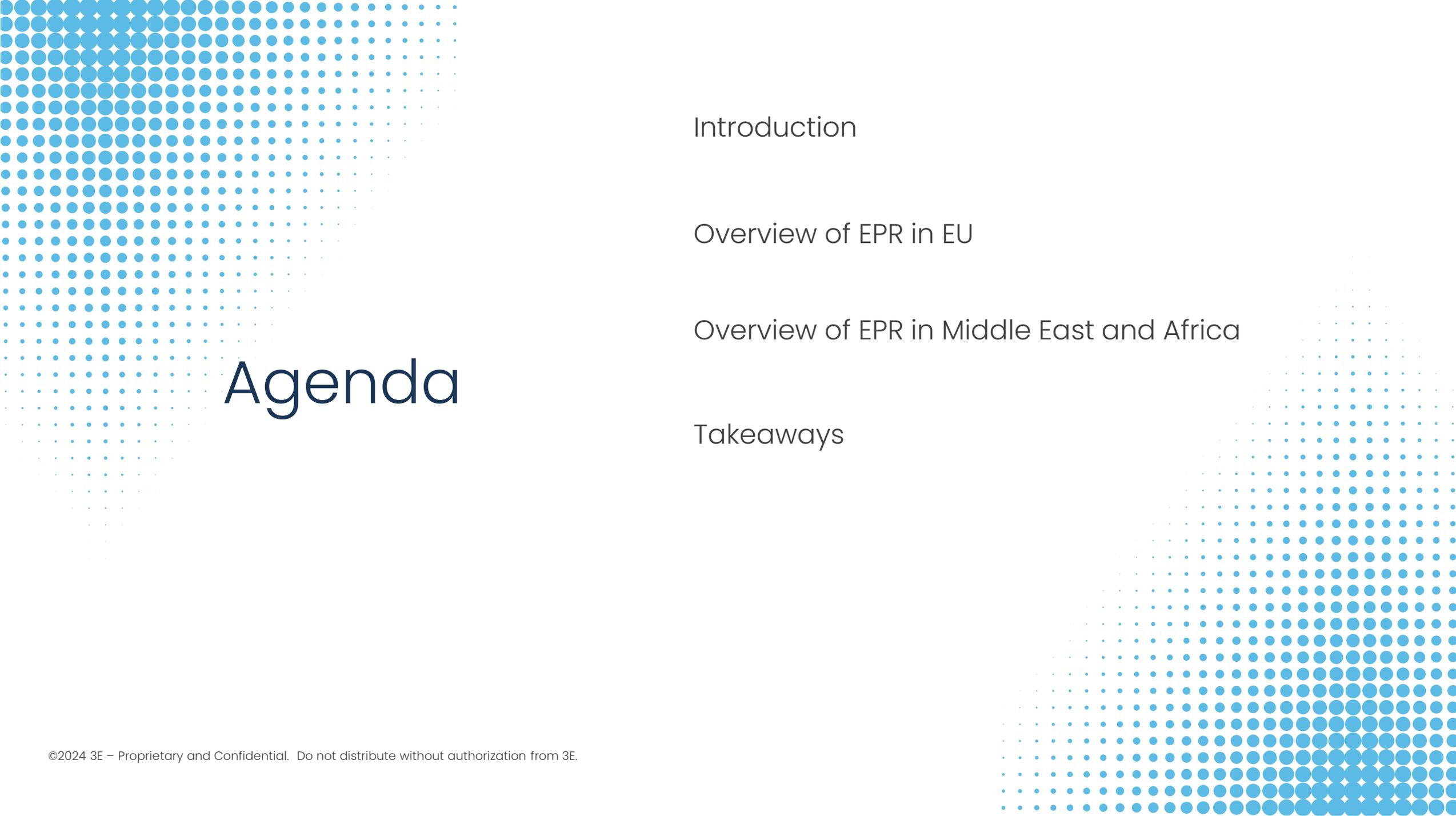




Extended Producer Responsibility (EPR): EMEA Overview

Emel Kasim

19 July 2024



Agenda

Introduction

Overview of EPR in EU

Overview of EPR in Middle East and Africa

Takeaways

Introduction



Introduction



Extended Producer Responsibility (EPR)

