POSITION PAPER

Establishing an EU harmonised system to provide consumers with understandable and clear sorting instructions for packaging waste

December 2021

1. Executive summary

Objectives	1) Foster consumers' awareness on the importance of waste sorting and recycling, empowering them as key actors in the circular management of packaging waste. 2) Increase collection rates in the EU to achieve (packaging) recycling targets. 3) Protect the free movement of packaging and packaged goods within the Single Market, addressing the proliferation of divergent national mandatory labelling requirements for packaging.
Proposal	Harmonise consumer sorting instructions to boost recycling across the EU.
Strategy	Leverage forthcoming revision of the Packaging and Packaging Waste Directive to implement an EU approach.
Criteria for success	Harmonisation of sorting instruction labels; focus on symbols not written instructions; prevent accumulation of different logos; be space-conscious on-pack so as to avoid increasing packaging size.
Practical approach	Match an identification symbol put on packaging by manufacturers with symbols put on waste bags/bins by waste management operators/municipalities.

2. Objective

In order to boost a circular economy and achieve the EU (packaging) recycling targets by 2025/2030, set out in the Packaging & Packaging Waste Directive (PPWD) and Waste Framework Directive (WFD), the collection rates in the EU must increase. Alongside industry's efforts to establish a better and more efficient collection, sorting and recycling infrastructure for post-consumer waste and to continuously improve packaging eco-design, it is now essential to engage consumers to achieve this goal. This can be done by **improving the separate waste collection rate at consumer level, increasing consumers' awareness about the need to sort and recycle, making sorting easy for consumers, and including them as relevant actors in the circular management of waste**.

With this in mind, the **undersigned organisations are putting forward a concrete and actionable solution to establish an easy and understandable system for correct sorting at source[1]**. An EU harmonised labelling system that helps consumers to correctly sort their waste and at the same time avoids any barriers to trade needs to become integral to the waste management systems in EU Member States. In order to work and to be implementable on an EU-wide scale, the **system needs to be simple, cost-effective and efficient for all stakeholders**.

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[1] The position does not refer to deposit return systems (DRS).

The upcoming review of the Packaging and Packaging Waste Directive (Directive 94/62/EC) represents a unique opportunity to set common requirements on which information should be provided to consumers for sorting instructions and how this should be done in a harmonised way, including the use of digital solutions that can help provide required information without the need to increase packaging size or repackage. The PPWD review should establish an EU harmonised model for consumer sorting instructions. Alongside the harmonisation of sorting instructions, labels indicating recyclability and reusability of packaging also need to be harmonised at the EU level. The details of this B2C marking would then be established via an implementing act in form of a regulation. In parallel, the work initiated by the European Commission to harmonise separate waste collection and sorting, as required by the Waste Framework Directive (Directive 2008/98/EC), will be key to the effectiveness of harmonised labelling requirements.

3. Challenges and opportunities

With regard to sorting instructions and information on waste disposal aimed at consumers, there are several challenges that industry and consumers are currently facing in the EU:

- **Proliferation of disparate national labelling schemes and requirements in individual Member States** is already causing single market fragmentation (see Annex I). If not adequately addressed at EU level, contradictory mandatory labelling requirements will cascade across the EU, in the worst-case scenario, resulting in 27 different mandatory on-pack labels within the EU. This does not only put burden on businesses and confuses citizens, but does also have a negative environmental impact.
    - o Increasing the size of the packaging to accommodate the required information on one single packaging to serve multiple (or all) national markets, ultimately generates more packaging waste.
    - o Using several national packaging labels makes the management of stocks more complex and can lead to an increase of unsold goods, as these cannot be sent to another market. In addition, if companies want to sell these products, they will need to re-pack them with the subsequent use of additional resources, including stickers, ultimately generating more packaging waste.

- **Complexity of waste management systems in Europe**: There is no harmonised EU approach with divergent waste management systems and sorting obligations in place across different Member States and sometimes even within a specific region.

- **Little useful and often inconsistent (non-harmonised) information regarding waste disposal** (on-pack and digital) aimed at consumers.

