



EPR Congress 2022

Event Report

Organised by EXPRA with the support of CONAI

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Executive summary

↪ **Changing an efficient and successful system is counterintuitive**

EPR systems across Europe have been successful in achieving the targets for recycling set at European Union level, proving their reliability in adapting EU legislation to the local context and in liaising with different actors. Some countries, namely Italy and Belgium, have even achieved the targets before they were due, despite the very different systems they set up at national level.

↪ **EU harmonization wave needs to acknowledge and promote diversity that delivers**

The two-day event highlighted the need for harmonization between EPR systems on various levels:

- a. Harmonization of data gathering and consequent improvements in transparency, which will in turn allow further development in data analysis and comparison.
- b. Harmonisation of criteria to fund and to support countries lagging behind.
- c. Creation of a central platform or authority to improve sharing of best practices and effective solutions.

However, harmonisation would be counterproductive if incorrectly applied to individual PRO's recyclability targets and EPR systems' structure:

- d. PRO's targets: the performance of each PRO depends on the amount of packaging it has to deal with and its market share. It would therefore be counterintuitive to set the same target for two PROs that deal with completely different contexts. Targets set at national level would instead be more effective, as the national government can directly liaise with the local PROs and implement the most effective strategy for the regional context.
- e. PRO's structure: the national set up of each EPR organization has developed over time, adapting to the national context and addressing the local challenges as needed, in close coordination with the national authorities. In the European Union, these systems have proven to work, and it would therefore be costly and inefficient to replace them with new systems which are not proven to be successful.

↪ **EPR systems setting the example in the international arena: OECD and UNEP speaking**

EPR systems are a success story of how a single concept can be effectively adapted and applied to different local contexts. This is the characteristic that more than anything else makes the European example applicable to different international contexts, as it involves a high degree of flexibility but also efficiency.

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Panel I: Packaging waste, EPR and EU legislation

👉 Speakers:

- 👤 Joachim Quoden (EXPRA Managing Director, EU)
- 👤 Luca Ruini (CONAI President, Italy)

👉 Key messages:

- European waste collection and recycling systems developed very differently since 1990, as responsibilities were allocated according to regional and national particularities. The European Union has been trying to create a common framework since the publication of the first European Packaging Directive in 1994, but it is a difficult task given the great differences existing at EU level.
- In Italy, a private organization has been asked to take over a public role and has been able to deliver excellent results so far, achieving the best results in Europe in many areas related to waste collection and recycling. CONAI has dealt with a complex and fragmented national context, and has adapted to the regional needs. Italy could therefore be considered a best practice at EU level, but such a model does not grant the same results for other regions/areas. Different contexts call for different solutions to be implemented.
- One way to harmonise different systems is to measure performance and gather data in a unified format, which would in turn lead to more transparency, allowing a clearer image of the systems that work and the ones that in turn need to be improved.

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Panel II: The importance of diversity among EU EPR business models

➔ Speakers:

- 👤 Chris Sherrington ([Eunomia](#), UK)
- 👤 Federico Bruno Pontoni ([Bocconi University](#), Italy)
- 👤 Michael Fanta ([CETA](#), Czech Republic)
- 👤 Oliver Bretz ([Euclid Law](#), UK)
- 🗣️ Moderator: Joachim Quoden ([EXPRA](#), EU)

➔ Key messages:

