

Efficient waste collection schemes, closed-loop recycling and access to recycled content are crucial to accelerating the transition to a circular economy in Europe

Brussels, 3 May 2022: Europe's non-alcoholic beverage industry, represented by the European Fruit Juice Association (AIJN), Natural Mineral Waters Europe (NMWE) and UNESDA Soft Drinks Europe, together with leading NGOs, including Changing Markets Foundation and Zero Waste Europe, call on EU decision-makers to create the right enabling policy framework to help accelerate the transition to a circular economy in Europe. These organisations underline the need to ensure resource-efficient waste management systems to enable close-loop recycling¹. They also call for a "priority access", or a similar mechanism that guarantees a "right of first refusal" to beverage producers to facilitate their fair access to the food-grade recycled materials coming from the products they placed on the market and which were successfully collected.

The EU Circular Economy Action Plan has the ambition of accelerating the transition to a circular economy. This will require significant changes in the way we collect, reuse, recycle and incorporate recycled materials. Achieving fully closed and resource-efficient waste management systems for all materials should be the primary objective. The more closed-loop a system is, the more resource efficient it will be by delivering quality recycled materials which can be re-used multiple times for the same application. Therefore, for each sector, the ultimate goal should be to achieve «closed-loop recycling». With the right enabling policy framework this can be achieved.

Patricia Fosselard, Secretary General of Natural Mineral Waters Europe (NMWE), comments:

"For beverage bottles, the first elements of such an enabling policy framework already exist with the introduction of mandatory separate collection and recycled content targets in the EU Single-Use Plastics Directive. However, it is clear today that a number of additional policy measures are needed for beverage producers to be able to meet those EU targets and move further towards a closed-loop system."

The main policy conditions that should be created are:

- **mandatory minimum requirements² for Deposit Refund Schemes (DRS)** to facilitate the roll-out of efficient waste collection schemes and the achievement of the EU 90% separate collection target;
- **a mechanism that grants beverage producers fair and necessary access** to the recycled

materials deriving from the beverage containers they put on the market and which were successfully collected. This way, these materials can be used again as recycled content for new beverage packaging. This legal mechanism to guarantee a “right of first refusal” to beverage producers will enable them to comply with the mandatory EU targets for the incorporation of recycled PET (rPET) and ideally meet their more ambitious voluntary pledges (e.g. UNESDA’s Circular Packaging Vision³ of achieving 50% rPET in 2025 and 100% in 2030 and NMWE’s commitments⁴ to achieving 50% rPET by 2030) towards fully circular packaging.

- a **harmonised definition of high-quality recycling⁵ and, based on this definition, a ranking of recyclability classes.** In such ranking, the highest position (priority) should be attributed to packaging that does not pose any recyclability issues and the recycled material can feed a closed-loop scheme and allows further recyclability of the same quality (for example, food-contact) when reaching their end-of-life.

Nicholas Hodac, Director General of UNESDA Soft Drinks Europe, adds: *“Recent reports⁶ have illustrated that post-consumer recycled PET from beverage bottles is increasingly used by non-food sectors (textiles, automotive, etc.) to boost their environmental sustainability credentials. This means that bottles are being recycled (“downcycled”) into other, lower grade applications. The new material created as a result of this process will no longer be recyclable for food grade applications. ‘Breaking the loop’ (a loss from the circular bottle stream) goes against the very principle of circularity. In addition, it also creates an unfair situation because food and drink producers are obliged to comply with strict EU health and safety requirements for food contact materials⁷.”*

A priority of upcoming EU legislation should be to look beyond beverage containers and enable the creation of closed loops for all products and packaging applications. The revision of the EU Packaging and Packaging Waste Directive, as well as the new Sustainable Products Initiative, the Recycled Plastics Regulation and the Sustainable Textiles Strategy - all offer great opportunities to achieve this.

