THE IMPACTS OF PPWR ON THE EUROPEAN FISHING AND FISH PROCESSING INDUSTRY

Why we are here:

- PPWR has reuse targets that will heavily impact the entire European fishing and fish processing industry in a **negative way**;

- We need your support for an exemption from the reuse targets in PPWR.

Signees of the letter to the initiative to get the exemptions

THE IMPACT OF PPWR ON THE EPS FISH BOX

Packaging and Packaging Waste Regulation (PPWR)
should ensure that all packaging in the EU market
are **reusable or recyclable**
in an economically viable manner by 2030.

EPS Packaging and fish boxes will be affected by **PPWR**

in three different ways

Recyclability

Packaging must meet new recyclability standards set by the PPWR.

Minimum Recycled Content

Plastic packaging, including EPS, will need to incorporate a minimum percentage of recycled content.

Reuse Targets

The PPWR will set reuse targets that may affect[1] fish packaging and production and usage.

FISH boxes as well as EPS will be comprised of compliance with **two recyclability criteria** by **2030** and **2035**

Design for recycling criteria to be adopted by 2028
Packaging recyclability shall be expressed in the performance grades A – 95%, B- 80% or C – 70%.

Compliance with design for recycling criteria by 2030
As from 2030 only packaging scoring grades A - C can be placed on the market;

Criteria for recyclability at scale to be adopted by 2030
Packaging, when it becomes waste, will need to be separately collected, sorted into specific waste streams with-out affecting the recyclability of other waste streams, and recycled at scale

Compliance with recyclability at scale criteria by 2035

FISH boxes as well as EPS will need to have **10% recycled content by 2030,** and **25%** by **2040**

Minimum recycled content in plastic packaging

- Any plastic part of packaging placed on the market, **shall contain the following minimum percentage** of **recycled content recovered** from **post-consumer plastic waste**, per packaging format;

EXEMPTIONS:

- If plastic packaging intended to come into contact with food in case the amount of recycled content poses a threat to human health and results in non-compliance of packaged products with Regulation (EC) 1935/2004;

Minimum recycled content targets for different types of packaging

	2030	2040
CONTACT SENSITIVE PACKAGING	**10**%	**25**%
OTHER PLASTIC PACKAGING	**35**%	**65**%

FISH boxes as well as EPS might be affected by the **reuse targets** by 2030

Article 29 – Reusability:

Art 29.1: Transport packaging or sales packaging used for transporting products within the territory of the Union, *including via e-commerce, in the form of pallets, foldable-plastic boxes, boxes, trays, plastic crates, intermediate bulk containers, pails, drums and canisters of all sizes and materials, including flexible formats or pallet wrappings or straps for stabilization and protection of products put on pallets during transport, shall ensure that at least 40% of such packaging used is reusable packaging within a system for re-use.:*

Art. 29.4: EXEMPTIONS:

- ~~rigid packaging in direct contact with food;~~
- flexible packaging in direct contact with food;
- All cardboard packaging.

Main Obligations Under PPWR Article 29

TYPE OF PACKAGING	YEAR	REUSE TARGET
All form listed in 29.1	**2030**	**40%**
All form listed in 29.1	**2040**	**70%**
Transport between the same company or linked enterprises, **Transport within the same EU country.**	**2030**	**100%**

Obligation is on:
Economic operators using transport packaging

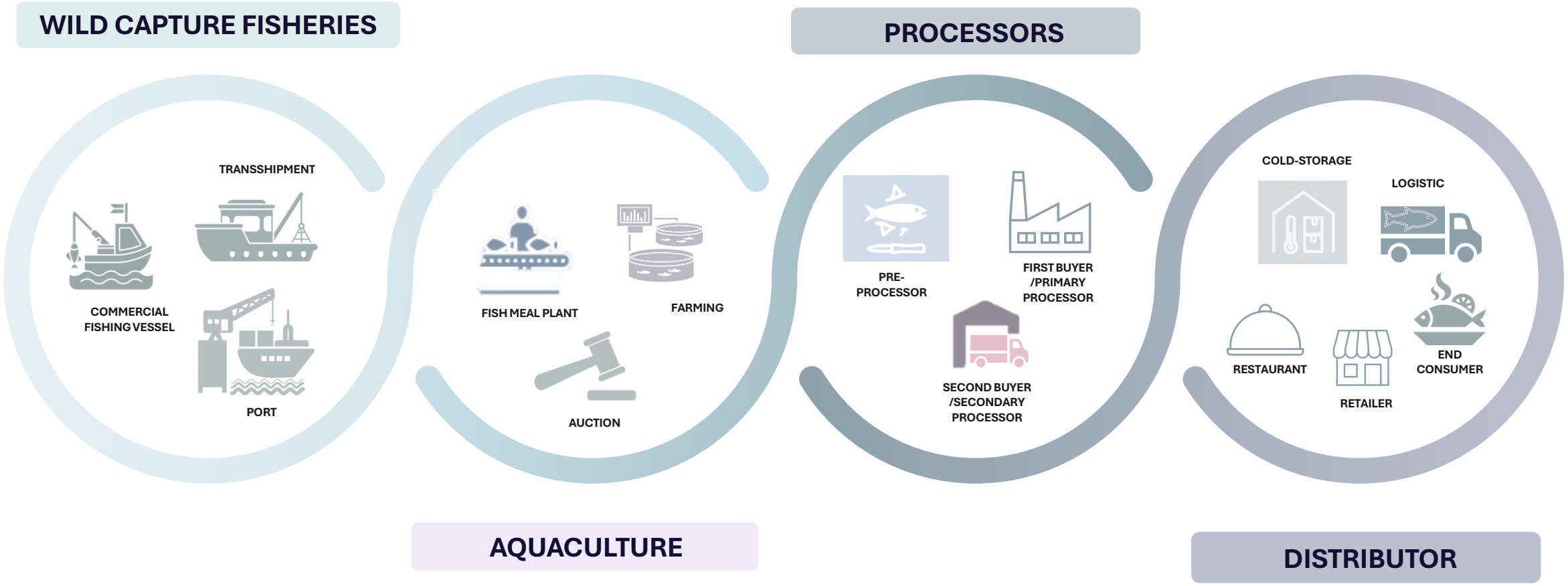
Responsibilities
Collection, reverse logistics, hygienic cleaning, traceability, and reporting obligations

Packaging format & examples \ Area of application		Transport *packaging*				*Transport packaging* ***and sales packaging for transport***		
		general		between companies in one country*	between sites in the EU**	general	between companies in one country*	between sites in EU**
		from 2030	from 2040	from 18 months after entry into force of the PPWR		from 2030		
Pallets		30%	90%	100%	100%	40%	100%	100%
Pallet wrappings		10%	30%	-	-	40%	100%	100%
Pallet straps		10%	30%	-	-	40%	100%	100%
Foldable-plastic boxes		30%	90%	-	-	40%	100%	100%
Boxes, without cardboard		30% (plastic)	90% (plastic)	100%	100%	40%	100%	100%
Trays		-	-	-	100%	40%	100%	100%
Plastic crates		30%	90%	100%	100%	40%	100%	100%
Intermediate bulk containers (IBC, FIBC)		-	-	100%	100%	40%	100%	100%
Pails		30%	90%	-	-	40%	100%	100%
Drums		30%	90%	100%	100%	40%	100%	100%
Canister		-	-	-	100%	40%	100%	100%

