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Position Paper
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Third position paper on the Packaging and Packaging Waste Regulation (PPWR)

EUMEPS, the Association of European Manufacturers of Expanded Polystyrene fully supports the objectives of the new proposal Packaging and Packaging Waste Regulation to prevent and reduce the adverse impacts of packaging on the environment and health. Ensuring the continued sustainable and responsible use of Expanded Polystyrene (EPS) is part of our mission. The environmental advantages of EPS over potential alternatives have been demonstrated in multiple comparative studies, such as life-cycle analyses (LCAs). Over the years EUMEPS has been actively engaged in developing and sharing best practices and offering sustainable solutions for the EPS industry. EPS is the most widely applied foam plastic widely used for the protection of people and sensitive goods. It is a lightweight, highly versatile material, composed of 98% air, which significantly reduces the amount of resources needed to produce the material which results in a reduction of the carbon footprint of EPS products. Mostly applied in mono-material packaging applications, EPS is excellently recyclable. In most Member States actual recycling rates of EPS packaging already exceed 50%, often based upon separate collection systems. EPS post-consumer packaging is in fact recycled in practice and at scale in Europe in accordance with the criteria defined by the Ellen MacArthur Foundation and has been so since before 2017.

The EPS value chain is committed to further improve the recycling rates and recyclability. In order to further increase EPS recycling rates, EUMEPS has collaborated with RecyClass, and we have developed Design for Recycling guidelines for EPS packaging applications. Most EPS and fish box packaging currently in use already comply with class A (full compatibility).

Also, compared to alternative packaging materials, such as paper, cardboard, glass, or metal, EPS packaging is energy efficient. The low energy consumption during the manufacturing process, related to the low density of the material, 98% air, reduces greenhouse gas emissions, and contributes to a diminished carbon footprint.

While welcoming the overarching goal of the Regulation, we are concerned that some parts of the draft amendments might lead to undesired adverse effects, ultimately undermining the environmental objectives of the Regulation. EUMEPS has already raised issues with the policymakers regarding **Article 26** and the **safety and environmental concerns** posed by setting unrealistic targets for reusable packaging for large home appliances and food contact transport packaging.

The proposed compromises which are introducing separate targets by 2030 and 2040 would not solve the problem. In addition, the initial target of 90% by 2030 was based on an impact assessment that lacks proper analyses stemming from the fact that our sector had neither been contacted, nor involved, while being directly referenced.

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Therefore, we are calling on policymakers to support the ITRE report that introduced the ability to use well-established methods which provide a science-based approach to assessing the more sustainable option, as outlined below:

- *ARTICLE 26.15b): Economic operators shall be exempted from the obligation to meet the targets in this Article, if reuse is not the option that delivers the best overall environmental outcome on the basis of a life cycle assessment, in line with the waste hierarchy as defined in article 4 of Directive 2008/98/EC, and without prejudice to requirements on health, hygiene and safety.*

From statement above, as an immediately affected party, the EPS packaging sector would like to explain the critical points towards policy makers prior to its next steps on the file.

1. **(Article 26, par.1) - Requirements for the reuse should be achievable and avoid the risk of encouraging the complex and long-distance return of empty packaging, which would be inconsistent with the overall goal of reducing CO2 emissions**. While the intention is to promote sustainability and reduce waste, the stringent requirements for reuse could have unintended consequences. Therefore, reuse targets outlined in Article 26 present a significant challenge, particularly in the case of large household appliances. Many electronic products have the packaging moulded to reduce the packaging needs;- however, designing reuse packaging would require more material usage as packaging could no longer be "tailored" to the specific application. EPS packaging solutions are not pre-made and stored in inventory; instead, they are custom-manufactured on-demand, following the principles of Just-in-Time (JIT) production. The consequence of mandatory re-use would be a multiplication of packaging warehouse storage volumes. For short transport distances specific B2B cases, re-use systems are already widely used for packaging. However, transporting goods from point A to point B presents numerous challenges. The rigors of the journey, including vibrations from trucks and varying road conditions, train wagons colliding, makes it necessary to have transport packaging that can withstand all these different real-life (transport) scenarios. Therefore, the dimensions of this EPS packaging are adapted and tailored to fit the specific means of transportation, such as trucks, ship containers, or trains, and altering these dimensions or modifying packaging weight for reusability could have adverse climate implications, reducing equipment capacity in comparison to the current setup. Furthermore, take-back systems for reusable packaging may have a significant impact on the climate due to the extensive backward logistics that would have to be organised to factories throughout the EU and worldwide.

2. **(Article 26 par. 12 and 13) - Sanitization and safety Challenges for reusable packaging:** Reusable packaging requires thorough sanitization between uses, which can consume significant amounts of water and energy. Reverse logistics and cleaning and maintaining reusable containers can sometimes outweigh their eco-friendly advantages. Even when cleaned, questions remain about hygienic aspect of re-use systems, particularly for EPS packaging used in applications involving contact with food and sensitive items. Striking a balance between sustainability goals and essential hygiene and safety standards is crucial. The current global context, as exemplified by the COVID-19 pandemic, underscores the importance of maintaining high standards of hygiene and food safety, emphasizing the need for practical, adaptable, and well-defined criteria in setting reuse

targets. In the pursuit of environmental protection, it is essential to ensure that these targets are not only sustainable but also conducive to a healthy and safe environment for consumers.

The production of durable reusable (composite) packaging materials which also have the necessary cushioning and insulating properties, such as paper, cardboard stainless steel, or glass, often involves higher energy consumption and emissions compared to single-use mono-material EPS alternatives. It takes a significant number of trips for reusable packaging to offset this initial impact.

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About EUMEPS

EUMEPS, the unified European voice of the Expanded Polystyrene (EPS) industry, is the premier advocate for EPS solutions. Representing every link of the EPS value chain, from large companies to SMEs, we are committed to fulfilling European environmental objectives. Through our 23 national associations and numerous recycling initiatives, we strive to elevate the circularity of our industry.

As a contributor to making Europe climate-neutral and resource-efficient, we showcase EPS as a smart choice in packaging and insulation. Stand by us in building a more resilient and sustainable tomorrow. www.eumeps.eu .