

REVISION OF THE PACKAGING AND PACKAGING WASTE DIRECTIVE

UNICE POSITION

1. Scope of the revision

In order to comply with the timeframe foreseen by the Commission, the scope of the revision should be strictly limited to a review of the recycling and recovery targets to be achieved by 2006 as specified in article 6.3a of directive 94/62.

Any other issues such as prevention, re-use, producer responsibility, internalisation of costs, etc., should only be addressed in a second step, in a way that is consistent with the 6th Environmental Action Programme and based on a sound scientific evidence. The thematic strategy for recycling should not be pre-empted by this revision.

2. Structure of the Targets

UNICE is in favour of keeping the current structure of directive 94/62 and having a range-based structure (minimum-maximum) for the overall recovery and recycling targets and a common minimum recycling target for all materials. The target ranges set by the current structure provides a framework that is essential to ensure a good functioning of the internal market and to allow the flexibility that the various national or local situations require. Furthermore, the study carried out by RDC/PIRA shows that a maximum recycling target has to be fixed because beyond a certain limit, recycling is not economically nor environmentally efficient or preferable.

3. Overall targets

Those targets should be realistic to be achievable by 2006, proportionate to the local conditions in all Member States and eco-efficient.

For the overall recovery target, UNICE supports the level proposed by the Commission of minimum 60% to maximum 75%.

For the overall recycling target, UNICE recommends a range of 45%-70%.

4. Material-specific target

The proposal for having differentiated targets per material should be reconsidered, as it could result in discriminating against certain materials. Potential distortions of competition within the internal market have not yet been studied to justify these material-specific targets. Besides, these targets do not take into account the strong differences in the market and infrastructure of the various Member States and the wide divergence of recycling performance to date across the EU.

UNICE therefore strongly advocates maintaining the current structure of the directive and keeping a common minimum recycling target for all materials. Such a target could be increased to 20% for all materials.

5. Implementation

The effectiveness of national implementation schemes, from an economic and environmental point of view, depends largely on local circumstance, e.g. infrastructure. The revision of the directive should recognise this fact and remain restricted to setting standards but not prescribing national implementation.