

Explanatory note

The Extended Producer Responsibility Alliance (EXPRA) and 6 Packaging Producer Responsibility Organisations (PROs)¹ have developed a joint paper that spells out some shared views concerning the future direction of the circular economy, EU waste review and EPR. These views were shaped as a result of an open dialogue and consultative process among the PROs, and include input from a number of international producers.

The contributors to this paper have agreed on two set of general recommendations to be considered by EU legislators and other stakeholders in the ongoing debate regarding the new Circular Economy Legislative Proposal, due in late 2015.

The first section highlights the need to strengthen the Extended Producer Responsibility principle in future EU legislation through the development of EPR minimum requirements. The Organisations provide concrete examples of minimum requirements that, amongst others, should be included.

The second section includes recommendations concerning data and reporting on packaging waste management at EU level and their impact on both target levels and the measurement point for recycling. Transparency and auditing of reported waste streams as well as environmental standards for recycling have also been mentioned.

The **Extended Producer Responsibility Alliance (EXPRA)**, comprising 23 members from Europe, Canada and Israel, welcomes the shared views reflected in the document, recognising that the contributors to this paper have differences in their approach and structure.

These views clearly reflect only the common overlap of beliefs, and the parties signing the document have further proposals that go beyond this paper. EXPRA will continue to strive for its own comprehensive demands as the recommendations outlined should be understood as minimum asks on the basis of which the EU should continue to pursue further efficiency, transparency and comparability of EPR schemes across the region.

A core belief of EXPRA is that **Packaging Recovery Organisations should be owned by the obliged Industry** and should operate on a not for profit or profit not for distribution basis.

The **EPR definition should be formalised within the Waste Framework Directive** while **strong and clear minimum requirements for EPR should be included in the Packaging and Packaging Waste Directive**. The paper contributors highlight that minimum requirements are best set in relevant product-based EU legislation.

EXPRA stresses the need for a **clear definition of the roles and responsibilities** of the different stakeholders involved in the waste value chain, as well as **their financial liability**. PROs agree that stakeholders should only be financially responsible for the costs falling under their remit and influence.

Furthermore, a **transparent accreditation process for PROs** should be ensured, as PROs convey. EXPRA believes that strict and permanent audits should accompany that process.

EXPRA moreover emphasises that EU legislators should ensure a **level playing field in the event multiple systems co-exist in a given territory via the establishment of a clearing house mechanism or process**, as specifically mentioned in the paper.

Finally, new **waste management targets** need to be realistic and based on reliable statistics, with **data harmonisation** at the centre of the legislative review. This message is shared by all PROs.

¹ ARA, Austria; Eco Emballages, France; Der Grüne Punkt – Duales System Deutschland GmbH, Germany; Rekopol, Poland; SPV, Portugal; and Valpak, United Kingdom.