

## GreenDot Group's position on coffee system single serve units in the proposal for Packaging and Packaging Waste Regulation (PPWR)



The EU is pursuing ambitious plans to bring the sustainability of packaging to a top level within a defined period of time. This is shown by the draft of the Packaging and Packaging Waste Regulation (PPWR) presented at the end of November 2022. GreenDot Group welcomes and sustains the European Commission's attempt **to reduce the consumption of resources by packaging, improve the recyclability of packaging and thus diminish the environmental impact of packaging** by updating the current legislation.

GreenDot Group as one of the most important providers of infrastructure for collection, sorting and recycling in Europe has committed to ensure a proper end-of-life for coffee system Single Serve Units that enables full circularity and maximization of resource efficiency for this type of packaging. For many years we have been setting up and operating a demonstrably well-functioning recycling system for this category which has voluntarily been chosen for disposal by the coffee industry.

We also support the EU Commission's move to consider **coffee SSU's as packaging under the new PPWR** which can be collected and recycled in the existing lightweight packaging (yellow) waste stream. The PPWR 'Reduce, Reuse, Recycle' premise that the coffee industry in cooperation with GreenDot Group has been working towards for over 10 years would finally legally apply to coffee SSU's.

**However, according to the European Commission's proposal, recyclable coffee system single serve units (SSU'S full-after-use) shall explicitly be prohibited to be put on the market and SSU's have to be compostable. This provision completely undermines the coffee industry's efforts to adopt a circular model by using our take-back and recycling infrastructure in place.**

### Objections

**Article 8 of the PPWR proposal** specifically mandates compostable packaging for *coffee bags* as well as for *coffee system single serve units* used to be disposed of together with the coffee in industrially controlled conditions in bio-waste treatment facilities.

We raise the following objections to this provision:

- **Infrastructure:**

At the current moment, there is no Europe-wide infrastructure for take-back of organic waste. The provision of the necessary infrastructure across Europe requires considerable investments and efforts of all Member States. The proposal would be totally dependent on the promise of industrial composting technology and infrastructure which is currently very limited in scale and scope.

- **National regulations and practices:**

In some countries like in Germany compostable capsules are not allowed to be disposed of via the organic waste stream according to the national law in place. It's a fact that several Member States explicitly do not accept coffee capsules in their biowaste collection systems. In Germany, a collection system for biowaste has been introduced almost nationwide, **however, German composting plants even do not accept bioplastics that meet the requirements for industrial composting according to EN 13432.** These plastics cannot be degraded using the composting technology commonly used in Germany and must be removed before the composting process as unwanted materials. For this reason, the vast majority of municipalities in Germany also ban bioplastics in their biowaste collection.

- **Evidence of environmental impact:**

Up to now, it has not been proven that biodegradable packaging has a better environmental impact than recyclable packaging.

- **Lack of compostable plastics producers' investment in recycling technology**

Compostable plastics have been on the market for almost 30 years in Germany. Our company has always tried to find solutions to the lack of a recycling stream for these materials. In fact, the German packaging regulation from 2005-2012 gave such bio-plastics an exemption from all EPR obligations and would have made this permanent if by 2012 the producers would have established at-scale solutions to nationwide collection and recycling. Even with this exemption – which provided significant cost-advantages to compostable plastics vs. fossil-based plastics – no infrastructure was created.

### **GreenDot Group Commitment**

- 1) **Our company supports and enables the use of different materials** to ensure sustainable investments that allow space to innovate and to compete while focusing on improved overall product environmental footprint.
- 2) **We advance the development of adequate infrastructures for the waste stream of light-weight packaging** and the harmonization of waste management requirements, profiting from best-in-class technologies in particular in our own recycling plants.
- 3) **We support the consumer campaigns** like [Waste separation works | Mülltrennung wirkt! \(muelltrennung-wirkt.de\)](#) aiming to protect valuable resources and the climate. With regard to the correct and proper disposal of coffee capsules, we run our own successful educational campaigns on our website at the link [Dispose of coffee capsules | Der Grüne Punkt \(gruener-punkt.de\)](#).

### **GreenDot Group's conclusions and requests**

Taking into account the above-mentioned arguments, GreenDot Group as one of the most important take-back and recycling system operators unconditionally supports the demand of the **European Coffee Federation** ([THE VOICE OF THE EUROPEAN COFFEE SECTOR - ECF : ECF \(ecf-coffee.org\)](#)) and request the following:

## 1. Clarity in the product definition and categorization

### **Article 3(1):**

- (f) **compostable coffee bags and system single-serve units or tea bags**, necessary to contain a tea or coffee product and intended to be used and disposed of together with the product;
- (g) coffee or tea system single-serve unit necessary to contain a coffee or tea product and intended to be used and disposed of together with the product;

### **Annex 1: An indicative list of items in the scope of the definition of packaging in**

#### **Article 3(1)a**

#### **Packaging**

(...)

Beverage system capsules (e.g. coffee, cacao, milk) **intended to be disposed empty after use**

(...)

## 2. Amendment to Article 8, consisting of deleting letter (g) from Article 8 (1)

### **Article 8. Compostable Packaging**

- (1) **By 2030** packaging referred to in Article 3(1), points (f) ~~and (g)~~ (...) shall be compostable in industrially controlled conditions in bio-waste treatment facilities, **and therefore allowed to be collected in bio-waste receptacles.**

An appropriate transition time should be ensured to allow industry to continue developing compostable packaging as well as for an adequate and harmonized infrastructure to be put in place across Member States that will accept all product categories referred to in Article 8

## 3. Coherent Extended Responsibility Fees

In the PPWR proposal, *coffee bags* and *coffee system single serve units* are to be subject to an Extended Responsibility Fee. For consistency purposes, the fee should be based on the dry weight of the packaging material and not include the weight of the organic contents (i.e. coffee grounds). Moreover, levies should be directly invested in continuing the development of an appropriate infrastructure for the category.

## 4. Compostability requirement harmonization

The PPWR refers to compostable in industrially controlled conditions. To ensure a level playing field and the same understanding and harmonization across Member States, it is paramount that there is a clear reference as to what industrially compostable implies as per [updated requirements](#) for packaging recoverable through composting and biodegradation. As an example, EN 13432 standard or any further applicable amendments, or subsequent standards.

We remain at your disposal for any further information.

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### **About the Der Grüne Punkt Group:**

The Green Dot company is service provider for extended producer responsibility, leading supplier of secondary raw materials for plastics, and premium producer of plastic recyclates, and as such positioned as *the* premier solution provider for the needs of the circular economy. The Der Grüne Punkt Holding GmbH & Co. KG, with the Green Dot® as its trademark, was among the companies to introduce and establish the dual system in Germany, and stands for intelligent take-back systems, plus the development and marketing of innovative recyclates and services. Systec Plastics, at its facilities in Eisfeld and Hörstel, produces premium-quality recyclates under the Systalen® brand name for the international market. Der Grüne Punkt Holding GmbH & Co. KG belongs to the group of companies Green Dot Global S.à r.l.