

## **FEAD feedback on the Commission Implementing Decision on EU rules on calculating, verifying and reporting data on separate collection of single-use plastic beverage bottles**

**FEAD**, the European Waste Management Association, representing the private waste and resource management industry across Europe welcomes the opportunity to comment on the draft implementing decision laying down rules for the application of Article 9 of the Single Use Plastic Directive setting separate collection targets for beverage bottles.

To foster alignment with the objectives of the Directive, we call on the European Commission to provide additional clarifications over certain provisions of the draft Decision, as follows:

**Article 2.2:** mentions "The weight of the waste single-use bottles shall not include the weight of any remaining beverage." If the weight of collected PET is supposed to be measured by weighing the collected waste (sorted PET) there is no technical means to ensure total exemption of remaining beverage. According to experience, there will always be residues that influence the weight.

**Article 2.4 (b) (i):** We suggest reformulating the article as follows: *"The collection system prohibits the collection of waste containing hazardous substances"*

Moreover, we think that Article 2.7 is too narrow as it does not allow for a Digital Deposit and Return System (DDRS) whereby beverage containers would be digitally counted as they are placed in a co-mingled dry recycling bin. The beverage containers would contain a unique identifier QR Code, so the counting would be very accurate. We suggest that Article 2.6 could be modified to cover both the collection of single materials and co-mingled materials and that Article 2.7 could then be removed. In allowing flexibility in the point of measurement in Article 2.6, we recognise that loopholes need to be avoided, so we suggest that an EU Wide auditing system should be utilised to ensure that only relevant materials are counted at the measuring point. Our suggested amendment to Article 2.6 is therefore as follows:

**Article 2.6:** The weight of waste single-use bottles collected separately in accordance with paragraph 4, shall be measured during collection or at the output of the sorting operations or at any other appropriate point subject to auditing. The weight of such bottles should be calculated by counting the bottles and applying conversion factors that take into account the weight of each bottle size, the polymer type of the bottles and the lids and caps.

**Article 2.7:** we suggest removing it, as mentioned above.

**Article 3.2:** The adjustment of figures based on assumed export, imports and movements for each country needs harmonization among Members States as this opens a loophole for incorrectness of the collection data.

**Article 3.3:** The proposed calculation method for bottles placed on the market by waste analysis is not supported by FEAD. This methodology will doubtlessly lead to underestimation of sales volumes hence false collection rates as e.g. illegal waste disposal is not considered.

It would also supersede the investment in sophisticated sorting technology. The data collection from the analysis could be very subjective.

Implemented compliance schemes would be better suited to present such data on the number of bottles placed on the market and should be held accountable to compiling such figures and those figures should be audited.

The proposed procedure would lead to high costs for data collection without any positive environmental impact. It is our concern that it will contradict the scope of the SUPD in its most important goal which is prevention of littering.

**Several articles:** When referring to single-use bottles across the draft implementing decision we deem it necessary to specify that the latter are single-use **beverage** bottles, in compliance with the scope of the implementing act.

Thanking you in advance for your consideration, we deem harmonization and clarification is needed to effectively implement the Directive.

**FEAD Secretariat**

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