



## Industry-NGO coalition calls on Member States to enable closed-loop recycling and support mandatory DRS in the Packaging and Packaging Waste Regulation

**Ahead of the finalization of the Council's General Approach on the EU Packaging and Packaging Waste Regulation (PPWR), Natural Mineral Waters Europe (NMWE), The Minderoo Foundation, The Reloop Platform, UNESDA Soft Drinks Europe and Zero Waste Europe call on Members States to:**

- 1. Maintain the obligation to set up Deposit Refund Systems (DRS)**
- 2. Enable closed-loop recycling with the support of a priority access right to certain recyclates**

First, as recognized by the European Commission in its proposal, and by the European Parliament in its text adopted in November, DRS have a key role to play in achieving a circular economy for beverage packaging. European countries with long-established DRS (such as the Nordics) usually report collection rates up to 95% and countries that have recently implemented DRS (Latvia, Lithuania, Slovakia and Malta) already see high collection rates, going up to 90%.

Given current collection performances in other parts of the EU, many Member States are unlikely to achieve their EU collection targets without setting up a DRS. As an example, in France, [research shows](#) a 60% collection rate for PET bottles, with limited ability to get to the 77% requested by the EU Single-Use Plastics Directive by 2025. The absence of well-performing collection schemes in every Member State would jeopardize the EU recycling and recycled content targets.

DRS are one of the most efficient options for meeting those targets but also for creating a closed-loop recycling system ensuring the material collected can be recycled in new beverage containers.

Indeed, DRS have not only delivered high collection rates for beverage packaging in countries where they are in place, but they also have the benefit of providing high-quality food-grade recycled material in a clean single stream. They can contribute towards the EU's climate objectives by reducing the need for virgin materials thanks to closed-loop recycling.

Another important factor is the widespread consumer support for DRS. For example, surveys found 92% of the French public support its introduction, and in Slovakia, 83% support rose to 89% after the DRS was introduced<sup>1</sup>.

**For those reasons, we call on Member States to maintain the obligation to set up a DRS in each Member State and to only provide exemptions based on similar very high collection rates achieved by other EPR schemes.**

This is the only way to ensure high collection rates are achieved in every single EU Member State. Removing this obligation would be accepting a status-quo where too much beverage packaging ends up being littered, not properly collected and therefore not recycled or reused as it should.

Then, our organisations would like to express their **support to the amendments adopted by the European Parliament and related to the development of a mechanism of preferential access which enables closed-loop recycling.**

<sup>1</sup> FR source: Ipsos, *Les Français et la Consigne des Emballages de Boissons*, April 2023

SK source: *Správca zálohového systému, How is DRS Doing So Far? – Survey*, December 2022



In particular we support **amendments 102, 266 and 341** as they provide critical enablers to support industry in meeting its recycled content targets and enable the closed-loop recycling of packaging, whenever it makes sense and is technically feasible.

We are aware that the development of a definition of high-quality recycling and the references to closed-loop recycling systems in the text have generated concerns from other industries for which closed-loop recycling is not necessarily feasible at the moment or even environmentally beneficial. However, we are convinced that enabling closed-loop recycling, whenever it makes sense, by providing packaging producers with the possibility to access the recycled material that would allow it to be used again in the same or a similar application is key.

It is indeed the only way to:

- give the sectors covered by the scope of the recycled content targets a fair access to sufficient recycled materials to actually be able to meet the targets;
- avoid downcycling, whenever preserving the quality or value of the material through closed-loop recycling makes more sense from an environmental and circular point of view, and is technically feasible;
- incentivise all sectors to invest in collecting and recycling their own materials;
- reduce the environmental impact of the recycling process by achieving significant reductions in carbon emissions from the continuous recirculation of material resources.

**We therefore call on Member States to integrate in their General Approach a mechanism of priority access right which would enable closed-loop recycling.**

**Signatories:**

- Minderoo Foundation
- NMWE – Natural Mineral Waters Europe
- The Reloop Platform
- UNESDA – Soft Drinks Europe
- Zero Waste Europe