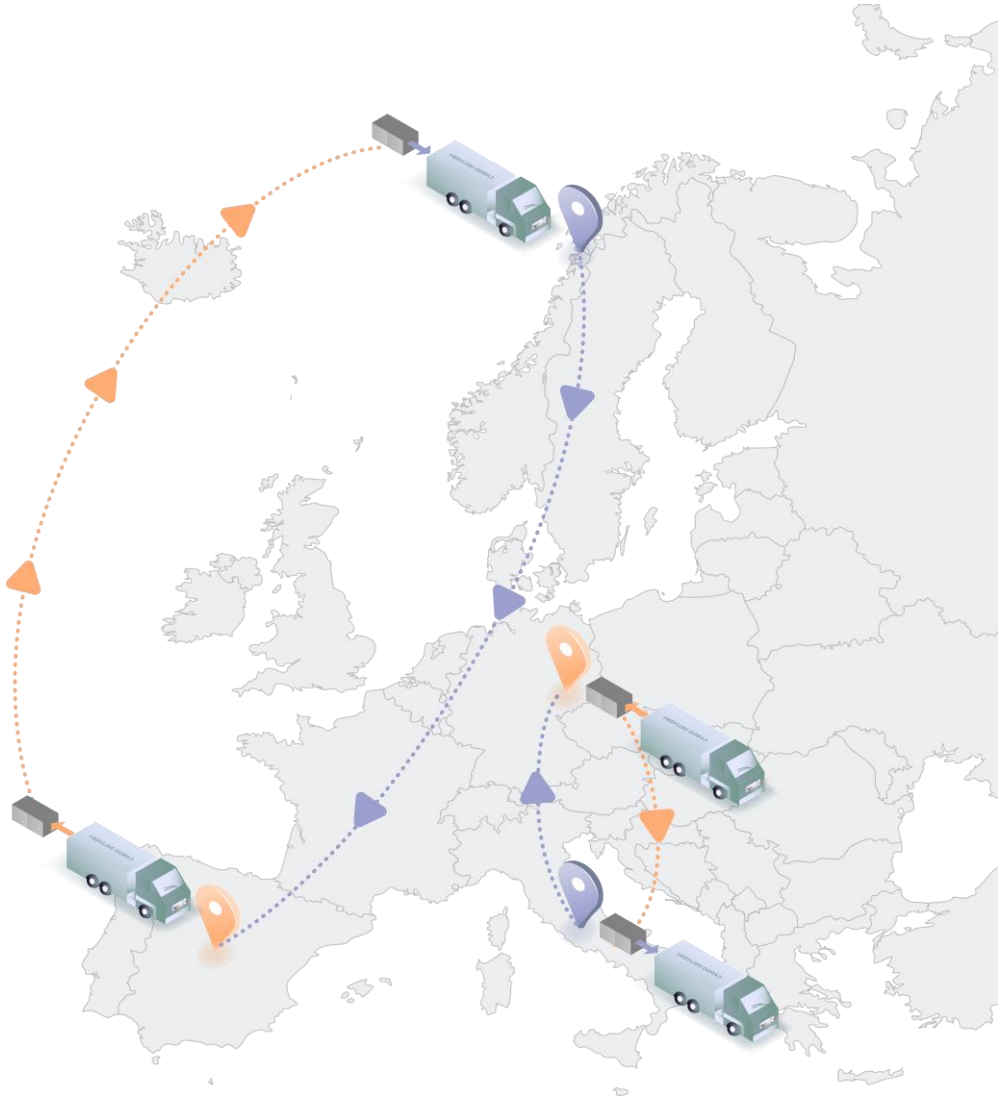
THE IMPACT OF THE PPWR REUSE TARGETS

SOCIAL AND ECONOMICAL IMPACT / ENVIRONMENTAL IMPACT / HYGIENE AND FOOD SAFETY

The reuse targets and mandatory reuse systems will impact the entire seafood supply chain



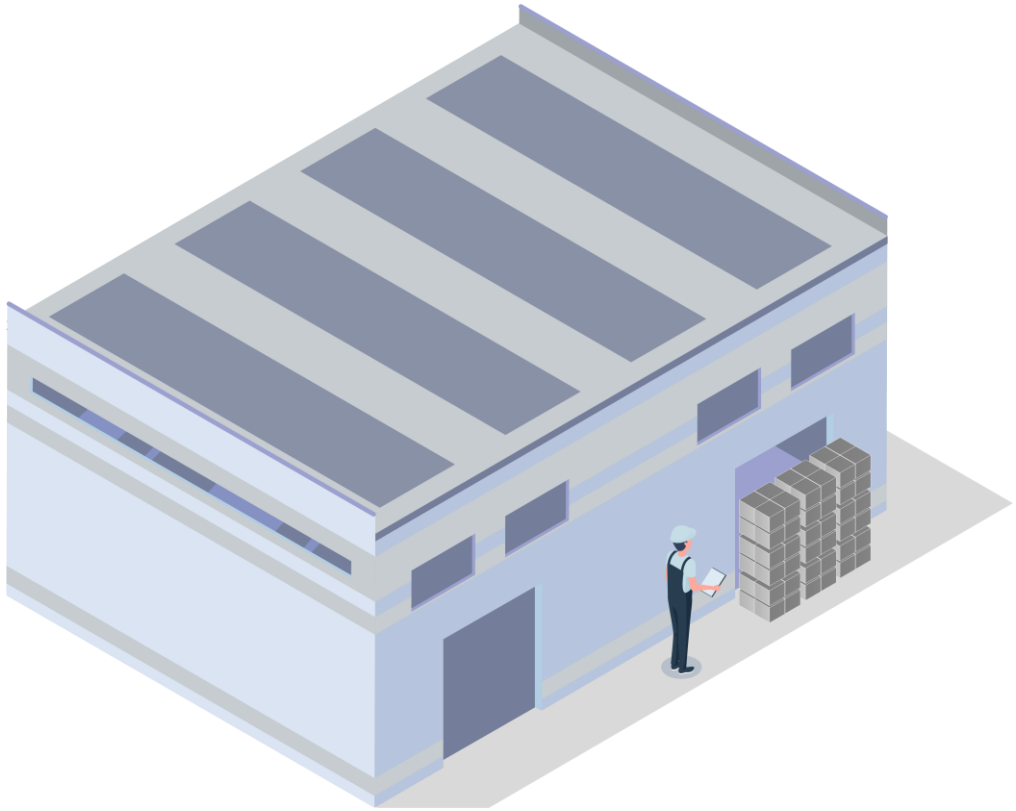
Backhauling empty boxes will increase transport



Transport costs are 125-130% higher[7] due to the necessity of backhauling empty boxes to fish slaughterhouses.

