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## POSITION PAPER ON THE PROPOSAL ON THE PACKAGING AND PACKAGING WASTE REGULATION

**PETCORE EUROPE welcomes the European Commission proposal** on the Packaging and Packaging Waste Regulation (PPWR), which aims to prevent the generation of packaging waste and to make all packaging on the EU market recyclable by 2030, as well as to increase the use of recycled plastics in packaging. In order to achieve such goals, the Commission intends, among other things, to promote reusable and refillable packaging solutions with mandatory targets.

**PETCORE EUROPE is supportive of the Commission's objectives** in the framework of the circular economy as well as of the decision to change the legislative instrument from a Directive to a Regulation, which will ensure a better and more harmonized implementation across the Member States. As regards PET, it is the most used plastic for soft drinks and water bottles as well as the most recycled plastic in Europe and worldwide. PET bottles and containers are highly recyclable which is a major contribution to the Circular Economy. PET bottles are made of one of the few polymers that can be recycled into the same form – a new beverage bottle – again and again. Additionally, the PET value chain has pioneered the so-called Design for Recycling Guidelines<sup>1</sup> in order to encourage packaging designers, converters and users to integrate certain criteria during the development phase of a new product in order to facilitate PET recycling.

Although **PETCORE EUROPE welcomes the Commission's objectives and approach, we would like to share our experience and highlight our concerns regarding the following PPWR aspects that would affect the PET sector.**

Firstly, even though the PET industry supports the PPWR's approach in scaling-up reuse systems in addition to recyclable packaging solutions, **undifferentiated reuse quotas should be looked at objectively and with caution.** Legislation should be evidence-based and always favor the least complex, most environmental-friendly, and most recyclable packaging solution. In this regard, what concerns us the most is the absence of a proper impact assessment taking into account all the essential elements that are related to reuse and refill, including environmental and economic implications such as weight of the packaging, sales channel, transport distance and efficiency, water use for cleaning purposes and recycled content. Without a thorough analysis of all these elements, there is no guarantee that the proposed measures will have the desired benefits. Hence, **any shift to reuse needs to be a managed transition considering the many changes required to the different supply chains.**

Secondly, **the Commission's proposal relies on a significant number of delegated and implementing acts that will be developed and adopted in the next few years.** This inevitably creates uncertainty towards the exact impact and obligations of the proposed measures and, as a consequence, generates

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<sup>1</sup> [epbp.org](http://epbp.org)

a certain level of ambiguity among market operators, which will inevitably bring to a decrease and lack of investments.

Thirdly, PETCORE Europe welcomes the dispositions proposed by the PPWR aimed at enhancing and increasing separate collection in the Member States as an essential tool to increase recycling at scale. However, **we would have appreciated more ambitious and specific targets for some valuable materials like PET trays**, which are very relevant tools for the sustainability of the food sector.

Considering the above, **PETCORE EUROPE asks the Commission and the co-legislators**, which are currently analysing and amending the proposal, **to carefully assess all the elements mentioned above before moving forward with the adoption of reuse and refill targets**. Particularly, we deem it very important to carry out a **more in-depth impact assessment** to make sure that the claims made in the PPWR proposal will actually bring the desired outcomes. In conclusion, PETCORE Europe would like to stress that PET is a valuable resource in the framework of the circular economy. In this context, PET needs to be collected, sorted, recycled and increasingly incorporated as a recycled content in new packaging material so that it can strongly contribute to the EU's decarbonization objectives.

**PETCORE EUROPE** (formerly Petcore - PET CONTAINER RECYCLING) is the association based in Brussels representing the complete PET value chain in Europe, from PET manufacture to conversion into packaging and recycling, and other related activities. The association is at the forefront of working with all stakeholders to ensure the sustainable growth of PET as a packaging material of choice, and also to further increase post-consumer PET collection and recycling.

#### **About PET:**

PET is the most used acronym for the polymer poly ethyleneterephthalate. It belongs to the family of thermoplastics, those that can be melted when heated and hardened when cooled.

PET is hygienic, strong, resistant to attacks by micro-organisms, does not react with foods or beverages, and approved as safe for contact with foodstuffs and beverages by the European Food Safety Authority and virtually all other health-safety agencies in the world.

PET is a remarkably energy-efficient packaging material, with an environmental impact that is much less than other container materials. As PET is very strong yet lightweight, it allows more product to be delivered with less packaging, less weight, and less fuel for transport. These factors help explain why life cycle studies of PET have consistently shown it to be a highly sustainable material with a positive environmental profile, compared to other packaging solutions.