



Brussels, 6 July 2023

**Subject: Packaging and Packaging Waste Regulation (PPWR) – End Landfilling and Incineration of Recyclable Packaging**

Dear Member of the ENVI committee,

We, the undersigned business and civil society organizations, are writing this letter to address the critical issue of landfilling and incineration of recyclable packaging in the context of your ongoing discussions regarding amendments to the PPWR. **We call upon you to support the changes proposed by MEPs from multiple groups in ENVI amendments 2318, 2345, 2346, and 2348.**

Effectively avoiding landfilling and incineration, whether with or without energy recovery, of recyclable packaging waste is a necessary complement to the rule that all packaging waste shall be separately collected, with one derogation proposed by the Commission (Article 43(1)-(2)). We welcome the current compromise in the Council, which states that packaging complying with design for recycling criteria – to be defined under the PPWR – shall be collected for recycling, while incineration and landfilling of such packaging shall not be allowed. This aligns well with the above-mentioned amendments, most of which describe one means to achieve this objective.

Ending landfilling and incineration of recyclable packaging waste is vital for our collective effort to combat waste, reduce environmental impact, and foster a sustainable circular economy. The current practices of landfilling and incineration of recyclable packaging not only harm the environment but also undermine the progress we have made in waste management and resource efficiency. These practices perpetuate the linear model of "take-make-dispose" or recover only

the energy value of waste, often in an inefficient manner<sup>1</sup>, while the resource value is lost forever. This leads to significant resource depletion, increased greenhouse gas emissions, and other adverse ecological consequences.

By avoiding the landfilling and incineration of recyclable packaging, we can unlock substantial environmental and economic benefits. First and foremost, it will drive a paradigm shift towards a circular economy, where resources are kept in use for as long as possible, and waste is minimized. This approach aligns with the European Green Deal's objectives and contributes to the ambitious targets set forth in the European Union's Circular Economy Action Plan.

Indeed, a recent report<sup>2</sup> has shown that improving the recyclability of packaging and separate collection alone will not be sufficient to meet the packaging regulation targets and the aforementioned objectives. **If the European ambition is to meet its recycling and carbon reduction objectives and achieve real circularity, it will need to take a holistic approach that includes further sorting of municipal mixed waste for recycling.**

Moreover, avoiding landfilling and incineration of recyclable packaging will incentivize investments in sustainable alternatives, such as reuse, innovative sorting, and recycling. This shift will promote job creation, enhance competitiveness, and stimulate the growth of a green industry that prioritizes sustainability and resource efficiency.

**We urge you to support the proposed amendments 2318, 2345, 2346, and 2348, as well as any compromise amendment reflecting them.**

Thank you for your attention to this critical matter. Should you require any additional information or support, please do not hesitate to reach out to us.

Yours sincerely,

Signatories (in alphabetical order):

**Deutsche Umwelthilfe e.V.**

**Chemical Recycling Europe (CRE)**

**Clariter**

**European Aluminium**

**Environmental Coalition on Standards (ECOS)**

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<sup>1</sup> Debunking Efficient Recovery: The Performance of EU Incineration Facilities  
<https://zerowasteeurope.eu/library/debunking-efficient-recovery/>

<sup>2</sup> Mixed Waste Sorting to meet the EU's Circular Economy Objectives <https://www.eunomia.co.uk/reports-tools/mixed-waste-sorting-to-meet-the-eus-circular-economy-objectives/>

**European Environment Bureau (EEB)**

**European Manufacturers of Expanded Polystyrene (EUMEPS)**

**European Plastics Converters (EuPC)**

**Metal Packaging Europe (MPE)**

**Minderoo Foundation**

**Natural Mineral Waters Europe (NMWE)**

**Petcore Europe**

**Plastics Europe**

**Polyolefin Circular Economy Platform (PCEP )**

**The Reloop Platform**

**Styrenics Circular Solutions (SCS)**

**TOMRA**

**UNESDA – Soft Drinks Europe**

**Zero Waste Europe**