



Fecc
EUROPEAN ASSOCIATION OF
CHEMICAL DISTRIBUTORS

EU Consultation: Reducing packaging waste - review of rules

European Association of Chemical Distributors (Fecc)

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Fecc acknowledges the consultation note proposed on 'Reducing packaging waste – review of rules' and welcomes the measures proposed to reduce waste in the EU. Nonetheless, we would like to raise the following points in this consultation note on behalf of the European chemical distribution sector and in particular, the many SMEs we represent:

- **What is the chemical distribution's role in terms of promoting reusable packaging?**

We support the Commission's initiative in its role to further implement the stipulations under the [Directive 852/2018](#), ensuring that waste management in the EU is further improved with a view to protect, preserve and improve the quality of the environment, whilst ensuring prudent efficient and rational utilisation of the natural resources available.

Chemical distributors utilise various materials such as intermediate bulk containers (IBCs), drums and cans. In addition, the packaging material is used from recycling and recondition companies where possible. Chemical distributors promote the reusable packaging in accordance to the appropriate quality parameters and the sector finds ways to use the packaging multiple times based on the corresponding risk assessments as well as determine the cost benefit matrix to refurbish the packaging for additional use and environmental gains.

With the EU Green Deal being a game-changer, support from the community includes a wider part of the industry and its downstream users in order to ensure that these type of initiatives on integrating circular economy on packaging waste are well-implemented.

- **How is our sector tackling waste prevention measures? Are there any examples or best practices that should be considered at a regulatory level?**

Fecc supports the initiative to incentivise users and customers that accept and reusable packaging in their supply chains. We believe that such incentivisation is a more pragmatic approach that encourages companies to innovate, rather than the overlapping regulations in the European chemical wholesale sector that results to an uneven level playing field, most especially for the SMEs.

There are various examples of closed packaging loops in chemical distribution. Fecc would like to raise the following best practices in the procurement and the utilisation of the packaging materials:

Purchase policy - A documented purchasing policy and procedure provides a standardised process for screening and collecting the required information on packaging (virgin or otherwise) prior to their purchase and subsequent use on-site. Consequently, monitoring, and its reintroduction to another industrial loop is further streamlined.

Usage policy - A key component essential to waste minimisation is an up to date inventory. The capacity exists for distributors to solve the logistical problems namely: (1) reusing packaging when possible, (2) contribute to the design of quality requirements, (3) incentivise the rent system that increases fast returns of the packaging material, (4) proper adherence to a system of return and return of containers (SDDR) and (5) an effective valorisation of Integrated Management Systems (IMS/ISG/SCRAP) at an industrial level.

- **What can the Commission do to support the industry in further developing these best practices?**

Fecc requests the Commission to evaluate the feasibility of an EU-wide guidance that streamlines quality control for chemical producers and distributors. This would ensure faster monitoring for the reintroduction of the packaging material into a circular loop.

For example in some member states such as Spain and Belgium, there are only integrated management systems (IMS/ISG/SCRAP) for domestic packaging catering to specific sectors such as phytosanitary products, medicines, industrial oil, tires and electrical and electronic devices. Other sectors, such as fertilisers, are also beginning to adapt through another IMS. However, for industrial packaging used in the chemical industry in general, a system does not yet exist that covers all of the aforementioned cases.

Through a comprehensive review of these rules, member states would better understand how chemical industrial packaging is managed in other European countries and formulating a comprehensive approach that is applicable to all member states could be developed.

Fecc acknowledges that this consultation note, along with the other reviews on the EU Green Deal, signals a regulatory paradigm shift for the European chemical industry. We look forward to further working with the Commission to establish a coherent regulatory framework and ensure that sustainability is not only an option, but rather the norm.