



**Consumers food safety of the ‘Green’
FCM under the new EU action plans
D. Mandis, AGMPM chairman**

EU strategy

Chemicals Strategy for Sustainability
Towards a toxic-free environment

**Circular Economy
Action Plan**
For a cleaner and
more competitive
Europe

**The
European
Green
Deal**



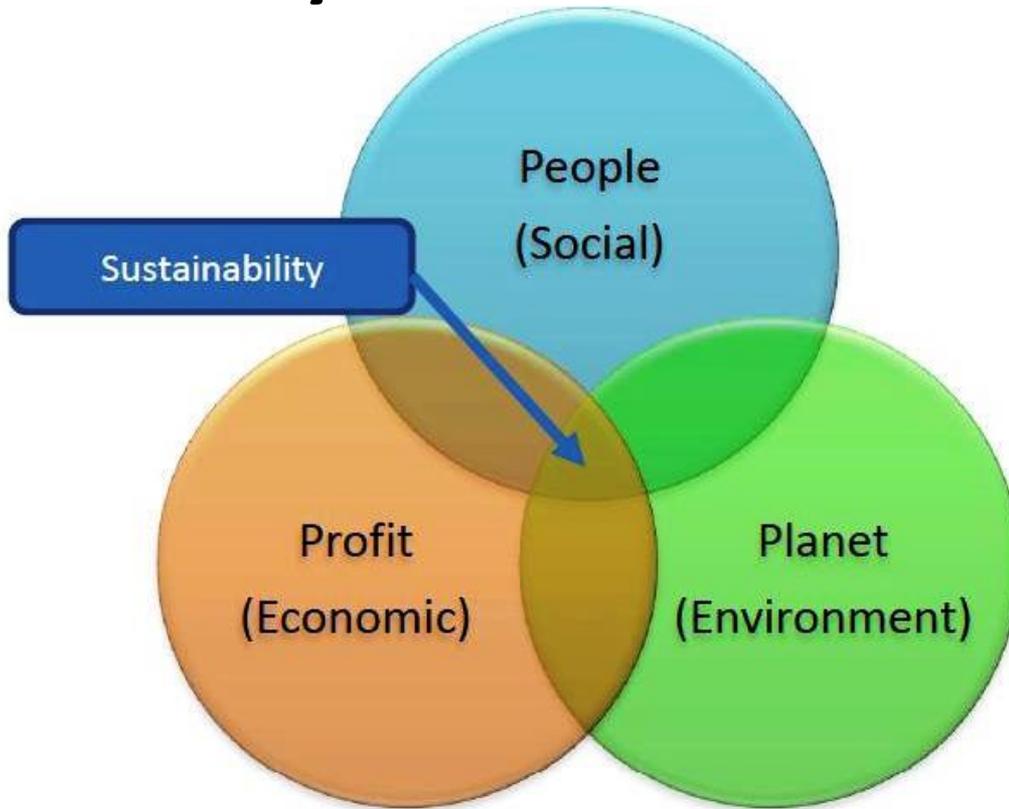
EU PLASTICS STRATEGY

A photograph of plastic waste, including bottles and bags, floating in the ocean. The text 'EU PLASTICS STRATEGY' is overlaid in white on the bottom left.

**THE EUROPE
INDUSTRIAL
STRATEGY**
#EUIndustrialStrategy

A graphic with colorful 3D cubes in blue, yellow, and orange. The text 'THE EUROPE INDUSTRIAL STRATEGY' is on the right, and '#EUIndustrialStrategy' is below it. A small EU flag is at the bottom right.

In theory



Sustainable development meets the needs of the present without compromising the ability of future generations to meet their own needs” (UN 1987 World Commission on Environment and Development)

Sustainability is the ability to continue a defined behavior indefinitely, therefore not hindering the future in any way, neither environmental, nor economic or social.