The [EU Strategy for Sustainable and Circular Textiles⁸](#) acknowledges that a growing source of concern is the accuracy of green claims on textile made on using recycled plastic polymers where these polymers do not come from fibre-to-fibre recycling but from sorted PET bottles. *“Beyond the risk of misleading consumers, such a practice is not in line with the circular model for PET bottles, which are fit for being kept in a closed-loop recycling system for food contact materials”,* according to the strategy. In addition, the Strategy adds that textile businesses should be encouraged to *“prioritise their efforts on fibre-to-fibre recycling and rather make claims on achievements to address this important challenge in closing the loop for textile products.”*

Joan Marc Simon, Executive Director of Zero Waste Europe, says: *“It is time to raise EU ambitions and define “high-quality recycling”⁹. Introducing such a definition in the EU legislation will incentivise investments in recycling infrastructure and foster resource efficiency across the whole production of products and packaging materials.”*

According to AIJN, Changing Markets Foundation, NMWE, UNESDA Soft Drinks Europe and Zero Waste Europe, **the shift towards truly circular products and packaging can only be successful if each producer invests in the design for recyclability, collection and incorporation of its own (recycled) materials, without free-riding on others’ efforts.**

Food and drinks producers are already investing heavily into separate collection to enable good quality material to be recovered. It is time for everyone to play its part.

Note to Editors

The position paper on access to recycled content by AIJN, Changing Markets Foundation, NMWE, UNESDA Soft Drinks Europe and Zero Waste Europe is accessible [here](#).

¹ Process in which post-consumer waste is collected and recycled preserving the value of the material so it can be used again to make the same product category it came from with minimal loss of quality or function.

² For more information, please read [this](#).

³ Find out more about UNESDA Circular Packaging Vision 2030 [here](#).

⁴ Learn more about NMWE’s commitments [here](#).

⁵ Currently, high-quality recycling is mentioned in the framework legislation, namely the Waste Framework Directive (e.g. Article 11 – Preparing for reuse and recycling and 11a - Rules on the calculation of the attainment of the targets); the Packaging and Packaging Waste Directive (e.g. Art. 6a - Rules on the calculation of the attainment of the targets) as well as the Single Use Plastics Directive which contains an explicit reference to high-quality recycling for beverage bottles (Preamble 27) and the recently adopted Implementing Decision 2021/1752 on calculation, verification and reporting of beverage bottles (Preamble 5).

⁶ “How circular is PET?” – report available [here](#).

⁷ Accessible [here](#).

⁸ The EU Strategy for Sustainable and Circular Textiles is available [here](#).

⁹ High-quality recycling could be defined as: “Recycling that ensures that the distinct quality of the material (the polymer, or the alloy, or the glass, or the paper fiber) is preserved or recovered so as to ensure they can be re-used in products with the same market value (compared to the correspondent virgin product) and allows further recyclability of the same quality when reaching their end-of-life. Such “distinct quality” should include, for example, food-contact quality /suitability.”

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About the European Fruit Juice Association (AIJN)

AIJN is the representative association of the EU fruit juice industry since 1962. AIJN promotes and defends the interests of the industry, from fruit processors to packers of consumer products, by engaging with EU Institutions and other relevant stakeholders. www.aijn.eu/en

About Changing Markets Foundation

The Changing Markets Foundation was formed to accelerate and scale up solutions to sustainability challenges by leveraging the power of markets. It works in partnership with NGOs, other foundations and research organisations to create and support campaigns that shift market share away from unsustainable products and companies and towards environmentally and socially beneficial solutions. <https://changingmarkets.org/>

About Natural Mineral Waters Europe (NMWE)

Natural Mineral Waters Europe represents almost 550 natural mineral and spring water producers in Europe, most of them small- and medium sized companies. NMWE is dedicated to promoting the unique qualities of natural mineral and spring waters as well as sustainable use of water resources and circular economy. www.naturalmineralwaterseurope.org

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

About Zero Waste Europe

Zero Waste Europe (ZWE) is the European network of communities, organisations, local leaders, experts, and change agents working towards the elimination of waste in our society. It advocates for sustainable systems and the redesign of our relationship with resources, to accelerate a just transition towards zero waste for the benefit of people and the planet. Created in 2014, the ZWE network now includes 33 members from 28 European countries and works with topics across the whole chain. www.zerowasteurope.eu