

## DRAFT GUIDELINES ON WASTE PREVENTION PROGRAMMES

### PRO EUROPE's comments

November 2009

***PRO EUROPE, the Packaging Recovery Organisation Europe, supports the need for guidelines for EU Member States on waste prevention programmes. However, we would like to recall the key contribution made by producer responsibilities organisations to waste prevention objectives.***

PRO EUROPE supports a majority of EUROOPEN's positions in its paper called "EUROPEN comments on prevention guidelines". Recycling actions have never limited initiatives of PRO EUROPE and EUROOPEN members to improve the packaging value chain, or to reduce the production of waste and optimise packaging.

Through producer responsibility schemes, producers are encouraged to optimise the packaging they put onto the market while minimizing their impact and limiting their weight.

Furthermore, each PRO EUROPE organisation translates one or more phases of this optimisation process (involving prevention initiatives and effective recycling and valorisation of packaging) for its members. Thus, producer responsibility for packaging is implemented in each country where a PRO EUROPE organisation is active.

Thus, in the first phase: "assessing the situation," countries should make a strong effort to include an inventory of producer responsibilities when developing a prevention plan. The inventory should also outline initiatives, results and opportunities for all applicable products (i.e. packaging, edible oil, batteries, WEEE etc).

Concerning the use of the CEN standard EN 13428, PRO EUROPE considers, in line with promoting producer responsibility, that the CEN standard EN 13428 can play an important role to help producers improve their packaging. However, PRO EUROPE also recommends this tool be interpreted as a guideline and stimulant rather than a legal obligation; which could introduce disastrous administrative constraints for SMEs. There are other alternatives to fulfil the essential requirements.

To conclude, PRO EUROPE insists once more on the fact that packaging is a very small part of waste and that packaging contributes to more minimization of waste than it creates. Nevertheless, PRO EUROPE thinks that its members can play an important role in contributing to optimisation of prevention actions, at European and national levels, starting from their success stories of packaging collection and recycling.

## **About PRO EUROPE**

PRO EUROPE s.p.r.l. (Packaging Recovery Organisation Europe), founded in 1995, is the umbrella organisation for the packaging and packaging waste recovery schemes which mainly use the "Green Dot" trademark. PRO EUROPE acts as the authoritative voice and common policy platform for its members, representing the interests of all packaging recovery and recycling organisations mainly using the "Green Dot".

PRO EUROPE's members span 33 countries: 26 Member States (Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and United Kingdom), 2 candidate countries (Turkey, Croatia), Serbia, Norway, Iceland, Ukraine and Canada.

The members of PRO EUROPE wish to demonstrate that the recycling of used packaging is an important step on the path towards the sustainable development that is necessary to safeguard our planet for future generations. Their work in Europe and worldwide is both successful and transparent. PRO EUROPE is headquartered in Brussels. The President is Henri Meiresonne (Fost Plus, Belgium), the General Manager is Joachim Quoden, and Pascal Gislais and Ursula Denison act jointly as Secretary Generals.

For detailed information, please visit [www.pro-europe.info](http://www.pro-europe.info)