Circular economy definition

An economic system in which the value of products, materials and other resources in the economy is maintained for as long as possible, enhancing their efficient use in production and consumption, thereby reducing the environmental impact of their use, minimizing waste and the release of hazardous substances at all stages of their life cycle, including through the application of the waste hierarchy.²

In practice, consumers

GOING AROUND IN CIRCLES:
#RECYCLING AND
#CIRCULARITY

Plastics recycling symbols



Eco-labels



Terminology

Single-use plastics

Ocean-bound plastic

Ipsos Synthesio Report, Conclusions

Labelling complexity adds to consumer confusion, with numerous terms, symbols, and ecolabels causing distrust. To pave the way for a circular economy, it is crucial to address these challenges and provide clear information to consumers.

In practice, the brands

The future of packaging in the circular economy

5 actions for long-term success

 accenture

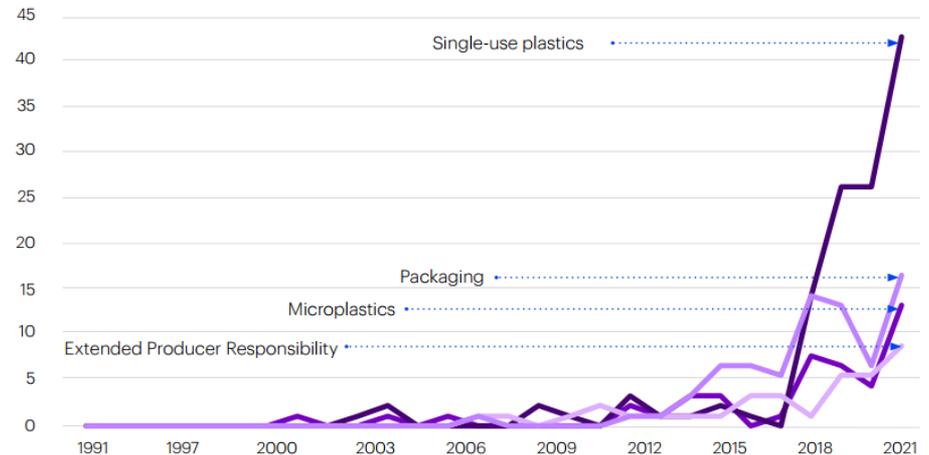
 SAP

The pilot purgatory

66 % of pledges to go greener on plastic have failed due to companies breaking their own commitments and targets

the overwhelming majority of pilots have not shown progress beyond the initial announcement, with no acknowledgement of cancelled pilots or shared learnings from those projects.

We have seen a hundred-fold increase in plastic policies since the 90s¹⁸

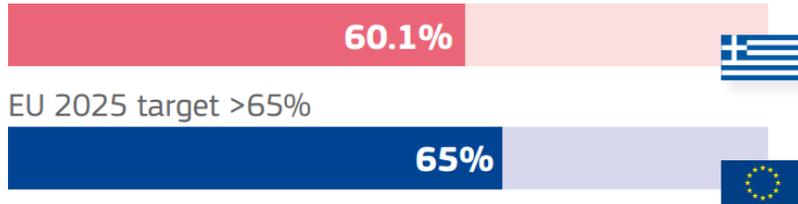


In practice, the EU m/s



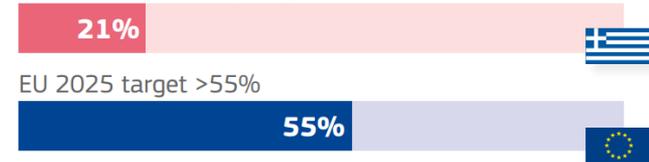
In 2020:

Packaging waste recycling was 60.1%

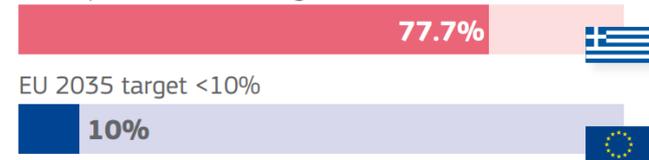


In 2020:

Municipal waste recycling rate was 21%



Municipal waste landfilling rate was 77.7%



The European Commission in a report published on 08 June 2023 lists the Member States at risk of not meeting the preparation for reuse and recycling targets for municipal and all packaging waste for 2025 and the landfill target for 2035.

Greece is at risk of missing the 2025 targets for the recycling of municipal waste and of all packaging waste. The distance to the 2035 target for the landfilling of municipal waste is also of concern.

