POSITION PAPER

AIM BRANDS INITIATIVE ON SORTING INSTRUCTIONS FOR CONSUMERS

Establishing an EU harmonised system for providing consumers with understandable and clear sorting instructions for (packaging) waste

September 2021

1. **In brief: 'quick-read':**
   - **Objective = increase collection rates in the EU to achieve packaging recycling targets.**
   - **Strategy = harmonise consumer sorting instructions to boost recycling across the EU.**
   - **Proposal = leverage forthcoming revisions of legislation to implement an EU approach.**
   - **Criteria for success = completely harmonise labels; focus on symbols, not language or colour instructions; prevent accumulation of different logos; be space-conscious on-pack so as to avoid increasing packaging size.**
   - **Practical approach = match a product identification symbol put on pack by manufacturers with symbols put on waste bags/bins by waste management operators/municipalities = inspired by Danish pictograms scheme for waste sorting.**

2. **Objective**

In order to boost a circular economy and achieve the EU (packaging) recycling targets by 2025/2030, set out in the Packaging & Packaging Waste Directive (PPWD) and Waste Framework Directive (WFD), the collection rates in the EU must increase. Alongside industry's efforts to establish a better and more efficient collection, sorting and recycling infrastructure for post-consumer waste, it is essential to engage consumers now to achieve this goal. This can be done by already **improving the separate waste collection rate at consumer level, increasing consumers' awareness about the need to sort and recycle, and including them as relevant actors in the management of waste**.

With this in mind, the branded consumer goods industry is keen to collaborate with waste management operators and municipalities, policy-makers and consumers to establish an easy and understandable system for correct sorting at source, with the key message for consumers being **"Do your part and recycle"**. An EU harmonised labelling system that helps consumers to correctly sort their waste and at the same time avoids any barriers to trade needs to become integral to the waste management systems in EU Member States. In order to work and to be implementable on an EU-wide scale, the system needs to be simple, cost-effective and efficient for all stakeholders.

3. **Challenges and opportunities**

With regard to sorting instructions and information on waste disposal aimed at consumers, there are several challenges that industry and consumers are currently facing in the EU:

- **Complexity of waste management systems in Europe**: There is no harmonised EU approach with divergent waste management systems and sorting obligations in place across different Member States and sometimes even within a specific region.

- **Little useful and often inconsistent (non-harmonised) information regarding waste disposal** (on-pack and digital) aimed at consumers.

- **Proliferation of national labelling schemes and requirements in individual Member States[1]** bearing the risk of single market fragmentation and, in the worst case scenario, resulting in 27 different mandatory on-pack labels within the EU.

The current political and public perception of (plastic) waste and call for common action to improve waste management and recycling systems and their capabilities is reflected in several (upcoming) EU legislation and initiatives, constituting a great opportunity to implement an EU approach for harmonised consumer sorting instructions to boost recycling:

- The **Waste Framework Directive** mandates separate collection for all materials including separate bags/bins for plastic (including films, sleeves and flexible packaging), glass (mostly via bottle banks), metal and paper. Derogations are possible, such as combined collection of plastics packaging, metal packaging and beverage cartons (as e.g. done in Germany and Belgium).

- The **Packaging & Packaging Waste Directive** mandates increased packaging recycling targets per material for 2025 and 2030 (by weight for recycling)[2]. In order to achieve these ambitious targets, especially for plastics packaging, Member States have to ensure the establishment of EPR schemes for all packaging (household, commercial and industrial packaging) by 31 December 2024.

- The **Plastics Strategy** highlights ambitious targets for plastics packaging. By 2030, all plastic packaging placed on the EU market has to be either reusable or recyclable in a cost-effective manner, and more than half of the plastic waste generated in Europe should be effectively recycled. Recycling of plastic

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[1] France – The use of the "Green Dot" logo is penalised. However, this logo is allowed to be used in other Member States and, to date, is even mandatory in Spain. Manufacturers would need to develop country-specific packaging or use stickers to label over the "Green Dot" which implies costs of up to 20-30 cents/item, as well as contravening the principle of the SIngle Market.

France – There is an obligation to use the "Triman logo" and include sorting instructions on-pack. Sorting instructions are not harmonised across the EU, hence, this information could be confusing for consumers in other Member States.

Italy – There is an obligation to use the alphanumerical codes of Decision 97/129/EC to identify packaging materials and to include sorting instructions on-pack. Sorting instructions are not harmonised across the EU, hence, this information could be confusing for consumers in other Member States. The entry into force of these requirements is 1 January 2022.

