

# **REDUCING PACKAGING WASTE: REVIEW OF RULES - COMMENTS OF INDEPENDENT RETAIL EUROPE -**

**06 JANUARY 2021**



## COMMENTS OF INDEPENDENT RETAIL EUROPE

---

Independent Retail Europe represents groups of independent retailers. The group model allows independent entrepreneurs to assist each other, operate under a common brand and benefit from economies of scale, e.g. through facilitating joint purchasing. **Since stores are run by “locals” they know how to cater to local needs and give a “local touch”** to shopping experiences. This down-to-earth style of doing business also makes our members **especially responsive to consumer demands**, e.g. for more sustainability in the food chain.

**We commend the Commission’s persistent efforts to reduce packaging waste in the Single Market.** Many Member States have already taken a number of measures in this area, in particular deposit systems, not only for beverages, but also for, for instance, fruit and vegetable trays, and bans on the use of plastic bags (e.g. in Germany the retail sector has reduced the use of plastic bags by 70 % since 2015). Apart from national regulation, there have been voluntary efforts by retailers in different Member States in this area which are giving very good results and proved to be more successful than regulatory measures, for instance with regard to reusable palettes and crates.

Our members, too, have made great strides in reducing product packaging over the past years. While further improvements are certainly possible, we would like to note the **continued importance of adequate packaging** in both the food and the non-food sector. When discussing packaging solutions, **logistics and hygiene aspects, the availability of affordable alternative sustainable packaging, food waste prevention, and adequate consumer information** should always be taken into account.

In the food sector, the **shelf life of certain fresh food products can be greatly extended** thanks to the sensible use of thin plastic wrappers, a **crucial factor in reducing food waste**. Recent years have seen new innovative solutions become market-ready. Our members are among the **early adopters of innovative alternatives to plastic packaging, such as natural branding and natural, edible coatings**. The testing and acceptance of such products for all types of perishable fruits and vegetables could reduce the need for packaging of these products.

Since the beginning of the **COVID-19 pandemic**, our members have noted **increased demand for packaged fresh foods**, as consumers reduce the number of store visits and stock up on food. At the same time, unpacked goods that are handled by customers directly, are more likely to be contaminated by the novel coronavirus and other infectants. The importance of **packaging as a hygiene measure** is often overlooked.

Beyond preventing waste, packaging also enables retailers to meet regulatory requirements as it plays a **vital role as a carrier of information to consumers** such as traceability requirements and in distinguishing organic food from conventional products. The ever-increasing amount of mandatory labels and other information is contributing to larger-than-necessary packaging. If packaging is to be further reduced, this could be achieved with **more flexibility on digital labels**.

Another important role of packaging is the **protection of the products during their course through the supply chain**. Too little or too feeble packaging leads to more product waste in transport and warehouses.

Whilst considering the reduction of certain types of packaging, the availability of suitable, safe and sustainable alternative packaging solutions should always be taken into account. **Packaging products should therefore be evaluated on their purpose with regard to their content and their merit for that purpose, as well as available alternatives. General prohibitions and taxation should be avoided.**

**Ultimately, it is the responsibility of the industry to improve packaging materials and design and enable its cost-effective recycling and reuse.** There are still too many types of non-recyclable packaging or types of packaging that require specific, individual and expensive collection and recycling processes. Retailers are doing their part by promoting more sustainable choices and as points of collection. Our members stand ready to push for further reductions in superfluous or environmentally harmful packaging.

With regard to the use of **recycled food contact materials, we believe EU law needs to be refitted and fully harmonised. More flexibility in the marketing codes for food packaging products would help increase the use of recycled materials.**

As a first step, **the remaining potential of mechanical recycling should be further explored.** As a second step, options for chemical recycling can be considered. **Better use should be made of marker-based sorting systems.**

Concerning biodegradability, we fully support the harmonisation of EU legislation and standards in this field. In particular, **sustainability criteria and separate collection systems where needed, should be developed.**

We also note that what is recycled and how differs drastically, not just from one Member State to another, but even among municipalities. This is why we **expect universal labelling obligations to be complicated to implement and enforce.** Such obligations should therefore be **preceded by a harmonisation and upgrade of collection and recycling systems** across the EU to allow for better separation and recycling of ingredients in different types of packaging. This implies that some Member States will have to increase their recycling capacities quite significantly. To promote cross border trade and avoid territorial supply constraints due to packaging constraints, it is also important that **packaging requirements and recycling systems are harmonised across the Single Market.**

**It should be noted that whilst efforts are made to reduce packaging waste all along the supply chain, online sales are increasingly leading to more use of packaging and consequently, packaging waste.**

We look forward to engaging productively in the upcoming discussions on the review of packaging rules as part of our shared ambition to create a more sustainable European Single Market.

- ➔ **Discussions on reducing packaging waste should always take logistics and hygiene aspects, the availability of affordable, sustainable alternatives, food waste prevention and consumer information into account;**
- ➔ **Packaging products should be evaluated on their purpose with regard to their content and their merit for that specific purpose, as well as available alternatives. General prohibitions and taxation should be avoided;**
- ➔ **More flexibility on digital labels will allow for smaller packaging sizes;**

- ➔ **Manufacturers should be incited to develop and market more recyclable packaging that retains its qualities after recycling;**
- ➔ **Recyclable food contact materials: EU law needs to be refitted and fully harmonised;**
- ➔ **More flexibility in the marketing codes for food packaging products would help increase the use of recycled materials;**
- ➔ **Raising and upgrading recycling capacity across the EU is key. Harmonisation of packaging requirements, collection and recycling systems across the Single Market should precede the introduction of new universal labels;**

Original version: English – Brussels, 06 January 2021

Established in 1963, Independent Retail Europe is the European association that acts as an umbrella organisation for the main groups of independent retailers in the food and non-food sectors. Our members are groups of independent retailers, associations representing them as well as wider service organizations built to support independent retailers. Independent Retail Europe represents 24 groups and their 380.980 independent retailers, who manage more than 757.000 sales outlets, with a combined retail turnover of more than 971 billion euros and generating a combined wholesale turnover of 291 billion euros. This represents a total employment of more than 6.486.000 persons.

Find more information on [our website](#), on [Twitter](#), and on [LinkedIn](#).