

Reducing packaging waste

Euroconsumers' checklist
for a regulation fit for consumers



euroconsumers

Empower people,
improve the market.



Empower people, improve the market

80 million tonnes. 177.2 kg per EU inhabitant on average. That is how much waste packaging is generated each year in the EU¹. It's no coincidence that consumers are increasingly worried about the environmental impact generated by overproduction and overconsumption, including packaging waste. Even more, consumers feel responsible and want to do their bit to tackle the problem.

A Euroconsumers survey identified waste management as one of the areas with the highest consumer responsibility². In fact, this is where consumers put the most effort, with avoiding plastic packaging and opting for products with less packaging in the top five of sustainable actions already taken by consumers³. In addition, another survey on food packaging coordinated by Euroconsumers among 11 countries - including Belgium, Portugal, Italy and Spain - showed overall consumer support (85%) for rules for producers and retailers to use less packaging material or only reusable and recyclable ones⁴.

Ironically the same survey results also identified waste management as one of the areas where consumers still encounter the most barriers that prevent them from acting more sustainably. The problem is, however, quite basic: next to the issue of excessive or non recyclable packaging, consumers lament it is often not clear if and how packaging material should be recycled.

Making the green shift requires consumers to be on board. When it comes to waste management that seems to be the case. Consumers stand ready to do their part. But they can do even more. If truly empowered they can also push and steer markets towards more sustainable options, becoming an actual driver for more sustainability and improve the market. But for them to be able to make good use of that green consumer power the right framework needs to be in place. One that works for consumers and supports them in their endeavours to be more sustainable. One that provides the right information, offers sustainable alternatives and gives access to the right facilities.

¹ According to Eurostat, in 2020 the total volume of packaging waste generated was estimated at 79.3 million tonnes. This is 177.2 kg per inhabitant in the EU (varying from 66.0 kg per inhabitant in Croatia and 225.8 kg per inhabitant in Germany): https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Packaging_waste_statistics#Waste_generation_by_packaging_material

² 56% of respondents think waste management is both consumers' and global responsibility; 21% more a global responsibility; 19% more the responsibility of a consumer and 4% think it is not priority at all.

³ 59% of respondents indicated to avoid plastic packaging, 54% to opt for products with less packaging. This in line with the results of a [March 2020 Eurobarometer survey](#) that found that 45% of Europeans had avoided single-use plastic goods or bought reusable plastic products within the past six months.

⁴ See BEUC, "[Unwrapped. What consumers say about safe and sustainable food packaging. Finding of a 11 country consumer survey](#)". The survey was conducted by Euroconsumers during October 2022 across 11 European countries: Austria, Belgium, Czechia, Denmark, Germany, Italy, the Netherlands, Norway, Portugal, Slovenia, and Spain. A total of 11,232 valid responses were collected. Samples were weighted for age, gender, educational level, and region to be representative of the countries' national populations.

That's why Euroconsumers welcomes the European Commission's proposal for a revision of EU legislation on Packaging and Packaging Waste and its aims to promote a more efficient use of materials and reduce packaging waste. However, in order to make sure it is fit for purpose and can truly live up to the challenge, Euroconsumers has developed a consumer checklist with five criteria to consider when designing legislation. Any regulation that aspires to be effective on ground, needs to tick the five boxes. So it can fit consumers, empower people and improve the market.



A five criteria checklist for a consumer fit packaging waste reductions

1. We start from science: ensuring a sound science-based approach to policy

At Euronsumers we always start from science. It is at the basis of all our tests, surveys and other activities. When assessing different options to reduce packaging and packaging waste that is no different. That's why any decision should be based on independent technical and scientific studies that take into account the entire life cycle of packaging products⁵. This also implies reuse should absolutely be prioritised if environmental impacts – with consideration of the overall life cycle – are lower than for single use packaging.



⁵ While drop-off points and reuse are generally used for the recycling of waste materials in general (glass, paper, plastic, etc), DRS systems are usually used for beverage packaging such as plastic and glass bottles and aluminium cans.

We currently have **different end of life systems running at the same time**, depending on the country and the type of material to recycle:

– System of drop-off points for recycling: Consumers are required to bring different types of separated waste streams to recycling centers (drop-off centers) or to containers placed at neighbour level (drop-off sites).

– Deposit Refund Systems for recycling of single-use packaging (DRS): This system aims at increasing the proportion of empty packaging returned by consumers to take-back/collection points and is often combined with a tax on product consumption and a rebate upon the return. This model - which has existed in Northern Europe since the late 1980s - enables the recycling of tens of millions of single-use beverage containers and has been validated in several countries. It can reach take-back rates of around 90%, according to SDR Portugal.

