EPR Toolbox | Frequently asked questions

How can roles and responsibilities in packaging value chains be defined?

1. Is it possible to implement an EPR system at regional/local/city level?

Establishing voluntary initiatives or getting voluntary commitments at regional level or below is generally fairly easy. However, implementing a mandatory EPR system is more complicated. A mandatory EPR system has to be underpinned by a legal framework that obliges producers and importers to participate in the EPR system, both financially and, if feasible, from an organisational point of view as well. It is very important to make sure that any EPR system can be controlled at regional level. There are two distinct possibilities:

Example 1: An EPR **regulation** is implemented **at national level**. However, on closer inspection of the legal framework, it becomes clear that only a limited section of the population is immediately covered by the system, and the whole population will be covered only after some years. For instance, it could be stated in the regulation that the EPR system shall cover 20% of the households in the first year, and then increase the rate gradually in the following years. Here there would be a good argument **for launching the EPR system in one or two cities or in other sub-national contexts over the first few years,** before extending it across the rest of the country step by step. In this example, the EPR system is thus implemented on a regional level – however, only for a **transitional period**.

Example 2: An **EPR law** is implemented, but it **only applies to a specific part of a country**. Since it is not a national regulation, the EPR system will also not cover the whole country. Before the law can be applied some additional information is required about material flows. There are two options to determine which companies need to pay into the system and how much they should pay:

PREVENT

a. Only companies that produce packaged goods in the region covered by the law, or that deliver such goods into that area for consumption there, are expected to participate in the system. For this option to be viable, **the area concerned must be clearly demarcated** (as must the country as a whole) **so that it is possible to determine both which companies are delivering in that region and how much they are delivering.** If this information is available, it becomes possible to determine the proportion of overall packaging waste for which each individual company is responsible, allowing an **EPR system to be implemented on a small scale.**

b. In most cases, it is **not possible to clearly demarcate the area concerned** and to **determine with certainty the amount of packaging individual companies are producing or delivering in that area.** Failing this prerequisite of case a, all obliged companies should be made to participate in a nationwide system. If you know the total nationwide revenue of each producer, you can calculate their percentage of the total revenue generated across the country and set up an EPR system on that basis, even if it only applies in one region initially (see example 1). In such circumstances it might be possible to consider exemptions for producers that could prove they were not producing or delivering anything in the area covered by the EPR system.

2. Does an EPR system disrupt competition between companies?

Voluntary initiatives by companies may negatively impact or even disrupt competition within their industries, as some companies may decide not to take part. In contrast, mandatory EPR systems create an additional financial flow by obliging *all* the companies concerned to pay into the system. This maintains a level playing field between them (i.e. ensuring fair competition/avoiding free-riding). However, if the regulatory framework for the EPR system does not provide for appropriate monitoring mechanisms and prevent free-riding, competition may be disrupted even in a mandatory EPR system.

› See also Factsheet 05

How can a PRO be established?

3. What is a PRO?

The acronym PRO stands for Producer Responsibility Organisation. The PRO functions as the 'system operator' within the EPR. It is the joint entity set up by the obliged companies or through legislation that assumes responsiblilty for the individual obliged companies concerning waste collection and disposal obligations. A PRO operates as the coordinating body between producers and take-back/recycling operators; it assumes the responsibilities of all the producers (or a group of producers) and organises take-back and recycling activities on their behalf. The PRO is also responsible for providing information about the system and maintaining communications between the stakeholders in the supply chain.

This wide range of responsibilities makes the PRO the most important stakeholder organisation within the system; it is responsible for setting up, developing and maintaining the system, as well as assuming the take-back obligations of the obliged companies.

In some countries, the acronym PRO is also used for 'Packaging Recycling Organisation'. A packaging recycling organisation does not cover responsibilities along the whole supply chain and

is therefore a less powerful body. The more neutral term 'system operator' is sometimes used to avoid confusion, but in most cases, PRO can be assumed to stand for 'Producer Responsibility Organisation'.

