

**«Responsabilità Estesa del Produttore»**

**Roma, Italia**

**16 settembre 2014**

Inspiring  
Packaging  
Recycling

## **Inquadramento generale e contesto europeo**

**Joachim Quoden**  
**Managing Director EXPRA**



**Exptra**

Extended  
Producer  
Responsibility  
Alliance

# We are EXPRA

- Extended Producer Responsibility Alliance - Established in 2013.
- Coalition for packaging and packaging waste recovery and recycling systems (compliance schemes) which are owned by obliged industry.
- Strong focus on inhabitants and packaging waste arising at municipal / household level.
- Currently, 19 members in 16 European countries and in Israel and Quebec, Canada.
- Working in close partnership with obliged companies and local authorities.

# Our current EXPRA Members



**More to come very shortly!**

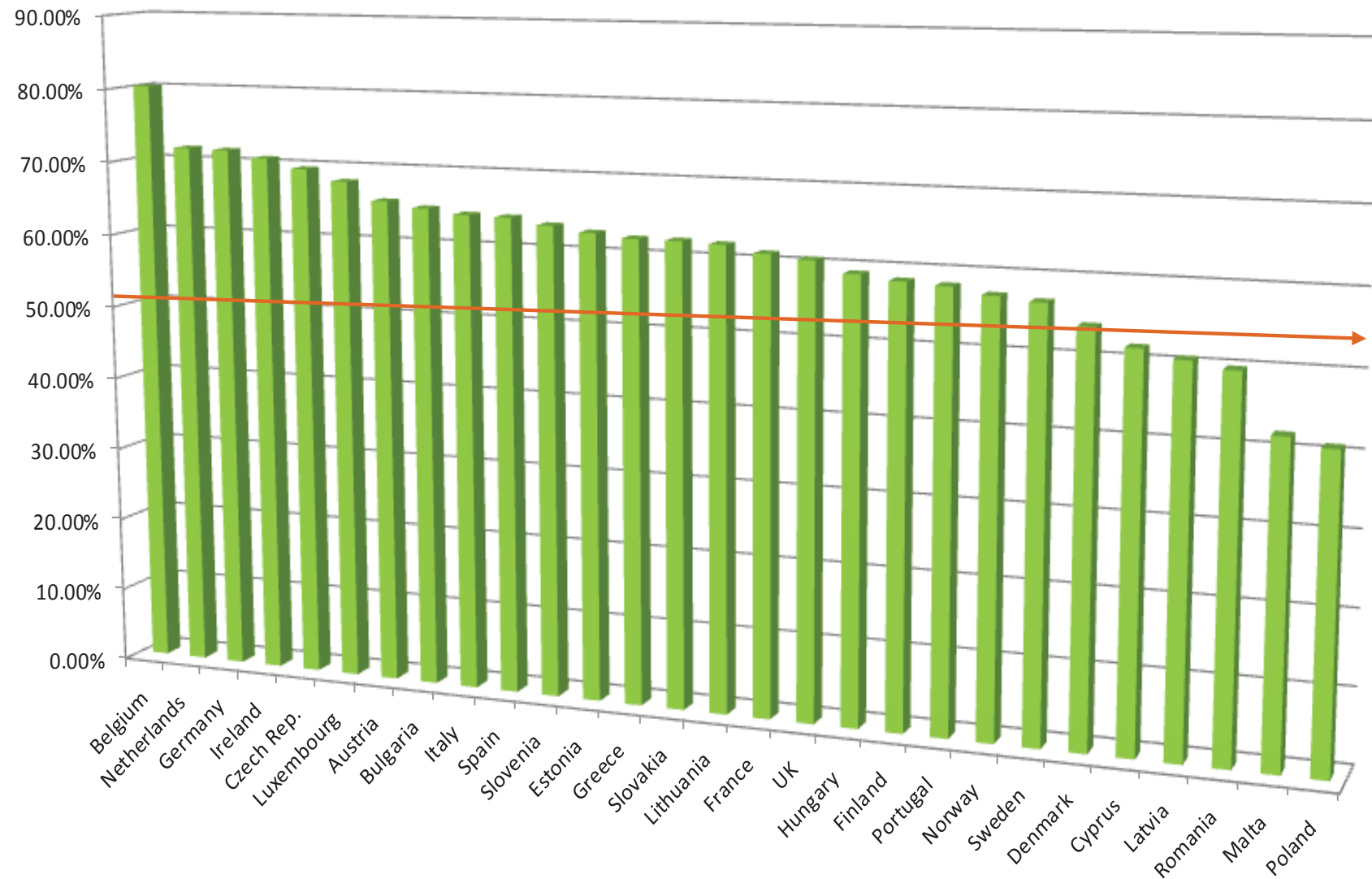
# Our EXPRA mission

To enable members to continuously **improve their services** by ensuring low costs to their client companies and convenient infrastructure for inhabitants

To promote a sustainable and efficient, **not-for-profit/profit-not-for-distribution EPR** scheme, driven by the **obliged industry** and offering a service of **public or collective interest**.