– Reuse systems: According to Ellen Macarthur Foundation, there are four basic existing reuse models which differ depending on whether the packaging is refilled directly by the consumers or returned to the business, and whether that refill or the return takes place from home or away from home.

// Refill at home: Consumers keep a reusable container which they refill at home. In this case, consumers are responsible for the reusable packaging, including its cleaning.

// Refill on the go: Consumers refill their reusable container away from home, i.e. at an in-store dispensing system. Also here consumers are responsible for the reusable packaging, including its cleaning.

// Return on the go: Consumers return the packaging at a store or drop-off point. Then the business is responsible for cleaning and redistributing the refilled packaging.

// Return at home: Packaging is collected from customers' homes by business or consumer providers which will then clean and redistribute the packaging.

The Commission’s proposal strongly favours the reuse of packaging, with a wide range of re-use and refill targets for different sectors and packaging formats and with requirements for economic operators to produce reusable packaging and ensure proper reuse systems.

It is definitely true that a reusable approach leads to lower quantities of waste produced. However, when considering the whole life cycle analysis (LCA), it might happen that a reusable approach leads to a higher environmental impact than drop-off points or Deposit Refund Systems for single-use packaging (DRS)⁶. That’s because for a full scientific analysis the environmental impact generated by transport, reverse logistics, washing, disinfection and sterilisation of reusable packaging also needs to be taken into account.

That’s why it is crucial to develop an entire life cycle analysis (LCA) to really ensure the most sustainable approach to packaging and packaging waste. This science-based approach will allow us to understand which system has a lower environmental impact and if that is the case for all types of materials (e.g. glass, plastics, aluminium, etc.).

While the legislative proposal currently on the table has some clear positive impacts, other impacts are still unclear (see table below). This can only be understood by an assessment based on independent, technical studies across Europe. That’s why Euroconsumers calls on the European Commission to support the [JRC platform](#) to deliver a full life cycle assessment of all waste reduction options on the table⁷.

Table n. 1: assessment of clear/undetermined impact of the proposal

Clear positive impact	Undetermined impact (more studies needed)
(+ Clear information on labels, especially the use of same symbols across EU	(?) Washing and disinfection of reusable packaging
(+ Clearing confusion around biobased, biodegradable and compostable plastics	(?) Food / drinks contamination on refill or reusable packaging
(+ Reduce unnecessary packaging	(?) Food protection and reduction in the shelf life of products
	(?) Import / export of food between EU countries

⁶ See for example our case study on plastic bags in the Annex at the bottom of this document.

⁷ In the [impact assessment](#) accompanying the proposal, the European Commission has taken into account information from different LCA studies to evaluate the environmental impact of the considered policy options. However, the studies considered by the Commission may not be comparable as different studies may have different approaches. For this reason, in order to ensure to adopt the the same approach for all products and materials and ensure consistency and accuracy, a LCA of all waste reduction options on the table should be conducted by the European Commission.

2. Safety first: reuse and recycling at no (health) risk

For any waste management system - reuse or recycling - to be effective, consumers need to be able to trust that their health and safety is not put at risk. That's why any assessment of the most suitable packaging waste management system should not only consider the full Life Cycle Analysis (LCA) but also be accompanied by an assessment of its environmental and health impacts.

Recycling can lead to a significant pollution or introduction of problematic chemicals in new product cycles. By no means should toxic substances be reintroduced. Likewise reuse systems equally need to safeguard consumers' health and safety by addressing both hygiene requirements and chemical concerns⁸.

Consumer concern to that regard is particularly real when it comes to food packaging, as chemicals in packaging can leach into food. A recent consumer survey showed 70% of consumers worries about the impact on their health of chemicals present in packaging, with 9 in 10 supporting stricter rules to prevent health impact⁹. This comes at a time when reusing food packaging and food containers is fairly common among consumers and 1 in 5 even report reusing such items for purposes that may increase their exposure to food-related risks¹⁰.

Therefore, ambitions for either reusable packaging and recycled content both require measures to minimise and cut out hazardous substances in packaging materials at the outset of the product cycle. If missing, this could result in an increased exposure of consumers to toxic chemicals. While the current proposal for a new packaging and packaging waste regulation mentions this as a general ambition, clear measures to achieve this are shockingly absent. Human health is not something to be bargained with.