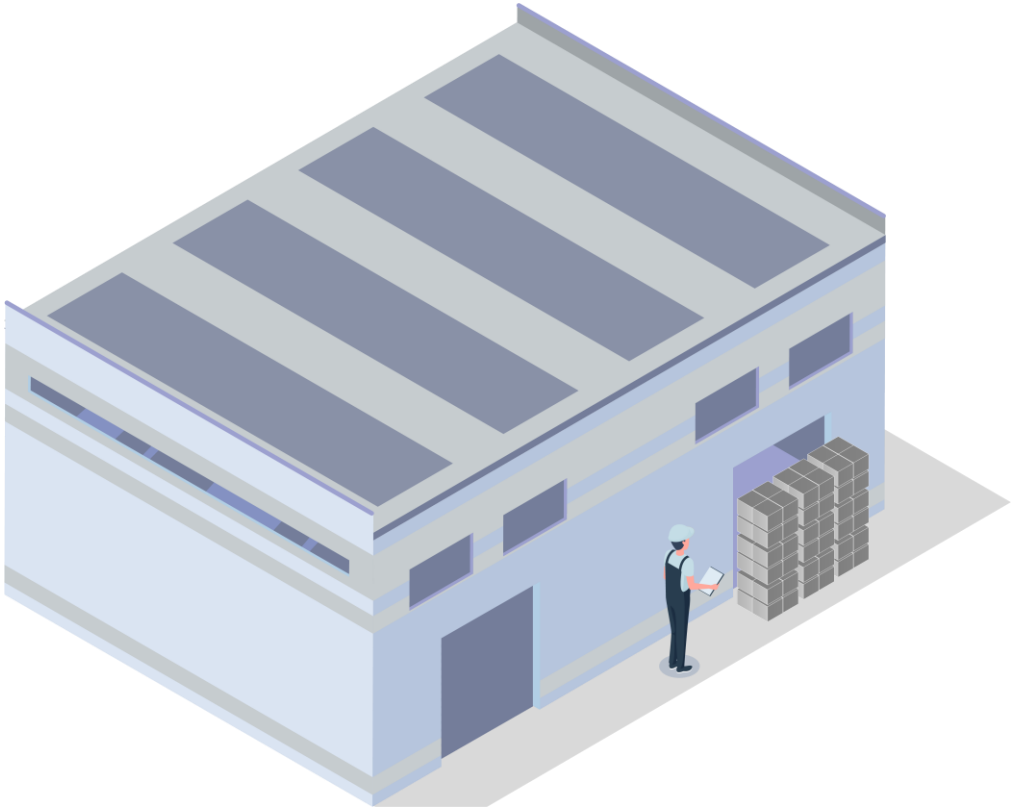
7) The potential impact of reusable packaging, McKinsey's Materials Practice (2022)

A reuse system will increase the need for personnel and space for cleaning and storage.



- **A reuse system will require additional personnel for warehouse management, logistics, cleaning operations, administration, and quality control.**
- **Each slaughterhouse and processing facility would require additional space for cleaning and storage. A site capable of cleaning 760 boxes per hour need approximately 900 sqm of space. Considering there are thousands of slaughterhouses and processing sites, securing space for cleaning will be a significant challenge, both in terms of availability and cost.**

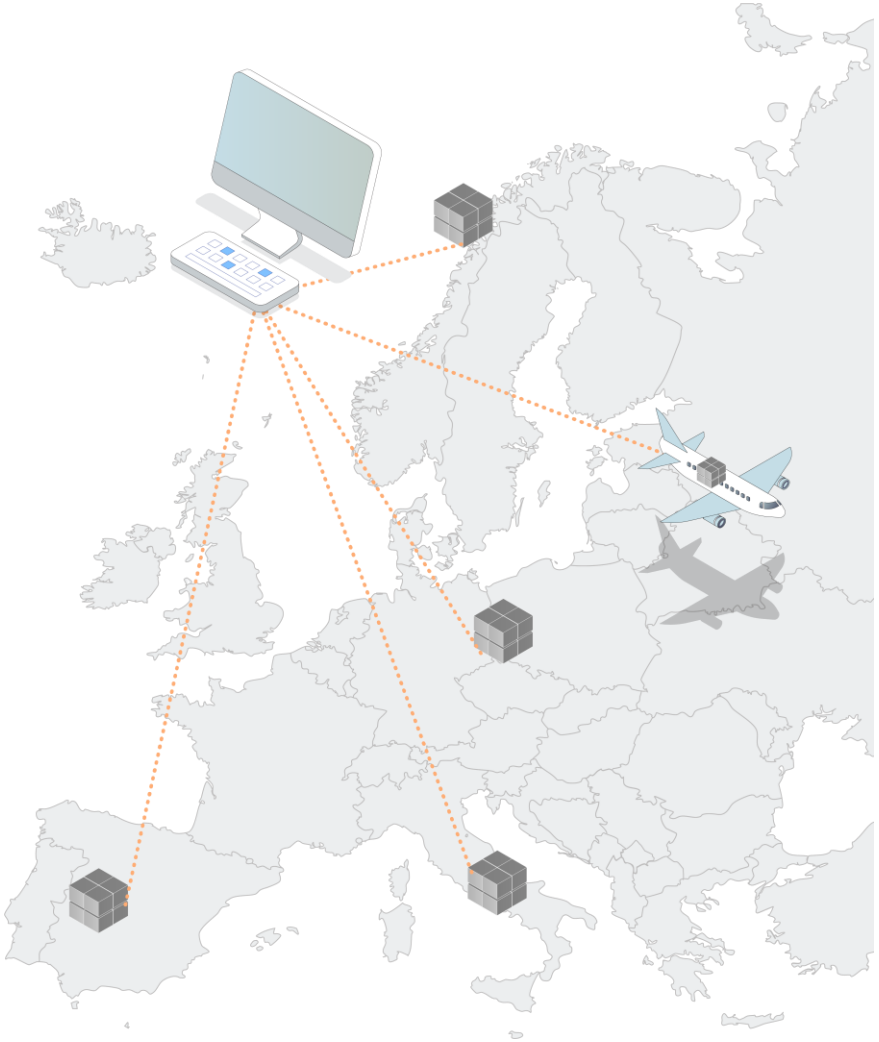
A system designed for reuse must meet strict regulatory requirements, including those set by the European Food Safety Authority (EFSA).



- To ensure compliance, several certifications are necessary, such as:
  - ISO standards 22000 for food safety,
  - 14001 for environmental management,
  - 9001 for quality management,
  - 22005 for traceability within the food chain, and
  - 45001 for occupational health and safety.

- Additional food safety certifications, including those from the Global Food Safety Initiative (GFSI) and the BRC Food Safety Standard, may also be required.

