

IN BRIEF

Labelling is increasingly considered as an attractive tool to achieve environmental objectives. Of particular relevance to PRO EUROPE members is the debate around Waste sorting recommendations.

*Overall our position is that **the introduction of such sorting recommendations is very challenging and can also be counter-productive** if the information is not simple, reliable and meaningful and avoids misleading the consumer.*

For instance:

- *There is a myriad of **different collection systems** throughout Europe,*
- *Packaging is often made of **different packaging elements** which would require different sorting labels.*

PRO EUROPE therefore calls upon cautiousness when considering these options that can have negative impacts compared to the primary objectives.

About labelling

Product labelling means every official label, private label, pictogram, logo, sentence, etc. that provides users with information about the product they have purchased. These labels can appear either directly on products, on their packaging or on their use notices.

The nature of these labels and their objectives vary greatly. It can inform the consumer about nutrition characteristics, hazardousness, suitability for children, sustainability, etc.

Of particular relevance to PRO EUROPE is the labelling of packaging with waste sorting recommendations.

Waste sorting recommendations

Some stakeholders are in favour of introducing a sorting label on products so that it can be properly sorted and then recycled. Based on its members' experience PRO EUROPE would like to call for cautiousness vis-à-vis such initiatives which could prove more harmful than helpful to achieve the objectives of waste recycling and prevention.

Daily decisions to separate waste or to buy products made of recycled materials faced by consumers determine the economic viability of environmental and waste management services. The success of PRO EUROPE's producer responsibility systems therefore relies on the engagement and participation of citizens.

Through intensive communication and media campaigns, we have raised consumer environmental awareness and educated about proper waste separation and avoidance, as well as recycling and recovery. This work is conducted hand in hand with local authorities. Indeed, individual producer responsibility approaches to the recycling processes vary from one region to another. In nearly all member states there are different local geographical characteristics, environmental standards and levels of waste management infrastructure in place that require adaptable strategies.

So far, the existing strategy has been very successful in allowing all Member States to meet and often exceed the recycling and recovery targets set in the EU legislation.

On the other hand **the introduction of packaging waste sorting labels can sometimes not only be very challenging but also counter-productive** because:

- Collection systems are not harmonised at the European level. They differ from one country to another, but also from one region to another within the same country. For example there are around 50 different collection systems in Germany. One EU label is therefore not possible and often not practical for multi-national companies to apply.
- Sorting labels on packaging cannot provide accurate and reliable instructions to all consumers and can often create confusion and sorting mistakes.
 - Packaging is usually made of different packaging elements which would require different sorting labels and would inevitably lead to technical problems and misunderstandings. There is often insufficient space on pack to include information regarding the recycling of all material types. In such scenarios it is more beneficial to have a label which points consumers to where they can find more detailed information on the packaging material content, the meaning of it's labels, and where they can find out more about local recycling facilities, such as a website. In the UK, Valpak packaging members can point their customers to www.recycle-more.co.uk which has a bank locator function to allow customers to find their nearest recycling facilities for a range of materials and products.
 - In the likely event of import or purchase at the borders, the label would not serve any purpose. Indeed, a sorting label for a product intended to be placed on the market in one country but which ultimately ends up in another is likely to contain inaccurate sorting information. For example, 80% of the packaged products being sold on the Irish market have been imported from the UK.
 - Incorrect or misleading advice can lead to the contamination of established recycling streams with packaging materials that are not currently recycled. For example in the UK where a piece of packaging is labelled 'widely recycled' the consumer will make the assumption that this includes his or her location, where in fact this logo can be placed on packaging providing that at least 65% or more of local authorities are able to collect and recycle this item. Equally, where the packaging is labelled 'not recyclable' because only a few authorities offer these facilities, this could disincentivise those local authorities which do offer these facilities to residents from continuing to do so.

Providing information to consumers on packaging waste sorting is on the whole the responsibility of local authorities, and in some countries with the collaboration of PRO EUROPE member organisations. This is currently done through various communication means and has proved to be very successful and effective, whereas the introduction of a 'one-size fits all' sorting label is not practically feasible and is unlikely to lead to the intended result of waste prevention or reduction.

On the other hand, information on-pack can sometimes be very useful to help the consumer to learn about the respective material the packaging is made of. In Norway, Green Dot Norway has introduced pictograms describing the material type to help the consumer to put their packaging into the right collection receptacle. Such pictograms may be understood by the consumer so that they do not cause as much confusion as described above, providing that collections across all local authorities in that country are standardised and that packaging does not migrate cross-border causing issues in other countries operating different collection infrastructures. CONAI in Italy is going a similar way and PRO EUROPE will monitor the effectiveness of these alternative labelling schemes.

About PRO EUROPE

PRO EUROPE s.p.r.l. (Packaging Recovery Organisation Europe), founded in 1995, is the umbrella organisation for the packaging and packaging waste recovery schemes which use the "Green Dot" trademark. PRO EUROPE acts as the authoritative voice and common policy platform for its members, representing the interests of all packaging recovery and recycling organisations mainly using the "Green Dot".

PRO EUROPE's members span 33 countries: 26 Member States (Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and United Kingdom), 2 candidate countries (Turkey, Croatia), Serbia, Norway, Iceland, Ukraine and Canada.

The members of PRO EUROPE wish to demonstrate that the recycling of used packaging is an important step on the path towards the sustainable development that is necessary to safeguard our planet for future generations. Their work in Europe and worldwide is both successful and transparent.

PRO EUROPE is headquartered in Brussels. The President is Henri Meiresonne (Fost Plus, Belgium), the General Manager is Joachim Quoden, and Pascal Gislais and Ursula Denison act jointly as Secretary Generals.

For detailed information, please visit www.pro-e.org