In our everyday practice



In practice, the price to pay

KANTAR



98% of people in APAC are prepared to take action to live in a more environmentally conscious way.

The first barrier that stops many of them taking action, however, is increased cost of living and the fact that too many sustainability products are still perceived to come at a premium



ENV



*PPWR proposal published on 30th
November 2023*

Brussels, 30.11.2022
COM(2022) 677 final

2022/0396 (COD)

Proposal for a

REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC

(Text with EEA relevance)

{SEC(2022) 425 final} - {SWD(2022) 384 final} - {SWD(2022) 385 final}

PPWR proposal published on 30th November 2023

New EU rules on Packaging and Packaging Waste: What to expect?

The European Commission proposal in a nutshell



Regulatory harmonisation

- Moving from a Directive to a Regulation
- Binding measures for direct and uniform application across all EU Member States



Packaging minimisation & waste prevention

- Waste reduction targets set for EU Member States
- Packaging minimisation obligations for economic operators
- Restrictions on certain packaging formats



Packaging recyclability

- All packaging to be fully recyclable: designed for recycling by 2030 and recycled at scale by 2035
- Recyclability of packaging to be assessed against Design for Recycling criteria
- Eco-modulation of EPR based on packaging recyclability and, for plastic packaging, on the percentage of recycled content



Plastic recycled content

- 2030 and 2040 mandatory minimum recycled content targets for plastic packaging, for each unit of packaging that contains a plastic part



Re-use and refill

- 2030 and 2040 reuse and refill targets for economic operators and final distributors for a wide range of food and beverage packaging, as well as transport packaging



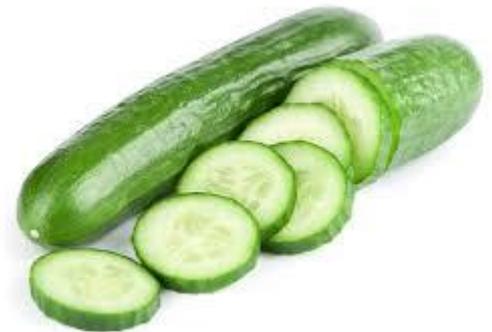
Harmonised labelling

- Requirements on the labelling of packaging to provide consumers with sorting instructions, information on plastic recycled content and the reusability of packaging

For more information and detailed analysis on the European Commission proposal for a revised Packaging and Packaging Waste Directive, visit the EUROPEAN website: www.europen-packaging.eu

NO packaging at all ????

- Article 22 and Annex V of the PPWR revision, currently discussed at EU level, restrict the use of certain packaging formats such as the proposed ban on packaging for fresh fruits and vegetables or the ban on single use packaging for food and beverage. This overlooks the important role that packaging plays for a resilient food system, in the prevention of food waste and cross-contamination, and needs to be carefully assessed to prevent unintended consequences for consumers' health and safety.
- Such bans will also favour food waste and spoilage. This runs counter the objectives of the Waste Framework Directive, also under review, which sets out a 30% food waste reduction targets in retail and other distribution of food, in restaurants and food services (per capita and compared to 2020 data).



Protecting sensitive food products ??

- Several Member States have already introduced an obligation to sell fresh fruit and vegetables in bulk (Spain, in December 2022) or restricted the use of packaging made partly or wholly of plastic for the sale of fresh fruit and vegetables (France, in July 2023).
- Such measures violate Article 6(3) of the [TRIS Directive](#) on technical barriers to trade (which obliges Member States to refrain from adopting legislation when a matter is addressed at EU level) and fragment the Union market as diverging requirements will apply across Europe.
- We see a risk of fragmentation of the Single Market in relation to the transposition of the ban on the use of packaging for the sale of fresh fruit and vegetables. While Annex V (point 2) in the Commission's text foresees the possibility to adopt exemptions in case, for instance, of turgidity loss, physical shock etc. the proposal has no built in mechanism to ensure that such exemptions will apply equally in all Member States. In practice, this could mean that for instance carrots are exempted in Spain but included in the French ban. Again, this would fragment the Union market.

BUT, what about the safety of consumers ?????



