



EUBA POSITION ON THE EUROPEAN COMMISSION'S PROPOSAL FOR A REVISED PACKAGING AND PACKAGING WASTE REGULATION

The European Bioeconomy Alliance (EUBA)*, representing 14 leading European organisations from various sectors active in the bioeconomy, supports the intentions of the Commission's proposal for a revised Regulation on Packaging and Packaging Waste (PPWR)¹ to make all packaging reusable and recyclable by 2030. EUBA considers the move towards a circular economy essential and calls for a stronger support of the bioeconomy sector in the Commission's legislative proposal to deliver on the sustainability and climate goals set out in the EU Green Deal.

The **bioeconomy has the potential to provide innovative bio-based materials and packaging solutions to ensure the sustainability and competitiveness of the EU packaging sector**, all while reducing the dependency on fossil-based resources. The Commission's own Communication on Sustainable Carbon Cycles² sets out the aspirational goal that at least 20% of the carbon used in chemical and plastic products should originate from sustainable non-fossil carbon sources. Bio-based products, including packaging, sourced from renewable raw materials can contribute to reaching the EU climate neutrality targets. Despite these declared ambitions, the Commission's **PPWR proposal misses the opportunity to fully embrace the required shift to bio-based materials and processes** that is necessary to make packaging more circular and sustainable.

The proposal fails to recognise that packaging **recyclability and reusability alone are not enough** to put the packaging sector on track for climate neutrality by 2050. EUBA urges the EU institutions to accelerate the **uptake of bio-based content to the same extent as recycled content to count towards reaching the recycled content targets** for packaging set out in the Commission's legislative proposal. Such targeted measures would not only encourage the use of bio-based materials for the manufacture of packaging and reduce the need for virgin fossil resources, but also make sure the strict requirements for contact-sensitive materials can be met while making food and medical packaging more sustainable. Both bio-based and recycled content help to reduce the environmental impact of packaging by significantly reducing GHG emissions and should therefore be promoted in the same manner.

¹ European Commission (November 2022) proposal for a revised Packaging and Packaging Waste Regulation, https://environment.ec.europa.eu/publications/proposal-packaging-and-packaging-waste_en

² European Commission (2021) Communication on Sustainable Carbon Cycles, https://climate.ec.europa.eu/system/files/2021-12/com_2021_800_en_0.pdf



While EUBA supports that targets for reusable and recyclable packaging should be complementary measures, our members call for caution when setting horizontal reuse target. Horizontal targets risk replacing a significant part of renewable and recyclable packaging with non-renewable alternatives without taking into consideration long-term environmental impacts. We therefore support **reuse and refill systems only where they deliver a better environmental outcome.**

The same concerns apply to the **proposed bans on certain single-use packaging** applications, in particular packaging for food-contact applications and the agricultural and HORECA sectors. Within agriculture, the ban on single-use packaging concerning the HORECA sector is of particular concern to the sugar and dairy sectors, and a specific ban on single-use packaging foreseen for the fruit and vegetables sector must also be highlighted. Such bans would be far-reaching and stand to have not only severe negative consequences for these sectors, but also result in unacceptable risks to consumer health and to sustainability.

As such, while EUBA fully supports the goal to reduce packaging to the necessary minimum to prevent packaging waste, we are concerned that the Commission's proposal overlooks the important functional role of packaging in preventing food waste and in ensuring the strict requirements for contact sensitive applications. Reuse and refill, prevention targets and restrictions on single-use packaging applications need to be based on independent science-based proof of their respective environmental benefits and carefully assessed against hygiene, food safety, and consumer health requirements. This is in line with the Waste Framework Directive's Article 4(2) which allows to deviate from the waste hierarchy on the basis of proof of environmental benefits. Exemptions for **compostable packaging materials can provide sustainable alternatives where it is difficult to separate the packaging from the product, in particular food or food waste** as it could be an efficient way to increase the ratio of organic waste recovery and valorisation.

The Commission has taken a first step in the right direction by mandating several packaging applications to be compostable in industrial composting facilities. Compostable plastics will play an essential role in facilitating and increasing the separate biowaste collection that will be mandatory across Europe by 2024. EUBA therefore calls to make sure that the **scope of compostable applications allowed to be placed on the market and to enter organic recycling systems is not limited** but includes all applications that adhere to the strict criteria for compostable plastic packaging set out in the Annex III of the legislative proposal.



In EUBA's view, it is vital for the EU to **enable and champion innovation** to ensure the packaging sector is fit for the future while moving towards a sustainable and circular economy model. Contrary to those ambitions, however, the legislative proposal sets overly rigid hurdles for innovative (renewable) materials. It risks stifling the industry's investments into R&D of innovative materials and packaging solutions and moving those resources outside of Europe. EUBA urges EU legislators to review the requirements on recyclability and recycled content targets for innovative materials and to introduce exemptions that go way beyond the proposed 5-year derogation period in order to allow innovative materials to scale up the necessary processes and infrastructure.

As we move fully into the implementation phase of the European Green Deal, EUBA considers it crucial that key legislative initiatives, such as the revision of the PPWR, concretely and cohesively support the transition to a more sustainable circular bioeconomy. EUBA will continue to engage in the next phase of the legislative process and push for a bold and future-oriented support for the bioeconomy and its products in making packaging more sustainable.

** BioChem Europe expresses reservations on parts of this statement, which does not prevent its approval and use by the European Bioeconomy Alliance.*



European
Bioeconomy
Alliance

ABOUT EUROPEAN BIOECONOMY ALLIANCE

The European Bioeconomy Alliance (EUBA) is an **alliance of leading European organisations** representing sectors active in the bioeconomy – agriculture, forestry, biotechnology, sugar, starch, vegetable oils, pulp and paper, bioplastics, renewable ethanol, and research & innovation.

MEMBERS OF THE EUROPEAN BIOECONOMY ALLIANCE



ACE
The Alliance for Beverage
Cartons and the
Environment



BIC
Bio-based Industries
Consortium



BiochemEurope
Biomass-derived
Chemicals in Europe



CEFS
European Association
of Sugar Producers



CEPF
Confederation of European
Forest Owners



CEPI
Confederation of European
Paper Industries



COPA-COGECA
European Farmers and
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