› See also Factsheet 02

4. Why should producers and other companies care about implementing an EPR system for packaging?

Many companies that introduce packaging and packaged goods into markets are concerned about waste management issues, and some (particularly multinational corporations) have already agreed to voluntary targets. However, delivering reliable collection and recycling systems for household packaging waste and other packaging waste is expensive, and they can only be funded effectively if all the companies introducing packaging and packaged goods to the market, contribute. This is one reason why companies should be interested in introducing mandatory EPR systems. Moreover, an EPR system allows companies to engage with the issue of waste on a level playing field, because the system is based on shared responsibility. Companies that decide to play an active role in an EPR system from the outset will also have the opportunity to influence how the system operates.

› See also Factsheet 05

5. Is it enough to implement a voluntary system?

Voluntary initiatives are a great way of bringing together a variety of individual experiences gained through pilot projects. However, a national waste collection system covering all packaging waste cannot be organised on a voluntary basis.

Voluntary initiatives are always limited in terms of the number of companies participating, the geographical areas they can cover, and the types and amounts of packaging they are able to collect and recycle.

Since none of the companies involved are under any obligation to participate, they can decide for themselves how much they want to invest in a project. This means that voluntary schemes cannot provide secure long-term financing to cover running costs. The financial contribution each company makes to a voluntary scheme tends to be lower than the fees companies are obliged to pay under a mandatory EPR scheme. Moreover, there are rarely any official monitoring systems or high-level planning expertise for voluntary schemes. Taken together, these factors limit the outcomes such schemes can achieve, and projects are often wound up once the initial objective has been completed or initial funds are used up.

› See also Factsheet 05

6. Who should the PRO members be?

Most PROs are industry-led, meaning that they are set up by companies, associations or other organisations in the private sector. These PROs are supervised by state authorities to ensure they perform their roles and carry out their responsibilities, but the implementation of the EPR system by the PRO is not directly connected to any public body. It is possible for a PRO to be set up as a state authority, for example, as a department within a ministry, but an industry-led PRO is usually preferable to a state-led PRO, as a close link between a public-sector PRO and the tax system increases the risk of funding being appropriated for other purposes. Encouraging companies to assume responsibility for their waste as part of an industry-led solution is also closer to the original idea of genuine producer responsibility. If a PRO is state-led, the underlying framework needs to make clear which state body is responsible for the EPR system.

› See also Factsheet 02

7. What role should government play?

It is up to governments to implement clear, mandatory regulations for the EPR system. The government should also monitor the system, or at least ensure that appropriate monitoring mechanisms are in place, both to make sure all the relevant requirements and targets are met, and to guarantee a level playing field for all companies involved. This responsibility also encompasses the imposition of sanctions if individual obligations are not fulfilled. It is also important that the government keeps the system under constant review and ensures it is modified as required.

› See also Factsheet 01 and Factsheet 05

8. Is it better to have one PRO, or multiple PROs competing with each other?

At the beginning at least, it is important to make sure there is only one PRO, or one PRO for each specific area of operations, and that no two PROs are in competition. For instance, the collection and recycling of lightweight packaging, industrial packaging or glass could each be organised by different PROs, because each of these waste streams has its own separate infrastructure.

Some countries do have multiple PROs operating in competition with each other, but even in these countries, the EPR system started with just one PRO. A structure with multiple PROs can only work if there is an independent monitoring mechanism that has an overview of all amounts each PRO has contributed to the system. This is the only way to prevent free-riding, ensure all the competing PROs set up and operate the relevant infrastructure, and make sure they fulfil their recycling obligations.

› See also Factsheet 05

How can financial flows be managed and fees and payments be set?

9. Will an EPR system significantly increase the price consumers have to pay for the products? Won't it make them too expensive for people on low incomes?

Wherever possible, EPR systems should operate nationwide and include all packaging. Strict cost controls and strong governance structures must be in place to prevent free-riding. If all these measures work properly, the fixed costs of such systems are shared by all the obliged companies and apply to all packaging, thus keeping additional costs for individual packaging items at a low level.