Materials Practice

Sustainability in packaging 2023: Inside the minds of global consumers

Consumer sentiment on sustainability is changing as we emerge from the COVID-19 pandemic. A few common themes are clear, but views on packaging materials and environmental priorities vary by country.

McKinsey
& Company

Exhibit 2

Consumers still prioritize hygiene and food safety together with shelf life as the packaging criteria shaping their purchasing decisions.

Importance of different aspects of product packaging, respondents who indicated “extremely” or “very strong,” %

■ Ranked in top 2
 ■ Ranked in lowest 2
 ▲ Percentage point (p.p.) change from 2020

Europe

Asia

North America

Latin America

	US	Mexico	UK	Germany	France	Italy	Sweden	Brazil	India	China	Japan	2023 global average, ¹ %
Hygiene and food safety	75	85	72	68	64	66	62	89	89	87	63	75 ▼ 2 p.p.
Shelf life	69	82	63	59	53	62	55	90	80	81	46	67 ▼ 2 p.p.
Ease of use	57	71	51	46	40	41	33	78	78	65	35	57 ▲ 0 p.p.

This 2023 survey covers a statistically significant sample size across 66 percent of global GDP and 50 percent of the global population, as well as across demographics in each of the 11 countries.

Responses from more than 11,500 consumers reveal three main findings. First, across all countries, hygiene and shelf life top the list of factors important in consumers' purchasing decisions.

Second, on the environmental impact of product packaging, consumer concerns related to ocean litter are most evident in Europe, Japan, and the United States. Meanwhile, consumers in other Asian countries and Latin America seem most concerned about other forms of pollution.

UNWRAPPED |

What consumers say about safe and sustainable food packaging



Findings of an eleven-country consumer survey



MAIN FINDINGS

1



1 in 4 consumers feel poorly informed about food packaging and kitchenware, while less than 10% feel well informed. Many find that the information provided with food packaging is neither understandable (26%) nor sufficient (36%).

2



Around 3 in 4 consumers recognise the official 'food contact' symbol – but only a minority (29%) knows what it means.

3



3 in 4 consumers experience at least occasionally that essential information is missing or unclear when buying or using food containers and kitchenware. All such items should have an easy-to-understand instruction for use, according to 9 in 10 consumers.

4



Consumers are in general aware that some packaging or containers can release chemicals into food – with plastic items perceived as especially ‘risky’.

5



50% of consumers say they keep using (for some time) worn or damaged food containers and kitchenware, such as damaged non-stick frying pans. Age and wear can increase risks of chemicals leaching into food. And, fear of food contamination along with a loss of utility are also the main reasons for discarding damaged food containers.

6



Reusing packaging and food containers is fairly common among consumers. 1 in 5 reports reusing such items for purposes that may increase their exposure to food-related risks, e.g. storing hot food or drink in single-use packaging.

7



2 in 5 consumers find it unclear which food containers and packaging are safe to use. A majority (59%) trusts public authorities to effectively check that food containers and packaging are safe. In reality, regulators however face major challenges in doing so.

8



70% of consumers are worried about the impact on their health of chemicals present in food packaging and kitchenware. 9 in 10 support stricter rules to prevent health impacts.

9



2 in 5 consumers find it unclear which food containers or packaging are environmentally-friendly. Green claims should however be strictly regulated, according to around 9 in 10 consumers.

10



4 in 5 consumers are worried about the impact of food packaging on the environment. Almost 9 in 10 support strict rules to prevent such impacts.

Reusable packs

2023 research was to perform a comprehensive evaluation of the hygienic condition of foodservice serviceware items, particularly the reusable takeout and delivery containers, single-use items and dine-in reusable foodservice items.

