential for making more significant progress during the first years.

At the same time, the study primarily uses data covering the period 1997-2001. It is unfortunate that the EEA bases many of its observations on relatively old statistics and information, particularly as Member States are currently working towards achieving the revised recycling and recovery targets covering the second 5-year phase until 2008 (taking into account the derogations granted for the EU-10, Greece, Ireland and Portugal).

Prevention

The study finds that the five Member States have focused their efforts more on recycling and recovery than on waste prevention: *"In general, the systems include a number of measures and aim mainly at increasing recovery and recycling, while efforts on prevention of packaging waste are clearly less embedded in the systems"* (Executive Summary, pg 6). However, PRO EUROPE would argue that recovering valuable materials effectively contributes to preventing the generation of packaging waste and reduces the use of natural resources in the manufacturing process in the first place. Moreover, 'Green Dot' fees based upon weight are an additional incentive to reduce packaging weight as it has been shown in PRO EUROPE's recently published brochure *Effective packaging - effective prevention*.

We would like to stress that less packaging is not necessarily more environmentally friendly. According to CEN standard 14328, prevention by source reduction can only be implemented until the critical point is achieved, due to the fact that an excessive weight reduction could risk packaging functionality which could in turn lead to higher environmental impacts.

PRO EUROPE believes that waste prevention means much more than weight reduction. Prevention means avoiding material and energy losses during the whole life cycle of packaged products, and PRO EUROPE would therefore advocate a more effective way of preventing waste which includes actions aimed at protecting products, optimising packaging and returning raw materials and energy to the production process.

Contribution of producer responsibility schemes

The study acknowledges the contribution of systems based on producer responsibility towards the fulfilment of the targets set out in the Packaging Directive. Moreover, PRO EUROPE wishes to draw attention to the main positive effects associated with the structure and functioning of these schemes, namely:

- Operation under open and transparent principles, whereby among other things the annual costs and expenditure are publicly available. The Austrian example in particular demonstrates the *"most complete cost estimate of the five countries in the study"*. As such, PRO EUROPE would contend that it is perhaps then unreasonable

to label this system “*expensive*” (pg 23) when there is not as much data on costs presented for the other countries in the study.

- Generation of sound data on packaging waste generation and waste management, providing relevant data for Member States reporting obligations and objective information for well-founded decision making.
- Contribution to raising consumers’ environmental awareness. Producer-responsibility based schemes are ideally positioned to contribute to environmental awareness programmes, both at national and international level.

Overall PRO EUROPE sees the merit of this type of policy analysis, which in principle is a valuable tool to decision makers and stakeholders. PRO EUROPE and its members therefore offer the European Environment Agency their continued co-operation and expertise in support of this goal.

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Annex

Concerning the lack of data on the costs of the Danish packaging management system, PRO EUROPE would offer the following information taken from an article in German food retail weekly *Lebensmittel Zeitung* (23 December 2004) on the total costs per packaging of the Danish deposit system. By including this data in the EEA study, it would enable a meaningful comparison to be made between the Danish model and the other systems examined in the study, which cannot be done based on the information provided presently.

According to *Lebensmittel Zeitung* (2004) the following figures applied in Denmark:

Every beverage producer/ importer pays an annual registration fee of €270 to the Dansk Retur System (Danish deposit system). The following costs are paid per item:

Logistical costs: €1, 06 euro cent

Deposit symbol fee: €0, 61 euro cent

Collection fee:

- Aluminium can, 0.33 cl €1,80 euro cent
- Plastic bottle, 0.5l €4,09 euro cent
- Glass bottle, 0.5l €6,45 euro cent

Therefore, the total costs for the 3 beverage packaging types in Denmark were:

- Aluminium can, 0.33 cl €3,47 euro cent
- Plastic bottle, 0.5l €5,76 euro cent
- Glass bottle, 0.5l €8,12 euro cent

When compared with the costs of the Austrian system for example (described as “*expensive*” in the EEA study), the Danish system would appear to be significantly more expensive, as demonstrated by the costs per material under the Austrian producer responsibility waste management system, ARA:

- Aluminium can, 0.33 cl €0,80 euro cent
- Plastic bottle, 0.5l €1,73 euro cent
- Glass bottle, 0.5l €1, 97 euro cent.