If the fees paid are spread across all the items concerned, the additional cost per item is not significant and is unlikely to be noticed by individual consumers. For instance, if you have a large plastic bottle weighing 25g and subject to an EPR fee of €300 per tonne, the EPR fee per plastic bottle is just EUR 0.0075. Moreover, these costs are also distributed fairly: only consumers buying the packaged goods will have to pay for that packaging to be collected and disposed of, whereas people buying unpackaged goods pay nothing. The fee depends on the weight of the packing concerned and the materials used to make it. The total fees charged to obliged companies can also be modified to reflect the amount of pollution for which they are responsible. The costs of operating the EPR system as a whole are covered by the EPR fees and depend on local circumstances.

› See also Factsheet 03

10. What is the difference between EPR fees and the other fees and taxes payable in many countries around the world?

Municipal fees are charges levied for specific services (e.g. collection, sorting and recycling). Municipal fees cannot be used to 'steer' the design of packaging or to promote the use of recycled materials.

Taxes, on the other hand, can be used to influence behaviour in various ways (e.g. relating to the use of resources or to imports). Taxes can be imposed based on a range of different criteria, which might include, for instance, the way packaging is designed or the proportion of recycled material in a given product. However, taxes based on criteria like this will not have any impact on the way packaging is handled after use, except if the tax system includes incentives for using recycled materials in new packaging. Any tax paid goes to the relevant state authority, and often ends up in the general state budget, where it can be spent on anything at all. Hence, this kind of tax-based system does not help to strengthen the principle that producers should be held responsible for their waste.

EPR fees are designed to cover the costs of the entire EPR system, including those associated with the collection, sorting and recycling of waste (or of recovery if recycling is not possible), communications, removal of litter and the cost of disposing of any packaging still disposed of by the municipal authorities. The level of these costs is directly tied to the volume of packaging on the market in the country concerned and the materials used to make it. Additional factors can also be taken into account when assessing EPR fees, such as the recyclability of the materials concerned or the proportion of recycled materials used. This means EPR fees can be used to influence both the design of the packaging and the way it is handled after use.

› See also Factsheet 01

11. How can we prevent double payments of EPR fees?

EPR fees should not be paid twice on the same packaging within the supply chain. With this in mind, it is crucial to identify a set point in the supply chain at which each obliged company can be clearly identified. Experience shows that this point is best set where the companies concerned introduce the goods for consumption in the country covered by the EPR legislation. Once they have been introduced to the market, these goods are consumed and, finally, disposed of, without leaving the country. The companies involved in this chain for EPR purposes are the companies that use the packaging, fillers and brand owners (which can be grouped together under the umbrella term 'producers') and the companies importing the goods for sale and consumption in the country concerned. Both producers and importers are obliged to pay into the EPR system.

Service packaging could be considered an exception, as it is only filled at the point at which the goods are sold. In this instance, identifying the filler requires much more effort and therefore offers more scope for free riders, so it is sometimes advisable to assess fees for this type of packaging by identifying the company that sells the empty service packaging to retailers, street food outlets and other places where the service packaging is filled.

› See also Factsheet 03

12. What kinds of packaging should be included in the EPR system?

Industrial packaging can be collected and recycled on the basis of individual responsibility (it is often composed of mono-materials, it is clear exactly where the waste will be generated, making take-back easy to organise, and there is a high level of traceability in the supply chain). For industrial packaging and packaging generated at other major points of origin, a collective EPR system is unnecessary, as it is easy to attribute packaging at the various points in the supply chain to the

party that produced it in the first place. Disposal systems are already in place for the majority of such waste streams.

This is not true of packaging generated by households and at equivalent places of origin. In an EPR system, the waste management responsibilities of producers and importers are transferred to a PRO, so packaging from households and equivalent places of origins should be included in the EPR system. The same applies to service and shipment packaging.

› See also Factsheet 03

How can a register of obliged companies be established?

