

# PPWR Media Briefing - FAQ

Link to the [Resource Pack](#)

## Is there a problem with the way we are producing & consuming packaging?

- Each European generates almost 180 kg of packaging waste per year on average and this keeps growing driven by overreliance on throw-away packaging applications.
- Packaging is one of the main users of virgin materials: 40% of plastics and 50% of paper used in the EU is for packaging.
- In 2020, 20% of packaging waste was landfilled, 16% incinerated. The rate of packaging recycling has stagnated since 2010.
- Without action, the EU would see a further 19% increase in packaging waste by 2030.

## Why is the PPWR being revised?

- The PPWR (introduced in 1994 and last revised in 2018) failed to manage the uncontrolled growth of packaging waste: it did not limit wasteful overpackaging (e.g. even allowing double walls, false bottoms creating the impression of increased product volume purely for marketing purposes); non-recyclable packaging in the packaging mix increased; huge loss of valuable resources, vague and not enforceable requirements...
- before the publication of the PPWR, everyone (industry, EP, Council and NGOs) seemed to agree - at least in principle - with the goals of the revision of EU rules on packaging:
  - to prevent the generation of packaging waste: reduce it in quantity, restrict unnecessary packaging and promote reusable packaging solutions.
  - make all packaging on the EU market recyclable by 2030
  - reduce the need for primary natural resources and create a well-functioning market for secondary raw materials (notably plastics)

## Was the PPWR Commission proposal disproportionate/excessive?

- The PPWR proposal was not disproportionate or excessive, in fact, even if all the waste prevention measures contained in the regulation were to be fully applied, this would still not be sufficient to achieve a 5% reduction of packaging waste generation by 2030.
- The PPWR clearly indicates that Member States would have to take additional measures to meet their waste prevention targets. This also shows that any further unjustified derogations and exemptions are to be avoided.
- The reduction of packaging proposed by the EC is very modest when compared with the dramatic environmental challenges that we face. [A 5% reduction is not ambitious](#) considering the current rate of Europe's overconsumption of resources and with the rate of emissions reductions needed to meet EU climate goals.

## What happened after the PPWR publication?

- The Commission's proposal was met with an unprecedented amount of negative lobbying against the key waste prevention measures, notably the restrictions for unnecessary packaging (art. 22 & Annex V) and the reuse targets (art. 26).
- Any EU decision-maker both in the EP and in Council can confirm the massive number of meeting requests and the increasingly insistent and misleading lobbying tactics (including use of sponsored content in the main EU policy media outlets)
- These attempts to undermine key waste prevention measures were not accompanied by alternative credible solutions to tackle the uncontrolled growth of packaging waste.

## How did some key industry players use misleading or false arguments to lobby decision makers?

Over the first months of 2023 a number of misleading lobbying arguments managed to capture a lot of attention - despite not being based on a solid factual basis. Examples of **false claims**:

- "Reducing single-use packaging will drive food waste" ➡ **Debunked** [here](#)
- "Deploying reusable packaging waste will inevitably result in hygiene & health risks" ➡ **Debunked** [here](#)
- "The measures to promote reuse will endanger the investments made in recycling" ➡ **Debunked** [here](#)
- The measure puts 6.3 million employed people at risk in Italy only ➡ **Debunked** [here](#)
- Paper packaging "originates from sustainably managed forests" ➡ **Debunked** [here](#)
- The industry funded many untransparent industry studies that claimed that single-use packaging had a better environmental performance than reuse systems – this was pushed by the single-use paper industry and MacDonald's ➡ **Debunked** by [LCAs experts](#), [JRC study preliminary results](#), [Eunomia/ZWE study](#)...)
- "Disposable paper-based packaging for food as "sustainable/renewable" alternative to disposable plastics" ➡ **Debunked** [here](#)

## What has been the impact of these massive lobbying efforts from the single-use packaging industry?

- Despite having been widely debunked by NGOs and scientists and the European Commission, these false arguments have successfully influenced the [positions of the ITRE and AGRI committees](#). Noteworthy was the ideological opposition to reuse and waste prevention measures championed by several Italian MEPs with influential responsibilities over this file.
- Regrettably, this pushback from some of the laggards in the packaging industry, has not only distracted from the useful policy discussions on how to improve and strengthen the Commission's proposal, but is also succeeding – to an extent - to water down the Regulation. All the indications that we have about the compromise amendments of the EP Rapporteur MEP Ries show an overall reduction on the level of ambition (in an attempt to find the support of the center-right EPP).

- As things stand, the European Parliament is poised to significantly lower the ambition of this regulation vs the original proposal, the opposite of the normal dynamic with EU environmental legislation, Parliament has driven ambition in other Green Deal files.
- The concrete risk is not only that the EU will not offer a credible solution to stop the packaging waste crisis (and the resource depletion and pollution that it causes), but that the industry lobbying push against PPWR might set a worrying precedent for EU policy making.

