



# THE KEY ASKS OF THE BREWERS OF EUROPE ON THE FUTURE EU PACKAGING AND PACKAGING WASTE REGULATION

## PIONEERS IN SUSTAINABLE PACKAGING AND COLLECTION SYSTEMS

Europe has a rich range of beers, all coming in different shapes and sizes. Packaging, whether it's glass bottles, aluminium cans, or kegs, is essential for beer. That's why brewers have innovated and invested over many years to make our packaging ever more sustainable, ensuring our sector has a positive impact on the planet.

We take our responsibility seriously to minimise the environmental impact of beer packaging throughout the lifecycle by reducing, reusing and recycling. Brewers pioneered the setting up of reusable packaging collection systems for kegs and glass bottles and supported the establishment of recycling collections systems for cans and other glass bottles.



The Brewers of Europe supports the overall goals of the Packaging and Packaging Waste proposal as we strive for a more circular economy, but legislation must support the EU Single Market and be non-discriminatory, proportionate, and enforceable.

## OUR KEY ASKS

1

### CREATE A LEGAL LEVEL PLAYING FIELD

It is neither legally nor environmentally justified to grant an automatic EU-mandated exemption from reuse targets or mandatory DRS for most alcoholic beverages except beer. If targets and mandatory requirements apply to beer then there is a legal obligation that they apply to all alcoholic beverage categories. Similarly, if exemptions are provided to any alcoholic beverage sector, then they must apply to all alcoholic beverage sectors, including beer, to avoid discriminatory treatment. European brewers therefore call for a level playing field amongst alcoholic beverages in the EU's packaging and packaging waste legislation.

2

### SET TARGETS AT THE MANUFACTURER LEVEL

It is superfluous and distorts competition within the internal market to impose re-use targets at the distributors' level, as the responsibility for the achievement of any distributors' targets will ultimately fall on the manufacturers. The beverage manufacturer should additionally have the option to implement any targets across its full product portfolio rather than per category of drink or per packaging type.

3

### INCENTIVISE THE USE OF KEGS

Excluding beer kegs, which can have a lifespan of thirty years, from the measurement of sales packaging reuse targets, or failing to take their size into account in the reuse target calculation, would discourage use of one of the best practise examples of reusable beverage packaging. A large volume of beer in the hospitality sector is sold on draught, meaning that kegs represent on average nearly fourteen percent, by volume, of EU beer packaging. Kegs should neither be considered as transport packaging nor counted as single packaging units without their volume being taken into account.

**4**

### **BUILD ON BEST PRACTICE**

Overly prescriptive new rules or governance must not provoke the dismantling of well-functioning existing collection systems, be they well-established reuse systems set up and supported by the brewers in many countries or efficient recycling collection systems already in place in others.

**5**

### **USE EXEMPTIONS TO SUPPORT PACKAGING SUSTAINABILITY**

Exemptions must be provided for small enterprises that, for example, are committed to packaging sustainability but may only have one, non-reusable but recyclable packaging line. Reuse targets should also not be imposed on producers of beverages in packaging that is already collected and recycled at a high rate. This is essential to also avoid endangering the supply of post-consumer recyclable material provided by successful collection systems to the recycling industry.

**6**

### **MANDATORY LABELLING MUST BE CLEAR**

Deposited packaging should only bear a deposit label and not additional waste sorting pictograms. Having both indications confuses rather than helps the consumer in correctly returning the empty packaging for recycling or reuse. Furthermore, the application of digital markings should only be considered when technology can truly ensure serialisation. In the Single Market, the tracking of individual packaging requires a common data standard, a common data set and common tracking modalities. This technological roll-out should precede any decision on mandatory digital labelling.

**7**

### **ANY BANS SHOULD BE EVIDENCE-BASED**

Restricting certain packaging formats which are 100% recycled and recyclable runs counter to the objectives of the legislation. Furthermore, this is not justified from a life cycle perspective. For example, the use of 100% recycled shrink wraps has the lowest carbon footprint when compared to available alternatives.

**8**

### **PROVIDE TIME AND CLARITY FOR CHANGE**

It is important to ensure realistic timelines to enable a smooth transition to the enforcement of new rules throughout the packaging value chain. Operators need clarity on the detailed legislation and the lead-in time to replace packaging equipment and/or to change distribution systems. For example, neither deposit return schemes nor reuse infrastructure are set up overnight and hence a five-year lead-in time is required.

**The European brewing sector is committed to collaborating with EU decision makers and the packaging supply chain to ensure that the forthcoming packaging and packaging waste Regulation will contribute to the wider EU sustainability agenda.**



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