

ENSA position paper on the Packaging and Packaging Waste Regulation (PPWR) proposal

ENSA welcomes the Commission's Packaging and Packaging Waste Regulation (PPWR) proposal, which aims to revamp the EU packaging legislation by aligning it with the Green Deal's objectives of halving the EU's GHG emissions by 2030.

ENSA's mission is to contribute to mainstreaming plant-based meat and dairy alternatives for **healthier and more sustainable diets**, fully supporting the objectives of the Green Deal.

Research shows that, if everyone incorporated more plant-based foods into their diet, global agriculture land use would be reduced by 75%.¹ Shifting towards more plant-based diets could also **mitigate CO2 emissions and water use**.² In addition, leguminous crops **contribute to soil health improvement**, by increasing its nitrogen levels. Thus, used in rotation with other crops, leguminous crops can significantly reduce the need for fossil fuel-based fertilizers, short in supply in the EU.

For plant-based products to be able to **continue to support the EU's shift towards a sustainable food system**, it is important that they are treated on an equal footing with animal origin alternatives both in the context of the reuse targets (Article 26 PPWR proposal) and mandatory Deposit and Return Schemes (Article 44 PPWR proposal) introduced by the PPWR proposal.

Just like dairy products, plant-based dairy alternatives encounter **hygiene** and **health safety constraints** in the context of implementing reuse and DRS, as elaborated upon in the following sections. **We therefore urge the EU to exempt plant-based liquid products from the scope of application of articles 26 and 44 of the PPWR proposal**. This exclusion is crucial to prevent the imposition of unjustified legislative burdens on plant-based foods manufacturer which could in turn hinder the transition towards more sustainable food systems.

Reuse

Liquid plant-based products present specific characteristics that make them prone to certain quality or food safety challenges.

Liquid plant-based products present a high water activity, a neutral pH³ and a high level of **nutrients** content, creating an ideal environment for microbiological growth. They are also high in **unsaturated fat**, making them susceptible to oxidation when exposed to light and oxygen. These oxidative reactions can in turn accelerate

¹J. Poore and T. Nemecek, "Reducing food's environmental impacts through producers and consumers", *Science*, 2018, Vol 360, Issue 6392, pp. 987-992.

² **On GHG emissions:**

Plant-based products present lower GHG emissions than their animal-based alternatives: producing a kilogram of beef and milk emits 60 and 3 kilograms of GHG emissions respectively, whilst the production of a kilogram of peas and soy-based drinks emits 0.9 kilograms of GHGs.

S. Roe et al., "Contribution of the land sector to a 1.5 °C world", *Nature and Climate Change*, 2019, Issue 9, pp. 817–828.

M. Springmann et al., "Health and nutritional aspects of sustainable diet strategies and their association with environmental impacts: a global modelling analysis with country-level detail", 2018, *Lancet Planet Health*, Vol. 2, pp.451-461.)

On water use: On average, 628 liters of water are required for every liter of dairy milk, compared to 371 liters for almond, 270 liters for rice, 48 liters for oat and 28 liters for soy drinks. - J. Poore and T. Nemecek, "Reducing food's environmental impacts through producers and consumers", *Science*, 2018, Vol 360, Issue 6392, pp. 987-992.

³ Both plant-based drinks and dairy are defined as 'low acid aseptic beverage' by the FDA CFR21 Definition.

their organoleptic deterioration resulting in a rancid taste. Finally liquid plant-based products are often **fortified with essential micronutrients such as vitamins**, which are sometimes sensitive to light and oxygen. When exposed to a luminous source, vitamins degrade, leading to a reduction in the nutritional value of plant-based products.

To avoid these degradations, liquid plant-based products require a **packaging that is completely sterile, and provides a strong barrier against external contaminants as well as oxygen and light**. By using such a packaging, manufacturers can deliver high-quality, preservative-free plant-based foods that maintain their freshness and nutritional value.

Imposing reuse targets on liquid plant-based products would **considerably increase production costs** to ensure that reusable packaging fulfills the same hygiene and health safety properties as sterile cardboard beverage packaging, with the deployment of a dedicated infrastructure (collection, cleaning, refill). These additional costs would be transposed onto products thus discouraging consumers from shifting towards sustainable diets, hindering the EU's progress towards achieving the Food to Fork Strategy goals. To avoid this, it is essential to strike a balance between environmental objectives and the affordability of sustainable food options for consumers.

Moreover, putting in place an infrastructure enabling reuse would generate **additional GHG emissions** (transport) and **water consumption** (cleaning), going against the objectives of the Green Deal.

Therefore, it is crucial for liquid plant-based products to be exempted from the reuse targets set under Article 26 of the PPWR proposal. Their unique characteristics and requirements, as outlined above, necessitate a different approach when it comes to packaging. Imposing reuse targets on plant-based products would impose undue burdens on manufacturers and disrupt the affordability and growth of sustainable plant-based options.

DRS

Just like milk, liquid plant-based products undergo degradation upon exposure to oxygen and light once their packaging has been opened. This **oxidation process results in the generation of residues and odors** which can either spoil or compromise resulting recyclates quality while **increasing collection point maintenance costs**.⁴ Therefore, the exclusion of plant-based products from mandatory DRS – imposed on single-use plastic bottles and beverage metallic cans under 3L in Article 44 of the PPWR proposal – should be reconsidered.

About ENSA

The European Plant-based Foods Association (ENSA) represents the interests of plant-based food manufacturers in Europe. ENSA is an association of internationally operating companies, ranging from large corporations to small, family-owned businesses with an annual turnover of around €1.8 billion. ENSA members produce high-quality plant-based alternatives to dairy and meat products. Since its establishment in 2003, ENSA has been raising awareness about the role of plant-based diet in moving towards more sustainable and healthier food consumption patterns.

⁴ Commission impact assessment report accompanying the Packaging and Packaging Waste Regulation proposal, 30.11.2022, SWD(2022) 384 final, Part 2, p. 633.