

Leatherhead Food Research

Understanding the EU regulatory landscape
for food packaging recycling logos

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23 March 2022



Agenda

1. The global problem of food packaging waste
2. Strategies for reducing food packaging waste
3. The current EU regulatory landscape
4. Creating chaos: The absence of harmonised EU recycling logos
5. The way forward

The global problem of food packaging waste



The importance of food packaging for the food industry

Food packaging is an essential part of food products, it:

- Protects food from damage
- Preserves food, therefore extending the product shelf life, and therefore reducing food waste
- Enables transport food over great distances
- Displays important information (both mandatory and voluntary) about the food product, such as nutritional contents, claims or allergies
- Advises on consumption/cooking methods



Types of packaging materials

- Plastics, such as polyvinyl chloride (PVC), polyester, polyethylene & its varieties (PET, HDPE, LDPE), polystyrene (PS) and Polyamides
- Metals such as steel, tin and aluminium
- Glass
- Wood, cardboard and paper

Disposing of food packaging

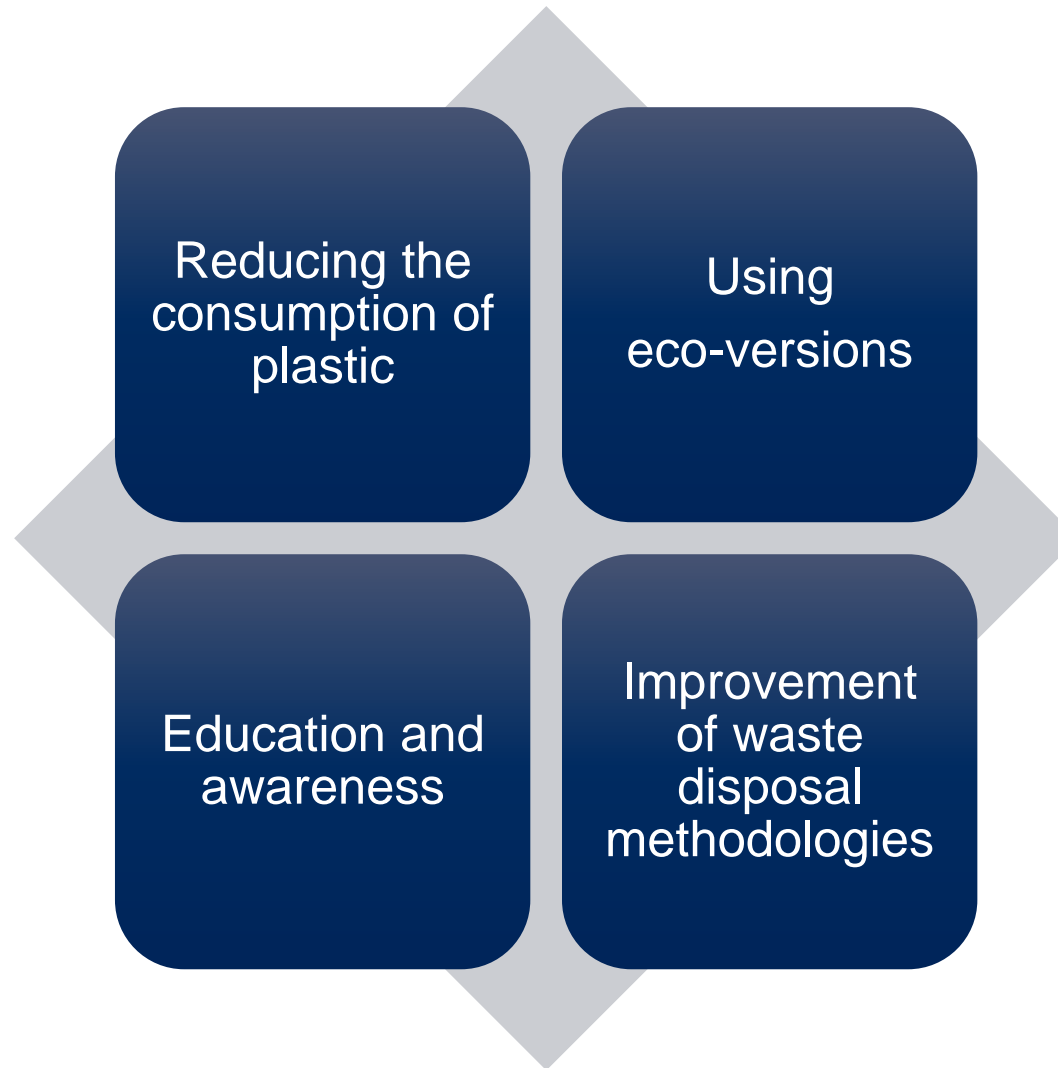
- We are disposing of tonnes of packaging materials (including plastic, paper, tin and glass) each year
- Globally we produce approximately 300 million tonnes of plastic waste every year
- In 2019, it was estimated that 177.4 kg of packaging waste was generated per inhabitant in the EU
- Approximately 7 billion of the 9.2 billion tonnes of plastic produced from 1950-2017 became plastic waste, ending up in landfills or dumped