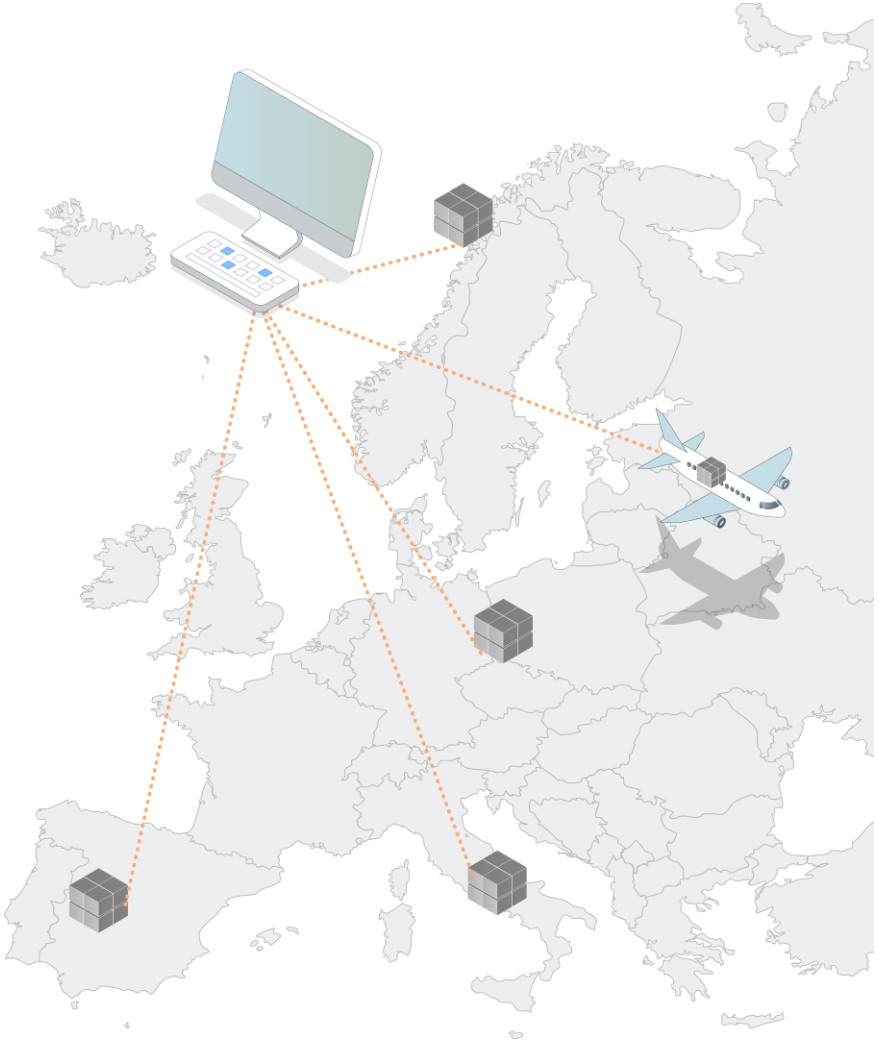
Tracking the reusable boxes across EU will require a comprehensive IT system



A comprehensive IT system will be required to manage orders, track boxes, and coordinate logistics across the EU.

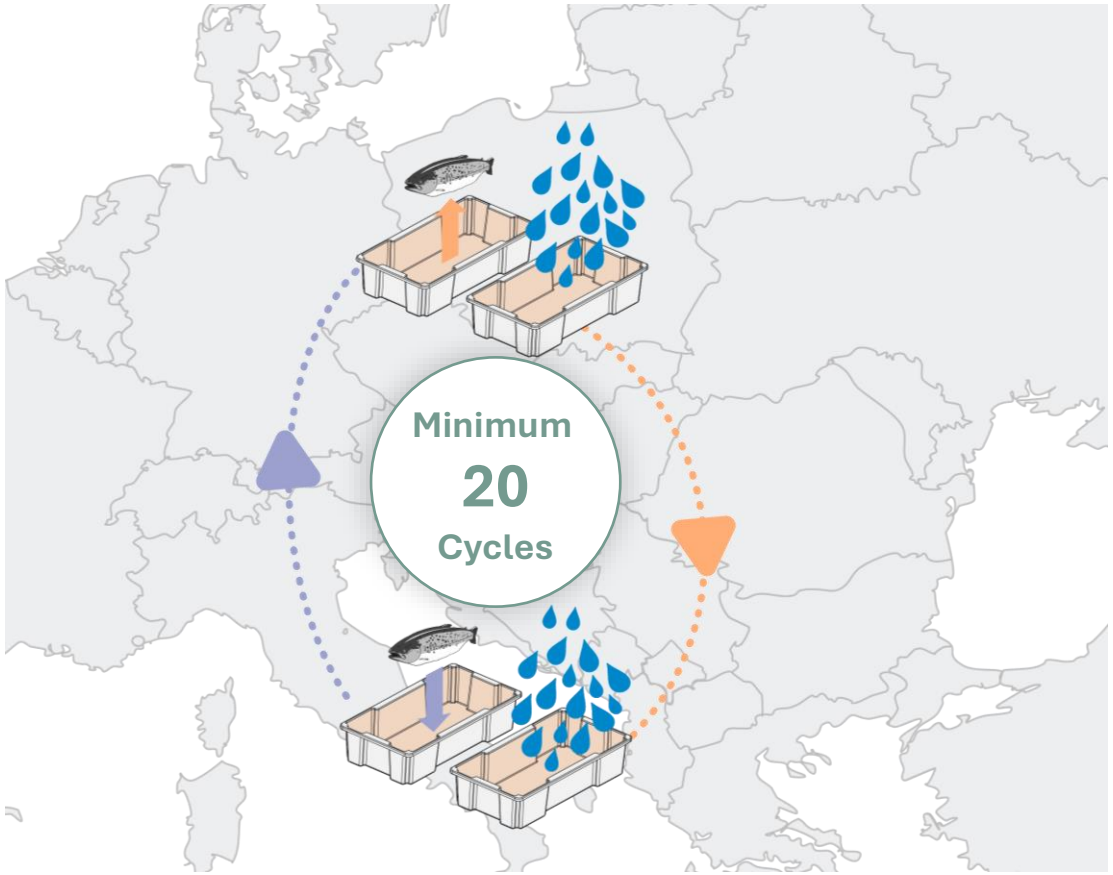
This system must integrate with existing systems to manage both EPS and reusable boxes, ensuring the target of 40% reuse by 2030 is met. The integration process will present complexities due to the need for seamless cooperation between the two systems.