13. Why is a register necessary, and how do you set one up?

The primary function of a register is to ensure that companies are registered and to prevent free-riding. Registers provide information on the quality and material composition of the obliged companies' packaging. PROs then rely on this information to set fees and to identify free riders. Obliged companies must report their packaging volumes and the packaging materials they use, and this information should be recorded in order to determine exactly how much each company must pay to the PRO.

› See also Factsheet 04

14. How can you make sure that companies actually register?

The list of registered companies should be published on a register website. This allows anyone to check whether a given company introducing packaged goods or service packaging to the market in the country concerned is registered and paying EPR fees.

› See also Factsheet 04

15. Which companies should be registered?

All companies obliged to pay an EPR fee for their packaging must be registered and fulfil their obligations. The registration criteria must be clear and set out in law.

Most EPR regulations define an obliged company as the company that introduces packaged products to the market 'for the first time'. Companies that introduce packaged goods to the market are obliged to register. This means that any company that imports packaged goods must register and pay the PRO for the packaging concerned. The same applies to companies that produce goods domestically and introduce them to their domestic market. Companies producing exclusively for export are not obliged to register in the country in which they produce their goods. It is also sensible to consider separate regulations for service packaging (see also question 11 above).

The registration regulations must also state who is obliged to register when production (filling) is done on behalf of a third party. Such filling occurs when one company owns a given brand, but the brand's goods are produced and filled by a third party, rather than by the brand owner. In such circumstances, the company on whose behalf the filling is carried out should be obliged to register.

The register should include basic company registration information confirming that the company is under an obligation, along with specific data on the volume and numbers of packaging items produced, if applicable. The precise data required will depend on how the fees are charged. They

may be based exclusively on the volume of packaging the company produces in each defined material, the number of units (also in relation to a filling volume) or a combination of both.

It is also possible to link permits for the distribution of packaged goods to a registration. Doing so would prevent companies that fail to register from selling the goods concerned.

› See also Factsheet 04

How can a regulatory framework be designed?

16. What kind of regulatory framework is needed?

A mandatory system cannot work unless the key aspects of the system are properly regulated. Specifically, these include definitions, the conditions applicable to the obliged producers and importers, the PRO, and ensuring the collection and recycling systems are described in detail and set measurable, manageable targets. Appropriate monitoring and enforcement systems must also be set out in the regulatory framework, along with any sanctions for breaches of regulations. The regulatory framework may be provided by a law or any other suitable legal provision that is compatible with the legal system in the country concerned.

› See also Factsheet 05

17. What are the most important steps for designing a regulatory framework?

The aim is to progress from isolated voluntary initiatives to a mandatory system. The first major step is to find allies (government and public authorities, major political parties, producers, importers, NGOs). Doing that means identifying objectives and solutions for achieving them, as well as connecting relevant stakeholders, either in one-to-one meetings or in larger group events or workshops. The next step is to mobilise all the stakeholders to discuss specific solutions and to gather information on experience obtained in other countries. Once this stage has been completed you should be able to draft an initial version of the framework.

› See also Factsheet 05

18. Who should be involved in designing a regulatory framework?

All political decision-makers must be kept informed of any plans for EPR legislation and included in the process. The more widely a regulatory framework is accepted, the easier it will be to implement it successfully. In the context of an EPR system, it is particularly important to include the companies that will be required to contribute to funding and organising the new system, or which are likely to become part of the PRO; such companies should also be consulted and involved in any discussions at an early stage. These companies might also begin the process of setting up an EPR regulatory framework themselves. It is also important to involve all the actors who will be important in ensuring the system is implemented successfully. These actors are likely to include producers, consumer organisations, national/local authorities, recyclers, PROs, NGOs and, in some cases, standardisation bodies.

› See also Factsheet 05

How can the collection of packaging waste be organised?

19. What factors influence the cost of waste collection?

The main factors are the local circumstances (collection systems on islands or in rural areas are usually more expensive to run); the type of collection system used (kerbside collection is generally more expensive than bringing waste to a central collection point), the intervals between collections; the total amount of waste to be collected and the distance between collection points and sorting plants.