- Environmental policy approach
- Producers are given a significant responsibility
- Effective for facilitating circular economy
- An element of Green Chemistry

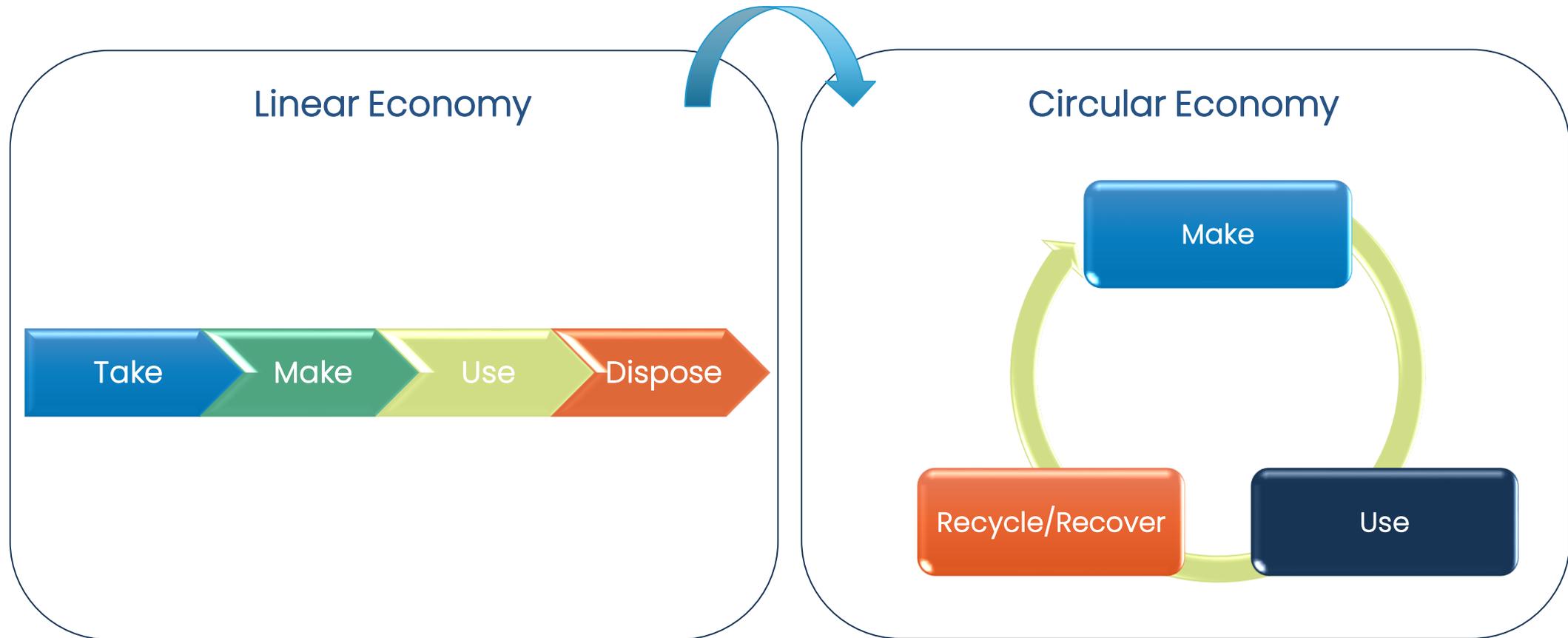
Introduction



Extended Producer Responsibility (EPR)



Towards a Circular Economy



Extended Producer Responsibility



European Union Regulatory Framework

Polluter-pays Principle

Waste Framework Directive
(Directive 2008/98/EC)

Single-Use Plastics Directive
(Directive 2019/904/EU)

Batteries Directive (Directive
2006/66/EC)

Packaging and Packaging
Waste Directive (Directive
94/62/EC)

Waste Electrical and Electronic
Equipment (WEEE) Directive
(Directive 2012/19/EU)

End-of-Life Vehicles (ELV)
Directive (Directive 2000/53/EC)

EU Proposal for Packaging and
Packaging Waste Regulation

Extended Producer Responsibility



Revision of Directive 94/62/EC on Packaging and Packaging Waste (REFIT)