Global strategies for reducing food packaging waste



Strategies for reducing food packaging waste



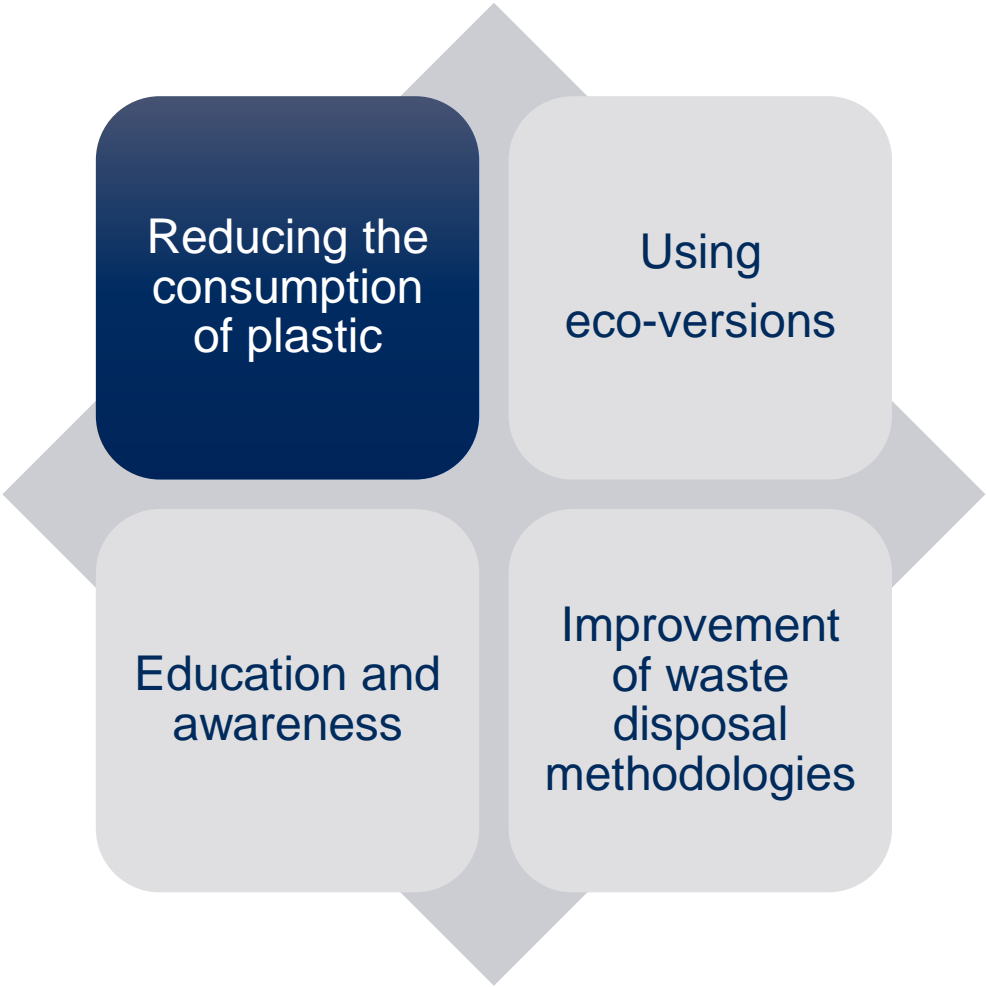
At the forefront of revolution for food packaging waste



