

Flexible Packaging Initiative's POSITION PAPER ON PPWR

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Members of the Flexible Packaging Initiative call for the Packaging and Packaging Waste Regulation to set the right regulatory framework to enable flexible packaging circularity.

Flexible packaging is a highly efficient material providing the right level of safety, quality, product protection and preservation, thereby avoiding food waste. Flexible packaging represents 44% of post-consumer packaging in the EU. It is low in weight and has a reduced carbon footprint compared to most alternative packaging materials.

Unfortunately, flexible packaging – in particular flexible plastic packaging – is not recycled at scale in Europe. Key **obstacles** to flexible packaging being circular include insufficient collection, common landfill and incineration practices, technological challenges both for sorting and recycling and inadequate EPR schemes.

We believe that the PPWR has the potential to accelerate the transition towards a circular economy for flexible packaging and we welcome the overall ambition of the proposed Packaging and Packaging Waste Regulation. In particular **we strongly support:**

- Article 4, which stresses on the **importance of free movement of packaging across the EU;**
- Article 11.1 which sets up **harmonized sorting labels** across the EU, allowing consumers to properly sort their flexible packaging which will contribute to improving recycling rates.
- We also support the development of a **harmonised definition of 'recyclable packaging'** at EU level (article 6)
- Article 43 which mandates collection for all packaging (including flexibles)
- Article 6.11 which foresees EPR fees to be eco-modulated on the basis of the recyclability performance grade.

We think the proposal could go further in its ambition by solving some of the key barriers limiting the circularity of flexible packaging. As FPI we are asking for the PPWR to:

1. **Create regulatory certainty for Chemical Recycling.** Chemical recycling is, at the moment, the only mature technology which has the potential to recycle flexible plastic packaging, at scale, into recycled content suitable for new food contact applications. It is a complementary technology to Mechanical Recycling. As FPI members we are ready to invest and pay a premium for our packaging to contain recycled content but we need:
 - a. **The certainty that recycled content coming from chemical recycling will be accounted for in recycled content targets. For this, mass balance allocation method needs to be recognized as part of the implementing act mentioned in article 7.7.** As building chemical recycling facilities will require time (approx..5 years), the recognition of mass balance would need to happen **at the latest by 2023**, to foster investments in the technology and secure sufficient volumes by 2030 to meet recycled content targets. We also call for the timeline proposed in article 7.7 to be revised: the delegated act should be adopted at the latest 12 months after the entry into force of the regulation.

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