Packaging Recovery Organisation Europe
PRO EUROPE

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Draft Final Report by Pira and Ecolas on the Study on the implementation of Directive 94/62/EC on Packaging and Packaging Waste and options to strengthen prevention and re-use of packaging

Task 1: Evaluation of the implementation of the Packaging Directive 94/62/EC

Achievements of member states against targets

p. 6-7. The averages in table 2 and 3 are ordinary averages. If the aim is to look at the European Union as a community (p.1), a weighed average would be more appropriate.

p. 13. Positive effects of the PPWD.
As the report mentions, the PPWD has changed the way packaging waste issues are addressed in Europe and it has changed the relations among the different actors in the packaging chain. These changes provide useful learning points for the management of other waste types.

Beside the effects mentioned in the report, the PPWD has lead to a strong improvement of the environmental awareness of the European citizens. Sorting packaging waste has become a daily habit for millions of European households.

Although it will be analysed in a separate study, the report should already make a qualitative reference to the positive and/or negative effects of the PPWD on the internal market and more specifically on the free movement of goods.

Environmental impacts

p. 17. It is remarkable that household paper/board collection is not included in the systems studied, since it is a collection system that is used in a lot of countries.

p. 17. From an LCA perspective, using “tonnes of packaging waste” as the functional unit is at least unusual and can be criticised. In most of the LCA studies, a number of litres or kilograms of product is used as the functional unit.

p. 20. Some assumptions don’t reflect reality, for instance considering steel recycling as steel can recycling and considering paper recycling as corrugated board recycling.

p. 39. The study assumes that in those member states in which selective collection systems were already implemented prior to the PPWD (Germany and Austria), the Directive has not had any substantial impact on the recycling and recovery results. We consider that this assumption minimises the overall positive impact of the PPWD on the whole EU. The real picture is that the majority of EU members started selective collection programmes once PPWD was transposed into their legislation.

Economic impacts

p. 44. The paragraph on quantification is not very well elaborated. This remark counts also for some other quantifications. It is doubtful that the example of UK (cost of setting up a database system) is representative for the EU-15. Also Valpak does not recognise this figure.

p. 46. It must be taken into account that the SOFRES study only gives information on four countries that cannot be extrapolated for other member states. Moreover, the information in the SOFRES study is out of date. Therefore, it is dangerous to use this study as the (only) basis for estimating the operating cost.

p. 47. The report remarks that the incremental cost of PPWD implementation is very limited, representing around 0,08% of the European GDP and 8% of the total environmental expenditure. The conclusion could be that PPWD implementation has achieved its own goals (to achieve a high level of environmental protection guaranteeing at the same time the correct functioning of the internal Market) without significant macro economical impact.

p. 48. Taking into account the comments on the assumptions and the data used, the estimated accuracy of 10% to 15% seems to be too optimistic.

p. 49. The difference in financing need between scenarios 1 and 3 (table 35) is probably underestimated.

p. 50-51. It is mentioned that the information duty is a task for the authorities. Nevertheless, most Packaging Recovery Organisations invest a lot of money in awareness campaigns and information towards the consumers.

p. 51. FOST Plus spends yearly more than 5,7 million euro on Communication and not 2580 euro, as stated in the report.

p. 51. An increase in turnover for companies that design new reusable packages leads also to a decrease for companies who are active in the design and production of one-way packaging.

p. 52. In ten Member States of the EU-15 a green dot system has been established (not eight as the report indicates).

p. 53, Table 36. As these data have not been modified in the draft final report, once again, we would like to indicate that Adelphe, ECOVIDRIO and REPA also use the green dot. Additionally, Greece (HERRCO) is missed, Valorlux also deals with industrial packaging and in UK, Valpak is responsible for municipal and industrial packaging waste.

p. 56. The indicative cost of 2.91 billion euro (based on the figures of the compliance schemes) and the comments concerning the comparison with the total financing need, clearly show that 3.7 billion euro is an underestimation of the total financing need.

p. 56. A comparison of the cost for packaging recovery with the turnover of the packaging industry makes little sense, since in most countries the companies that produce packaged products pay the recovery cost (and not the packaging industry).

p. 57. A 51% (metal) / 49% (non-metal) split-up of the recycling industry is not representative for packaging recycling. Packaging recycling is predominantly glass and paper/board.

p. 60-61. As table 39 is not very clear, it is difficult to extract any conclusion nor comment about it.

p. 63. The report is mixing two parameters that should be kept separated in the analysis: the competence to organise collection and recycling schemes and the financing of those schemes. In most countries the municipalities are in charge of the collection, but a lot of variation exists in the financing by industry. An extrapolation as suggested on page 64 would lead to erroneous results.

p. 64. The UK system is not mainly aimed at not-household packaging, but gives producers an obligation for all packaging including household and non-household.

p.64. The reasoning concerning consumer goods with an inelastic demand and the chances for a company “to pass on a substantial part of the burden to the demand side” is too simplistic. On the contrary, price competition for these products is very intense.