⁸ See ANEC, [Position paper on revised EU rules for packaging and packaging waste](#), March 2023.

⁹ See BEUC, "[Unwrapped. What consumers say about safe and sustainable food packaging. Finding of a 11 country consumer survey](#)". The survey was conducted by Euroconsumers during October 2022 across 11 European countries: Austria, Belgium, Czechia, Denmark, Germany, Italy, the Netherlands, Norway, Portugal, Slovenia, and Spain. A total of 11,232 valid responses were collected. Samples were weighted for age, gender, educational level, and region to be representative of the countries' national populations.

¹⁰ According to the survey, 3 in 4 consumers reported that they sometimes or frequently reuse lidded glass jars. Metal and hard plastic containers are also being reused at least occasionally by 41% and 51% of respondents, respectively. On the contrary, reuse of polystyrene trays, cardboard boxes, and takeaway food containers is less common, with only 15%, 19% and 28% of respondents stating to do so.

3. Keep it simple: careful with too many overlapping systems

Any waste reduction system, be it reuse or recycling, will depend heavily on consumers' engagement. Without their active participation it simply won't work. While this is not an easy thing to predict, especially when it comes to returning packaging, **recent research** identifies efficient and easy-to-use recycling facilities, environmental benefits, and financial incentives as the most important driving factors behind the recycling habits of European consumers.

This resonates with the findings of a Euroconsumers survey that pointed out the need for more hands-on information, the lack of simple and understandable recycling systems and the costs associated with recycling (e.g. trash bags) as the key barriers to shift consumers' recycling habits. That's why to ensure consumers are on board and fully empower them to drive this systemic change, there must be a system in place that is easy, convenient and above all fit for consumers.

Case study: reuse and deposit return systems in Portugal

Reuse and deposit return systems have been successfully implemented across Europe, showcasing consumers are important allies to implement a more circular packaging system. For example, in Portugal, consumers have been using drop-off points for recycling for over more than 25 years. Thousands of collection points are used daily, without any monetary incentive. Despite this, collection and recycling rates of materials such as glass or plastic bottles are still lower than they should be. To increase the collection of PET bottles, a deposit and return system (DRS) was piloted in Portugal with deposit system machines that provided some kind of a return. It proved to be a success when consumers received a direct return (i.e. discount on purchases); however collection rates dropped when the return was forwarded to charity organisations. The Portuguese government aims to roll out this DRS across the entire country this year.

The Commission's proposal requires economic operators using reusable packaging to participate in one or more re-use systems for this packaging. It is important to keep in mind that the introduction of any new system or process for packaging disposal will require a buy-in from consumers. The dual prioritisation of i.e a deposit system with reward and a reusable system with deposit, or the introduction of any other parallel system, will be a communication challenge. Running multiple systems for the same type of packaging materials at the same time could create confusion for consumers, with the real risk of losing their support.

4. Price matters: sustainability at an affordable cost

When it comes to reducing packaging and packaging waste, consumers will need to make efforts and take upon an active role. They will need to change the way they consume, reuse products and packaging and the way they dispose of valuable goods – either in unsorted waste or recycling streams.

We know from extensive consumer surveys that the higher costs related to adopting a more sustainable lifestyle are still by far the main barrier for consumers. This is the case across all sectors, including the waste management sector¹¹. Respondents indicated for example that the required specific trash bags come at a high price. Overall consumers call on financial incentives to be able to choose sustainable products and manage more sustainable systems. That's no different when it comes to waste management. That's why any new system not only needs to be easy and understandable, but above all affordable for consumers. A system that comes at a higher cost, will be challenging to accept and risks not reaching the much needed target.

5. The power of information: communication and labelling

Consumer empowerment starts with getting the right information. Consumers are expected, rightfully, to take upon responsibility and contribute to the reduction of packaging waste, but they cannot do this without easy access to trustworthy information. They need to know what package needs to be recycled or reused, what exactly they need to do and where it needs to go.

This requires elaborate communication and ongoing education campaigns. For more than twenty years European member states have been running initiatives to raise awareness on how to separate waste and access drop-off points. For example, the city of Rome recently launched **“Roma non è indifferente”**, an awareness campaign aimed to convince Romans to sort their waste. And last year Altroconsumo, together with many other civil society organisations, joined **“A Buon Rendere - molto più di un vuoto”**, a campaign that aims to raise awareness among citizens, politicians, the beverage industry and organised distribution about the benefits of a deposit system. Nevertheless, low recycling rates in most of the European countries show the ongoing need for strong and recurrent education campaigns to shift consumers' behaviour.