Portugal – There would be an obligation to use the alphanumerical codes of Decision 97/129/EC and to include sorting instructions, in particular the colour of the recycling bin, on-pack. It could also lead to a ban of the "Tidyman" logo on recyclable packaging. These requirements could result in specific packaging for the Portuguese market. In addition, sorting instructions and colour codes of bins are not harmonised across the EU, hence, this information could be confusing for consumers in other Member States.

Slovenia – There would be an obligation to use the alphanumerical codes of Decision 97/129/EC to identify packaging materials. The marking of the packaging material must be placed on the packaging itself or on the label attached to the packaging, and it must be clearly visible and legible.

[2]

	Current ones as adopted in 2008	2025	2030
Overall target	55% - 80%	65%	70%
Plastic	22,5%	50%	55%
Wood	15%	25%	30%
Ferrous metals	50% (metal)	70%	80%
Aluminium	50% (metal)	50%	60%
Glass	60%	70%	75%
Paper and Cardboard	60%	75%	85%

packaging waste should achieve levels comparable with those of other packaging materials. Furthermore, sorting and recycling capacity should increase fourfold compared to 2015, leading to the creation of 200.000 new jobs in Europe.

- The **new Circular Economy Action Plan** lists **information on correct separation of (packaging) waste at source** as an action point.

4. Criteria for EU harmonised system

For branded consumer goods manufacturers, the following criteria are crucial for establishing a fully harmonised EU approach for consumer sorting instructions:

- The system needs to give **clear and actionable guidance to consumers on how to correctly sort/dispose of waste and must be easy to use**, while also acknowledging that different waste management infrastructures and systems exist across EU countries and even within EU countries.

- The system needs to be **flexible enough to be adopted in all EU Member States** with their current different waste management infrastructures and systems without creating consumer confusion when the same pack is sold in multiple countries. A harmonised (minimum level) of waste management infrastructure in the EU would be the best solution. However, with all the different approaches in EU Member States, this is difficult to implement and will take years to be achieved.

- For an EU approach, **labels need to be completely harmonised**. The **focus should lie on symbols** rather than language instructions or colours:

  o Labels should not include harmonised language instructions or at least limit the use of words, since this would require translation for packs that are used in multiple EU Member States.

  o It is best to avoid a colour approach for the labels, especially due to the different colour schemes already in place for waste management in the different Member States.

  o **In the case of incorporation of language and/or colour, it is crucial that the labels are available in different <u>multipurpose designs</u>** (e.g. black-and-white vs. colour; with language instruction vs. without language instruction; horizontal vs. vertical layout) so to ensure that the label can be easily used by the relevant stakeholders such as manufacturers, municipalities and waste operators and despite different existing colour schemes for waste systems in the EU.

- Labels should **not take up too much space on the packaging** and should be also **easy to adapt to new innovations** in packaging materials, sorting and recycling.

- Rather than inventing a new scheme, **existing schemes and approaches for consumer sorting instructions need to be evaluated** to define the most suitable ones and/or how they could be taken up/combined as part of an EU harmonised system.

- In order to prevent any information overload for consumers and to provide them with clear guidance on how to dispose of their waste, it is crucial that any **accumulation of different sorting logos on packaging is prevented**. Therefore, the following points are critical:

  o The sorting pictograms/symbols developed within an EU harmonised model would **exclude the use of any additional symbols and labels on-pack indicating (national) sorting instructions**, such as the **Triman logo**, **Tidyman**, etc.

  o With a fully harmonised model, we also believe that the **Green Dot** could disappear since studies show it is quite a confusing, not actionable label for consumers[3] and since it "only" highlights a producer's contribution to an EPR scheme, which in any case is mandatory.

  o Regarding the **alphanumerical codes** (EU Decision 97/129) for material, it needs to be checked by the EU Commission whether these B2B markings are actually helpful for the waste management sector and recyclers. In some EU countries, e.g. Bulgaria, it is mandatory to put the alphanumeric code into triangles on pack. However, alphanumerical codes may no longer be useful for recyclers since they use sorting technology based on pack material "reading" through NIR (near-infra red) technology, AI (artificial intelligence) or digital watermarks. In this case, the codes should disappear on-pack, but could for example be integrated via digital means instead of directly on-pack (e.g. using digital watermarking).

  o Any bans of existing labels should of course only happen once the EU labelling approach takes effect with a **reasonable transition period for manufacturers to phase out existing labels on-pack**.