› See also Factsheet 06

20. Which collection system is best?

The choice of collection system always depends on the circumstances. In densely populated cities, it is often easier to set up collection points in public places and on the street, than to set up the infrastructure needed for kerbside collection. In rural regions, kerbside collection is often the better option. It is important to ensure that all citizens covered by the collection system are aware of it and happy to use it.

› See also Factsheet 06

How can sorting procedures for packaging waste be organised?

21. What factors influence the cost of sorting waste?

The cost of sorting waste depends on what waste is collected and the technical facilities and labour required. Manual sorting is a good option if the system collects a lot of clean mono fractions. On the other hand, for state-of-the-art mechanical sorting systems to work properly, it is important to minimise contamination and to ensure that the waste collected is made up of fractions the sorting plants can handle.

› See also Factsheet 07

22. What fractions should be sorted in a sorting plant?

Mixed packaging needs to be sorted into marketable fractions and pressed into transportable bales. Even packaging collected as part of a single-fraction collection also needs to be sorted to separate out any material that should not have been included in the collection and to prevent contamination, which would make the material harder to recycle and commercialise. Glass containers are an exception: glass fractions are separated during recycling, so they do not have to be sorted immediately after collection.

› See also Factsheet 07

23. What are the main components and costs of a sorting plant?

A state-of the-art sorting system for lightweight packaging should include the following:

- A bag opening mechanism for separating mixed packaging (if it is collected in bags).

- A classification system. This system screens the material collected and assigns it to between 3 and 5 different categories according to the size and coarseness of individual particles. This allows the system to filter out fine particles and organic material, and to remove large pieces of material that might cause disruption during sorting. The rest of the material will be of more or less average size (the exact size depends on the size of the packing) and easy to sort.
- A wind-sifting system for separating film and paper.
- A magnetic separation system for recovering ferrous metals/tinplate.
- Eddy current separation for separating out non-ferrous metals.
- Sensor-based optical sorting.

The system described above is not suitable for packaging waste like glass containers or paper collected in mono collections. These materials need their own separate sorting processes.

› See also Factsheet 07

How can the informal sector get involved in the system?

24. Should informal waste pickers be paid according to the amount of recyclables they collect?

Where waste is collected informally, the only way to pay waste pickers is by the number or amount of recyclables they collect. However, this incentivises workers only to collect waste with a market value, meaning that other types of waste remain uncollected. For a sustainable waste system to work, all types of waste must be collected, including waste with little to no economic value. To ensure that all waste is collected, people have to be paid for the service of waste collection, sorting, recycling and disposal services, rather than for the value of the waste they handle. In turn, this means integrating waste pickers into the system, taking them out of the informal waste sector and into formal employment with contracts.

› See also Factsheet 08

25. Should informal waste pickers be registered if they are working under an EPR system?

If informal workers work directly on behalf of the PRO as part of the EPR system, either as business partners or as self-employed contractors, then they should be registered. People currently working informally must have an appropriate employment or service contract if they are employed by a waste management company to collect or sort waste, or if they are working on behalf of such a company.

› See also Factsheet 08

26. Who pays informal workers in an EPR system?

If informal workers are working directly for, or on behalf, of the PRO, either as business partners or independent self-employed contractors, the PRO pays them directly. If they are employed by, or

working on behalf of, another company providing services to the PRO, they are paid by the company concerned.

› See also Factsheet 08

How can citizens be incentivised to separate packaging waste at the source?

27. What is the role of municipalities/local authorities?

The most important challenge for municipalities and local authorities is to ensure that all citizens are informed about the waste collection system and the fact that packaging and other recyclables will be collected separately. Local authorities are also the key point of contact for groups and institutions that can act as awareness multipliers for the rest of the population, such as nurseries, schools, universities, clubs and other organisations. The precise remits of municipal authorities differ across the world, and their roles in the EPR system will vary accordingly.