In addition, standard labelling on packaging products will equally be key. At present more than 400 different labels holding a sustainable or environmental packaging claim are used across the EU. It doesn't need much explaining that this is utterly confusing for consumers, especially when they are travelling across Member States. To ensure consumers are fully aware of the environmental impact of packages and what exactly they need to do with them, we need to secure the same approach and standard labels across the EU.

¹¹ In the water and energy sector respectively 49% and 34% of all respondents lamented the higher cost of more efficient solutions and the lack of providers with a good price for sustainable solutions. For food and drink, 45% of respondents identified the higher cost of sustainable food as one of the key barriers, while in the mobility sector the affordability of any electric vehicle was one of the main obstacles for 39% of consumers. 34% of interviewed consumers also pointed out the inaccessibility of green funds due to a limited budget and the low return on investments as key obstacles in adopting more sustainable initiatives in the financial sector.

1

We start from science:

Ensuring a sound science-based approach to policy



Decisions need to be based on independent technical and scientific studies that analyse the entire life-cycle of packaging products.

2

Safety first:

Recycling and reuse at no (health) risk



Reusable packaging and recycled content both require measures to minimise and cut out hazardous substances from packaging material to safeguard consumer health.

3

Keep it simple:

Careful with too many overlapping systems



Careful with the introduction of overlapping systems for the same type of materials, as this could lead to confused consumers.

4

Price matters:

Sustainability at an affordable cost



Waste management systems need to be affordable for consumers. If it comes at a higher cost, it will be challenging to accept and to reach the target.

5

The power of information:

Communication and labelling



Empowerment starts with the right information, clear communication and educational campaigns. Likewise clear and standard labelling is needed across the EU.

ANNEX

Reusable plastic bags – a case study

In 2021, a Euroconsumers [study](#) found that reusable plastic shopping bags had the lowest environmental footprint. However, context is everything.

Consumers face an array of options for shopping bags, from cotton or hessian tote bags complete with green slogans to recycled plastic bags or even small trolleys to transport bigger loads home. It is not always easy to choose the most environmentally sound option.

The study from Test-achats/Test Ankoop, OCU, Altroconsumo and Deco Proteste tested the ecological footprint of 96 different types of shopping bags, using LCA. As well as this lifecycle rating, each bag was given a score for how it performed in a test scenario where the bag would carry 10kg of produce. The rating and the test score helped identify the best performing (or ‘least worst’) option.

Once the best performer was identified, the testing team calculated how many times the other types of bag would have to be used to have an equally small footprint score.

The results showed that a reusable plastic bag (LDPE) sold at supermarket checkouts came out as the most environmentally friendly option, as one to two uses (depending on whether or not it contains recycled materials) were enough to compensate for its environmental impact.

The other bags performed as follows:

- Reusable, compostable plastic bags required 2 shopping trips to compensate for its environmental impact.
- Lightweight, foldable polyester bags made of recycled plastic took two uses to do better than LDPE.
- Sturdy polypropylene bag with strong handles: three to four uses are enough to have a lesser impact than the LDPE plastic leader.
- Paper bags need to be used eight times to get a better performance than LDPE bags.
- Fabric bags: bags made from jute need to be used between 36-68 times to beat the leading LDPE option, and due to the water and energy used in production, cotton bags need to be used just over 100 times.
- Organic cotton bags have an even higher impact because its extensive cultivation requires more land, meaning that it would need to be used 154 times to have less impact than an LDPE bag.

As with all sustainable consumption choices this case is all about context – which can make simple messaging and advice difficult. For instance, reusable textile bags are not bad per se, but must be reused many times over in order to have a positive impact. And, if more bags were produced in Europe and not shipped from Asia, as is common now, their energy footprint could drop by up to 90%.

Find out more about the studies in each country:

- [Belgium](#) (Test-Achats/Test-Ankoop)
- [Spain](#) (OCU)
- [Portugal](#) (Deco Proteste)
- [Italy](#) (Altroconsumo)

ABOUT EUROCONSUMERS

Gathering five national consumer organisations and giving voice to a total of more than 1,5 million people in Italy, Belgium, Spain, Portugal and Brazil, Euroconsumers is the world's leading consumer cluster in innovative information, personalised services and defence of consumer rights. Our European member organisations are part of the umbrella network of BEUC, the European Consumer Organisation. Together we advocate for EU policies that benefit consumers in their daily lives.