- Part of the European Green Deal and the new Circular Economy Action Plan
- Ensure more effective harmonization for packages at the EU level
- Reduction of packaging (5% by 2030, 10% by 2035 and 15% by 2040) → amendment: 10 % by 2030, 15 % by 2035 and 20 % by 2040
- All packaging would have to be recyclable (designed for recycling by 1 January 2030 and can be recycled at scale from 1 January 2035)

EU Proposal for Packaging and Packaging Waste Regulation

Packaging and Packaging Waste Directive (Directive 94/62/EC)



- Parliament adoption of The Committee on the Environment, Public Health and Food Safety (ENVI) report, Nov. 2023
- Parliament and Council reached a provisional agreement on the proposed Regulation, March 2024
- The agreement was adopted by the Parliament, April 2024

Extended Producer Responsibility



Revision of Directive 94/62/EC on Packaging and Packaging Waste (REFIT)

- Ban on single-use containers by 2030 in HORECA sector (bottles, body lotions, etc.) and in the food sector (fruit, vegetables, sauces, sugar, etc.)
- Minimum recycled content in plastic packaging (30 % for single use plastic beverage bottles in Jan. 2030 and 50% in 2040)
- Harmonization of labelling requirements
- Emphasis on extended producer responsibility (EPR) schemes, new registration requirements, and communication among the supply chain

EU Proposal for Packaging and Packaging Waste Regulation

Packaging and Packaging Waste Directive (Directive 94/62/EC)

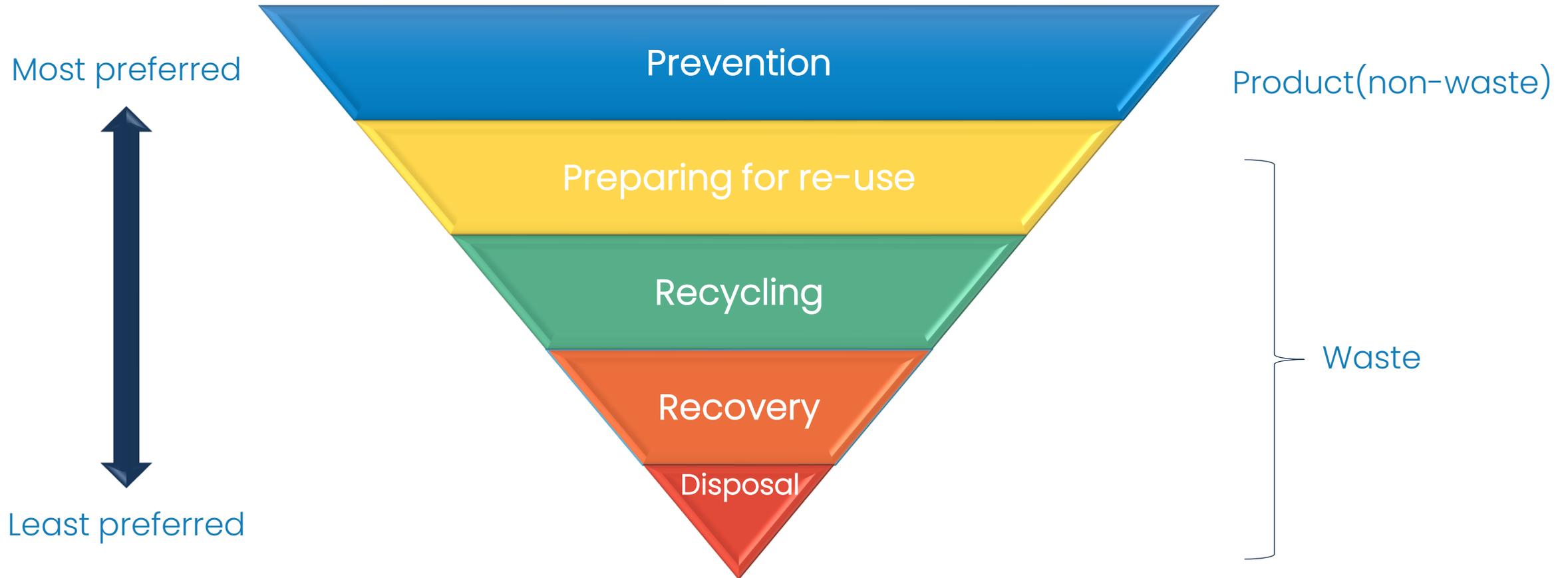


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Waste Framework Directive (Directive 2008/98/EC)