Reuse system will request more staff for warehouse management, logistics, cleaning operations, administration, and quality control



- **Training will be essential to ensure staff are well-versed in the relevant legislation and standard operating procedures.**

A reuse system isn't necessarily more environmentally friendly

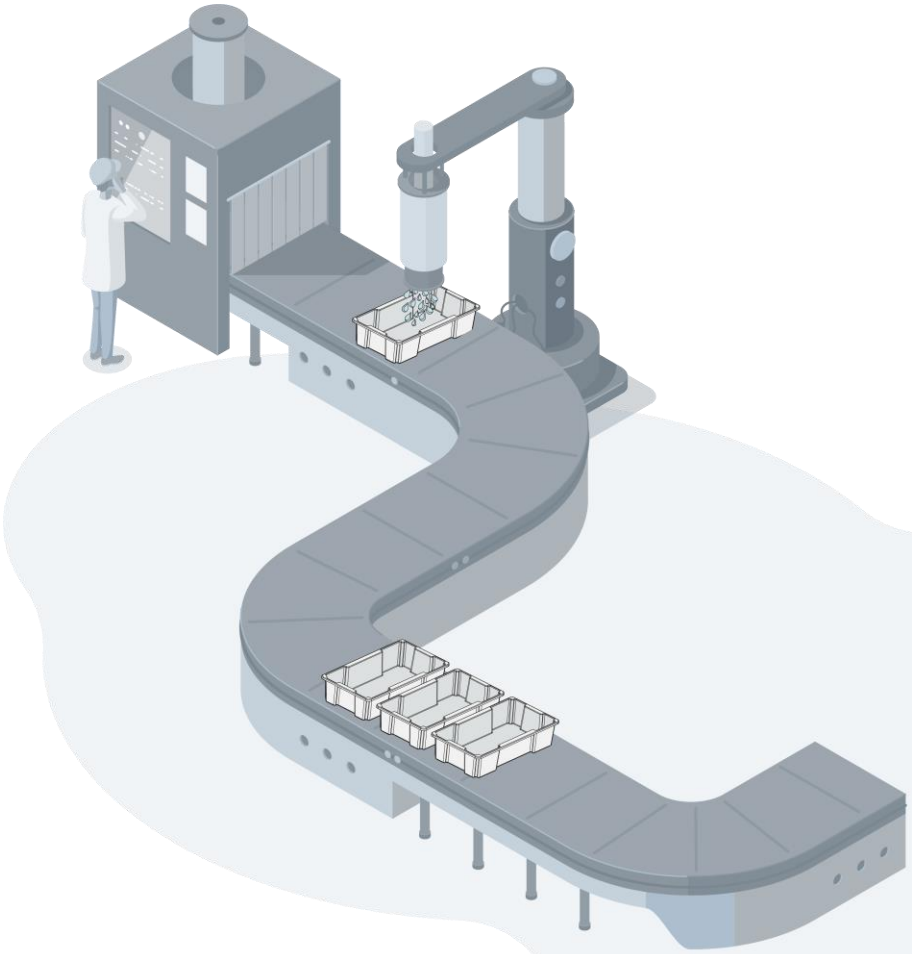


- **The transport distance, the number of reuses, the return rate and the number of washes are critical aspects in evaluating when – and if – reuse has a lower environmental impact.**

- **Each box requires two cleanings—one at the processing site and another at the fish slaughterhouse—to maintain food safety standards.**

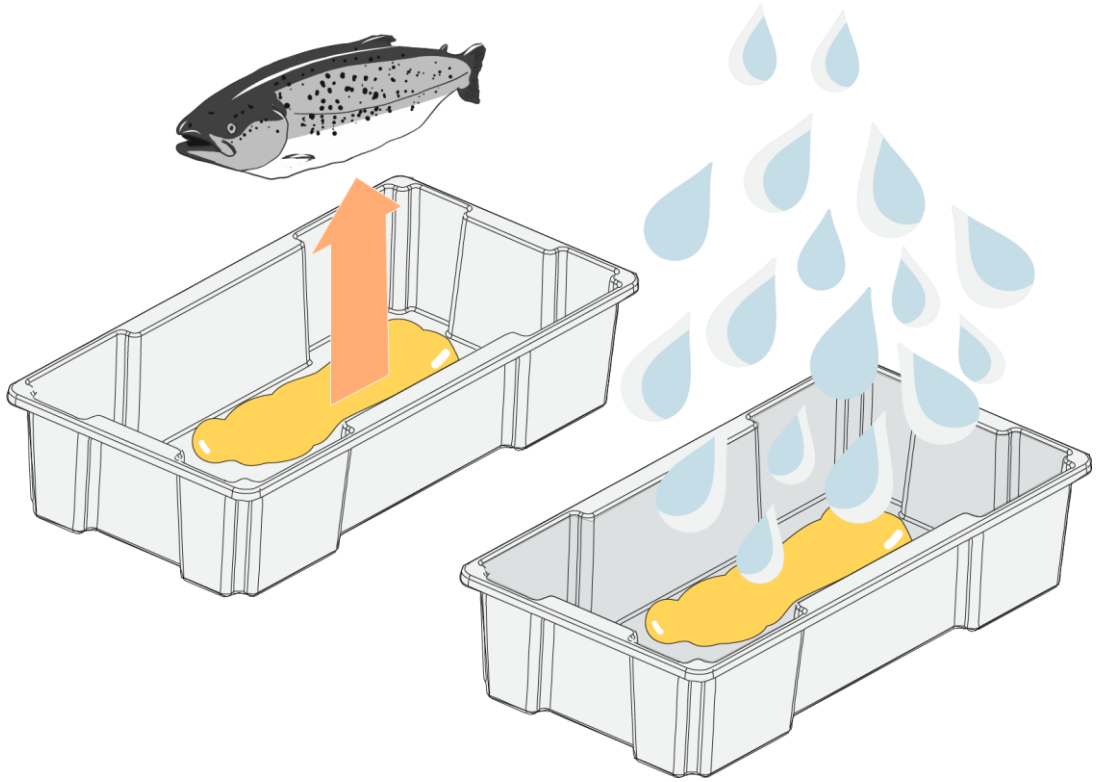
- By 2030, with 40% of the 550 million EPS fish boxes being transferred to a reuse system, results in following volumes for cleaning process:
  - 3 liters of water per box, an annual usage of 660,000 m^3, this results in 12 times the water consumption compared to producing one EPS fish box.
  - 0.027 liters of detergent per box, the annual usage would be 6,000 m^3 of detergent, translating to an estimated cost of 20 million EUR.

Cleaning the boxes will increase water usage and require large investments in infrastructure



- To maintain food safety standards each box requires at least two cleanings.
- One at the processing site and another at the fish slaughterhouse.
- The process with washing and drying is very energy- and water demanding.

It will be difficult to maintain food safety standards with a reuse system due to the fatness of the product



- **The fatness of the product makes it difficult to get the boxes clean enough with regular washing systems;**
- **Stacking of boxes in reuse systems also can leave “sweet spots” for bacterial growth;**
- **Mold can grow in nooks and crannies, due to moisture after washing/drying;**
- **Condensation is a problem during storage and the storage needs to be tempered (energy demanding).**

THE OPPORTUNITY FOR THE FISH INDUSTRY

Delegated acts are a possibility to get **exemptions** of the **reuse targets** for **EPS fish boxes and other fish transport boxes**

Article 29.18:

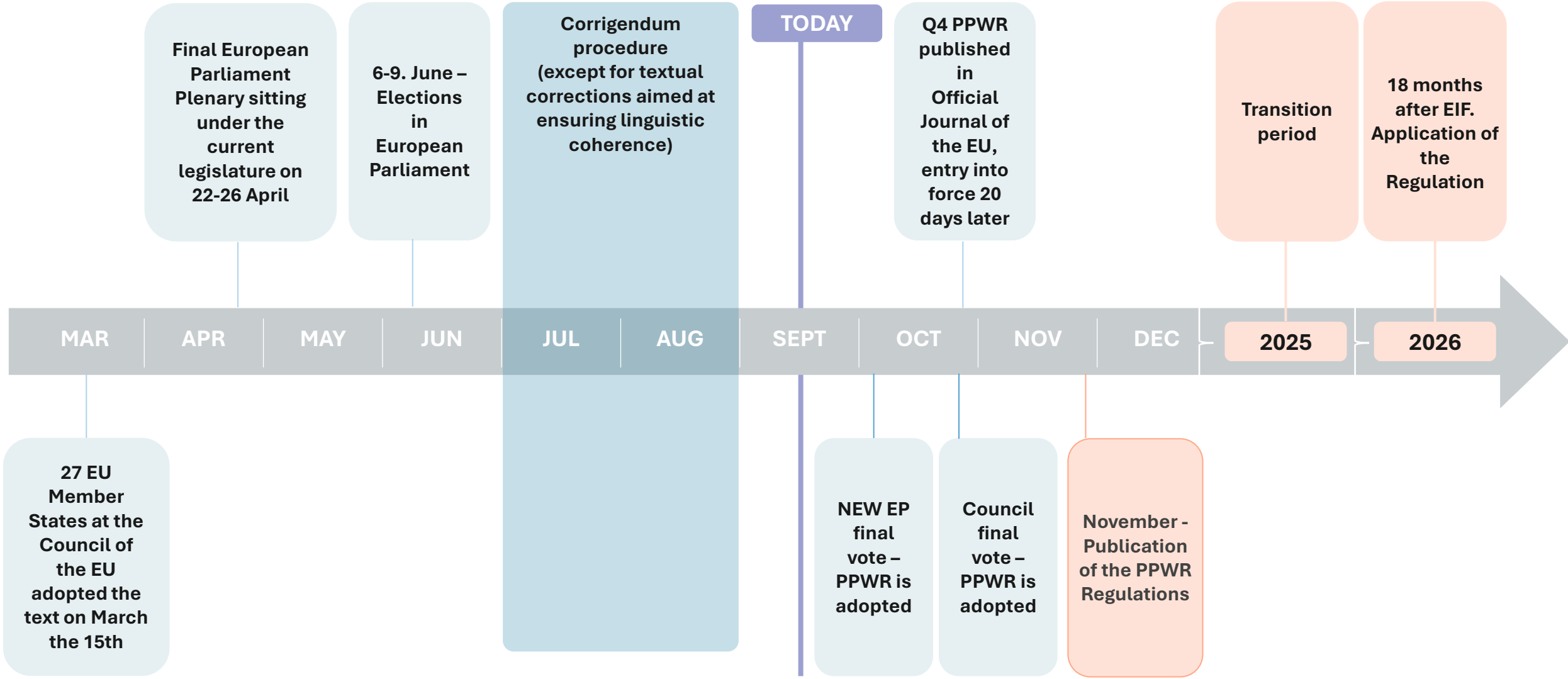
Commission's Authority
The Commission is empowered to adopt delegated acts in accordance with Article 58 to supplement this Regulation.

Purpose of Delegated Acts
These acts are intended to establish exemptions for specific packaging formats covered by the targets.

Consideration of Latest Data
The Commission will take into account the latest scientific and economic data and developments when establishing these exemptions.

Exemption Criteria
Exemptions may be granted in cases of **hygiene, food safety, and environmental issues** that prevent the achievement of the targets.

Time is of the essence



EUMEPS coordinates work for a delegated act for fish boxes

TARGET

Delegated act only for fish boxes;

Technical subgroup support:
Social and economical requests
Hygienic requests and food safety
Environmental issues

EUMEPS to coordinate (Each group to draft document with best evidence from subgroups)

TASKS

Collection of studies, LCAs, best examples
Collaboration with Food industry and fish industry
Connection with DG ENVI, DG MARE, DG SANTE

Targeted countries: Sweden, Finland, Denmark, Poland, Germany, France, Spain, Italy, Greece, Romania, Croatia, Portugal, Ireland, Norway, Netherlands, UK, Scotland;

Strategy for delegated acts

ADVOCACY GROUP FOR FISH BOXES

SOCIAL AND ECONOMICAL IMPACT

BEWI

SCOPE
- Investments in alternative packaging;
- Warehouses to store reusable packaging stocks;
- Investments in logistic handling in the lines and during internal/external transport;
- Investment in system for reuse;
- Potential economic burden on the fishing industry if forced to transition to reusables;
- Comply with all audits

HYGIENE AND FOOD SAFETY

NORWEGIAN EPS ASSOCIATION

SCOPE
- Critical role of EPS in Food Safety – fresh fish during transportation and storage;
- Insulation Properties;
- Contamination Risks with Reuse – stringent hygiene standards. Demonstrates the risk of contamination associated with reusable containers for fish, especially compared to EPS boxes;
- With alternatives we will increase food waste;
- Comply with all food safety legislations

ENVIRONMENTAL IMPACT

DANISH EPS ASSOCIATION

SCOPE
- Lond and short distance;
- Possibility for reuse- %;
- LCA EPS has lower envir. Impact – This should consider factors like resource extraction, production energy, transportation, and end-of-life disposal for both options;
- Ongoing environmental sustainability efforts through efficient recycling;

Call to action

Prioritize the Issue
Urge European Commission – DG ENVI to work on delegated act for exemptions by giving them opinion of the concerns for this meter in PPWR

Consider fish Industry Needs
Balance environmental goals with the sustainability and safety of the fishing and fish processing industry