The PRO needs to work closely with the local authorities. One way of designing an EPR system is for the municipality/local authority to collect the packaging on behalf of the PRO, and for the PRO to pay the authority for this service.

› See also Factsheet 09

28. Which residents are most important for a system of separate collections?

It is important that the entire population of the area/country concerned are included in any separate collection system. Nurseries, schools and universities can accelerate the transition by driving change. The first step is to educate the population about waste, how it should be managed, and the harmful effects that can arise when it is not dealt with properly, and to promote best-practice procedures.

› See also Factsheet 09

How can deposit refund systems be set up?

29. What kinds of items can be included in a deposit-refund system?

PET bottles, beverage cans and glass bottles are especially suitable for inclusion in deposit-refund systems, since they are easy to store, separate and recycle. PET bottles and beverage cans can also be easily returned to reverse vending machines. Other types of packaging, such as cardboard used to package liquids (TetraPak) or sachets are less suitable for deposit-refund systems.

› See also Factsheet 10

30. Is it possible to set up local deposit-refund systems?

If you want to set up a DRS on a small scale, for example to cover a small geographical area, such as the area covered by a specific company operating on a market or a specific venue during a public event, a direct deposit-refund system model is the most suitable option, as it requires minimal effort to run.

The simplest form of deposit refund system is one based on a direct relationship between the buyer and the retailer. Under this model, the buyer pays a fixed deposit when they buy a given item, which is added to the sale price. When they are finished with the item (for example when they have consumed the contents) the buyer can solely return it to the point of sale where they bought it, which acts as the only take-back station under this model. The retailer then returns the deposit to the buyer on presentation of a receipt, either in cash or in the form of a voucher.

› See also Factsheet 10

31. What incentive systems are there besides the deposit-refund system?

Charging a deposit is not the only way to encourage people to return empty packaging. Retailers or consumer goods companies can offer consumers other rewards for returning packaging, such as cash, products, services, phone credits, electronic payments or vouchers.

How can high-quality recycling be ensured?

32. Which recycling processes should be encouraged?

According to the waste hierarchy, the best option is to prevent the generation of waste in the first place. Where this is not possible, the next best option is to re-use the item concerned, or to prepare it for reuse, followed by recycling, recovery and, as a last resort, permanent disposal. The best recycling processes are those that allow the materials to be reused in new products similar to the initial one. As far as packaging is concerned, this would mean turning used packaging into a secondary product that is as similar as possible to the original in terms of its material composition. However, since packaging waste often contains mixed plastics or other compound materials, the scope to recycle packaging without 'downcycling' is often limited. Therefore, it is important to duly consider the available waste treatment techniques with respect to the waste hierarchy for each waste material concerned.

› See also Factsheet 11

33. How can we promote high-quality recycling?

Making new, high-quality products from used packaging requires high-quality recycling infrastructure, including good treatment and sorting systems. The recycled material does not necessarily have to be used to make new packaging; the first priority is to reduce the need for virgin raw materials by replacing them with recycled ones. This can only happen if the secondary raw material can meet the same key requirements as equivalent virgin raw material, meaning that the recycled material has to meet a clearly defined and controlled specification, and must do so consistently enough to be used in production in the same way as new raw material. Recycled material will only be able to meet these requirements if the original packaging is designed to be easy to recycle, and if appropriate recycling technology is available for processing each individual type of material to be recycled.

› See also Factsheet 11

34. How can we create incentives to invest in the recycling market?

One of the key ways to encourage investment is to ensure planning reliability to recycling companies for their operations. For an investment to be profitable, secondary raw materials have to be

available in consistent quantities and quality for the entirety of the planning cycle (e.g. 5 years). Establishing an EPR system, underpinned by a solid legal framework, also helps to create good conditions for investments in the recycling market. The biggest incentive you can provide is a stable legal framework that provides for mandatory collection and recycling targets and measures to enforce them. This creates certainty for investors, which in turn encourages more investment.

› See also Factsheet 13

How can the recyclability of packaging be increased?