- The proposed harmonised labelling system should only **apply to primary and secondary packaging** (not tertiary) as they are the only ones that reach the final consumer. The purpose of the labelling is to give guidelines to the final consumer on how to manage packaging waste. Therefore, tertiary packaging should be left out of the scope of application.

- The approach needs to **include all actors**: manufacturers, waste management operators/municipalities and consumers.

- The [joint principles for better consumer information](#) shared by AIM – European Brands Association and the EU consumer organisation BEUC should be the basis for any initiative on consumer information.

- An on-pack solution for sorting instructions does not exclude additional, (more detailed) information provided to consumers via **digital means** (e.g. through a QR code, barcode, digital watermarks).

- For an EU harmonised approach, a special focus needs to be put on Ireland. Since **many products in Ireland are made for both the UK** and Ireland, there would need to be some flexibility for Irish products to be able to display labels that could be required by the UK (e.g. OPRL).

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[3] "Can I Recycle This? A Global Mapping and Assessment of Standards, Labels and Claims on Plastic Packaging" published in 2020 by United Nations Environment Programme (UNEP) and Consumers International: www.oneplanetnetwork.org/consumer-information-scp

5. EU solution

Based on the above criteria, AIM, the European Brands Association, supports an EU harmonised model for on-pack pictograms/symbols. It would be essential to combine such a model with an extensive pan-EU awareness-raising campaign. We believe that the approach of an actionable **product identification symbol which is put on pack by manufacturers and which corresponds to the symbols that are put on waste bags/bins by the waste management operators/municipalities** would be an efficient and workable solution for industry, the waste sector and consumers, who would just need to pair the symbols on the packaging with the ones on the waste bag/bin. This pictograms system should <u>not</u> include concrete sorting instructions on-pack, as e.g. the Triman logo in France does, since this would not work as basis for an EU harmonised model due to the divergent waste management systems and sorting obligations in place in different Member States and sometimes even within a specific region. Based on these differences, the system also needs to be available in multipurpose designs.

Looking into pictograms systems, the **[Danish pictograms scheme for waste sorting](#)** represents a strong conceptual example and has the potential to serve as the basis for an EU harmonised labelling approach (not excluding possible refinements). This system, already rolled out in several EU Member States (Scandinavian countries), has been developed by the Danish waste facilities, is available in multipurpose designs, and also involves all key actors:

- **Manufacturers:** need to put the pictograms for identifying the product on pack (currently on voluntary basis).
- **Waste management operators/municipalities:** need to put the pictograms for identifying the product on waste bags/bins (mandatory roll-out from 1 July 2021).
- **Consumers:** need to sort waste according to the provided pictograms.

To make sure the system would work for consumers, the development, evaluation and final roll-out of such an EU system for sorting information needs to be based on **consumer testing and insights**. Based on the final system, an awareness raising campaign for consumers is crucial. Furthermore, in order to help manufacturers understand how their packaging is classified under the final system, a supporting guidance document needs to be provided to them.

For branded consumer goods manufacturers, the **upcoming review of the Packaging and Packaging Waste Directive (Directive 94/62/EC) represents a unique opportunity to set common requirements on which information should be provided to consumers for sorting instructions and how this should be done in a harmonised way**, including the use of digital solutions that can help provide required information without the need to increase packaging size or repackage. This could be done by including in the PPWD a general part on establishing an EU harmonised model for consumer sorting instructions. The details of this B2C marking would then be established via an implementing act in form of a regulation. In parallel, the work initiated by the European Commission to harmonise separate waste collection and sorting, as required by the Waste Framework Directive (Directive 2008/98/EC), will be key to the effectiveness of harmonised labelling requirements.
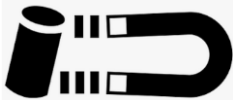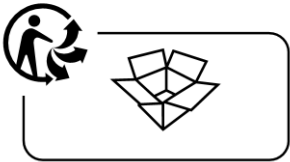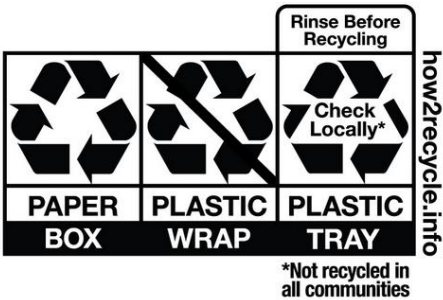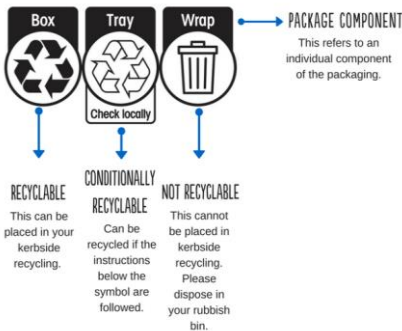
Annex