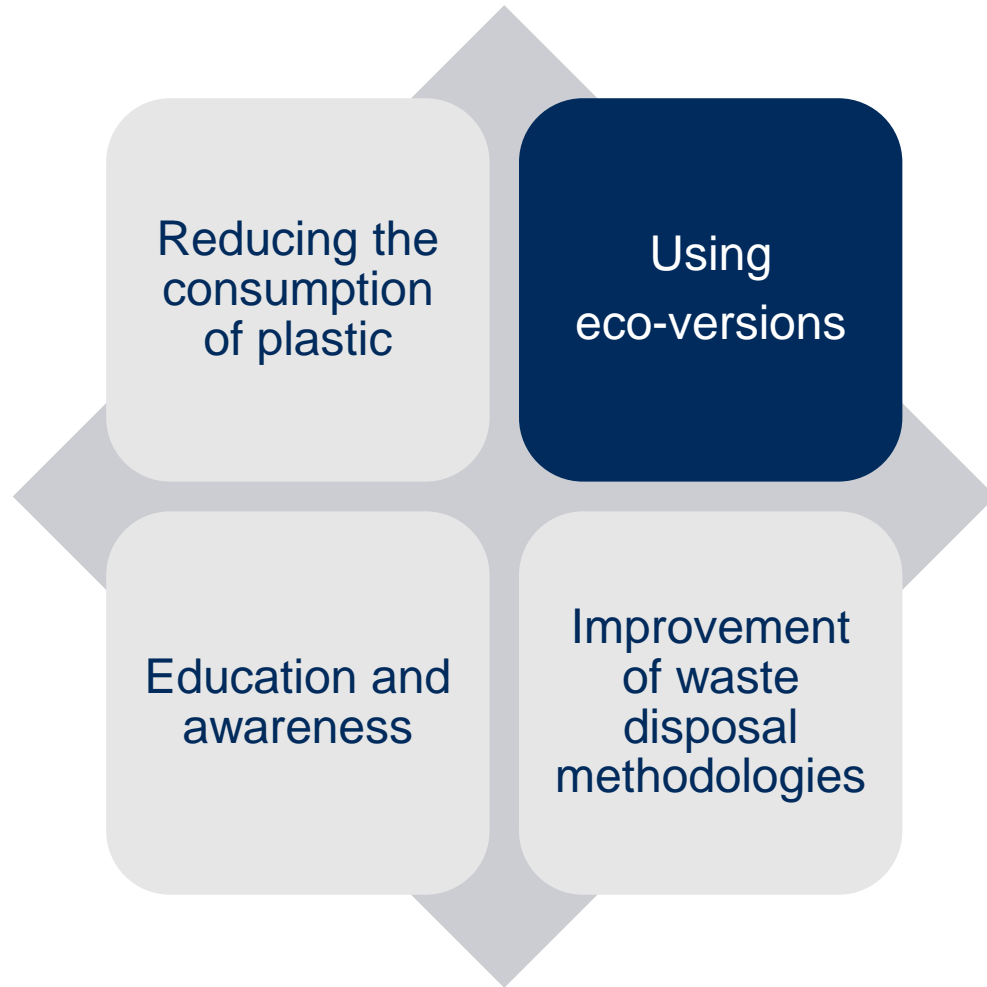
Japan



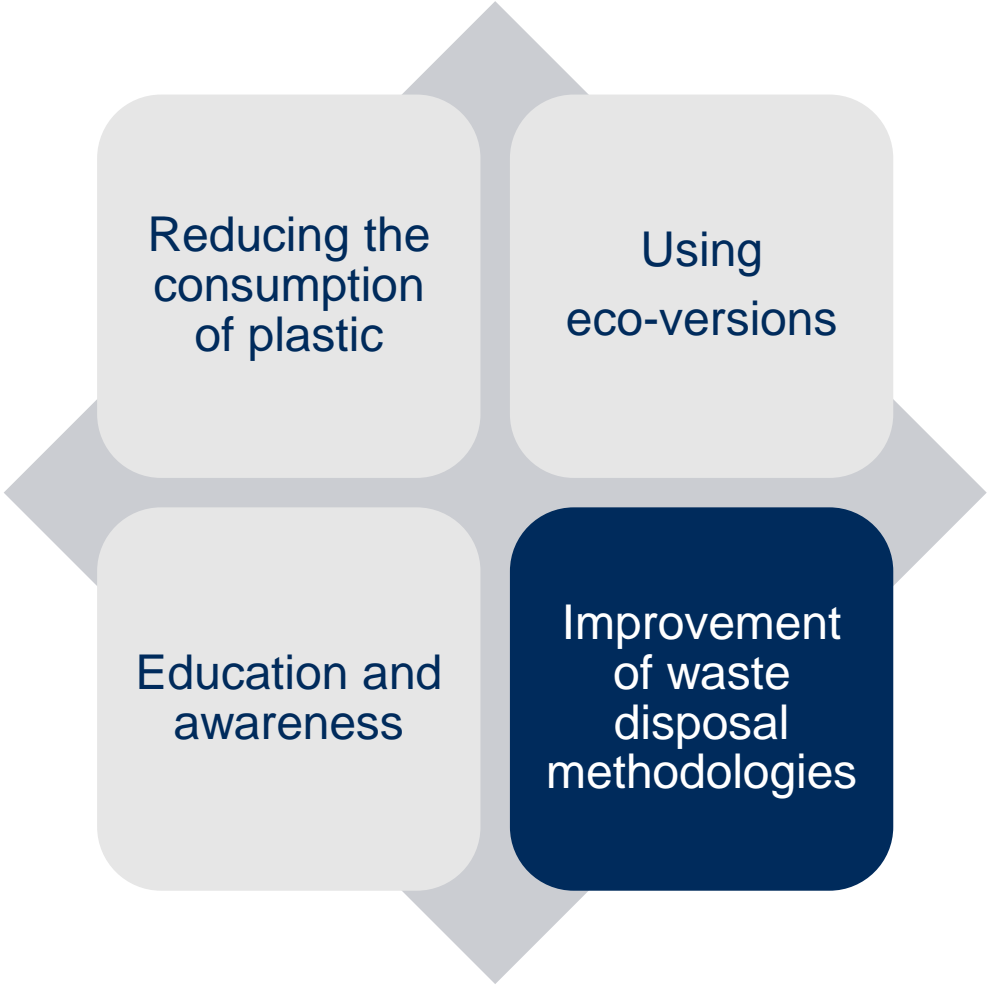
South Korea



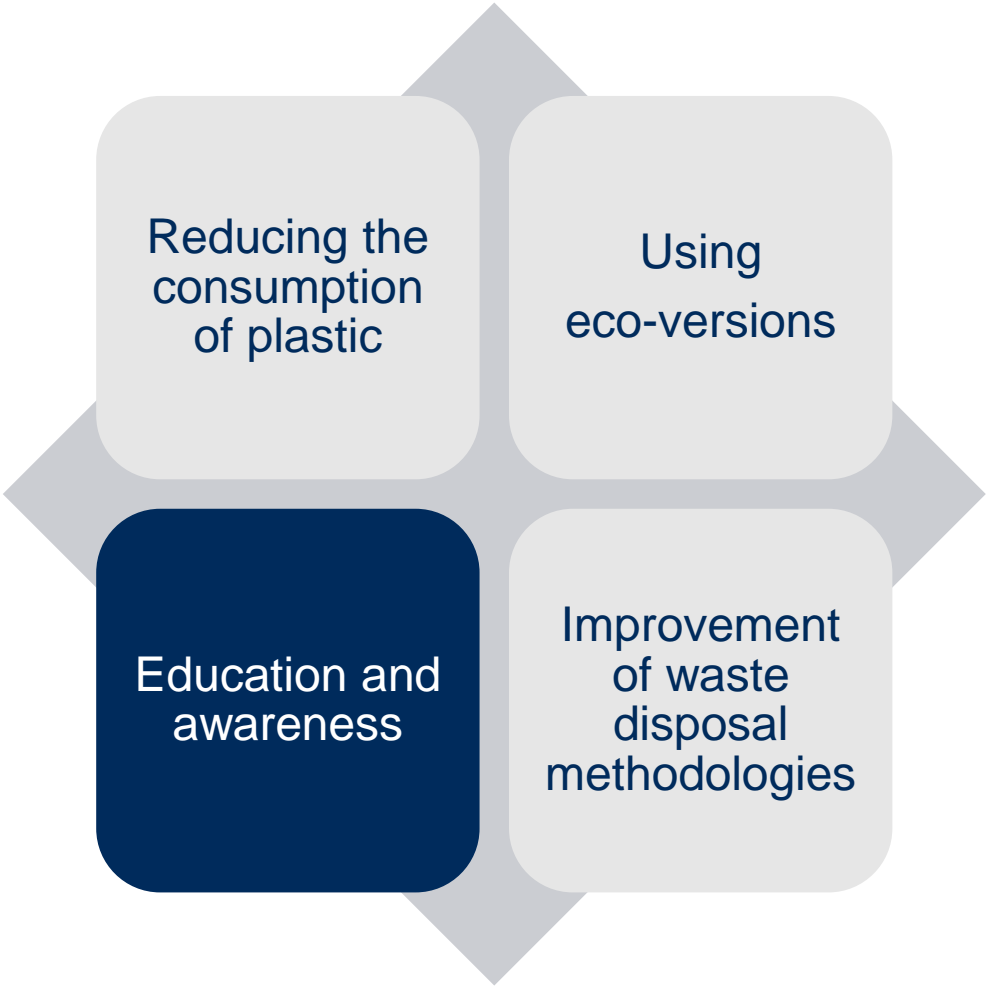
Investment in biodegradable polymers



Correct recycling and disposal methods is essential



Correct information communication crucial factor



Using recycling logos to inform consumers

- The correct disposal of food packaging starts with the correct information being given to the end-consumers that will enable them to correctly dispose of their waste
- Logos are generally the most common method being used due to their universal clarity
- Development of more self-explanatory information to display on food packaging for consumers' knowledge



The current regulatory landscape

The European Packaging and Packaging Waste Directive



- Obligates Member States to meet targets for the recovery and recycling of packaging waste
- Deals with marking and identification for packaging for the purpose of identification by the industries concerned but does not cover the recycling logos

Extended Producer Responsibility (EPR)

- The fundamental principle of EPR is to make the initial producer liable for the life (and end of life) effects of its product
- This producer thus "responsible" by the financing of the management of its waste, will be led to become aware of the costs induced by his activity in terms of final waste, which will encourage to reduce the quantity and the harmfulness of the waste to source through the eco-design of its products and processes
- EPR does vary by country. In the UK, the system is being reformed and is considering including glass

What's included in the EPR?



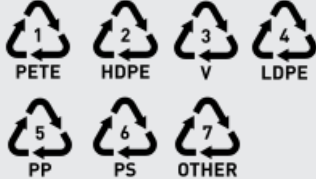

- Furniture and furnishings
- Graphic papers
- Tyres
- Clothing textiles
- Household linens
- Shoes
- Household packaging (incl. food)
- Electrical and electronic equipment
- Batteries and accumulators
- Products that generate specific non-point waste

Household glass packaging and products for professional use are excluded.