Social impacts

p.66. We miss a reference to the increasing environmental awareness of European citizens in which PPWD and green dot compliance schemes have played a key role.

Compare the PPWD with two scenarios

p. 72. The report suggests concentrating more efforts on packaging minimisation. Although packaging minimisation is indeed important, it should be kept in mind that packaging has a lot of functions, for instance with regard to the essential role of preventing product loss.

Task 2: Packaging Prevention

General remark. We would like to point out that any measure to be implemented in order to prevent packaging waste should be addressed in a cost-benefit perspective from the environmental and economic point of view, with the less possible administrative burden for companies and with the necessary flexibility to allow innovation.

Indicators for the environmental performance of packaging

p. 77. A PEI should also be straight forward to implement with the minimum of administration.

p. 79. It is not clear in what way eco-taxes and deposit schemes would be indicator-based initiatives.

Packaging Prevention Plans

p. 109. As the report mentions, the figures for Belgium represent only the information obtained from the individual packaging prevention plans. In fact, these represent less than 20% of the packaging. This should be mentioned more explicitly at the tables 44 and 45.

p. 110. The averages % reusable packaging (table 44) refer only to the companies with some reusable packaging. So these are not overall average tonnages.

p. 111. The preference to use a standard format to prepare a packaging prevention plan is only true with regard to individual prevention plans (not for sector prevention plans).

p. 115. The report states that an obligation to prevention plans is only justified for companies above a certain threshold level. Even for large companies the first question to be asked is what the added value of a prevention plan is.

p. 116. “This decrease of packaging waste generated might be due to the implementation of prevention measures in the packaging plans.”
This is an assumption. In those countries where Prevention Plans have been implemented, there is no information available to assert that Prevention Plans are responsible for the decoupling achieved (as in the annex 5, page 117, it is said that “the decrease of the packaging waste generation index might be the result of the Plans presented by ECOEMBES and ECOVIDRIO”). On the other hand, there are countries as Germany or France which have reached a decoupling between GDP and packaging waste, and prevention Plans have not been implemented.

Essential requirements

p. 124, third paragraph, second sentence. We would like to amend this to “Packagings are generally redesigned at least each five years …”

Producer responsibility

p. 131. Same remark as on page 63.

p. 134+136. Belgium has also a total cost system, where the fees are calculated to cover all costs of the packaging waste collection, recycling and recovery.

p. 137. In contrary to what is suggested, the Green Dot is not a symbol that is used to help people in sorting the packaging. It is a symbol that identifies the financing via a Packaging Recovery Organisation.

p. 146. It is not because the cost of recycling is incorporated in the price paid by the consumer, that this would take away the incentive for the producer. Producers will search to reduce all costs, including the material cost of packaging and the cost of compliance with the Directive.

p. 153. Section 2.6.2.2. should emphasize that there are major practical difficulties for using prevention targets in packaging prevention plans. Moreover, a distinction should be made between voluntary and mandatory prevention targets.

Task 3: Packaging Reuse

p. 159. The example of milk delivery in the UK refers to a very specific type of distribution, which is not common in Europe. A discussion on packaging type should take into account the actual distribution systems.

p. 160. The Norwegian example refers to a deposit scheme for one-way containers. This is not a re-use system.

p. 161. The report states that “single-trip packaging will be placed under pressure if consumers begin to place more value on local products and avoid imported products.” Presumably the assumption is that local products are more likely to use re-usable systems. Is this assumption based on facts?

p. 161-162. According to the German Refill Alliance, “Refillables are found to be superior in terms of economic and environmental performance in all cases, except when several specific circumstances are present at the same time. In those cases, they are mostly found to be equal.” This is a strong statement, based on the opinion of one stakeholder. The number of

references in the report to this stakeholder is not proportional to the other stakeholders' comments and opinions.

p. 167. A distinction should be made between 'return rate' and 'trip rate'. It is not because a packaging is returned, that is also re-used.

p. 167-168. The huge investment in a reusable bottle bank has also consequences on the limits to continuous innovation. One-way bottles can more easily and more frequently be adapted, integrating new technologies and new materials. This can lead to stronger packaging prevention dynamics.

p. 171. "It is claimed that 53000 jobs would be lost if reusable packaging systems disappeared from Germany." Other sources say that 10000 jobs have been lost due to the introduction of a mandatory deposit scheme for one-way packaging in Germany.