A call for common action to improve waste management and recycling systems and their capabilities is reflected in several EU legislation and initiatives. **The ongoing and upcoming reviews of key pieces of legislation in this area** (see Annex II) **constitute a timely opportunity to effectively boost recycling by implementing an EU approach for harmonised consumer sorting instructions**, as also highlighted as **key action point in the new Circular Economy Action Plan**.

4. Harmonised EU solution

The undersigned organisations support an EU harmonised model for on-pack pictograms/symbols. It would be essential to combine such a model with an extensive pan-EU awareness-raising campaign. We believe that the approach of an actionable **identification symbol which is put on packaging by manufacturers and which corresponds to the symbols that are put on waste bags/bins by the waste management operators/municipalities** would be an efficient, simplified and workable solution for industry, the waste sector and consumers, who would just need to pair the symbols on the packaging with the ones on the waste bag/bin. This pictograms system should <u>not</u> include language sorting instructions on-pack, since this would not work as basis for an EU harmonised model due to the divergent waste management systems and sorting obligations in place in different Member States and sometimes even within a specific region.

An EU harmonised labelling approach should leverage the features of existing national schemes. As an example, the **[Danish pictograms scheme for waste sorting](#)** represents a solid concept, which could be further refined to ensure broad comprehension by consumers across the EU. This system, already rolled out in several EU Member States (Scandinavian countries), has been developed by the Danish waste facilities, is available in multipurpose designs, and also involves all key actors:

- **Manufacturers:** need to put the pictograms for identifying the product on packaging (currently on voluntary basis).
- **Waste management operators/municipalities:** need to put the pictograms for identifying the product on waste bags/bins (mandatory roll-out from 1 July 2021).
- **Consumers:** need to sort waste according to the provided pictograms.

To make sure it would work for consumers, the development, evaluation and final roll-out of such an EU system for sorting information needs to be based on **consumer testing and insights**. Based on the final system, an awareness raising campaign for consumers is crucial. Furthermore, in order to help manufacturers understand how their packaging is classified under the final system, a supporting guidance document needs to be provided.

5. Criteria for EU harmonised system

The following criteria are crucial for establishing a fully harmonised EU approach for consumer sorting instructions:

- The system needs to give **clear and actionable guidance to consumers on how to correctly sort/dispose of waste and must be easy to understand and use**, while also acknowledging that different waste management infrastructures and systems exist across EU countries and even within EU countries. Its introduction must be accompanied by the necessary awareness-raising campaigns across all Member States.

- The system needs to be **flexible enough to be rapidly adopted in all EU Member States** with their current different waste management infrastructures and systems, without creating consumer confusion when the same packaging is used in multiple countries. For this reason, concrete country-specific sorting instructions cannot be included on-pack. The ultimate goal should, however, remain the harmonisation of separate waste collection systems across the EU (to be prioritised under the upcoming review of the Waste Framework Directive).

- For an EU approach, **labels need to be harmonised** with a focus on **symbols**:

  - **Labels should not include written instructions** nor require mentioning of any country-specific information since this would defeat the harmonisation and environmental goals by requiring increased packaging size to accommodate multiple translations and could lead to unintended negative environmental consequences (loss in efficiency in production and more waste of unsold goods).

  - Notwithstanding the different colour schemes currently in place for waste management in the different Member States, harmonisation of colours could further support consumer engagement. However, an **essential precondition for the use of colours for any sorting pictograms system is the harmonisation of separate waste collection systems at EU level**, including a unified colour code for bins/bags across the EU.

  - It is key to enable the quick roll-out of the new harmonised system for sorting information and at the same time take into account the differences among Member States in language as well as colours used for waste bins/bags. Therefore, in the case of incorporation of language and/or colour, it is **crucial that the labels are available in different multipurpose designs** (e.g. black-and-white vs. colour; with language instruction vs. without language instruction; horizontal vs. vertical layout) so to ensure that the label can be easily used by the relevant stakeholders such as manufacturers, municipalities and waste operators and despite the current differences in waste systems in the EU.

- The harmonised labels should be **designed in a space-conscious way** to avoid the placing on the market of unnecessary packaging material and support the EU goal of reducing packaging waste. The labels should be also **easy to adapt to new innovations** in packaging materials, sorting and recycling.

