

EUROMOT POSITION

RECOMMENDATIONS ON THE PROPOSAL FOR A NEW REGULATION ON PACKAGING AND PACKAGING WASTE

19 April 2023

EUROMOT, the European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers, represents the key manufacturers of internal combustion engines and alternative powertrains installed in industrial non-road mobile machinery, marine and stationary applications that are operating in Europe and worldwide.

EUROMOT supports the objectives of the Packaging and Packaging Waste Regulation (PPWR) proposal to contribute to the transition to a circular economy and to the efficient functioning of the internal market by harmonising national measures on packaging and packaging waste. However, we are concerned that some provisions in the text would lead to an unharmonized and fragmented EU market, increased and unnecessary administrative burdens.

Key recommendations:

1. ***Ensure that EU MSs shall not further implement individual national measures on packaging and packaging waste as this hinders the good functioning of the EU internal market, as well as causes administrative burdens for industries.***
2. ***The regulatory framework must take into account the uniqueness of the challenges of individual industry sectors at the different stages of the packaging life-cycle.***
3. ***Avoid double regulation.***

(More details below)

1. EUROMOT welcomes the introduction of a Regulation rather than a Directive, as this should ensure a harmonised implementation of the requirements throughout the European Union (EU) and its MSs. Harmonised and uniformed requirements are essential to replace the current mix of different national demands in the various EU MSs and avoiding double regulation. **EUROMOT stresses the need for the EU Commission to ensure that EU MSs shall not further implement individual national measures on packaging and packaging waste as this hinders the good functioning of the EU internal market, as well as causes administrative burdens for industries.** A harmonised internal market is crucial for the

circular economy to function and to deliver sustainability gains at scale. National measures, despite their intentions, are detrimental to the internal market and to the development of a circular economy. We believe that MSs should not be allowed to introduce further labelling requirements for the purpose of identifying EPR schemes, as prescribed in the following examples:

Free movement, Article 4.5: “In addition to the labelling requirements laid down in Article 11, Member States may provide for further labelling requirements, for the purpose of identifying the extended producer responsibility scheme or a deposit and return system other than those referred to in Article 61(1).”

Labelling of packaging, Article 11 (8): “Packaging included in an extended producer responsibility scheme or covered by a deposit and return system other than that referred to in Article 61(1) may be identified by means of a corresponding symbol throughout the territory in which that scheme or system applies. That symbol shall be clear and unambiguous and shall not mislead consumers or users as to the recyclability or reusability of the packaging.”

EUROMOT is concerned that this could mean further requirements on manufacturer and/or producer in some member states. This poses a real concern for market fragmentation and preventing the free movement of goods. This also goes for Art. 38 which implies MSs could go beyond requirements and set more stringent waste targets.

2. Moreover, **the regulatory framework must take into account the uniqueness of the challenges of individual industry sectors at the different stages of the packaging life-cycle.** This can best be achieved by embracing and prioritising harmonised standards before technical specifications, as it provides for each given stakeholder sector to propose tailor-made solutions to address the established requirements. Functionality of packaging, product security and stability are key for our industries. More specifically, we believe that **it should be further assessed whether the requirements under Article 26 (7) and (9) on the requirements for re-use for transportation packaging are realistic, proportional and appropriate.**
3. In addition, article 5 on substance requirements in packaging, EUROMOT would like to stress the importance of keeping substance requirements in REACH to **avoid double regulation.** All packaging feedstock comprising recycled and virgin materials should only be in conformity with the REACH regulation. This is also applicable for the concentration limits proposed for certain substances, which should refer to those mentioned in the REACH regulation.

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A Non-Governmental Organisation in consultative status with the UN Economic Commission for Europe (UNECE) and the UN International Maritime Organisation (IMO)

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THIS IS EUROMOT

EUROMOT, the European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers, represents the key manufacturers of internal combustion engines and alternative powertrains installed in industrial non-road mobile machinery, marine and stationary applications that are operating in Europe and worldwide.

Founded in 1991, we provide an unparalleled heritage and hub of expertise for businesses, authorities, regulators, and public stakeholders worldwide. In partnership with major sector associations and institutions, it is our mission to drive smart regulation and sustainable innovation.

Delivering dependable power for society at high energy conversion efficiency with low emissions remains a key objective of EUROMOT member companies. EUROMOT asserts internal combustion engines and alternative powertrains are a key enabler to address the additional societal need for decarbonisation across multiple industry sectors. This can be achieved by continuing to advance the development of highly efficient energy conversion systems capable of operating on low and net-zero Greenhouse Gas (GHG) energy carriers.

Headquartered in Brussels, EUROMOT is a European interest group, and our profile is registered in the EU Transparency Register under the identification number 6284937371-73. We have been granted consultative status at the United Nations IMO (International Maritime Organization, London) and United Nations ECE (Economic Commission for Europe - Geneva) and other relevant stakeholders.

OUR MEMBERS



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30
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