



ACE POSITION ON COLLECTION AND DEPOSIT RETURN SCHEMES

PACKAGING AND PACKAGING WASTE DIRECTIVE REVISION BEVERAGE CARTON ASKS

- **ACE calls for a 90% mandatory collection target for used beverage cartons by 2030**
- **In addition to a mandatory collection target for beverage cartons that will set the performance level, ACE asks beverage cartons to be part of the EU mandatory minimum scope for deposit return schemes**

Introduction

ACE represents the beverage carton industry in Europe. Our members are committed to provide a low carbon sustainable and circular packaging solution to support resilient food systems. Thanks to their functionalities and composition, beverage cartons allow to safely pack, transport, shelve and use sensitive products such as milk and juice.

Beverage cartons are mainly made from renewable materials (on average 75% fibres), are recycled at scale and have the lowest carbon footprint compared to alternative packaging in their core category of milk and juice as demonstrated by LCAs.¹

ACE members are committed to continue their journey to produce even more sustainable products and hence are actively supporting increased collection and recycling of beverage cartons. Investments to recycle the fibre and the non-fibre components of beverage cartons will ensure increased recycling of beverage cartons over the coming years.

Collection target for beverage cartons

Industry needs enabling conditions to ensure full circularity of beverage cartons.

ACE therefore calls for a 90% mandatory collection target for used beverage cartons by 2030 as part of the revised Packaging and Packaging Waste legislation.

A 90% collection target for beverage cartons would present many benefits including²:

- Significant savings in GHG emissions contributing to the EU climate ambitions (ca 190 k tons to 340 k tons reduction per year).
- Contribution to the paper recycling rate and to Member States targets contributing to the EU circularity objectives and goals.
- Level playing field for all packaging (beverage cartons are discriminated against their main competitor (PET) that have a collection target set up in the SUPD).
- Increased traceability of recycling of beverage cartons.
- Harmonised approach across the EU – some Member States have a collection target for beverage cartons, while others support an EU-approach to a collection target for used beverage cartons.

¹ - Supporting evidence – Environmental performance of beverage cartons, Circular Analytics, <https://www.beveragecarton.eu/news-and-resource-centre/publications/>.

² Roland Berger study, 2022 - <https://www.squareandcircular.eu/>



- Incentive to increase investments in sorting and recycling –predictability of volumes collected would be beneficial and complementary to our industry’s continuous investments on recycling.
- Administrative costs for Member States and the Commission would be negligible as the responsibility for reporting and aggregating data is with PROs (Producers Responsibility Organisations).

Deposit return schemes (DRS)

At EU level

DRS is a valuable system in countries where the existing selective collection schemes are unable to deliver high collection rates. In countries with well-functioning collection and recycling systems, which means they can demonstrate that they reach a 70% collection rate of beverage cartons latest by 2025 so as to reach a 90% collection rate by 2030, it would not be meaningful to establish a DRS.

In addition to a mandatory collection target for beverage cartons that will set the performance level either through EPR or DRS, our industry asks beverage cartons are to be part of the mandatory minimum scope to be mandated by the upcoming Packaging and Packaging Waste legislation. In our understanding it means:

- Where Member States set up a DRS, beverage cartons will be in scope.
- Member States that can demonstrate that they reach a 70% collection rate of beverage cartons latest by 2025 so as to reach a 90% collection rate by 2030 should not be mandated to set up a DRS.
- DRS should focus on formats whatever the content is – excluding dairy products from DRS would confuse consumers as to how and where to recycle beverage cartons. There are no technical limitations to including dairy in DRS as is demonstrated in some countries. Beverage cartons are collected with PET and cans in many countries in the LWP (light weight packaging) stream and that does not hamper recycling.

Minimum requirements for DRS

- DRS should be industry-owned (by the obligated industries), not-for-profit, based on the net cost principle and centralised systems.
- DRS fees should vary depending on the size of the packaging but should be high enough to provide an incentive.
- A transition period should be foreseen where DRS is already in place and should be retrofitted to include other packaging formats.
- DRS should be established at retailers but not only. The option of dedicated collection points should be accepted.³

At national level

In addition to a mandatory collection target for beverage cartons that will set the performance level either through EPR or DRS, our industry asks beverage cartons to be part of the mandatory scope of DRS at national level.

The above principles on DRS schemes should be established at the EU level and apply at national level. Additionally, we highlight that DRS should aim at collecting packaging formats and not discriminate on content as the latter would confuse consumers.

³ Especially in rural areas, the number of retailers may not be sufficient to collect all packaging covered.



WORDING PROPOSAL

Wording proposal

Member States shall take the necessary measures to implement mandatory collection targets for recycling of specific fiber-based packaging in the following categories:

- (a) by 2025, packaging not collected at a rate of 70% by existing collection systems as specified in the annex to this directive shall be collected to a level equal to 75 % of such packaging placed on the market in a given year by weight;*
- (b) by 2030, packaging not collected at a rate of 75% by existing collection systems as specified in the annex of this directive shall be collected to a level equal to 90 % of such packaging placed on the market in a given year by weight.*
- (c) By 2030, packaging used in HORECA shall be collected at the consumption point to a level equal to 90%.*

Member States should look to a range of measures to fulfil the target, including economic measures and investment in collection, sorting and recycling, designing fit for purpose, reducing overpackaging and consideration of other measures such as DRS and mandatory take back.

ABOUT ACE

ACE provides a European platform for beverage carton manufacturers and their paperboard suppliers to benchmark and profile cartons as renewable, recyclable and low carbon packaging solutions. Engaging with stakeholders and partners seeking high environmental stewardship, it contributes expertise to EU policy, legislation and standard-setting.

ACE members include beverage carton producers Tetra Pak, SIG Combibloc and Elopak, and their paperboard suppliers Stora Enso and BillerudKorsnäs.

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For further information or media inquiries please contact: Annick Carpentier, MOB +32 477521422, EMAIL annick.carpentier@beveragecarton.eu