- Harmonisation is essential for European EPR schemes to properly function in the EU common market. Despite the need for PROs to adapt the schemes to the local context, taking into consideration the socio-political and economic context, the European framework requires harmonisation. Harmonisation can happen at various levels: reporting, relationship setting between producers and industry, structure. It is important to have an harmonised set of fees and recycling standards to be able to create comparisons between PROs. This helps also to set positive examples and regulate competition.
- Competition for procurement of services is important to ensure a fair ecosystem, especially when PROs have to compete and dialogue with other sectors. Antitrust laws can help ensure a fair playing field.
- Strategic investment is more difficult to be implemented in a complex and differentiated framework, as investors have less control/understanding. The challenge can be addressed by instituting a central register and a strategic investment fund. Moreover, a central authority might help coordinating the various systems, increasing transparency and data sharing, as well as guaranteeing competition and homogeneity.
- Potential (in)efficiencies brought by vertical integration of EPR systems: it is difficult to offer input and access other PROs for customers. Regulation is needed where there is significant market power in some sector, as vertical integration becomes impossible when a PRO has too much control in the market. For example, in Czech Republic the vertical integration of PROs is not permitted, as polarised power in the market would put in difficulty other industries.
- Transitioning to circular economy means that in the future there will be not waste, but rather resources.

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Panel III: Local best practices from EXPRA members

👉 Speakers:

- 👤 Luca Ruini ([CONAI](#), Italy)
- 👤 Wim Geens ([Fost Plus](#), Belgium)
- 👤 Mario Schembri ([Green Pak](#), Malta)
- 👤 Alexander Urmanov ([Ecopack](#), Bulgaria)
- 👤 Jaana Roine ([Grønt Punkt Norge](#), Norway)
- 👤 Moderator: Francis Huysman ([Valipac](#), Belgium)

👉 Key messages:

Examples of how EPR systems have developed in each country as a consequence of their national specificities (i.e., geographic, economy, importance of municipalities):

- **Green Pak, Malta:** A cooperative non-profit system was set up, where every producer is partly owner of the system. Green Pak considers this model as being effective in Malta as it increased transparency and consumer trust. Moreover, the profits are being redirected to improve the efficiency of the system, for example by installing the so-called “iBiNs”, which are able to identify in real time how full they are and signal a central data service advising when the bin needs to be emptied. This technology allowed to increase packaging collection by 49%.
- **Fost Plus, Belgium:** Since 2019, they introduced the so-called “New Blue Bag”, which allows packaging to be sorted in five high-tech sorting centres in Belgium, two of which are already operating (all sorting centres are scheduled to be up and running by 2025). The roll-out of these new sorting centres will allow 80% of plastic to be recycled on Belgian territory. In 2020, the Blue Bag system allowed to recycle almost 95% of all household packaging waste, therefore proving the effectiveness of this system in Belgium. Additionally, they are currently investigating the introduction of a QR code that could be applied to every packaging solution and should be scanned by the consumer, therefore transferring the packaging cost directly to every consumer.
- **Ecopack, Bulgaria:** The EU needs to recognise the fact that the starting point of EU countries is not the same. Establishing a level playing field across Member States would be more encouraging and motivating, in comparison to unreasonable targets set at EU level that do not mirror the national/regional real-life situations. Bulgaria is currently lagging behind compared to other EU countries, and is therefore aiming at setting up the DRS system by 2025 to reach EU objectives. Moreover, they are setting up training centres in the capital as they believe that teaching young people good practices will lead to greater and faster results in the future.

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- **CONAI, Italy:** Italy has been achieving all EU targets for the collection of all materials before time. The system can be further improved, especially minding the situation in the South and investing in skills and competences. As the system is already efficient and effective, it would be counterproductive and expensive to replace it from scratch with a DRS system, that would on top require new infrastructure to work.

➡ **Additionally:**

- All stakeholders demand more clarity in how EU collecting and recycling targets are set, as having and communicating the correct data is key for transparency and for implementing the right solutions.
- With energy becoming increasingly more expensive, PROs are having more and more difficulties competing on the international arena, and are being forced to export more to southern Asia due to cheaper energy. Higher energy cost also mean that many recycling centres are being forced to close.
- DRS system have proven to be a good solution in countries with low recycling rates, where they successfully managed to improve the local situation. However, they would not give the same results everywhere, and this system should not be forced in countries like Belgium and Italy which are already (over)achieving EU targets.
- We expect PPWD to act on online sales.