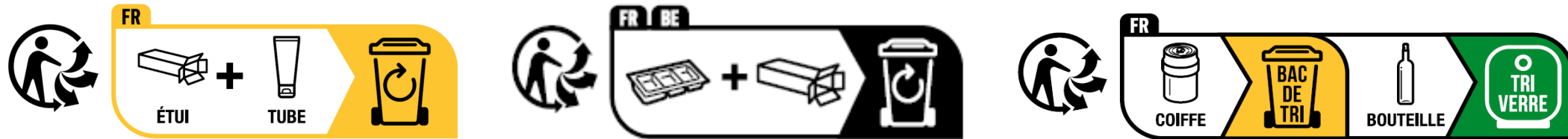
Creating chaos: The absence of harmonised EU recycling logos



The absence of harmonised EU recycling logos

| Name | Logo | Regulatory | Criticisms / Downsides |
|---|--|---|---|
| Tidy-man |  | The tidy-man symbol does not have any regulatory nor recycling meaning. | It is affixed on packaging to remind consumers to dispose of waste appropriately. |
| Mobius Loop |  | This symbol indicates that a product can be recycled, but not necessarily that it has been itself produced from recycled materials. Sometimes it has a percentage figure in the middle, indicating how much of the product comes from recycled materials. | It is not a definitive indication that an item can be recycled or accepted by all recycling centres/systems. In a Which? survey published in 2018, out of the 2,155 respondents, 73% could identify the Mobius loop symbol, but didn't know exactly what the symbol meant, with many believing that it gave consumers the go-ahead to throw the item in the recycling bin. |
| ASTM International Resin Identification Coding System (RIC) |  | The main purpose is to identify the polymer used in plastic packaging. This logo does not indicate that the material is recyclable. | Although the mobius strip use looks like they are recyclable not all of these materials are recyclable. The end consumer may not understand the meaning of the number. |
| The Green Dot |  | The Green Dot symbol is a protected trademark. It is used in 29 countries as a financing symbol to finance the organisation of the collection, sorting and recovery of used (mainly household) packaging. When the Green Dot is displayed on a packaging it means that for such packaging a financial contribution has been paid to a qualified national packaging recovery organization set up in accordance with the principles defined in European Packaging and Packaging Waste Directive 94/62 and the respective national law. | This symbol has been known to cause confusion, as some people wrongly assume that it is a recycling symbol placed on packaging to indicate that the particular piece of packaging can be recycled. |

France: The first Member State to define new recycling & waste disposal logo



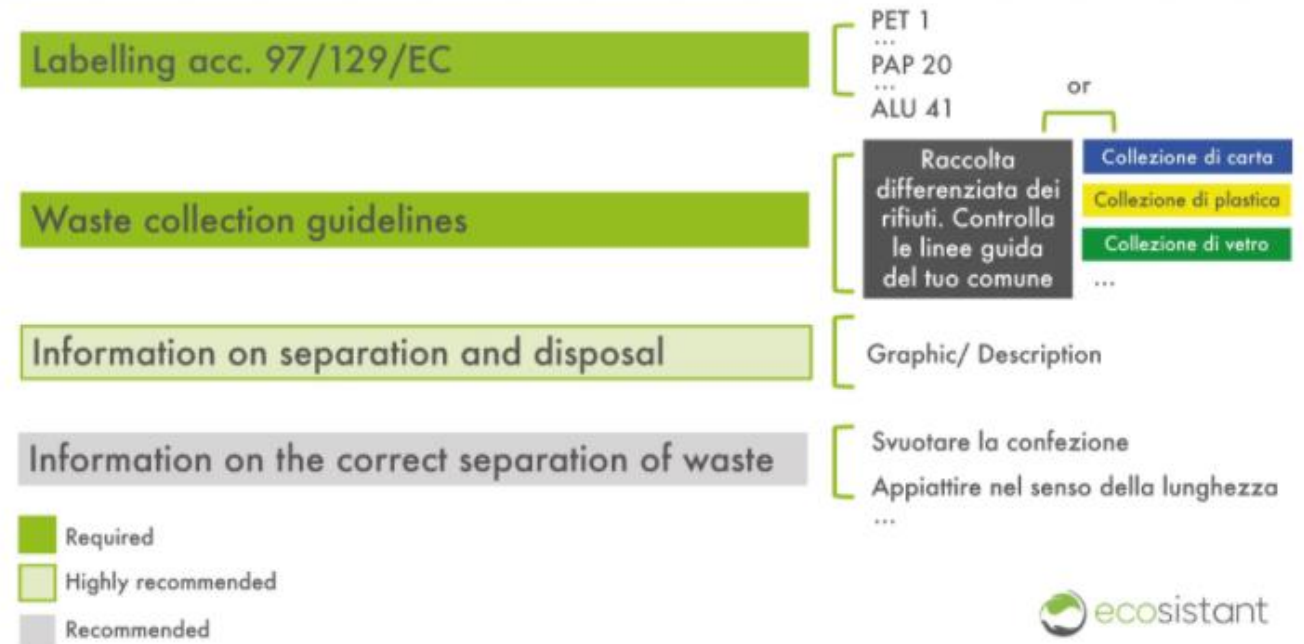
- France has had a mandatory recycling logo since 2015, however it has been barely used
- It has been confused with the Green Dot and misunderstood by the end consumer
- In 2021, a new guidance has been published making the Triman logo combined with waste disposal instruction mandatory on all packaging in France
- Ban of the use of the Green Dot currently suspended

