

ECF position on the draft Regulation proposal for packaging and packaging waste (PPWR)

The European Coffee Federation (ECF) welcomes the European Commission's proposal to update the EU legislative framework for packaging and packaging waste (PPWR) by giving Member States and businesses adequate support to achieve waste reduction targets to diminish the environmental impact of packaging.

For over a decade ECF and its members have remained committed to ensure that Single Serve Units (SSU's), referred to in the proposal as *coffee bags* and *coffee system single serve units*, meet a proper end of life that enables full circularity and maximization of resource efficiency for the category. Regretfully, **all proactive proprietary and collective¹ investments made over the years² have been compromised by the wording of the Packaging and Packaging Waste Regulation proposal.**

Although the preamble to the PPWR reinforces the criticality of recycling as a vital enabler of a circular economy, **the proposed PPWR's explicitly prohibits recyclable coffee system single serve units being placed on the market. Moreover, it mandates that full after use SSUs be compostable, utterly undermining the coffee industry's efforts to operate on a circular model.**

In the new PPWR proposal, *coffee system single serve units* are to be considered as packaging, becoming eligible to be collected by the recycled packaging waste stream. The PPWR 'Reduce, Reuse, Recycle' premise that the coffee industry has been single-handedly working towards for over 10 years would finally legally apply to coffee SSU's. However, Article 8 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, despite there is: (i) no evidence of compostable outperforming recycling solutions in environmental terms, (ii) no bio-waste infrastructure in place across the EU today, requiring considerable investments and efforts from Member States to ensure an existing and well-functioning infrastructure, and (iii) no guaranteed access³ to the bio-waste stream for coffee SSU's.

Capturing the essence of circularity, the coffee industry should have **freedom of material choice** to continue to work to **find the best solution** to ensure *coffee system single serve units find an appropriate end of life*. Moreover, effective circularity may only be achieved if a true legislative⁴ harmonization exists across the EU.

Today, the overall environmental performance of SSU's vs coffee brewed using other systems is comparable⁵. Because of the high extraction efficiency, less roast & ground coffee is required to brew the cup, compared to filter or espresso coffee. Due to the reduced use of coffee, the greenhouse gas (GHG) emissions of a SSU brewed cup is comparable to any other brewing systems, also reducing the amount of coffee waste.

As for the potential plastic and aluminium waste, according to Euromonitor in 2021, 290,000 tonnes of SSU's were sold in the European Market, out of which 70% corresponded to *coffee system single serve units* and 30% to *coffee bags*. A further breakdown within the *coffee system single serve unit* category would lead to 70% aluminium and 30% plastic. Considering the average weight of the plastic casing per plastic SSU, the total annual amount of plastic waste disposed of would amount to 18,100 tonnes. To better contextualize, around

¹ Collective initiatives: [Arecafe](#) (Spain); [Green Deal](#) (Netherlands); Aluminium & Plastic Recovery Plan (Netherlands); [Blue Bin](#) (Belgium), [Recycling capsule communication](#) and Best in Class sorting technology (Germany), Alliance pur le Recyclage des Capsules en Aluminium, [ARCA](#) and Alliance Recyclage Petits Plastiques (France), [Podback](#) (UK), [ReCap](#) (Italy), etc.

² Only in 2020, 24% of global coffee innovation corresponded to the SSU category. In 2022 15% of the EU coffee category volume and 40% of the value correspond to SSU's.

³ As an exception, according to the German Biowaste Ordinance, "compostable capsules" may not be disposed of in the bio-waste bin. They are to be disposed of with the residual waste. In the region of Flanders, Belgium, [Vlaco](#) explicitly forbids tea bags and coffee pads being disposed of in the bio-waste bin.

⁴ Spain as an example of a Member State with a specific legislation on home composting: [Ley 7/2022, de 8 de abril, de residuos, y suelos contaminados para una economía circular](#) and [Real Decreto 1055/2022, de 27 de diciembre, de envases y residuos de envases](#)

⁵ [Quantis LCA on coffee consumption](#): <https://lyonspc2019.files.wordpress.com/2019/03/pac0680-full-lca.pdf>

26 million tonnes of plastic waste⁶ are generated in Europe every year, out of which plastic capsule waste would represent approximately 0.07%, should no recycling exist, which is not the case.

Additionally, the penetration of capsule coffee machines in the 197 Million⁷ EU households is estimated at 70%, resulting in approximately 140 million perfectly functioning machines to be disposed of with no further consideration. Should *coffee system single serve units* be mandated compostable, for certain systems, entirely new coffee capsule machines will have to be acquired by consumers leading to further waste and an increase of cost.

As mentioned above, the proposal would be totally dependent on the promise of industrial composting technology and infrastructure which is currently limited in scale and scope. The estimation is that only 26%⁸ of food is collected as bio-waste and that less than 20% of EU consumers have direct access to biowaste infrastructure, as well as the fact that Germany and the region of Flanders (Belgium) explicitly do not accept any type of *coffee capsules* in their biowaste treatment facilities. Moreover, mandating compostable SSU's would only increase European dependency on new virgin raw materials.

The Sector's commitment

In line with the spirit of the EU Green Deal and Circular Economy Action Plan, ECF and its members will continue to be committed to SSU's circularity, contributing to diminishing the impact of packaging in the environment.

The European coffee sector respectfully requests the European Commission adequate support to achieve waste reduction targets to diminish the environmental impact of packaging.

- **Freedom of material choice** to ensure sustainable investments that allow space to innovate and to compete while focusing on improved overall product environmental footprint. A multi-material approach that considers the benefits of all available options to meet the requirements for safety, functionality, quality and circularity would be today the best way forward. **Contrary to the draft proposal, *coffee system single serve unit*, disposed of together with the product, should not be mandated compostable.**
- **A fair collective approach** (industry + competent authorities + waste management) that promotes an enabling environment by the development of adequate infrastructures for the different waste streams and the harmonization of waste management requirements across the EU, profiting from best-in-class technologies and avoiding duplication of efforts.
- **Launching consumer campaigns** aiming to create awareness to boost consumer engagement in circularity and promoting harmonized EU-wide sorting instructions to bring further clarity to consumers. Clear labelling is to be ensured so there is no consumer confusion regarding disposal in the appropriate waste stream.

The Sector's request

ECF and its members appreciate the European Commission's consideration and respectfully request:

1. Clarity in the product definition and categorization

Article 3(1):

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

⁶ https://ec.europa.eu/commission/presscorner/detail/en/MEMO_18_6

⁷ Statista, 2021 data

⁸ https://zerowasteurope.eu/wp-content/uploads/2020/07/2020_07_06_bic_zwe_report_bio_waste.pdf

(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)~~, sticky labels attached to fruit and vegetables and very lightweight plastic carrier bags 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 External 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.

Notwithstanding, ECF and its members will continue to work collaboratively and invest accordingly, to ensure, that according to the chosen material there is an appropriate infrastructure in place and that consumers are provided with the necessary information to enable the full circularity of the SSU category.

The European Coffee Federation (ECF) is the representative organisation for the European coffee trade and industry, speaking for over 750 companies ranging from SMEs to internationally operating companies, representing approximately 35% of the world coffee trade volume. ECF offers its members a forum for exchange, identifying industry-wide issues of common interest in the areas of food safety, sustainability and international trade.