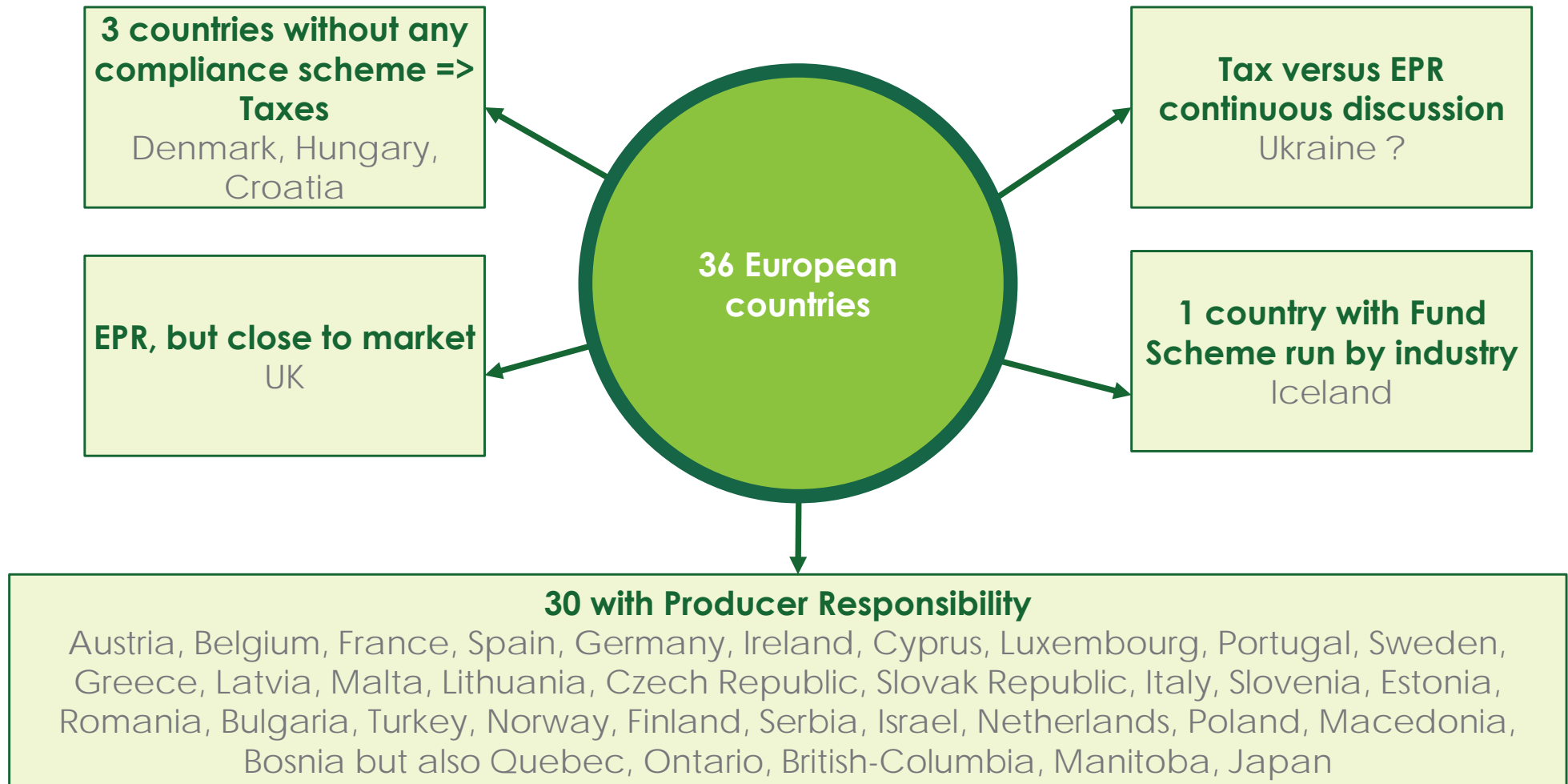
To provide a **platform for exchange of experience and know how** for our members but also for other stakeholders

# Overall Packaging Recycling Quotas in 2011



Source: Eurostat data

# Implementation of the Packaging Directive in Europe



# EPR: several ways of implementation: “Operational and Financial Responsibility”

## „Dual model” (Austria, Germany, Sweden)

Full operational and financial responsibility for industry for collection, sorting and recycling; separate collection system besides collection of local authorities, very small influence from local authorities