- Rather than inventing a new scheme, **existing schemes and approaches for consumer sorting instructions need to be evaluated** to define the most suitable ones and/or how they could be taken up/combined as part of an EU harmonised system.

- In order to prevent any information overload for consumers and to provide them with clear guidance on how to dispose of their waste, it is crucial that any **accumulation of different sorting logos on packaging is prevented**. Packaging labelling requirements must be coherent across the Single Market. Therefore, an EU harmonised system would replace any existing or planned national symbols on packaging:

  - The sorting pictograms/symbols developed within an EU harmonised model would **exclude the use of any additional symbols and labels on-pack indicating (national) sorting instructions**, such as the **Triman logo**, **Tidyman**, etc.

  - Given that EPR schemes will become mandatory in all Member States as from 2024**, labels to prove the payment of EPR fees, such as the Green Dot**, would become obsolete and therefore

should also be phased out at EU level. Studies also show that the Green Dot is a quite confusing and not actionable label for consumers[2].

- The **alphanumerical codes** for material identification (provided in EU Decision 97/129) are B2B markings, not meant for information to consumers. However, these codes are also not useful for recyclers since they use sorting technology based on packaging material "reading" through NIR (near-infra red) technology, AI (artificial intelligence) or digital watermarks (currently piloted). In this case, the codes should disappear on-pack, but could for example be integrated via digital means instead of directly on-pack (e.g. using digital watermarks or QR codes).

- Any bans of existing labels should take effect with a **reasonable transition period for manufacturers to phase out existing labels on-pack, exhaust stocks and familiarise consumers and waste managers with the new system.**

- The proposed harmonised labelling system should only **apply to primary and secondary packaging** (not tertiary) as they are the only ones that reach the final consumer.

- The approach needs to **include all relevant actors clearly defining respective roles and responsibilities**: manufacturers, waste management operators, municipalities/(local) authorities and consumers.

- The EU harmonised system for on-pack sorting instructions does not exclude additional (more detailed) information provided to consumers via **digital means** (e.g. through QR codes, barcodes, digital watermarks).

- For an EU harmonised approach, a special focus needs to be put on Ireland. Since many products in Ireland are made for both the UK and Ireland, there would need to be some **flexibility for Irish products to be able to display labels that could be required by the UK** (e.g. OPRL).

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[2] "Can I Recycle This? A Global Mapping and Assessment of Standards, Labels and Claims on Plastic Packaging" published in 2020 by United Nations Environment Programme (UNEP) and Consumers International: www.oneplanetnetwork.org/consumer-information-scp

AGMPM – Association of the Greek Manufacturers of Packaging and Materials

AIJN – European Fruit Juice Association

AIM – Europen Brands Association

A.I.S.E. – The International Association for Soaps, Detergents and Maintenance Products

AMCHAM – American Chamber of Commerce to the EU

APPLiA – Home Appliance Europe

CITPA - The International Confederation of Paper and Board Converters in Europe

Cosmetics Europe – The Personal Care Association

CPME – PET Manufacturers in Europe

DIGITALEUROPE

EBPC – European Balloon and Party Council

ECMA – European Carton Makers Association

Edana – The Voice of Nonwovens

EDRA - European DIY Retail Association

EFIC - European Furniture Industries Confederation

EKO-PAK – Packaging Association, Poland

EPPA – European Paper Packaging Alliance

EUMEPS - The Association for European Manufacturers of Expanded Polystyrene

EuPC – European Plastics Converters

EUROMCONTACT – The Voice of the European Contact Lens and lens Care Industry

European Nursery Products Confederation

EUROPEN – European Organization for Packaging and the Environment

FEFCO – The European Federation of Corrugated Board Manufacturers

FESI – Federation of the European Sporting Goods Industry

FINAT - The association for the European self-adhesive labelling and adjacent narrow-web converting industries