Overview of existing recycling / waste disposal labels

1. **Existing recycling / waste disposal labels vary across materials and are diverse across EU Member States:**
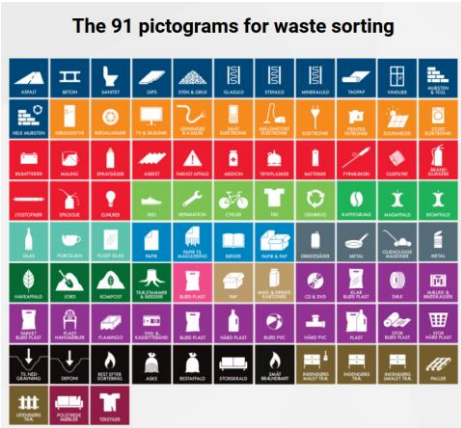   - Material specific labels
   - General recycling / waste disposal labels
   - Concrete recycling / waste disposal labels
   - Digital apps / reward systems

Material specific labels		
Plastic		
Plastic resin identification coding for recycling		Voluntary (US society of plastic industry SPI – now the Plastics Industry Association) Appearing on plastic products to identify the plastic resin out of which the product is made. ➔ Commission Decision 97/129/EC on identification systems ➔ Coming up in Italy & Portugal
	+ additional related symbols covering paper, glass, metals, etc.	
Glass	 Example	Different national symbols for indicating recyclability of glass products. No EU-wide harmonised symbol.
Metal		Indicates infinite recycling possibility for metal (aluminium & steel) -> no "downcycling"
Aluminum		Symbol indicates that the item is made from recyclable aluminum.

Steel		Symbol indicates that the item is made from recyclable steel.
Batteries & electrical and electronic equipment		
Separate collection for batteries		Mandatory for batteries Symbol indicating 'separate collection' for all batteries and accumulators according to Directive 2006/66/EC.
Separate collection for electrical and electronic equipment		Mandatory for electrical waste ➔ Symbol indicating separate collection for electrical and electronic equipment according to Directive 2002/96/EC. The bar below the symbol is a B2B indication.
General recycling / waste disposal labels		
Green Dot		Mandatory in Cyprus. In all other 'Green Dot' countries, producers have to ensure a contract with the relevant organisations if you want to use the Green Dot. Indicates the producer has contributed to a Packaging Recycling Scheme. **Does NOT indicate the specific packaging can be recycled.** See www.pro-e.org
Mobius loop	 Many variations of the basic design.	Voluntary Use governed by ISO 14021 which says the logo indicates that the packaging: • is capable of being recycled (though the local region may not be able to do so) OR • made of recycled material (when accompanied by a % indication below or within the loop)
Tidyman		Voluntary (since the 1960ies) Encourages consumer not to litter in the environment. No copyright on the International Tidyman and it can be modified if required, e.g.

		adopted in 1969 by the Keep Britain Tidy campaign based on the 1961 logo used by Keep America Beautiful.
	Variations:	
Triman logo - Guide du tri Citeo		Through new anti-waste law, mandatory on pack in France by 2021. Displayed on all recyclable household products that are separately collected and that are covered by Extended Producer Responsibility (EPR), with the exception of electrical and electronic equipment, batteries and accumulators, and specific non-point waste. BUT: Expensive for obligated producers to implement - having to change the design of products and packaging to meet the requirements of only one national market - and is potentially contradicting its aim of simplifying waste sorting activities. It also bears the risk of Internal Market fragmentation. See: https://www.citeo.com/info-tri/
Concrete recycling / waste disposal labels for informing consumer about proper recycling / waste disposal options		
Triman logo with sorting instructions - Guide du tri Citeo	Used with variations:	Through new anti-waste law, mandatory on pack in France by 2021. Displayed on all recyclable household products that are separately collected and that are covered by Extended Producer Responsibility (EPR), with the exception of electrical and electronic equipment, batteries and accumulators, and specific non-point waste.