## „Shared model” (e.g. France, Spain, Italy, Belgium, Netherlands, Czech Republic, Norway etc)

Shared responsibility between industry and local authorities, common agreements on the way of collection necessary

Municipalities responsible for collection and often for sorting

Financial responsibility of industry different from country to country

## “Tradable Credits” Model (UK, partly Poland)

No link between industry and municipalities



Extended  
Producer  
Responsibility  
Alliance

# Producer responsibility- several ways of implementation

## **„EPR System in hands of obliged industry“ (Belgium, Spain, Italy, Netherlands, Norway, Czech, France, Ireland, Portugal, ....)**

Obliged industry has created 1 common non profit entity that collects the necessary funding, cooperates with local authorities and ensures recycling in most cost-efficient + environmental way

## **„Vertical integrated systems“ (Germany, Poland, Romania, Bulgaria.. )**

Several usually profit oriented entities compete to attract obliged companies; waste management differs from country to country

## **“Tradable Credits” Model with several traders (UK)**

No link between industry and municipalities, no operational responsibility for industry, virtual competition



# New Proposals for PPWD+ WFD

Key topics of concern:

1. Targets / Costs / Measurement Point
2. Missing or wrong definitions
3. EPR Criteria

# New Proposals for PPWD+ WFD

## 1. Targets / Costs / Measurement Point

- 70% Recycling for municipal waste in 2030
- 80% Recycling for all packaging in 2030
- 60% recycling for plastic packaging in 2025
- 90% for all other materials in 2025 resp 2030
- In addition change in the measurement point from input to output recycling
- Obligated industry should bear costs in an unclear scope partly outside their influence

# New Proposals for PPWD+ WFD

## 1. Targets / Costs / Measurement Point

- The Target Review Study states that it is already today clear that 10 to 20 Member States will not meet the 2020 targets!
- Data and calculation methods of today are fully unreliable which is stated several times in all the reports of the EC
- But new targets are justified with the performance of the Top 3 member states
- Fulfilment of targets would need collection of more than 100% of what is put on the market
- No impact assessment for the change in the measurement point

# New Proposals for PPWD+ WFD

## 2. Missing or wrong definitions

- „True costs“ – no definition
- „entire costs“ – no definition
- „EPR“ – narrow definition, not in line with OECD def
- Preparation for re-use – unclear definition
- Compliance scheme – no definition
- EPR scheme – no definition
- Difference between „material recovery“ and „recycling“?

# New Proposals for PPWD+ WFD

## 3. EPR Criteria

- Not taking the findings of the BIOIS study ordered and paid by the EC into account
- Very vague and not touching the crucial topics
- No measures to avoid conflict of interests when allocating roles and responsibilities amongst the stakeholders
- No clear criteria for the authorization of compliance schemes
- Using terms without defining them

# BIOIS EPR Guidelines Study commissioned by the European Commission

Follows 2012 study on the use of Economic Instruments and Waste Management Performances, according to which:

*EPR is an effective tool to shift waste streams to more sustainable paths*

Commission develops guidelines on EPR

<http://epr.eu-smr.eu/>

Commissioned a 15 months study about best practices in EPR and guidelines

36 national case studies: <http://epr.eu-smr.eu/documents>



Extended  
Producer  
Responsibility  
Alliance

# OECD: Revised EPR guidelines

- ***“Global Forum on Environment: Sustainable Materials Management through Extended Producer Responsibility”***, Tokyo, June 17 – 19, 2014
- <http://www.oecd.org/environment/gfenv-extendedproducerresponsibility-june2014.htm>
- Further work on
  - Competition issues on 3 levels – Where makes competition sense?
  - Design for environment incentives missing in many jurisdictions
  - Authorization, monitoring and enforcement
  - Integrating the informal waste sector

# ISWA: Key considerations for successful implementation of EPR

- **Stakeholder involvement** in the development of EPR and continuous dialogue during implementation
- **Clear allocation of responsibilities** among all stakeholders involved
- **Transparency** of EPR
- **Governmental** support, **monitoring**, evaluation and control
- Ambitious and clever policy **targets** are a necessity
- **Quality and accessibility of collection service** nationwide for municipal waste streams
- Compensation of **reasonable** costs for the use of municipal infrastructure



# Our EXPRA Beliefs for EPR Best Practices -1-

- EPR is **not a stand-alone solution** but needs a comprehensive + integrated waste management approach and system
- EPR organisations should be **run by obliged companies on a not-for-profit basis**
- **Focus on Separate collection** and collection infrastructure for **inhabitants** that covers also out of home consumption is key for the success of the system!
- In order to ensure that the right legislation is in place and implemented, **different stakeholders have clear roles to play, ensuring no conflict of interests!**

