



**SPITRSEUROPE POLICY
RECOMMENDATIONS ON THE RE-USE OF
PACKAGING FOR SPIRITS DRINKS**

**IN THE CONTEXT OF THE REVISION OF THE
PACKAGING & PACKAGING WASTE DIRECTIVE**





KEY POLICY RECOMMENDATIONS BY SPIRITSEUROPE FOR THE ONGOING REVISION OF THE PACKAGING & PACKAGING WASTE DIRECTIVE

- No mandatory re-use targets should be set for spirits drinks
- Policy objectives must be science based, streamlined and may not be contradictory
- International trade rules and the Internal Market must be protected, requiring harmonised policy objectives: a Regulation for Packaging and Packaging Waste is needed
- Policy on re-use schemes needs to distinct clearly between (fast moving) consumer goods packaging and business-to-business packaging

In the context of the revision of the Packaging and Packaging Waste Directive (PPWD), the European Commission considers the introduction of mandatory re-use targets per sector as measure to reduce packaging waste per capita across the EU Member States. **For the spirits sector, the EU COM foresees mandatory re-use target for all packaging as follows: 5% - 10% by 2030, and 15% - 30% by 2040. More than 90% of spirit drinks sold in the EU are packed in in glass bottles, a highly sustainable packaging format, particularly considering the high and constantly increasing recycling rates. Spirits drinks account for only 0.8% of all glass bottles on the EU market. Further, as rather concentrated drinks with a high value, low volumes of packaging are required to transport high numbers of portions, adding to our products environmental sustainability.**

spiritsEUROPE and its members call on the European Commission to refrain from the introduction of mandatory re-use targets for spirits drinks. Brand manufacturers should be allowed to select the waste management models for their product portfolio that deliver the best results in terms of life cycle analysis principles for specific products and the supply chain specific contexts; there is no one-size-fits all. Our sector is already implementing and testing new waste management models, including also packaging reuse models, but there is no “one size fits all” model from a carbon footprint perspective and consumer safety perspective: the regulatory requirements necessary for the off- and on-trade differ significantly. Freedom to innovate must be given to industry to continue to invest in breakthrough packaging innovation and R&D; policy must not limit these R&D activities by stringent targets.

For this reason, spiritsEurope welcomes and supports a policy framework that allows brand manufacturers the flexibility to select waste management models that deliver the best outcomes in



terms of sustainability across the value chain. We need to be able to manage packaging and packaging waste in the best possible way to ensure consumer safety, product quality as well as brand equity and reflect product specificities as well as supply chain opportunities and constraints. **This can only be achieved by bottom-up policy approaches.**

The spirits sector is a global market which is highly regulated by specific legislation, such as the Spirit Drinks Regulation (2019/787), which stipulates a.o. that GI spirits may only be produced and bottled in specific geographies (typically, the area of production). Re-usable packaging must circulate within the retail chain from fillers to retailers to consumers and the same way back. **It can only be an efficient and environmentally sustainable packaging solution in short supply chains of maximum of 200 to 300km to be environmentally beneficial in comparison to recycling solutions¹.** Against this scientific background, shipping a vast number of empty bottles for re-use purposes throughout the EU and back to countries like Mexico or the UK (Scotland) could impossibly provide any environmental benefit and renders them a-priori unsuitable for environmentally sustainable re-use systems. Therefore, we call on the legislator to propose **science-based policy objectives**, driven and supported by high-quality data. Thorough impact assessments are a prerequisite to understand the environmental socio-economic and consumer safety implications of any policy initiative such as re-use.

Various Member States are in the process of introducing mandatory weight reduction requirements for glass packaging. These bottles would de facto not allow any reuse models to be implemented. Background is that glass bottles designed for recycling are lightweight and do therefore not withstand multiple uses, hence are not safe for the consumer when taken out of foreseen use conditions. Meanwhile, bottles designed for reuse purposes are usually thicker and heavier due to their specific resistance requirements ensuring secure handling and consumer safety. As a result, different types of glass bottles for the same product would need to be placed on the market via the same outlets, leading to consumer confusion, mixed-up collection systems, and eventually not advancing environmental sustainability policy objectives but jeopardizing them. **In this context we stress the need for policy that is streamlined across Member States and which protects the Internal Market.** Investing in R&D to take carbon out of the environment, for instance by exploring options for re-useable packaging, requires planning and a minimum investment security for companies which would be compromised by national waste management targets; a harmonised policy approach forms the very basis for R&D activities, whilst contradictory national waste management policies endanger the significant investments needed from industry for best-in-class environmental action.

As a global sector, **international trade rules play an important role for us and** no barriers to trade may be imposed for imports of products into the European Union. Mandatory re-use systems for spirits

¹ [Deroche Consulting's](#) Life Cycle Analysis (LCA 1), published in 2009. This study focused on a Return on the go model applied to a beer glass bottle of 75 cl used by the brewer Meteor and cleaned in the Alsace region. The METEOR case highlights the importance of keeping the distance travelled during the return logistics to around less than 250 - 300 km. Results of LCA 1 and of another LCA (LCA 2) "[Reusing glass bottles in Italy: A life cycle assessment evaluation](#)" made in Italy and published in 2020.



drinks are very likely to infringe WTO rules.

Finally, **Policy on re-use schemes needs to distinct clearly between (fast moving) consumer goods packaging and business-to-business packaging.** Supply chains differ significantly for foodstuffs and are particular **for spirits drinks, who are not typical fast moving consumer goods as they have an indefinite shelf life and depletion rates range from 8 to 12 months for high-volume spirits and several years for premium products.** Thus, the active lifespan of spirits drinks bottles is not comparable to that of portion sized, perishable foodstuffs. Top-down policy that disregards sector and product specificities prevent the best possible environmental outcomes. **Also, spirit drinks are – due to their high value– at high risk of counterfeiting – which can put consumer health at risk. Re-usable bottles and related packaging schemes require extra attention to ensure continued highest levels of consumer and product protection.** Phasing in re-use schemes for spirits drinks therefore represents a complex, costly and systemic change of existing business models and supply chains. Policy measures focusing on setting mandatory re-use targets for packaging do not reflect the complexities and dynamics of neither the spirit drinks sector nor the packaging market.

For these reasons, spiritsEurope welcomes and supports a policy framework that allows brand manufacturers the flexibility to select the collection models that best ensure consumer safety, product quality, and brand equity and reflect product specificities as well as supply chain constraints alongside the lowest carbon footprint. To develop a policy-mix on waste management – which may include re-use models for specific situations – that delivers best results in terms of taking carbon out of the environment, a structural exchange and strong partnership between industry, retailers, NGOs, stakeholders and governments is critical. Government supported awareness campaigns are needed to ensure consumer engagement and generate a real shift in consumption patterns. The spirits sector is looking forward to partner with the EU and national governments to do so.



spiritsEUROPE proudly represents one of Europe's most valuable agri-food export sectors and, with it, the interests of 31 associations of spirits producers as well as 11 leading multinational companies. Distilled spirits are as diverse as the EU itself, spanning 44 product categories and including a host of geographically specific products that contribute to the culture of their regions (240 GIs)

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