### **What industry engagement with the PPWR has InfluenceMap monitored?**

- Consumer goods, paper packaging and chemicals sector have been very active
- Around 2/3 of the industry sector engagement were unsupportive of the file, which appeared to lead to a significant weakening of the EU Commission proposal in 2022
- Some waste prevention measures such as deposit return schemes gained top-line support but regulatory provisions, for example waste reductions targets at member-state level or bans on single-use packaging, were predominantly opposed
- Reuse measures were strongly opposed and have proven the most contentious element of the file - intense engagement in 2023 in opposition to the reuse targets mirror the EU Parliament Committee amendments to make reuse targets optional for the takeaway food and drink industry
- Measures to scale up recycling gained the most support across industry, over reduction and reuse elements of the file
- Consumer goods companies have been highly active (1/3 of engagement analysed by InfluenceMap), with companies like McDonald's even coordinating as part of the so-called Sustainable Packaging Alliance, an alliance of fast food and other brands to oppose prevention and reuse measures → food and drink and consumer goods companies tended to align on this file
- The chemicals sector has also been highly active (another 1/3 of engagement) on the file
- The paper packaging industry advocated for single use fibre-based packaging and recycling to be prioritized over reuse measures

### **What are the issues with toxic chemicals in single-use packaging?**

- Every day, consumers are exposed to hazardous chemicals present in packaging, particularly through disposable food packaging. This is because the chemicals used in packaging migrate and affect human health.
- This was confirmed by the largest ever human screening for toxic chemicals in Europe: the European population is exposed to alarmingly high levels of harmful chemicals, especially children. The evidence shows children and pregnant women having levels of chemicals in their bodies that are often above safe levels.
- This is having an increasing impact on public health.

## **What is the current state of legislation on chemicals in packaging?**

- There are many shortcomings related to the current regulation of chemicals in packaging. Existing rules do not ensure safe food packaging nor other packaging
- The REACH regulation, which is the main EU law to regulate chemicals, is under revision. But due to intense lobbying by the chemical industry, the revision is stalled.
- REACH and the EU legislation for food packaging do not sufficiently protect citizens from exposure to harmful substances. This is a regulatory failure
- The revised PPWR creates an opportunity to act on hazardous chemicals, as we need more ambitious / effective measures in the PPWR to control substances of concern in packaging, including food packaging.
- Better regulation of chemicals is becoming the neglected part of the circular economy package due to intense lobbying

## **What is a better and healthier alternative?**

- While McDonalds and others line their packaging with PFAS and throw into the bin, packaging by default should be designed with safe, non toxic materials and be reusable/refillable
- The industry is claiming that reusable packaging is a health-risk, this argument has been clearly debunked.
- Having complementary rules to manage toxic chemicals in sectorial legislations, especially those that regulate consumer products, is supported by the EU chemicals strategy for sustainability and supposed to help protect vulnerable groups of population like children

## **Why is paper not a sustainable alternative to plastic?**

- We use more wood than forests can provide sustainably (not just for paper but also for biomass, furniture, textile, bioplastics etc) and can be sustainably regenerated.
- European forests cannot supply all the required wood, that's why at the current trend, imports from the tropics will grow, with deforestation and other impacts.
- Pulp and paper production increased more than 33%.
- Paper industry claims that paper comes from well managed and sustainable forests in Europe - this is not accurate
- In the top paper and pulp supplying countries such as Finland, Estonia, Sweden, forests are now releasing more CO<sub>2</sub> than they can absorb! They have become a net emitter of carbon
- European forests alone cannot cope with the ever-increasing demand for disposable paper. This is why imports of wood from Brazil, Chile, Indonesia are increasing, which is eliminating the last tropical forest of Borneo and causing enormous impacts in South America.

### **Why can recycling not mitigate the overconsumption of disposable paper?**

- Recycling cannot mitigate this overconsumption, and in its turn it is prevented by packaging waste (un-recyclable waste)
- Composites layers, chemical additives, contamination by fat makes such products virtually impossible to recycle. If recycling was working, we wouldn't need to cut down 3bn trees logged every year just for packaging.
- In order to keep producing useful applications, we need to reduce drastically wasteful consumption (i.e. consumption of products that soon become waste, like disposable packaging).