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Roundtable I: Balancing packaging circularity with climate ambitions

Speakers:

- Zbynek Kozel ([Ekokom](#), Czech Republic)
- Lucie Charbonnel ([Ceflex](#), Europe)
- Helmut Schmitz ([Der Grüne Punkt, Duales System Deutschland](#), Germany)
- Piotr Barczak ([European Environmental Bureau](#), Europe)
- Moderator: Claude Turping ([Valorlux](#), Luxembourg)

Key messages:

- Importance of promoting not only a circular economy, but also slow cycles, in order to save energy, material and the quality of the material, which inevitably goes lost in the recycling process. For this reason, it is important to have long-lasting materials and incentivise prevention.
- It is critical to promote local consumption and reuse, in order to reduce from the start the amount of chemicals used in the products and the pollution that derives from transport. However, local consumption and reuse is not easily implementable or feasible everywhere, as European countries not only have diverse systems in place, but they are also geographically different and there are therefore different logistics distribution costs.
- Packaging reuse is a complex topic because of its primary function, as to say to protect the good. This is particularly challenging especially when the packaging is destined to protect food, as it has to comply both with environmental standards while also making sure to effectively protect a good. In this case, continuous study and innovation is fundamental. Moreover, many stakeholders agreed on the need to carry out analysis in a transparent way to set up clear, mandatory targets for reuse, as voluntary measure would not be effective.
- Chemical recycling: there is a need for more legislative certainty for European industries to understand where to invest. There is much confusion around the role that chemical recycling can have, as on one hand it offers an effective and fast way to recycle even complex materials while maintaining their quality, but on the other hand it is an energy-intensive industry with a big carbon footprint, and should therefore be chosen only when no other options are available.

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Roundtable II: EPR models in action – adaptability outside the EU

👉 Speakers:

- 👤 Paul Christiaens ([Afvalfonds Verpakkingen](#), The Netherlands)
- 👤 Gloria Gabellini ([Global Consumer Forum](#), global)
- 👤 Feng Wang ([UNEP](#), global)
- 👤 Peter Börkey ([OECD](#), global)
- 👤 Axel Darut ([CITEO](#), France)
- 👤 Moderator: Alessandro Bizzotto ([CONAI](#), Italy)

👉 Key messages:

- EPR systems are a success story of how a single concept can be effectively adapted and applied to different local contexts. This is the characteristic that more than anything else makes the European example applicable to the international context, as it involves a high degree of flexibility but also efficiency.
- International organizations are currently supporting governments of developing countries in creating a legal basis to strengthen municipal waste management. In a second moment, this could translate in the implementation of EPR systems. However, this instrument can become truly effective only when sided with effective policies for circular economy, reuse and recycle, as well as product design. Finally, many developing countries are currently lacking the needed trust between industry and government that makes the implementation of EPR systems possible.
- Mexico and India are two countries which are increasingly improving their waste collection systems, starting from companies voluntary setting up PROs and collecting a limited amount and type of materials at first.
- The definition of “EPR system” has been kept very broad on purpose, both to not risk focusing only on one single product, and especially to allow them room for improvement and experimentation, including unusual but potentially effective solutions.
- For a good implementation of existing EPR systems and new potential ones, the essential elements are transparency and efficient data gathering, substantial funding, increased communication and exchange of solutions/best practices across Europe and beyond.



EXPRA is the alliance of 30 packaging and packaging waste recovery and recycling systems - Producer Responsibility Organisations (PROs) - active in 18 EU countries as well as 11 non-EU countries including Chile, Turkey and Canada, which are owned by obliged industry and work on a not-for-profit basis.



CONAI is the Italian, private non-profit consortium within which packaging producers and users ensure that they achieve recycling and recovery targets of packaging waste provided for by law. For more than 20 years, CONAI has served as an effective system for the recovery, recycling and valorisation of steel, aluminium, paper, wood, plastic, bioplastic and glass packaging materials.