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# MANIFESTO OF SPANISH AGRIFOOD SECTORS ON THE EUROPEAN PACKAGING REGULATION (PPWR)



**ACES**  
ASOCIACIÓN SUPERMERCADOS

 **ALIANZA  
CARTÓN  
BEBIDAS**

**ANGED**

**ASEDAS**

**AFCO**

**ASPAPPEL**  
Naturalmente, papel

**COAG**

**fenil**  
Federación Nacional  
de Industrias Lácteas

 **MARCAS DE  
RESTAURACIÓN**

 **Repacar**

 **ZUMOS Y GAZPACHOS  
DE ESPAÑA**

## Spanish agri-food sectors urge European institutions to preserve legal and food safety in the future European Packaging and Packaging Waste Regulation (PPWR)



In the context of the processing of the future European Packaging and Packaging Waste Regulation, representatives of the Spanish agri-food sector, including farmers, livestock breeders, producers, packagers, distribution and catering industries, as well as recyclers, request the Spanish Presidency in the Council of the European Union to consider food safety when setting objectives for reuse and recycling during the Regulation negotiations.

Likewise, they demand greater legal certainty regarding the progressive adaptation of Spanish production and agri-food industry to the objectives of reuse, collection, and recycling, carefully studying the impact of each of these objectives on the entire value chain of production and industry.

## MANIFESTO OF SPANISH AGRIFOOD SECTORS ON THE EUROPEAN PACKAGING REGULATION (PPWR)

***"The future Packaging and Packaging Waste Regulation must ensure that the objectives of reuse, collection, and recycling safeguard food quality and safety and the availability of food everywhere, as established by the European Farm to Fork Strategy."***

The signing agri-food organizations request:

# 1 Flexible reuse objectives and recycled content ensuring greater food safety

During the past years, significant changes and advancements have been recorded by the entire value chain of production and the agri-food industry, ensuring better practices in the field of circular economy, such as the reduction of plastics or the substitution of materials to ease recyclability.

These practices support the ambition of the European proposal to ensure that by 2030 all packaging placed on the market in the European Union is sustainable. However, the new European regulation should not only incentivize solutions that contribute to the objectives of minimizing the impact on the environment established in the EU Green Deal, but also ensure that the goals of the European Regulation safeguard food quality and safety and the availability of food everywhere as set out in the European Farm to Fork Strategy. Specifically:

## More flexible reuse objectives



The imposition of reuse objectives for all types of packaging and products can impact not only their quality and durability, but it would also have a significant effect on the logistics chain, requiring the implementation of new refrigeration, transportation, and washing systems that adapt to the new product requirements. It is worth noting that the current Spanish recycling and collection system is fully functional and contributes to the reduction of carbon and water footprint compared to the logistical implications that would come with meeting the reuse objectives.

Therefore, the future Regulation should conduct a comprehensive review of the different functionalities of packaging and food, considering the necessary exemptions to preserve food safety, minimize health risks, and reduce food waste.

## Plant-based plastic to achieve the recycled content objective in the face of a shortage of recycled plastic



In the objectives of recycled content, the Regulation establishes minimum objectives of recycled content for plastic packaging, up to 50% by 2040 for food contact packaging. However, the European Commission does not foresee measures that ensure an adequate supply of recycled plastics that can be prioritized for use in food systems while preserving food safety. Not all recyclable plastics are suitable for contact with food, and given the shortage of recycled plastics for food use at competitive prices, the future Regulation should consider technological neutrality when setting recycled content objectives, promoting other options to achieve these objectives, such as promoting plant-based plastics. Plant-based plastics have a role to play in the ecological transition for the decarbonization of food packaging.

## 2 Minimize secondary legislation to provide sufficient legal certainty for undertaking long-term industrial investments

Until now, the production and agri-food industry have made significant efforts to achieve collection and recycling objectives. The carton packaging industry has already invested approximately 200 million euros to increase beverage packaging recycling capacity in the EU and plans to invest another 120 million euros by 2027. Simultaneously, investment has been made and will continue over the next five to 10 years to further improve the environmental profile of packaging.

All of this has been developed in the context of the impact that the implementation of the European Single-Use Plastics Directive (SUP Directive) has had on the Spanish industry, which has had to adapt its packaging to the new requirements during the pandemic period and an inflationary context, increasing production costs and substantially reducing profits. In this regard, the food organizations also urge:

**Businesses are facing new costs, operational changes, and investments that require legal certainty and a regulatory framework that facilitates this transition**



In the face of a possible framework of overregulation in the field of the circular economy, both at the national and European levels, greater legal certainty will be necessary to implement the necessary investments to achieve the objectives of the Regulation in a timely manner. It will also be essential to limit to the maximum extent the delegated acts in the future European Regulation to provide sufficient legal certainty to promote long-term industrial investments.

While the signatories of this manifesto support the ambition of the future Regulation to reduce packaging waste and achieve that all packaging is recyclable or reusable by 2030, in the upcoming negotiations of the Council of the European Union, it will be crucial to adopt more flexible objectives that measure the impact of the measures on the agri-food sector, considering the diversity of packaging formats and materials used by production and the agri-food industry for their food, always preserving legal certainty for Spanish agri-food sector companies and food safety for consumers.

From the Spanish agri-food sector, we will remain committed to working closely with lawmakers and stakeholders to promote more sustainable packaging and achieve the implementation of objectives throughout the value chain of the sector.

# Signatories of the manifesto:

ACES - Association of Spanish Supermarket Chains

ACE - Alliance for Food and Beverage Cartons for the Environment

AFCO - Spanish Association of Manufacturers of Corrugated Cardboard Packaging

ANGED - National Association of Large Distribution Companies

ASEDAS - Spanish Association of Distributors, Self-Service and Supermarkets

ASPAPPEL - Spanish Association of Manufacturers of Pulp, Paper, and Cardboard

COAG - Coordinator of Farmers and Ranchers Organizations

FENIL - National Federation of Dairy Industries

REPACAR - Spanish Association of Recyclers and Recoverers of Paper and Cardboard

MARCAS DE RESTAURACIÓN - Business Association of Restaurant Brands

ZUMOS Y GAZPACHOS DE ESPAÑA - National Association of Juice and Gazpacho Manufacturers in Spain