Along with aerobic plate count microbial levels, the study also compared levels of Coliform and Staphylococcus bacteria

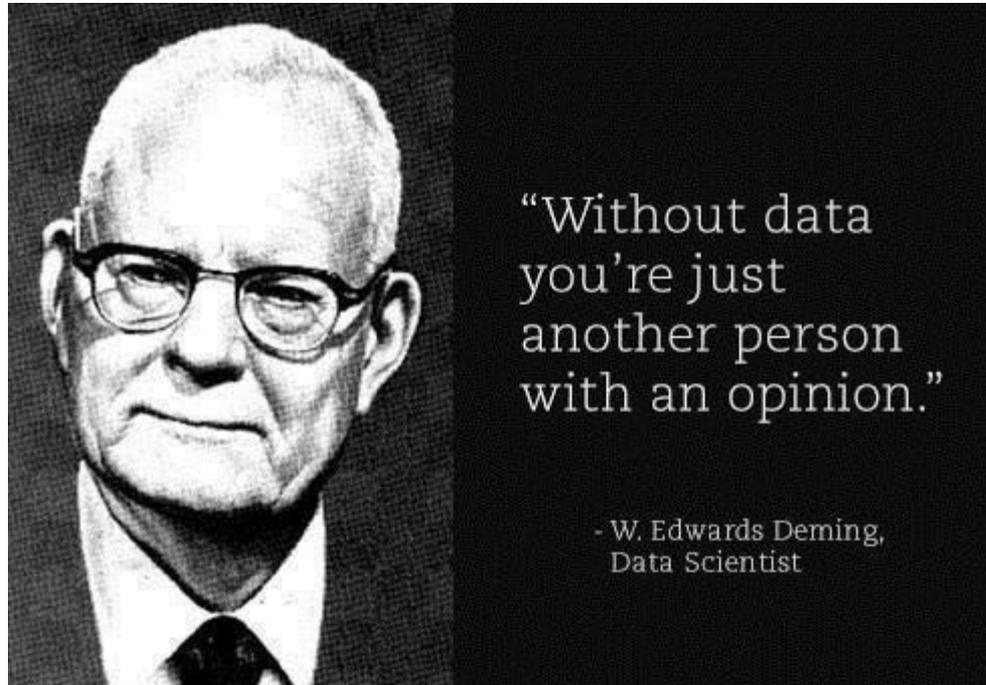
CONCLUSIONS

Overall, reusable to-go durable foodservice items had higher aerobic plate count microbiological levels than reusable dine-in and single-use items



Reusable packs

WE NEED MORE DATA, MORE REPORTS AND STUDIES



CATEGORIZING REUSE/REFILL MODELS



Many models and ideas are explored for the reusable sector

Reuse and SUI

TEST PHOTOS



Before Test



During Test

Outdated EN standards still exist in the market

EN 12875-1:2005, Mechanical dishwashing

EN 12875-2:2001, Mechanical dishwashing resistance of utensils - Part 2:
Inspection of non-metallic articles

EN 12875-4:2006, Mechanical dishwashing resistance of utensils - Part 4: Rapid
test for domestic ceramic articles

EN 12875-5:2006, Mechanical dishwashing resistance of utensils - Part 5: Rapid
test for ceramic catering articles

Reuse and SUI



MODERN standards ensuring food and beverage consumer safety should cover every food and beverage category

Defining Recyclate Quality Target Specifications to Improve Plastic Packaging Circularity