		BUT: Expensive for obligated producers to implement - having to change the design of products and packaging to meet the requirements of only one national market - and is potentially contradicting its aim of simplifying waste sorting activities. It also bears the risk of Internal Market fragmentation. See: https://www.citeo.com/info-tri/
Recycle Now – used under OPRL scheme: https://www.oprl.org.uk/		National recycling campaign in UK It is supported and funded by the government, managed by WRAP and used locally by authorities. See: https://www.recyclenow.com/
How2Recycle		US (voluntary; only used by member companies of the programme; annual membership fee applies) Label includes information on: - Preparing material for recycling - How2Recycle - Type of material - Lists parts of packaging See: http://www.how2recycle.info/
Australasian Recycling Label (ARL)		Australasian Recycling Label (voluntary) Label includes information on: - How to recycle - Lists part of packaging https://recyclingnearyou.com.au/arl

Danish pictograms for waste sorting		Applied increasingly in Scandinavian countries: https://danskaffaldsforening.dk/the-danish-pictograms-waste-sorting
Recycling logo (2019)		Voluntary initiative among retailers in Germany\n\nSimple pictograms on the packaging for correct waste separation introduced in German supermarkets and drugstores: https://www.rtl.de/cms/neues-recycling-logo-hilft-bei-muelltrennung-4305903.html
Trennhinweise		Voluntary initiative in Germany, organised by the dual systems:\n\nwww.trenn-hinweis.de
Recicla al Amarillo (Recycle Yellow)		Voluntary Ecoembes symbol system for the recycling of packaging in Spain:\n\nwww.ecoembes.com
Examples of brand / retailer specific apps		• Nestlé – Italy: Nestlé: nasce "dove lo butto?" La piattaforma digitale per non sbagliare mai più la raccolta differenziata	Nestlé Italia (nestle.it)
Digital solutions with reward systems		
Recycl3r	Austria & Spain (based) - recycling information and rewards	https://recycl3r.com/service/
Bower App	Sweden (based) - Start-up	https://en.getbower.com/

Blippar	London (based) - Augmented Reality creation tool	https://www.blippar.com/work
EcoEmbes Circular Lab	Spain	https://www.thecircularlab.com/en/

2. **Ideas:**

Pack2Go idea: **Empowering consumers: the one-size-fits-all approach to better separate collection**		Recycling idea A simple approach for consumers would assign all forms of packaging that are considered recyclable with a clearly identifiable colour code. Consumers would only need to do a "colour match" in order to place the waste item in the right recycling bin. See: https://bit.ly/2AAMQTx
AIM Tidyman project idea (2011)		EU harmonsied idea for consumer information on proper waste disposal Tidyman was used in connection with numbers per material for informing consumers in which bag/bin to put which type of packaging material.

About AIM

AIM (Association des Industries de Marque) is the European Brands Association, which represents manufacturers of branded consumer goods in Europe on key issues that affect their ability to design, distribute and market their brands.

AIM comprises 2500 businesses ranging from SMEs to multinationals, directly or indirectly through its corporate and national association members. Our members are united in their purpose to build strong, evocative brands, placing the consumer at the heart of everything they do.

AIM's mission is to create for brands an environment of fair and vigorous competition, fostering innovation and guaranteeing maximum value to consumers now and for generations to come. Building sustainable and trusted brands drives the investment, creativity and innovation needed to meet and exceed consumer expectations.

AIM's corporate members
AB InBev • Arla Foods • Bacardi Limited • Barilla • Beiersdorf • Bel Group • BIC • Chanel • The Coca-Cola Company • Colgate-Palmolive • Coty • Danone • Diageo • Dr. Oetker • Essity • Estée Lauder • Ferrero • Freudenberg/Vileda • FrieslandCampina • General Mills • GlaxoSmithKline • Heineken • Henkel • JDE • Johnson & Johnson • Kellogg • The Kraft Heinz Company • Lavazza Group • The LEGO Group • Levi Strauss & Co. • Lindt & Sprüngli • L'Oréal • LVMH • Mars Inc. • McCain Foods • McCormick • Mondelēz • Nestlé • Nike • Nomad Foods Europe • Orkla • PepsiCo • Pernod Ricard • Procter & Gamble • Puma • Reckitt • Royal Philips • Sanofi • Savencia Fromage & Dairy • SC Johnson • Signify • Sofidel • Unilever

AIM's national association members
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