

Packaging proposals present big challenges

The European Union (EU) is committed to creating a more sustainable and resource-efficient economy and the food industry is one of the key sectors that will need to act if that vision is to become a reality. **Sebastian Emig** discusses the challenges and opportunities faced by the savoury snacks sector in the transition to a circular food system, focusing in particular on the proposal for a new Packaging and Packaging Waste Regulation (PPWR)

A CIRCULAR food system is an approach that focuses on minimising waste and maximising resource efficiency in the food system, from production to consumption. Of course, ESA's members have already been working hard to design products, packaging and supply chains to be more sustainable. After all, it makes sense to reduce waste and pollution and to increase the use of renewable resources - provided we can do it without impacting adversely on the safety and quality of the food we produce.

The savoury snacks sector is a major player in the food industry and will inevitably play a significant role in Europe's transition to a circular food system. The sector produces and distributes a wide range of products and also contributes to packaging waste, since many snack packs are made from single-use plastics.

One of the main challenges for the snacks sector is the need to balance sustainability with affordability and convenience. Consumers are increasingly concerned about the environmental impact of the products they buy, but they also expect snacks to be inexpensive and easy to access. This means that our sector needs to find ways to reduce the environmental impact of its products without compromising on food safety, quality, affordability, or convenience. That's quite a juggling act.

Packaging waste is a significant problem across the entire food system and it poses a particular challenge for the snacks sector, which relies heavily on flexible packaging. The current review of packaging waste



legislation aims to increase the recycling and reuse of packaging materials, reduce the reliance on single-use plastics and tackle packaging waste. This presents an opportunity for the snacks sector to redesign its products and packaging to be more sustainable and to invest in recycling infrastructure and technologies.

However, while manufacturers will continue to invest resources to develop more sustainable packaging solutions, our ambition to achieve efficient circularity for flexible packaging cannot happen without the support of services and infrastructure to properly collect, sort and recycle these materials. Unfortunately, that support is sadly lacking across the EU today.

Current barriers to recycling processes and technologies such as chemical recycling are also hampering the development of innovative solutions.

REALISTIC TIMEFRAMES

Redesigning flexible packaging requires time and involves important financial and human resources. Ultimately, most packaging will need to comply with 'design for recycling' guidelines. However, companies will need clarity and sufficient

transition time well ahead of any implementation. We believe the Regulation should grant at least five years to comply with 'design for recycling' criteria (the countdown should begin from the date of adoption of the delegated acts, which are the instruments that bring the guidelines into force). The same approach should be taken for the 'recyclability at scale' criteria.

We also need to make sure that any effort made so far is not wasted. Some savoury snacks manufacturers are already involved in research programmes and consortia at European and international levels to develop more sustainable packaging options and work on recyclability. This includes everything from packaging design, collection and sorting to the development of reprocessing infrastructure.

We therefore recommend that in the case of flexible packaging, the recycling criteria should be based on existing harmonised standards such as those developed by The Circular Economy for Flexible Packaging (CEFLEX) initiative.

CEFLEX includes information and practical advice on designing polyolefin-based flexible packaging to be recyclable, covering the key elements of a flexible packaging structure. This includes setting limits on specific materials and elements to enable designers to maximise the sortability and recyclability of flexible packaging.

The proposed regulation stresses that Member States shall ensure systems are set up to provide for the return and separate collection of all packaging waste from the end users. We agree that the obligation for ►

Member States to ensure separate collection of all packaging waste is an instrumental prerequisite for achieving recycling targets and meeting recyclability requirements, including recycled content targets. However, we believe that this provision should go a step further and mandate the collection of all packaging that meets 'design for recycling' criteria. Furthermore, landfill and incineration of such packaging should be banned.

The introduction of harmonised labels should help to boost the collection and sorting of different packaging materials. Moreover, to further stimulate the recycling of flexible plastic packaging, the contribution paid by manufacturers under Extended Producer Responsibility (EPR) schemes for this material should be clearly earmarked and directed to contribute to increased and improved waste collection and management infrastructure for this specific packaging type.

CALCULATION CONUNDRUM

The way that the recycled content of packaging is calculated could pose a big problem. At the moment, the proposal suggests it could be calculated 'per unit packaging', rather than 'per economic operator', effectively giving companies zero room for manoeuvre.

Industrial, technical and economic constraints can push companies to integrate more recycled content into some formats than others or in some production lines

than others. A target on each packaging unit would considerably reduce this flexibility and the ability to optimise manufacturing operations.

There is no evidence that having a target on each packaging unit leads to a better environmental impact compared to having it calculated on the basis of an average per operator. In addition, forcing companies to maximise their use of recycled content on each packaging unit, including the most affordable brands, would lead to a general increase in prices and a disproportionate impact on the availability of affordable products for consumers.

We believe that the 'average per operator' approach can deliver the same overall increase in recycled content and send strong signals to create a secondary raw material market. Simultaneously, it would offer the benefit of giving the necessary flexibility to companies to allocate recycled content more dynamically, based on packaging suitability and the availability food-grade recycled materials in the market. A target set at the packaging unit level could not offer any of that.

We will be advocating strongly for our concerns to be properly addressed before the Packaging and Packaging Waste Regulation becomes law. With that proviso, we fully support the objective of achieving circular food systems and believe that the European Commission's proposal could represent a big step towards a circular economy for packaging - including flexible plastic packaging. It would make a significant

contribution to the European Union's climate neutrality goal and Green Deal objectives.

However, the desired results - especially in the case of flexible packaging materials - will not happen without the development of related services and infrastructures, as well as the removal of barriers to the necessary recycling processes and technologies. Without these changes, many parts of the food industry, including the snacks sector, could be impacted severely.

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Director General Sebastian Emig*
*in his capacity as permanent representative of Prime Consulting BXLBCN SL

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