### **How will PPWR affect employment in the single-use packaging industry?**

- These measures would not cause widespread unemployment: the takeaway single use packaging industry is booming and increasing its profits on an extraordinary rate, at the costs of the environment and of the communities. Bold measures will not threaten it, they can eventually contain its over-expansion.
- Furthermore, the paper industry is not increasing more jobs, it is losing them despite capacity growth, due to consolidation.
- An industry focusing on cheap mass production will succumb to its competitors in South America and South-east Asia.
- High-added-value and jobs opportunities come instead from the innovative reusable packaging industry in terms of value and jobs creation in Europe linked to the handling, cleaning and logistics of operating reuse systems

### **What role has Italy played in the lobbying efforts?**

- InfluenceMap followed corporate engagement, what they can see for Italy is Confindustria who have been very active, and in the early stages of the PPWR they opposed the revision of the PPWR, alongside other national federations like MEDEF & BDI
- Italian MEPs role: for the national allocation of rapport and shadows (ENVI, ITRE, AGRI ) Italian MEPS overrepresented and in key positions. Their work on the PPWR proposal has in most cases uncritically mirrored the request of the laggards in the single-use packaging industry n. A national system denying the need for reuse, with the false claim to say that reuse cannot work in practice and would not deliver better env. performances.
- MEP Toia clearly against restrictions for unnecessary packaging (Annex V), and reuse targets fro 2040 all simply removed, although she is from S&D and this is not necessarily part of her party line
- Question on why is Italy so adamant about this? Do you have any explanation about this? The False claims are very inflated, but the Commission showed that - even all the

available recycling capacity of Europe, even in Italy, it will not be possible to recycle all incoming packaging.

- There is also a role played by Italy's PRO Conai which directly aligned with the single use packaging industry - vehemently opposing Deposit Return Schemes and reuse.
- Another element of explanation may be that the PPWR impacts the food&drink sector, and the agrifood sector has a lot of power in Italy

### **Is there a way to assess who is winning the lobbying battle?**

- Very visible campaigns from McDonalds and single-use packaging. They have achieved some successes:
  - The reuse targets for the take away sector were deleted.
  - LCA discussions have distracted from other important aspects of the proposal.
  - Looking at the Compromise amendments now there are unnecessary derogations, exemptions here and there.
  - The entry into force of key provisions has been delayed with no justification , particularly overpackaging for marketing purposes (such as double walls, false bottoms, etc.) but at the moment the entry into force of this requirement is being delayed.
  - All these exemptions and derogations amount to small lobbying successes by various players. The Member States that are not genuinely committed to Circular economy transition are also quite successful, as continued opposition to DRS and other circular economy measures still is on the agenda
  - When it comes to substances of concern, some MEPs want to improve. The packaging industry don't have arguments to say that there is no problem with toxicity. But the Council does not like this focus on chemicals.

### **Reaction to the CONAI PR released on Monday**

- CONAI PR issued on Monday - PROs are there to take care of financial and practical management of waste, but here they are doing much more. They are defending their current operation. please note, in October 2021, Conai, McDonald's & Seda together announced that McDonalds' "by the end of 2021 will be equipped to achieve 100 percent recycling of packaging". Have we seen that implemented?  
<https://www.comieco.org/mcdonalds-seda-e-comieco-alleanza-per-la-sostenibilita/>
- Fee for disposable packaging and when it grows very fast they accumulate more money.
- The issues with the governance of PROs should be addressed in the Waste Framework Directive
- In order to enable PROs to focus more on prevention and reuse environmental NGOs have been asking for: a fund for change to earmark money for reuse, plus we asked to expand the litter clean up costs in order to help municipalities (which we all pay for) deal with street litter
- The Expansion of the pulp and paper industry at the cost of society.

## Which part of the PPWR did the plastic and chemicals industry engage with?

- InfluenceMap analysis found that the chemicals industry advocated against reuse measures as well as provisions to increase the recyclability of packaging. Actors seemed to prioritize recycling over measures to reduce or reuse packaging, including [Cefic](#) and [Henkel](#).
- Plastic recycled content targets were supported by [PlasticsEurope](#) and consumer-goods companies [Unilever](#), [Danone](#) and [Nestlé](#), although [DuPont](#) advocated for exemptions from this measure. However, the chemical sector, including companies [Eastman Chemical](#), [BASF](#), [DuPont](#), and industry associations [PlasticsEurope](#) and [Cefic](#), advocated that the targets take a flexible mass balance approach to recycled content, which would replace a traceability-based method of calculating the recycled material as it moves through the supply chain.
- The chemicals sector also opposed measures to improve the recyclability of packaging, including simplifying the complexity of packaging materials and banning certain substances of concern, including [BASF](#), [PlasticsEurope](#), [Henkel](#) and [CEFIC](#).

## Where is the suggestion of a credit based system for recycled content coming from

- It is very surprising to see a long and new introduction to the compromise amendments at this stage in the process
- Not entirely sure how this has come about but best to contact [lauriane@zerowasteeurope.eu](mailto:lauriane@zerowasteeurope.eu)

## Have you observed an evolution in the lobbying arguments?

- Next to the claim that reuse is a bad idea from an env. perspective, the new argument of the industry is that there might be job losses if we get rid of single-use packaging.
- Single use reduction indeed has a just transition angle to be taken into account. But reuse doesn't only create new business opportunities, it creates many jobs in Europe related to cleaning, logistics, etc. These jobs cannot be outsourced to other countries because cleaning etc needs to happen locally. The European Commission in its staff working document estimates that a transition to reuse will create 600.000 jobs.