# Our EXPRA Beliefs for EPR Best Practices -2-

- **Transparency** of operations and data is crucial
- The fees for all materials covered should be **calculated in a fair manner**
- EPR organisations should **control the use of the fees** collected, and **influence infrastructure design** if necessary
- The aim should be to continuously **improve system performance**
- **Packaging optimisation, design-for-recycling, clear communication and education of inhabitants and company representatives** are essential parts of successful EPR systems

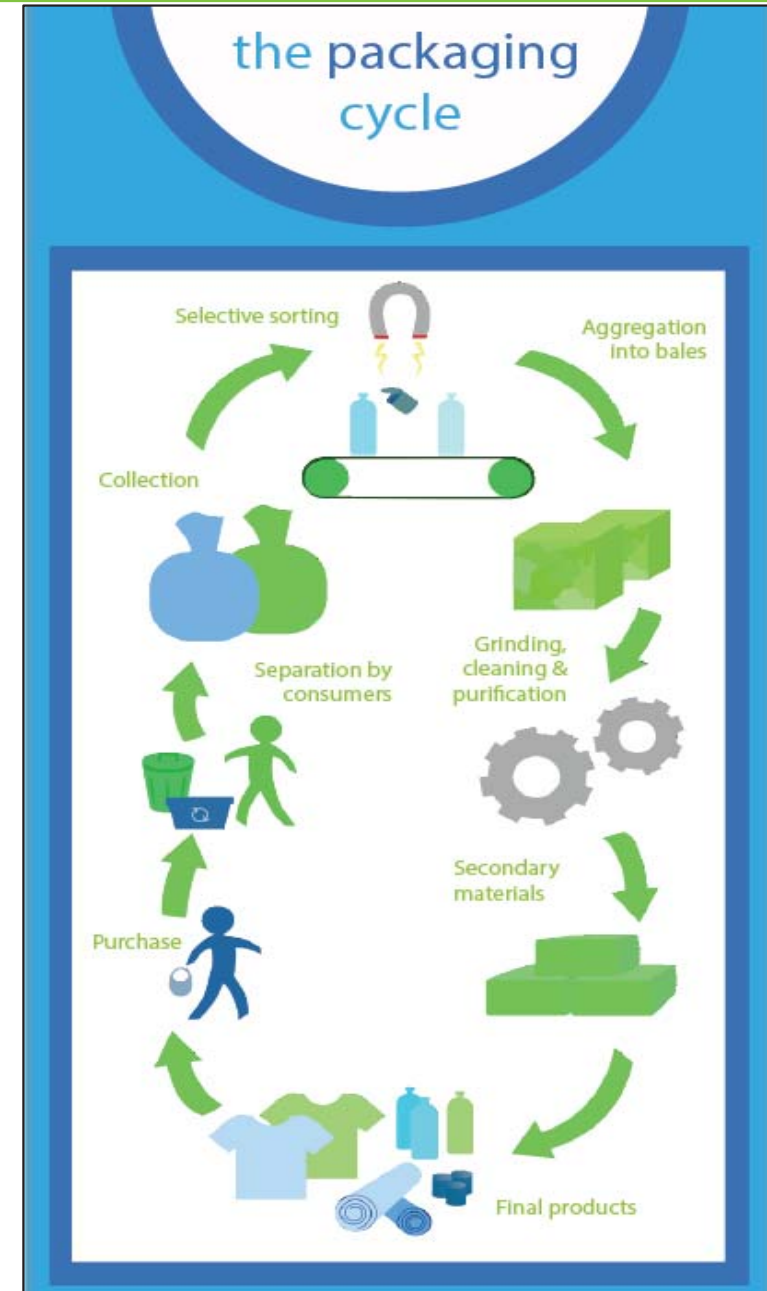
# Contact

Joachim Quoden  
Managing Director

EXPRA aisbl  
2 Avenue des Olympiades  
1140 Brussels – Evere  
Belgium

[joachim.quoden@expa.eu](mailto:joachim.quoden@expa.eu)

[www.expa.eu](http://www.expa.eu)



# Joachim Quoden – [www.quoden.com](http://www.quoden.com)

- Profession: Independent Lawyer since 1995
- 10/92 – 01/93: German Ministry of Environment
- 02/93 – 06/06: German Green Dot scheme DSD in various capacities, i.e. Head of International Affairs
- 10/00 – 02/13: Secretary General respective Managing Director of PRO EUROPE
- **05/13 - ...:** **Managing Director of EXPRA**
- 10/13 - .... Chair of ISWA Legal WG
- 04/14 - .... Member of the GPSC Advisory Council

Inspiring  
Packaging  
Recycling

**PARTNERSHIP IS A KEY TO SUCCESS**



**Expra**

Extended  
Producer  
Responsibility  
Alliance