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Reduce, Reuse, Recycle: Plastic and Packaging Waste in the European Green Deal and Circular Economy Action Plan

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Introduction

According to a recent report,¹ each European Union (EU) inhabitant generated 172.6 kg of packaging waste in the year 2017, 19% of which was made of plastic. Amid growing concerns about the environmental effects of such consumption habits, the regulation of packaging waste and plastic has moved higher up the legislative agenda of the EU in recent years.² In March of this year, the European Commission released two important policy documents in this regard. The first is the European Green Deal (EGD),³ which embodies a growth strategy for transforming the EU into a “fair and prosperous society, with a modern, resource-efficient and competitive economy [...] where economic growth is decoupled from resource use” (EGD, p. 2). The second is the Circular Economy Action Plan (CEAP),⁴ described as “one of the main blocks of the European Green Deal,”⁵ which aims to promote circular economy processes and sustainable consumption. This Discussion Paper discusses the implications of these two policy documents for plastic and packaging waste.

The European Green Deal

The European Green Deal is a framework document that sets out a vision for a sustainable EU economy, which is to be achieved through measures in various sectors, including clean energy, industry, infrastructure, and finance. A number of the proposed measures are relevant to plastic and packaging waste. The new Circular Economy Action Plan (discussed below), for example, will focus on resource-intensive sectors including plastics. As well as setting a target for 100% reusable or recyclable packaging throughout the EU by the year 2030, it provides for a new regulatory framework for biodegradable and bio-based plastics and the implementation of measures on single-use plastics (EGD, pp.9–10).

With a focus on sustainable agriculture and food production, the ‘Farm to Fork’ strategy foreseen by the European Green Deal aims to contribute to achieving a circular economy by reducing the environmental impact of packaging and food waste (EGD, p. 12). It is likely to address the problem of excessive plastic packaging due to food safety concerns.

In the European Green Deal, the Commission has also identified non-recycled plastic-packaging waste as a new revenue stream that can contribute to the budget for achieving climate objectives (EGD, p.15).

Finally, the European Green Deal envisages a leading role for the private sector in financing the green transition. This is reflected in plans to adopt a clearer taxonomy of environmentally sustainable business activities, integrating sustainability into the corporate governance framework and strengthening the disclosure norms for climate and environmental data that apply to companies and financial institutions (EGD, p. 17). This could have an impact on companies’ obligations to disclose information about their sustainability efforts in the realm of plastic use.

¹ https://ec.europa.eu/eurostat/statistics-explained/index.php/Packaging_waste_statistics

² This is evidenced, among other things, by the launch of the European Strategy for Plastics in a Circular Economy, amendments to the 1994 Directive on packaging and packaging waste, and the 2019 Directive on single-use plastics.

³ https://ec.europa.eu/info/sites/info/files/european-green-deal-communication_en.pdf

⁴ https://eur-lex.europa.eu/resource.html?uri=cellar:9903b325-6388-11ea-b735-01aa75ed71a1.0017.02/DOC_1&format=PDF

⁵ <https://ec.europa.eu/environment/circular-economy/>

The Circular Economy Action Plan

The CEAP is guided by a vision to change the largely linear nature of the European economy, where only 12% of secondary materials and resources are currently brought back into the economy.⁶ It aims to increase circularity through product sustainability, efficient resource utilisation, and waste management. One of the key features of the CEAP is a policy framework for sustainable products. Noting the current lack of a “comprehensive set of requirements to ensure that all products placed on the EU market become increasingly sustainable and stand the test of circularity” (CEAP, p. 3), the Plan outlines how the Commission will propose a legislative initiative for a sustainable product policy to address the reusability, reparability, and energy and resource efficiency of products.⁷

The CEAP also contains a chapter on ‘Key Product Value Chains’ with two sub-sections dedicated to packaging and plastics, respectively. The Commission intends to review the 1994 Directive on packaging and packaging waste⁸ with a view to ensuring that, by the year 2030, all the packaging on the EU market is reusable or recyclable in an economically viable manner (CEAP, p. 8). The Plan identifies three focus areas in this context: first, reducing overpackaging and packaging waste by setting targets and implementing waste prevention measures; second, driving design for the reuse and recyclability of packaging; and third, reducing the complexity of packaging materials where possible (CEAP, p. 8). Improved accessibility to drinkable tap water in public places is also proposed as a means of reducing the dependence on bottled water (CEAP, p. 9).

