

## UNESDA – AIJN

### Comments on Notification 2021/612/I

#### Italy – Draft Legislative Decree implementing Directive (EU) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment

UNESDA-Soft Drinks Europe and AIJN (representing the European fruit juice industry) are highly supportive of the Italian draft decree 2021/612/I, as currently notified under the TRIS procedure, and in particular of Article 6 paragraph 4 which foresees that *“In order to achieve the objectives referred to in subparagraph 3, the systems established pursuant to Article 9(1) shall ensure that the post-consumer material is returned to the producers for beverage bottles listed in Part F of the Annex, defining the percentage share to be returned and the corresponding methods of return”*.

Such a mechanism would facilitate our sector’s access to the recycled content required to meet our EU obligations. Indeed, according to the EU Single-use Plastics Directive (SUP Directive, n°2019/904), our sector must achieve the following recycled content targets:

- at least 25 % recycled plastic in PET bottles by 2025
- at least 30 % recycled plastic in PET bottles by 2030

In addition, as per EU legislation, recycled content for food and drink packaging applications must comply with strict health and safety requirements: recycled content used in our packaging must be of “food grade quality”.

However, despite setting binding targets for our sector, the current EU legislation does not foresee any mechanism that would facilitate our access to the recycled content required to meet those obligations.

**We therefore strongly support Art.6 Paragraph 4 of the Italian Decree which provides a solution to this legislative gap.**

Indeed, the beverage industry, as a whole, will only be able to meet the mandatory EU targets and its additional voluntary targets if it is able to get access to the necessary high quality recycled content.

**We therefore recommend to the European Commission to reject any claim that this article would not be in line with European law and the SUP Directive itself. On the contrary, this article is a necessary inclusion that will allow the beverage industry to meet the targets set by the SUP Directive.**



We would also encourage the Commission to reject any claim that this article could violate competition rules: The article provides for a particularly fair system as beverage producers should only be offered the equal amount they have originally placed on the market and which was successfully collected. If some of this material is not needed, it can then be sold in the free market and be made available for other non-food applications.

#### [About UNESDA Soft Drinks Europe](#)

Established in 1958 UNESDA Soft Drinks Europe is a Brussels-based association representing the European soft drinks industry. Its membership includes both companies and national associations from across Europe producing drinks including still drinks, squashes, carbonates, powders, iced teas, iced coffees, syrups, energy drinks and sports drinks.

[www.unesda.eu](http://www.unesda.eu)

#### [About the European Fruit Juice Association \(AIJN\)](#)

AIJN is the representative association of the fruit juice industry in the EU. It defends the interests of the juice industry including the entire value chain and promotes the sector by engaging with the EU Institutions and other relevant stakeholders.

[www.aijn.eu](http://www.aijn.eu)