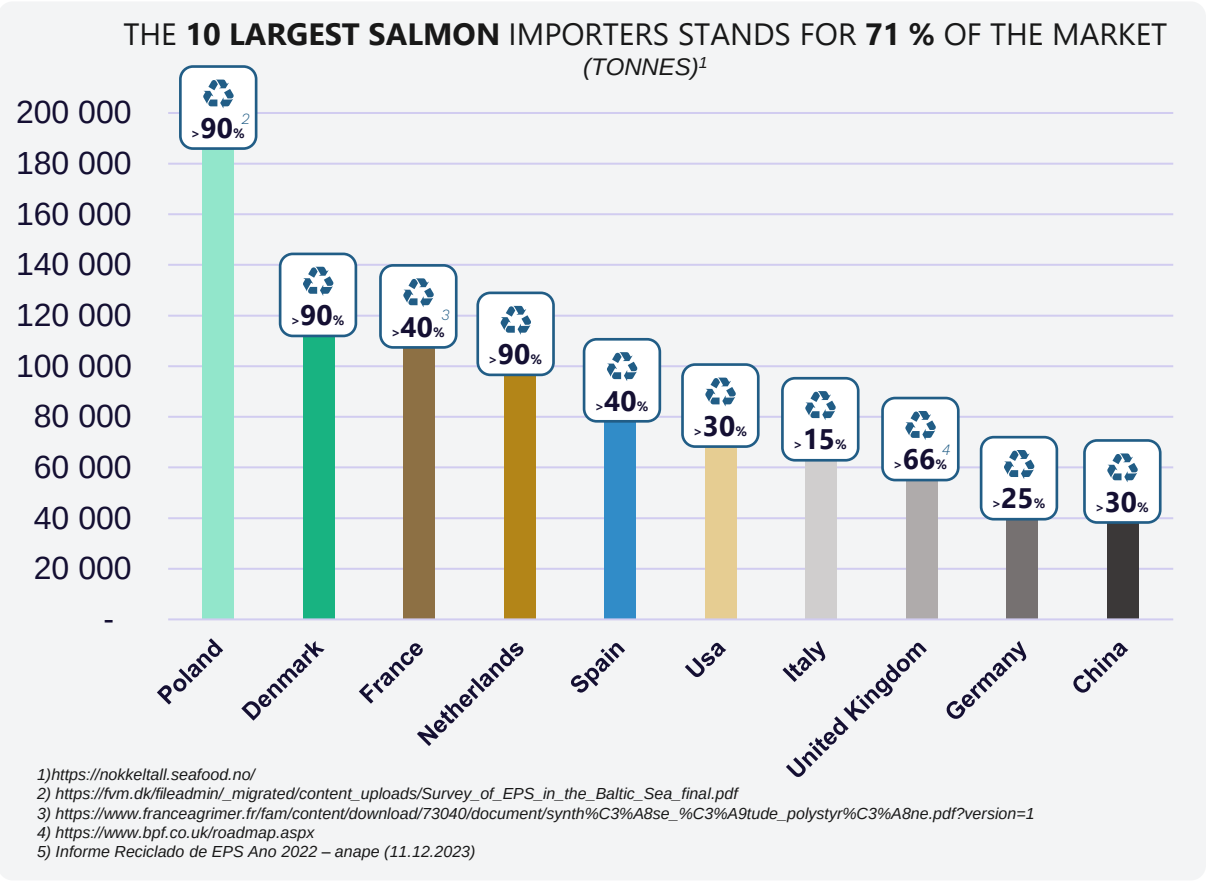
Engage in Dialogue
Industry stakeholders are available for further discussion in subgroups as well as in additional meetings to find viable solutions

APENDIX

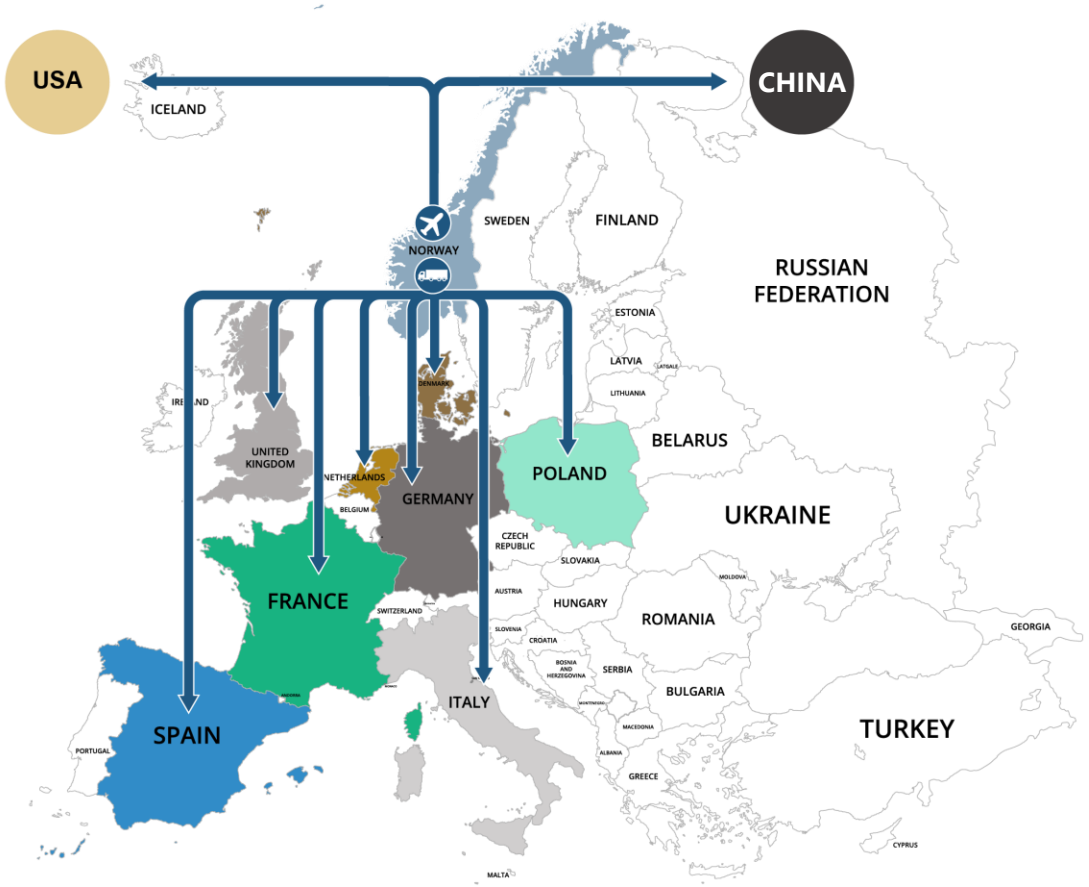
INITIATIVES FROM THE EPS INDUSTRY

There is still a lot of potential for improvement, but so far, the industry has a lot initiatives

Fish is exported to countries with a relative high recycling rate on fish boxes – most large facilities have internal EPS-compactors



