

Guidance on how to address packaging and packaging waste in the context of the European Commission Product Environmental Footprint methodology

The packaging supply chain's perspective

On behalf of the packaging supply chain, EUROPEN – The European Organization for Packaging and the Environment –, welcomes the European Commission's Product Environmental Footprint (PEF) methodology¹, and is pleased to contribute to the ongoing stakeholder discussions on the development of PEF Category Rules (PEFCRs). EUROPEN supports the European Commission's objective and efforts to achieve harmonized and clear environmental information for consumers to make better informed choices, based on a life-cycle approach, in line with the objectives of the Resource Efficiency Roadmap².

The packaging supply chain has a proven track-record in continuously improving the environmental performance of packaging for packaged products. By effectively protecting and preserving products on their way to the market, packaging is part of the solution to reduce products' overall environmental footprint (e.g. by avoiding damage and spoilage). This demonstrates the positive role of packaging in the product sustainability performance through its whole life cycle, also taking into account that the share of packaging in the (packaged) product environmental footprint is generally low compared to the product itself.

Packaging is one of the focus areas since the very early days of life-cycle assessments (LCA). The packaging supply chain has strived to develop harmonized life-cycle approaches and agreed on a common basis to assess packaging in a consistent and holistic manner in LCAs. Based on the experience and expertise of its membership, comprised of multinational corporate companies spanning the packaging value chain (raw material producers, converters and brand owners), EUROPEN has developed key recommendations on how to address packaging for packaged products in the future development of all PEFCRs by the European Commission:

EUROPEN's recommendations:

- 1. EUROPEN recommends using the existing guidance for packaging in life cycle approaches instead of developing additional rules like PEFCRs for packaging.** The packaging supply chain has established comprehensive LCA guidance (see references below) constituting an appropriate framework to consistently address packaging for packaged products in life cycle approaches including the Product Environmental Footprint. In view of these achievements, EUROPEN does not see the rationale for packaging specific PEFCRS.
- 2. EUROPEN recommends recognizing the interlinked relation between product and packaging as central element in delineating category rules for products.** Based on numerous LCAs (see references below), EUROPEN can demonstrate that packaging needs to be addressed in the context of the packaged product as the product determines the functionalities which packaging has to provide e.g. in order to prevent damage and product loss.
- 3. EUROPEN recommends improving the coherence and consistency of rules to address the specificities of raw materials along the material life cycle, regardless of whether they are used as packaging or for other purposes.** In view of established sectoral guidance (see references below), EUROPEN can demonstrate that any further harmonisation on the level of packaging depends heavily on coherence in the material supply chain.
- 4. EUROPEN recommends enhancing data quality and availability for life cycle phases where data is currently lacking.** A key learning of EUROPEN is that consumption patterns and consumer behaviour have a large impact on the environmental performance of products and thereby on the size of the Product Environmental Footprint.

¹ The European Commission's recommendation can be found at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:124:FULL:EN:PDF>

² The Commission Roadmap to a Resource Efficient Europe can be accessed at http://ec.europa.eu/environment/resource_efficiency/pdf/com2011_571.pdf

These recommendations are based on the following achievements by EUROPEN member companies through various multi-stakeholder initiatives, which should further serve as a reference framework for the European Commission to consistently address packaging for packaged products throughout all future PEFCRs:

- The Global Protocol on Packaging and Sustainability^[1], developed and released in 2011, which represents a milestone towards a harmonized LCA approach for packaging and sustainability in terms of data and information exchange throughout the global packaging supply chain.
- EUROPEN Guidelines^[2] on how to communicate LCA environmental information in a Business-to-Business context through the packaging supply chain, which provides a common approach towards the use and the communication of LCA results.
- Being one of the founding members of the EU Food Sustainable Consumption and Production Round Table, EUROPEN actively contributed to the development of a harmonized tool, the ENVIFOOD Protocol^[3]. The protocol establishes a clear framework to deal with packaging in the context of food and drink products, while ensuring that provisions and specification are in line and fully applicable for the packaging value chain.
- The recent UNEP/SETAC initiative on life-cycle assessment also provides recommendations for LCA practitioners and policy makers for packaging in food & beverage applications and provides a synopsis of ISO compliant packaging LCAs.
- The CEN Report, CEN/TR13910 on Packaging^[5] - Report on criteria and methodologies for life cycle analysis of packaging, revised in 2010, offers valuable best practice guidelines for undertaking those aspects of life cycle assessment specific to packaging and distribution systems.
- Although not specifically LCA-based, the harmonized suite of CEN Standards (see references below [5]) provide a demonstration of conformity with the Essential Requirements of the EU Packaging and Packaging Waste Directive. An equivalent suite of ISO Standards is currently being reviewed for their suitability to replace the existing CEN Standards. Both these suites of standards are extensively referenced in the Global Protocol on Packaging and Sustainability described above.

For these reasons, EUROPEN believes that packaging needs to be consistently addressed, as part of the product, in the future development of PEFCRs by the European Commission and not as a separate product group or category.

EUROPEN members remain willing and prepared to offer their expertise and practical knowhow to support the European Commission in building the single market for green products.

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EUROPEN, the European Organization for Packaging and the Environment, is an industry association based in Brussels presenting the opinion of the packaging supply chain in Europe, without favouring any specific material or system. EUROPEN members are comprised of multinational corporate companies spanning the packaging value chain (raw material producers, converters and brand owners, using packaging materials) plus five national packaging organizations all committed to continuously improving the environmental performances of packaged products, in collaboration with their suppliers and customers. www.euopen-packaging.eu

References:

Achievements of EUROPEN and its member companies through multi-stakeholder initiatives:

- [1] Global Protocol on Packaging Sustainability 2.0, The consumer Good Forum, 2011. Available here: http://globalpackaging.mycgforum.com/allfiles/GPPS_2.pdf
- [2] Guidelines how to communicate LCA environmental information, B2B, through the packaging supply chain, October 2012. Downloadable here: <http://www.euopen-packaging.eu/downloads/1133.html>
- [3] ENVIFOOD Protocol, Environmental Assessment of Food and Drink Protocol, Version 1.0, EU Food Sustainable Consumption and Production Round table, 20 November 2013. Available here: http://www.food-scp.eu/files/ENVIFOOD_Protocol_Vers_1.0.pdf
- [4] An Analysis of Life Cycle Assessment in Packaging for Food & Beverage Applications, UNEP/SETAC Life Cycle Initiative, 2013. Downloadable here: http://www.lifecycleinitiative.org/wp-content/uploads/2013/11/food_packaging_11.11.13_web.pdf
- [5] CEN standards on packaging:

CEN Report CEN/TR13910:2010 Packaging - Report on criteria and methodologies for life cycle analysis of packaging

The current suite of harmonized CEN Standards, EN 13427 – EN 13432 provide a demonstration of conformity with the Essential Requirements of the Packaging and Packaging Waste Directive (94/62/EC). See:

- CEN 13427, Requirements for the use of European Standards in the field of packaging and packaging waste
- CEN 13428, Requirements specific to manufacturing and composition – Prevention by source reduction
- CEN 13429, Reuse
- CEN 13430, Requirements for packaging recoverable by material recycling
- CEN 13431, Requirements for packaging recoverable in the form of energy recovery, including specification of minimum inferior calorific value
- CEN 13432, Requirements for packaging recoverable through composting and biodegradation – Test scheme and evaluation criteria for the final acceptance of packaging