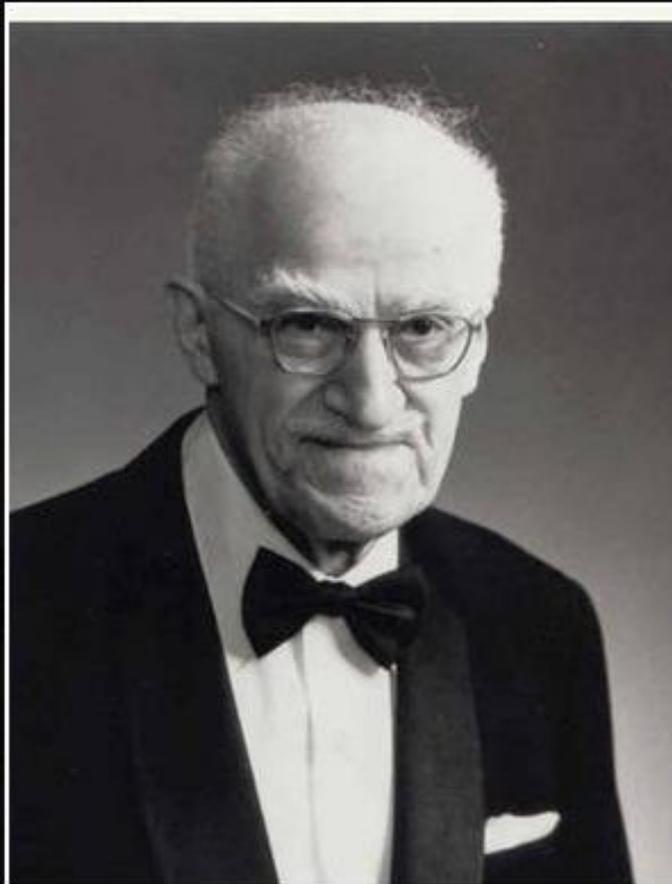
Final Report – July 2023

Conclusions:

Without consistent target specifications for quality recyclate for circular packaging, there will not be enough material to meet the recycled content demand.

The European plastics industry is not yet able to reach its recycling targets due to insufficient volumes of recycled plastic that fully meet the required quality for all key packaging applications. Furthermore, recycled content targets are expected to increase under the European Commission's proposed Packaging and Packaging Waste Regulation (PPWR).

We urgently need to produce recyclate quality target specifications and associated bale specifications to develop the market.



Without a standard there is no
logical basis for making a decision or
taking action.

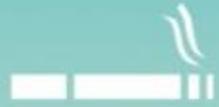
— *Joseph M. Juran* —

AZ QUOTES

SUPD implementation, the Greek case

10 most common plastic objects found on European beaches

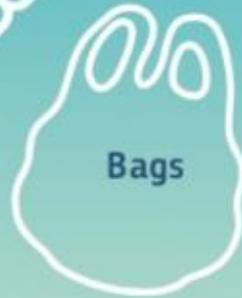
Cigarette butts



Food containers



Drink bottles



Bags



Crisp packets/
sweet wrappers

Single-use plastic items represent
50%
of marine litter

Balloons and balloon sticks



Cups & lids



Cutlery,
straws &
stirrers

Sanitary applications



Cotton buds



Source: Based on JRC report

SUPD implementation, the Greek case

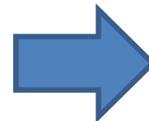
Νόμος 4736/2020 (Ενσωμάτωση της Οδηγίας 2019/904 σχετικά με τη μείωση των επιπτώσεων ορισμένων πλαστικών προϊόντων στο περιβάλλον).



Νόμος 4819/2021 (Ολοκληρωμένο πλαίσιο για τη διαχείριση των αποβλήτων).



Απόφαση της 20 Δεκεμβρίου 2021 για τον καθορισμό Καθορισμός του τύπου και του περιεχομένου της δήλωσης απόδοσης της εισφοράς προστασίας του περιβάλλοντος για τα πλαστικά προϊόντα



Νόμος 4876/2021, 23 Δεκεμβρίου 2021 με τίτλο 'Ρυθμίσεις για την αντιμετώπιση της πανδημίας του κορωνοϊού COVID-19 και την προστασία της δημόσιας υγείας και άλλες επείγουσες διατάξεις'



NOMOS 4964/2022
Διατάξεις για την απλοποίηση της περιβαλλοντικής αδειοδότησης κα
ΥΠΕΝ, Διευκρινήσεις σχετικά με την επιβολή εισφοράς προστασίας του περιβάλλοντος, 29/12/2022

SUPD implementation, the Greek case

August 2023, Athens



September 2023, Athens



Illegally mass-distributed articles with no direct food contact certifications

SUPD implementation, the Greek case

November 2023, Athens



*= Illegally mass-distributed reusable bamboo DFC packages
- Intended use instructions are missing also in every case.*

CONCLUSIONS

1. *EU Consumers are massively greenwashed*
2. *The majority of EU consumers cannot afford to pay a very expensive green pack*
3. *The EU customers prioritize food and beverage safety*
4. *Lack of reports on food safety of reusable and new green packs*
5. *New revised standards needed to cover each scenario*
6. *Implementation of regulations is a key issue in the majority of MS*
7. *Food waste/food loss will stand as the great loser toward the path for a green deal*

Our network



RecyClass

Contact our team of experts

www.pac.gr

