

FEDIAF POSITION PAPER

Packaging & Packaging Waste Regulation



FEDIAF, the European Pet Food Association, welcomes the European Commission's proposal on the revision of the Packaging and Packaging Waste Regulation (PPWR).

Pet food packaging is critical to ensure pet food is kept safe and retains its nutritional quality. Packaging also provides pet owners with important factual and legal information about the food they are purchasing for their pet.

Pet food packaging comes in a variety of formats, including pouches, cans, bags and trays. There are different materials used in their formulation ranging from paper and cardboard to plastic and aluminium. Manufacturers carefully select the best option in order to ensure freshness, hygiene, safety and sustainability.

FEDIAF members are fully committed to reducing the environmental impact of pet food packaging. The pet food industry has been making progress to reduce and optimise the use of packaging materials, find balanced and efficient alternatives to non-recyclable plastic and increase the use of recycled content. These efforts are part of our active contribution to tackling climate change and reducing waste.

FEDIAF is keen to highlight the key policy points from PPWR that will ensure pet food safety, essential to the health and welfare of over 300 million pets in the EU, alongside broader policy objectives aiming to harmonise rules and minimising packaging and packaging waste.

FEDIAF is aligned with the Flexible packaging initiative, and we welcome the overall ambition of the proposed Packaging and Packaging Waste Regulation. We strongly support:

- Article 4, which stresses on the importance of free movement of packaging across the EU.
- Article 11.1, which sets up harmonised sorting labels across the EU, allowing consumers to properly sort their packaging which will contribute to improving recycling rates.
- Article 6, which supports the development of a harmonised definition of 'recyclable packaging' at EU level.
- Article 43, which mandates for all packaging (including flexibles) to be collected.
- Article 6.11, which plans for EPR fees to be eco-modulated on the basis of the recyclability performance grade.

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FEDIAF believes that PPWR proposal should aim to remove the barriers to an achievable circular economy for packaging.

1 Collection, sorting, and recycling technologies and infrastructure should be further developed across the EU to meet common minimum quality requirements. Rules should be established – and harmonised – for the safe recycling of plastic materials other than PET into food contact materials. Sorting infrastructures should be developed so that all types of valuable petfood packaging, designed for recycling, could be properly sorted and therefore recycled.


2 Chemical recycling: calling for recognition of chemical recycling in the EU. Chemical recycling is a technology that complements mechanical systems. It provides a safe recycled material with the required quality to pack our products. **The Pet Food Industry need certainty that firstly, we will be able to use the recycled content produced by Chemical recycling technology to support our industry’s circular economy and secondly that chemical recycling will be accounted for in recycled content targets.** For chemical recycling to scale up and for petfood industries to achieve its target, an EU mass balance method should be defined at EU level.

3 Extended Producer Responsibility (EPR) schemes should increase and enhanced the development of packaging collection and recycling: Producers under EPR schemes, in place in a number of EU countries, are responsible for the management of waste, which includes the collection of used goods, sorting and treatment of their recycling. FEDIAF ask for EPR fees to be earmarked to the packaging material they are paid for. Collected fees should not fund other types of packaging.

4 EU harmonised labelling scheme: the pet food industry welcomes the proposal to develop an EU harmonised labelling scheme, which will help consumers to improve the sorting of packaging waste and will contribute to the functioning of the single market.

A realistic transition period to implement:

- 5**
- New harmonised sorting labelling instructions (a minimum of 2 years after rules are defined in the implementing acts). (Article 11)
 - Criteria for Designed For Recycling and criteria for Recycled At Scale (minimum 5 years after the adoption of the delegated acts). (Article 6)

- 6 Composite packaging to be exempted from recycled plastic targets:** there is no evidence today that suppliers will be able to provide recycled content in this very thin layer (Article 7).
- 7 In the absence of robust impact assessment, pet food primary packaging should not be named as a specific category for reuse targets:** Moreover, new reuse targets applied to pet food could enter into conflict with Regulation 142/2011, which requires that “processed petfood must be packaged in new packaging”. 
- 8 Reuse targets for secondary/tertiary packaging:** Reuse targets should be feasible, and it should be ensured that they represent the best environmental option considering the whole life cycle of packaging, including logistics pathways. We call for proper impact assessments based on a clearly defined methodology. (Article 26)
- 9 Last but not least, FEDIAF also requests that no new national packaging initiatives are introduced until the PPWR is in place, to ensure smooth implementation of Regulation across the EU.**



"FEDIAF members are committed to achieving the objectives defined by PPWR. The new European Commission proposal is a great opportunity to encourage harmonisation across the EU and we thank in advance decision-making bodies for taking into account the interests of the 90 million pet keeping households in the EU."