35. What factors influence recyclability of packaging?

The recyclability of packing depends to a large extent on the following factors:

- The packaging must be designed to be recyclable. This means that the need to ensure a high level of recyclability should be factored into the design and production stages.
- There must be appropriate infrastructure for the collection, sorting and recycling of the packaging, and it must be available for use as part of the recycling system.

To put it another way, this means that packaging that is designed for recycling but is not recycled, in practice, for instance because it is not collected, not sorted or not taken to a recycling plant, cannot be considered recyclable.

› See also Factsheet 12

36. How can we influence the recyclability of packaging?

Recyclability can be influenced by a number of different factors. For instance, recyclability can be increased by offering a cash bonus for recyclable packaging, or by imposing a financial penalty for non-recyclable packaging. Such incentives can be controlled by modulating the EPR fees within an EPR system. Taxes on non-recyclable materials or packaging can also be used as a financial tool to increase recyclability. Mandatory regulations and labelling/certification systems are another way of encouraging recycling.

However, many packaging designers do not know which types of packaging are recyclable, or which elements in packaging make it difficult to recycle. With this in mind, one of the most important steps towards improving recyclability is to ensure there is a dialogue between raw material suppliers and packaging manufacturers on the one hand, and recycling companies on the other.

› See also Factsheet 12

37. How can we promote the use of recyclates?

There are a number of factors that can increase the use of recyclates, and several approaches to doing so.

Manufacturers using secondary raw materials need to be confident that this material is of the same quality as a primary, non-recycled raw material. In turn, this means that recyclers must be able to ensure a reliable supply of high-quality recyclates. Moreover, there has to be a market for the products containing the recycled material, or it must be possible to establish one. One way of doing this might be, for example, to make state authorities follow green procurement policies that encourage the purchase of recycled products. This would allow the bodies concerned to act as role models at the same time as creating the economies of scale needed to establish the market.

Another way is to set binding standards for the use of recyclates in law. For instance, Article 6 (5) of the EU Single Use Plastic Directive states that:

> *"With regard to beverage bottles listed in Part F of the Annex, each Member State shall ensure that:*
>
> *(a) from 2025, beverage bottles listed in Part F of the Annex which are manufactured from polyethylene terephthalate as the major component ('PET bottles') contain at least 25% recycled plastic, calculated as an average for all PET bottles placed on the market on the territory of that Member State; and*
>
> *(b) from 2030, beverage bottles listed in Part F of the Annex contain at least 30% recycled plastic, calculated as an average for all such beverage bottles placed on the market on the territory of that Member State."*

Another important aspect is price. The price a recycler obtains for the sale of their recyclates must, at the very least, cover the costs incurred throughout the entire recycling chain (collection, sorting, storage, processing, recycling). Indeed, the price depends more heavily on the costs of these services than on the price of virgin raw materials, which in turn means that products made from recycled materials are often no cheaper than equivalent raw materials; in some cases they are actually more expensive. This is one reason why financial bonuses, whether in the form of tax incentives or bonus/malus systems for EPR fees, can make a major contribution to promoting the use of recyclates.

› See also Factsheet 13

38. How can we increase acceptance of products made from recycled packaging?

There are a number of things we can do to increase acceptance of recycled products. Most importantly, products made from recycled packaging must fulfil the same standards as equivalent products made of virgin raw materials. Moreover, the recycled products should not be more expensive than products made of virgin raw materials. Issuing certificates, labels and other information about recycled products can also help to build trust and acceptance among consumers.

Imprint

Published by:

Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH
PREVENT Waste Alliance
Friedrich-Ebert-Allee 32 + 36
53113 Bonn
Germany

Tel. +49 61 96 79-0
Fax +49 61 96 79-11 15

info@giz.de
contact@prevent-waste.net
www.giz.de
https://prevent-waste.net/en/epr-toolbox/

cyclos GmbH
Westerbreite 7
49084 Osnabrück
Germany
https://cyclos.de

Authors:
Agnes Bünemann, Jana Brinkmann, Dr. Stephan Löhle and Sabine Bartnik.