



UNESDA statement on the publication of the revision of the EU Packaging and Packaging Waste Regulation

Brussels, 30 November 2022: UNESDA Soft Drinks Europe takes note of the European Commission's publication of the revision of the EU Packaging and Packaging Waste Regulation (PPWR), which was released today. Our sector is fully committed to the objective of accelerating the transition to a circular economy, which is why we have set out a number of very bold commitments in [our Circular Packaging Vision 2030](#).

Nicholas Hodac, Director General of UNESDA Soft Drinks Europe, comments: *"The published proposal is ambitious and contains several important enablers for Europe's journey towards increased collection and recycling, and the integration of more reuse. However, further improvements are necessary to support our sector in achieving full circularity and integrating more reuse."*

Particularly, the proposal needs to urgently address the issue of downcycling of food-grade materials into non-food-grade applications. It currently fails to include a priority access mechanism or right of first refusal that grants fairer access to the necessary amount of recycled content to those sectors that are required to use food-grade materials to comply with EU food safety requirements. This is a key enabler for further promoting closed-loop recycling, while preventing downcycling of food-grade recycled materials. Sectors that are not required to use food-grade materials must also be incentivised to invest in efficient collection and recycling systems that can achieve true circularity for their own products.

In addition, the proposal places reuse targets only on the beverage sector and on each of its manufacturers, distributors, and in each Member State. The PPWR needs to take into account the huge diversity of economic operators in the beverage sector, the different sizes of the companies and the different types of consumption experiences of Europeans. Indeed, many businesses may become unsustainable due to an ineffective use of recycling technology investments, which will be made redundant with the necessary additional reuse investments in each country. The proposal also does not state how the circularity of recyclable beverage packaging, achieved through mandatory investments in deposit return schemes, will be protected.

There is also lack of evidence that the proposed approach for reuse targets will lead to the intended environmental outcomes. That's why we reaffirm the need for the targets to be based on a thorough environmental and cost impact assessment to ensure that reusable beverage systems are only put in place when and where they make the most sense for our environment and are cost-efficient.

We are looking forward to engaging with the European Parliament and the Council of the European Union so as to ensure that the legislative framework builds the right enablers for our sector to move towards full circularity of beverage packaging in Europe.

Note to Editors

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About UNESDA Soft Drinks Europe

Established in 1958, UNESDA Soft Drinks Europe is the Brussels-based trade association representing the non-alcoholic beverages sector. Its membership comprises of 10 companies and 23 national associations from across Europe. UNESDA members are involved in the production and/or distribution of a wide variety of non-alcoholic beverages including still drinks, carbonates, fruit drinks, energy drinks, iced teas and sports drinks. UNESDA's policy priorities are sustainability (e.g. beverage packaging, collection, recycling), responsibility (e.g. sugar reduction, school policies, marketing practices towards children and labelling) and competitiveness (e.g. taxation, market access).

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