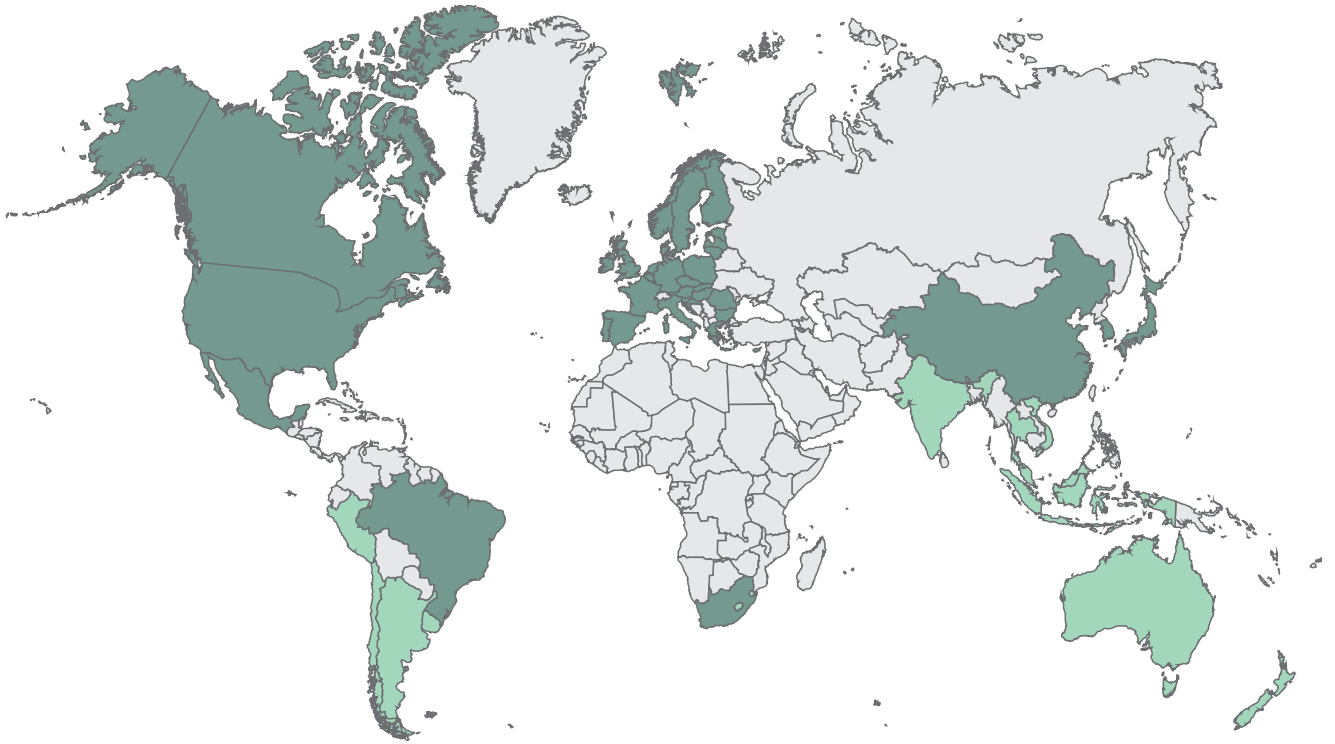
1)https://nokkeltall.seafood.no/
2) https://fvm.dk/fileadmin/_migrated/content_uploads/Survey_of_EPS_in_the_Baltic_Sea_final.pdf
3) https://www.franceagrimer.fr/fam/content/download/73040/document/synth%C3%A8se_%C3%A9tude_polystyr%C3%A8ne.pdf?version=1
4) https://www.bpf.co.uk/roadmap.aspx
5) Informe Reciclado de EPS Ano 2022 – anape (11.12.2023)



EPS transport packaging is recognized as recyclable in practice and **at scale in UNEP INC-4 “plastic pollution science” report**

In 38 countries, with a population of 4.2 billion people and spanning four continents the post-consumer recycling rate for insulated and protective EPS packaging exceeds 30%.

This means EPS packaging meets the criteria for recycled at scale and in practice as defined by the Ellen MacArthur Foundation and proposed by the United Nations Environmental Programme.



Government, NGO and EPR-scheme data proving recycling rate above 30%.

EPS industry data documents recycling rate above 30%.

The European industry has a lot of initiatives to reduce environmental impact

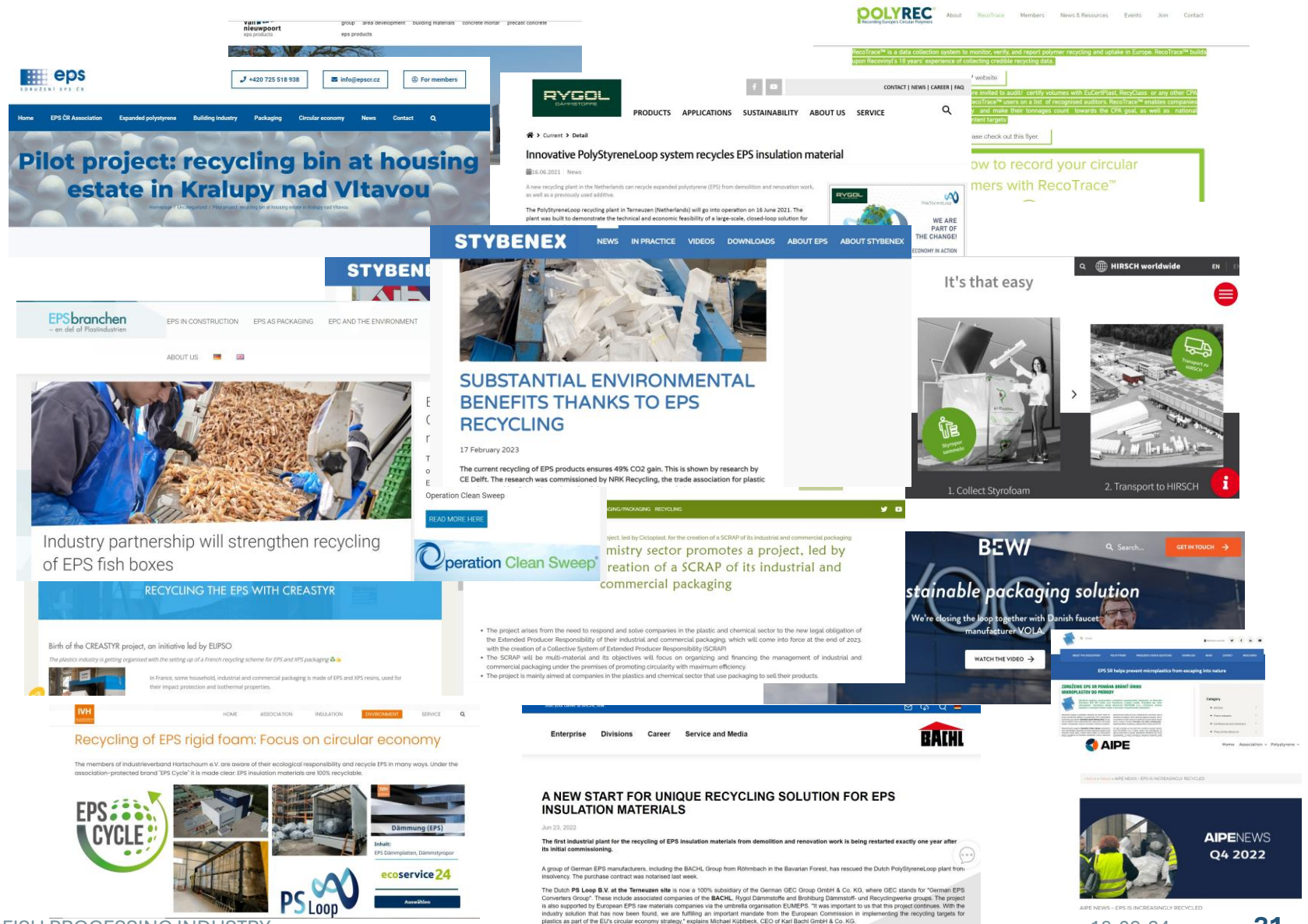
- “EPS porto a Porto” for the recovery of EPS boxes for fishing in port areas;
- Milan Fish Market for the collection and recycling of fish boxes in a commercial area;
- COREPLA launched in Marghera (in Veneto region) for the collection and recycling of EPS fish boxes in the fish market and seaports;
- Past the testing on OCS in plants
- EUMEPS has guideline how to treat EPS material in production factory

- Our members are users of RecoTrace

- Several project on EU and global level

- The Danish report finds that less than 0.02% of EPS produced in the Baltic Sea region becomes marine litter

- Providing good practice for Extended Producer Responsibility Scheme



Thank you!

DISCUSSION:

WHAT IS THE OPINION OF THE FISH INDUSTRY?