

## “STRONG” DECISIONS ON WEAK FOUNDATIONS

### **It is confirmed: the impact assessment on which the PPWR is based is flawed, inconsistent and based on prejudices and unsubstantiated assumptions**

On December 18<sup>th</sup> 2023, the European Council set out its proposal for a regulation on packaging and packaging waste (PPWR), which will face the one approved by the Parliament in plenary on November 22<sup>nd</sup>.

The substantial discrepancies between the two proposals confirm how unstable the construction of this measure is.

This instability is already in the foundations of the proposal, i.e. in the preliminary impact assessment, which has been subjected to numerous comments and criticisms, including from bodies and authorities within the European legislative system itself.

The ProFood Scientific Committee, a team of LCA experts, subjected the impact assessment to a comprehensive methodological analysis: [here the full document](#).

The analysis highlights numerous limitations and shortcomings of impact assessment, as:

- it refers to multiple models of analysis for environmental, economic and social assessments, with little consistency and possibility to check and replicate the impact assessment results;
- it is generally not clear about the data sources used and calculation methods;
- it limits, omits or hastily resolves the analysis of entire key environmental, economic and social impact categories.

The impact assessment estimates that attainable environmental benefits will be less than 1% of Europe's annual CO<sub>2</sub> emissions; a derisory result and moreover overestimated, as it does not consider at all the environmental impact caused by increased food waste: multiple studies show that 'food waste' due to non-use of packaging generates 5 times more CO<sub>2</sub> emissions than the production and use of the packaging itself ([guideline\\_stopwaste\\_e\\_082020\\_web.pdf](#) ([denkstatt.eu](#)); [p2-impact-exec-summary-ef-dec-2023.pdf](#) ([cpma.ca](#)))

The assessment does not even consider, in terms of social and economic sustainability, the potential hygiene and consumer safety risks of eliminating single-use food and beverage packaging.

This impact assessment does not use robust methodologies that ensure transparency of calculations and comparability of results and that are based on the integrated life cycle approach, such as LCA (life cycle assessment), LCC (life cycle costing) and S-LCA (social life cycle assessment): these three tools would instead allow effective 'parallel' analyses of environmental, economic and social sustainability.

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The ProFood Technical Committee analysed in detail Measure 7 (M7) of the impact assessment on the elimination of so-called unnecessary packaging, which is a prerequisite for and justification of Articles 22 (and its Annex V) and 26 of the PPWR, and its connection to the version of the PPWR proposed by the Council of the European Union.

The restrictions on the use of specific plastic food packaging in the fruit and vegetable and horeca sectors, which the Council's version proposes, find no real justification neither in the impact

assessment, nor in the introduction or opening "recitals" of the proposal, nor even less in the "material neutrality" claimed in Article 2 of the PPWR.

The assessment does not define packaging as "unnecessary/avoidable", nor does it prove that the increase in packaging and packaging waste is only/mainly due to single-use plastic packaging: the application of the limitation to plastic packaging alone is based on a bias against such packaging, and contradicts the principle expressed in Article 2 of the proposal.

The assessment overlooks the fact that -according to a study made by Eunomia itself- from 1999 to 2015 the products to be banned have been the most virtuous in terms of reducing the material used to produce them, and therefore the related waste generated, whilst maintaining the same performance: plastic cups and containers have seen their average weight reduced by 35% (compared to 10% for paper ones) and plastic trays by 40% (compared to about 13% for cellulose fibre and paper ones).

In the evaluation of these plastic packages, moreover, no value has been given to their recyclability, with direct and immediate reuse of post-consumer recyclate (unlike paper and cardboard packages, for which this is not possible): many primary fruit and vegetable packages already contain 70% recycled plastic by weight, thus well beyond the targets set for 2040 by other articles of the same PPWR.

Even the assessment of the expected economic impacts raises many doubts: it is not clear with which tools the assessments were made and what their level of uncertainty is: certainly, a loss of turnover of 15,380 mln Euro and 133,000 jobs for companies affected by the restrictions and bans (often LDCs) is not neglectable.

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**For all these reasons, ProFood hopes that the next legislative steps will take into account the objective weakness of the foundations on which the PPWR is based, and that they will be made in a reasonable manner and supported by objective data free of ideological bias: this issue is too important in terms of the impacts and consequences it may generate to turn into a hasty political-electoral decision.**

*ProFood is the internal product group of Federazione Gomma Plastica (Confindustria), which brings together 14 Italian companies producing plastic containers for the packaging, distribution and consumption of food and beverages.*

*The member companies of ProFood employ about 4500 people in 29 production plants in Italy and abroad, develop a turnover of 1.5 billion€ and represent over 70% of the Italian production in the sector (EPD packaging).*

### **Pro Food**

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