The CEAP builds on the existing European Strategy for Plastics in a Circular Economy⁹ of 2018 and advocates the “timely implementation” of the Single Use Plastics Directive¹⁰ of 2019 (CEAP, p. 10). In this context, the Commission aims to strengthen the circular economy for plastics by introducing mandatory requirements for recycling as well as waste reduction measures for key products that utilise plastic. It also plans to develop rules for measuring the recycled content in products (CEAP, pp. 9–10).

In a section titled ‘Less Waste, More Value’, the CEAP focuses explicitly on the prevention and reduction of waste. Here, it refers to the Commission’s intention to “put forward waste reduction targets for specific streams” (CEAP, p. 13) in the course of a review of the Waste Framework Directive (2008/98/EC)¹¹.

Need for greater ambition

EU climate leadership is seen as particularly important in the Paris Agreement framework,¹² and both policy documents reflect the EU’s intention to emerge as a world leader in sustainability. The European Green Deal has, for example, an entire section on ‘The EU as a Global Leader’ (EGD, pp. 20–24), which refers to the EU’s desire to set a credible example and promote ambitious environmental policies. Similarly, in reference to the sustainable product policy framework, the CEAP notes that “the single market provides a critical mass enabling the EU to set global standards in product sustainability and to influence product design and value chain management worldwide” (CEAP, p. 3).

⁶ https://ec.europa.eu/commission/presscorner/detail/en/ip_20_420

⁷ According to the Annex to the CEAP, the deadline for this is 2021.

⁸ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:31994L0062&from=en>

⁹ <https://ec.europa.eu/environment/circular-economy/pdf/plastics-strategy.pdf>

¹⁰ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019L0904&from=EN>

¹¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32008L0098&from=EN>

¹² <https://www.theguardian.com/world/2020/mar/09/what-is-the-european-green-deal-and-will-it-really-cost-1tn>

Against this backdrop, it would have been reasonable to expect these policy documents to adopt a strong stance on sustainability with ambitious steps and clearer targets. But this is not the case. The CEAP is meant to serve as a road map to improve circularity in the EU. Yet, to a large extent, it builds on existing EU guidelines and directives on the topic, without adding or substantially clarifying further concrete measures.

Waste avoidance and reduction

The European Green Deal notes that “Where waste cannot be avoided, its economic value must be recovered and its impact on the environment and on climate change avoided or minimised. This requires new legislation, including targets and measures for tackling over-packaging and waste generation” (EGD, p. 8). This message is not new; it repeats what has already been stated in existing EU directives. Moreover, the targets and measures referenced in the European Green Deal are not further developed in the CEAP. They are, rather, postponed to a future time, for example, until after the review of the Waste Framework Directive has been completed (CEAP, p. 13).¹³

The section on ‘Less Waste, More Value’ in the CEAP focuses mainly on issues like better waste segregation, secondary raw material markets, and waste exports. There is little by way of a discussion on avoiding waste generation. The CEAP shies away from setting concrete reduction targets, for example, in the realm of packaging waste. And while it states that future efforts will focus on product design for reusable packaging, it offers no further details on the topic.

Market interventions

An emphasis on strong market-based interventions is also lacking in both policy documents. Both allude to non-recycled plastic-packaging waste as a future revenue stream, but no further details are provided in either policy document. It is also not clear whether this is a reference to taxing virgin plastic, and if so, how this would be implemented. The CEAP notes that the European Commission will “continue to encourage the broader application of well-designed economic instruments, such as environmental taxation, including landfill and incineration taxes, and enable Member States to use value added tax (VAT) rates to promote circular economy activities that target final consumers, notably repair services” (CEAP, pp. 16–17). The language of this text indicates, once again, that taxing non-recycled plastic waste is not likely to take centre stage.

Conclusion

The European Green Deal and CEAP are important policy documents for setting the course for plastic and packaging waste streams in Europe in the coming years. While they are full of good intentions, they are not as strong on ambition and urgency as could have been hoped.

Nonetheless, the European Green Deal and the CEAP are important road maps to guide the course of the European Union as a global climate leader and direct the policies of Member States on plastic and packaging waste. The upcoming review of existing EU packaging legislation and the planned legislative proposal for a sustainable product policy should focus on reduction targets and market mechanisms that create strong financial incentives for circular economy practices. Furthermore, the “reduce” and “reuse” models should be supported through legislation-backed systemic changes, like the proposal made in the CEAP to reduce consumption of bottled water by providing greater accessibility to drinkable tap water in public places.

¹³ Based on the timeline provided in the Annex to the CEAP, this review is likely to be partially completed in 2021 and 2022.



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