Italy: Looking at developing waste disposal labelling rules



- In 2020, Italian packaging law obliged Food Business Operators to label packaging materials and made environmental labelling mandatory on all packaging
- Packaging intended for end consumers must be clearly labelled with appropriate instructions for disposal
- It proposes the simple version of Mobius logo and sorting instructions
- This has been postponed to 30 June 2022
- Guidance is due to be published to detailed application of the law

Labelling on packaging in Italy:



Other initiatives in the UK and Portugal

UK

- The OPRL scheme & logo provides simple and consistent reuse and recycling messages on consumer packaging
- Voluntary
- Not regulated by the authorities



Portugal

- Similar to Italy, obligation to use the alphanumerical codes to identify packaging
- Obligation also to include sorting instructions, in particular the colour of the recycling bin
- Could also result in a ban of the “Tidy man” logo on recyclable packaging



Source: mintel

Potential trade barrier implications: French ban of the Green Dot

For example, a product label sold in both Spain and France

| | Spain | France |
|--|--|--|
|  |  |  |
|  |  |  |

Potential trade barrier implications: Different sorting instructions

For example, a product label sold in both Portugal and France

| | Portugal | France |
|--|--|--|
|  |  |  |
|  |  |  |

The way forward



Key challenges

Communication challenges

Lack of harmonised recycling logos creates:

- FBOs - trade barriers
- Consumer confusion
- Unclear waste management strategies
- Doubt on impact on reduction of food packaging waste

Technical & logistical challenges

- Different logos may be needed for different packaging materials
- Different logos may be needed for different Member States, therefore increasing production of different packaging – counter-effective?

Harmonised regulation is needed for an effective impact on reduction of food packaging waste

Planning for a greener world

Short-term

- Accommodate national requirements
- Horizon-scanning in order to be ready for any new possible logo
- Acceptance of the different logos between the member states

Long-term

- Advocacy for harmonised regulation
- Work toward the other 3 strategies for reducing food packaging waste:
 - Reducing the consumption of plastic
 - Using eco-versions
 - Improvement of waste disposal methodologies

Supporting your short-term strategy

Leatherhead's global regulatory team can help you with all aspects of food & beverage regulation, whether that's a regulatory question, food safety advice or contributing to an internationalisation strategy.

We do this by;

- Helping our clients understand the rules and regulations that exist within their marketplace – in the UK, Europe and globally
- Interpret guidance in this global context including where markets are interconnected
- Providing recommendations based on the balance between the regulatory context now – and in the future



Benefits

- ✓ Unlock the potential of new, global markets
- ✓ Avoid future costly events through up front regulatory insight

Questions

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