FPE – Flexible Packaging Europe

Independent Retail Europe

IK – Industrievereinigung Kunststoffverpackungen e.V, Germany

INTERGRAF – European Federation for Print and Digital Communication

NMWE – Natural Mineral Waters Europe

Pakkaus – Packaging Association, Finland

PCEP – Polyolefin Circular Economy Platform

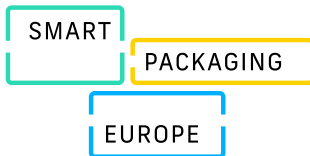**PlasticsEurope – Association of Plastics Manufacturers**

SCS – Styrenics Circular Solution

Sociedade Ponto Verde, S.A. – Packaging Recovery Organisation, Portugal

Serving Europe – Branded Food and Beverage Service Chains Association

SPE – Smart Packaging Europe

spiritsEUROPE

TIE – Toy Industries of Europe

Tobacco Europe

360° Foodservice

ANNEX I – Overview of country-specific labelling obligations threatening the Single Market and the free movement of goods across the EU

Country-specific labelling obligations are intrinsic barriers to the Single Market as they establish different, and sometimes contradicting, conditions to the marketing of packaged products in different Member States. Sorting-related marking requirements in particular either limit the marketing of the product to one specific market or forces economic operators to produce Member State-specific packaging as sorting rules differ from one Member State to the other.

Below an overview of recent national initiatives introducing country-specific labelling obligations:

France – The use of the "Green Dot" logo is penalised. However, this logo is allowed to be used in other Member States and, to date, is even mandatory in Spain. Manufacturers would need to develop country-specific packaging or use stickers to label over the "Green Dot" which implies costs of up to 20-30 cents/item, as well as contravening the principle of the Single Market.

France – There is an obligation to use the "Triman logo" and include national sorting instructions on-pack. Sorting instructions are not harmonised across the EU, hence, this information could be confusing for consumers in other Member States.

Italy – There is an obligation to use the alphanumerical codes of Decision 97/129/EC to identify packaging materials and to include sorting instructions on-pack. Sorting instructions are not harmonised across the EU, hence, this information could be confusing for consumers in other Member States. The entry into force of these requirements is 1 January 2022.

Portugal – There would be an obligation to use the alphanumerical codes of Decision 97/129/EC and to include sorting instructions, in particular the colour of the recycling bin, on-pack. It could also lead to a ban of the "Tidyman" logo on recyclable packaging. These requirements could result in specific packaging for the Portuguese market. In addition, sorting instructions and colour codes of bins are not harmonised across the EU, hence, this information could be confusing for consumers in other Member States.

Slovenia – There would be an obligation to use the alphanumerical codes of Decision 97/129/EC to identify packaging materials. The marking of the packaging material must be placed on the packaging itself or on the label attached to the packaging, and it must be clearly visible and legible.

Bulgaria – Obligation to use alphanumerical codes laid down in Decision 97/129/EC.

ANNEX II – Overview of EU legislation and initiatives

- The **Waste Framework Directive** mandates separate collection for all materials including separate bags/bins for plastic, glass, metal and paper. Derogations are possible, such as combined collection of plastics packaging, metal packaging and beverage cartons. Its upcoming review should develop harmonised criteria for separate waste collection.

- The **Packaging & Packaging Waste Directive** mandates increased packaging recycling targets per material for 2025 and 2030 (by weight for recycling)[3]. In order to achieve these ambitious targets, Member States have to ensure the establishment of EPR schemes for all packaging (household, commercial and industrial packaging) by 31 December 2024. Furthermore, it is clear that a significant rapid improvement of the separate collection of all packaging types and materials is a precondition for the achievement of the PPWD targets. The ongoing review of the PPWD must therefore tackle the harmonisation of sorting instructions.

- The **Plastics Strategy** highlights ambitious targets for plastics packaging by 2030, i.e. recycling of plastic packaging waste should achieve levels comparable with those of other packaging materials.

- The **new Circular Economy Action Plan** lists information on correct separation of (packaging) waste at source as an action point.

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[3]

	Current ones as adopted in 2008	2025	2030
Overall target	55% - 80%	65%	70%
Plastic	22,5%	50%	55%
Wood	15%	25%	30%
Ferrous metals	50% (metal)	70%	80%
Aluminium	50% (metal)	50%	60%
Glass	60%	70%	75%
Paper and Cardboard	60%	75%	85%