

PRO EUROPE welcomes European Commission's *'Study on Coherence of Waste Legislation'*

Brussels, 3 May 2012 -The study on coherence of waste legislation published in March 2012 by the European Commission's Directorate General for Environment and carried out by BIO Intelligence Service (BIOIS) presents a critical analysis of the waste stream Directives in contributing towards resource efficiency and a "recycling society". PRO EUROPE warmly welcomes the findings of this study, the valuable information it contains about recycling targets and the need for common definitions in all EU Directives as well as its recommendations on the importance of awareness raising, sharing of best practices and the need for adequate enforcement.

PRO EUROPE acknowledges that the packaging waste sector is an important part of waste policy, as citizens deal with this on a daily basis in one form or another. Thus, when it comes to the coherence of waste legislation, PRO EUROPE considers that harmonisation of waste legislation is not only necessary for EU waste Directives but also in the implementation phase by Member States of the legislation into national law.

The study also brings forth several important findings related to the recycling targets outlined in the Packaging and Packaging Waste Directive and the importance of enforcement. For example, increasing targets are likely to have limited benefits, particularly as newer Member States should be given the time frame to comply with the current targets. Or that packaging waste shows a relative decoupling with GDP from 1997-2007 and that in fact packaging waste in the EU amounts to 83 million tonnes per year, meaning it constitutes no more than 2,75% of total waste generated. The study also acknowledges improvements in packaging waste management as a result of the increase in the material efficiency of packaging materials. The study notes an increase in material use in the packaging sector for, among other things, plastics (40% between 1997 and 2006) and 24% for paper and cardboard in the same period. It also notes the importance of the quality of collection schemes, in order to be able to facilitate material recovery and waste management and, as such, contribute to resource efficiency.

As regards enforcement, PRO EUROPE fully agrees with the BIOIS finding that there are a number of barriers to the proper implementation of the waste stream Directives that need to be overcome in

order to achieve higher recycling levels. Examples include the definition of packaging, which differs from Member State to Member State and data reliability and measurement in each Member State.

Joachim Quoden, Managing Director of PRO EUROPE outlined that the study makes several very important findings in relation to Extended Producer Responsibility (EPR), for example increases in job creation and cost savings for local authorities. He said *“the EPR system not only contributes to increasing recycling rates while incentivising the optimisation of packaging and reduce environmental impact through eco-design, but also ensures efficient use of the financial contribution made by industry”*. Nevertheless, PRO EUROPE considers that benefits from implementing EPR can be much more, and agrees with the results of the study, which outline that benefits can be limited by a number of factors such as: differing configurations of EPR schemes and the question of who must pay the associated costs. Therefore, PRO EUROPE encourages further investigation into EPR systems for packaging, how they function, perform and their related costs – as this will help to identify best practices and further enhance its effectiveness.

PRO EUROPE also fully supports the study’s recommendations related to ensuring good quality of separate collection at the post-consumer stage and the importance of awareness raising campaigns, communication, waste separation controls and economic instruments. PRO EUROPE members are, among other things, active in the setting up of information and awareness raising campaigns with an overall purpose to encourage citizens to sort their packaging and not to litter.

PRO EUROPE remains committed to a continued dialogue and considers this study a good starting point for the continuation of work on waste management solutions.

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About PRO EUROPE

PRO EUROPE (PACKAGING RECOVERY ORGANISATION EUROPE), founded in 1995, is the umbrella organization for packaging and packaging waste recovery and recycling schemes which mainly use the "Green Dot" trademark as an identification symbol. In its primary role, PRO EUROPE is the general licensor of the "Green Dot" trademark. It also acts as the authoritative voice and common policy platform representing the interests of all packaging recovery and recycling organizations founded and run by or on behalf of obliged industry.

- PRO EUROPE has 34 member organizations active in 34 countries in 2012 of which 27 use the Green Dot, financing and / or running the infrastructure for the collection, sorting and recycling of (mainly household) packaging waste
- PRO EUROPE member organizations ensure access for over 400 million inhabitants to separate collection of used packaging
- PRO EUROPE member organizations recover yearly about 33,300,000 tons of packaging
- PRO EUROPE member organizations recycle yearly more than 3,300,000 tons of plastic packaging
- PRO EUROPE member organizations run communication and education campaigns, support anti-litter campaigns and cleaning projects