The European Union (EU) – Waste Hierarchy

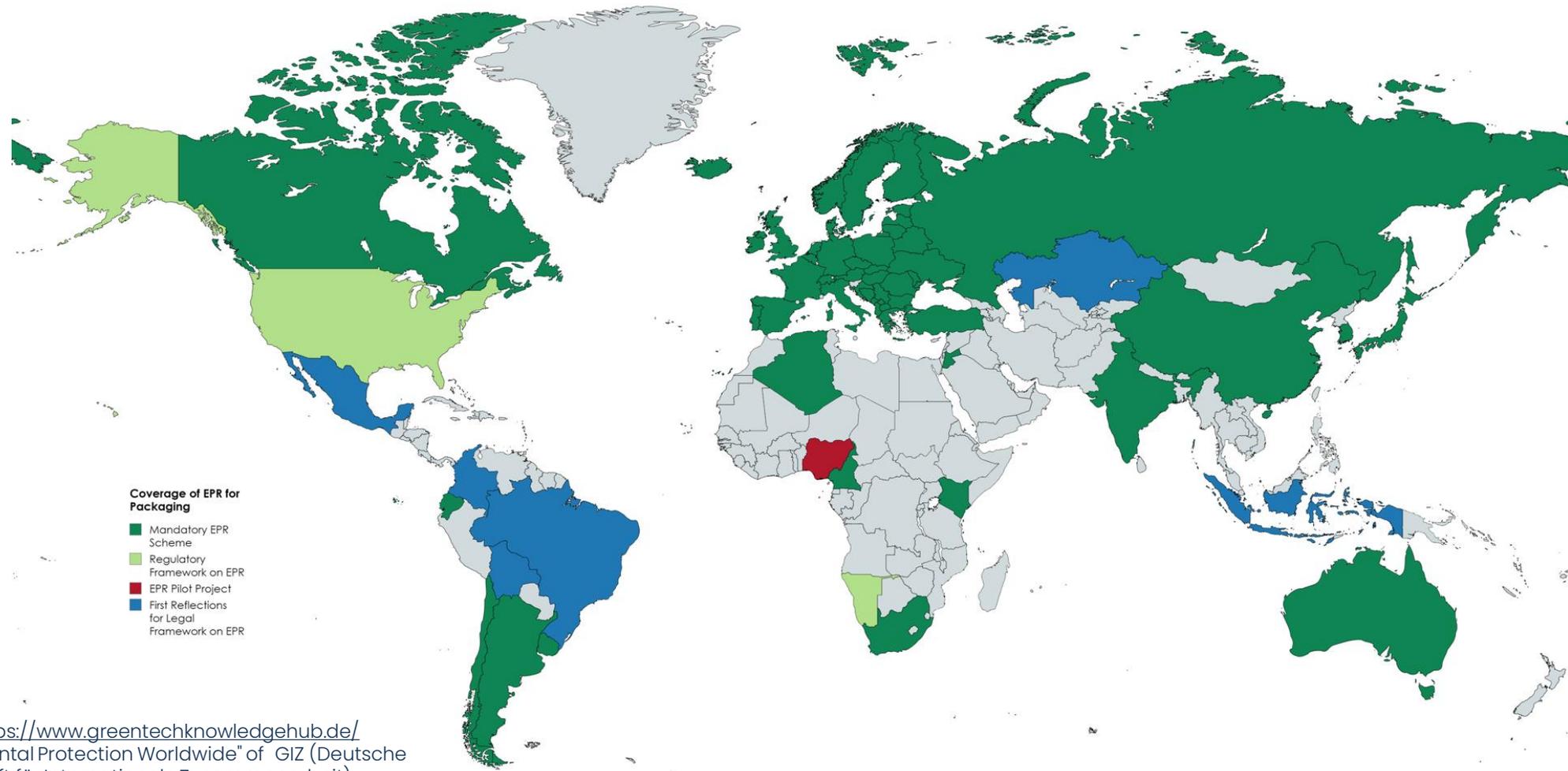


Structure of EPR Implementation in the EU



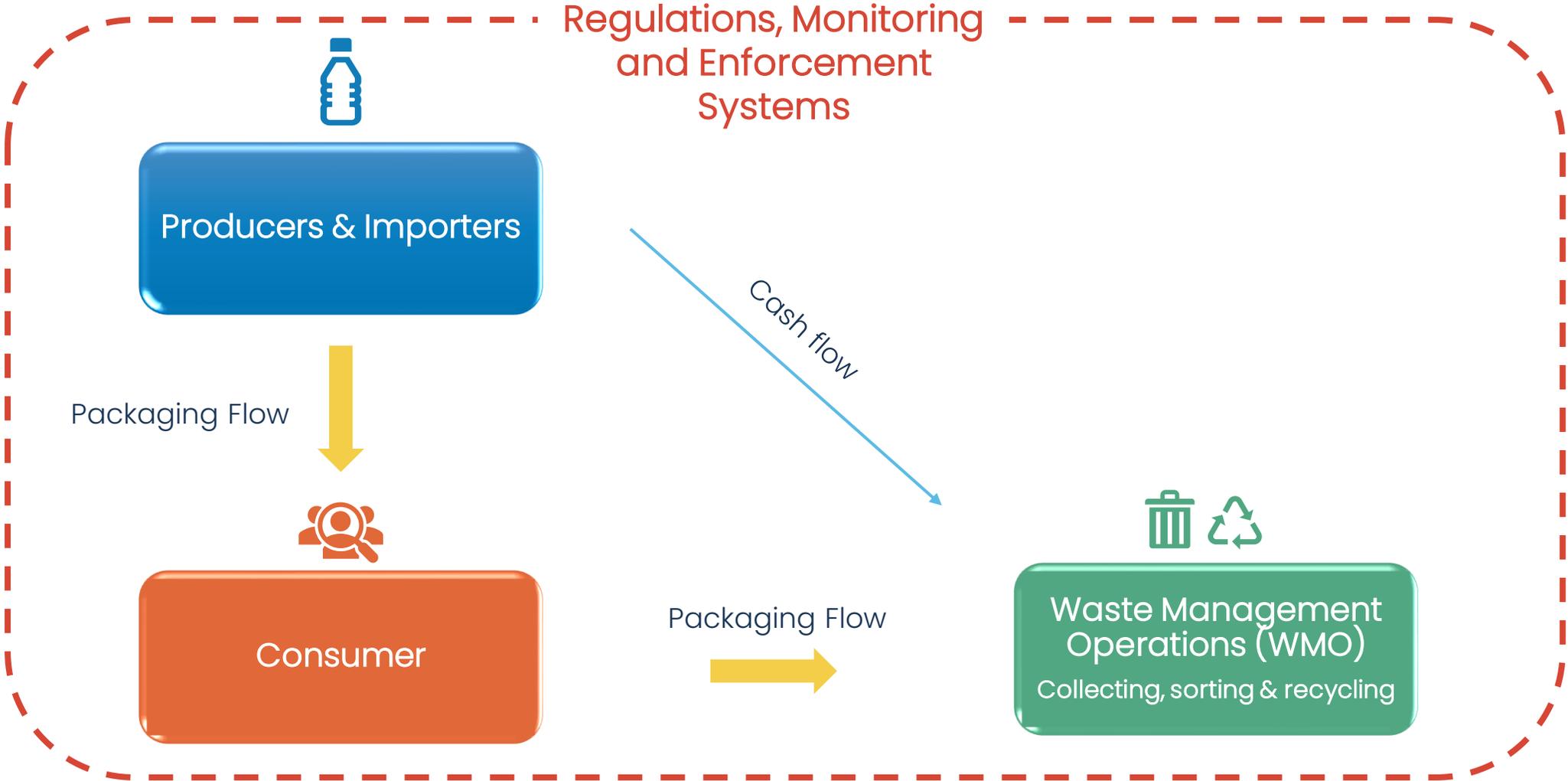
- Specific product categories with a defined regulatory framework
 - Packaging
 - End-of-Life-Vehicles (ELV)
 - Electrical and Electronic Equipment
 - Batteries
 - Single-Use Plastics
- Eco-design for Sustainable Product Regulation (ESPR)
 - Textile & footwear
 - Furniture (including mattresses)
 - Detergents
 - Paints
 - Tires
 - Toys
 - Intermediary products (iron, steel, cement, aluminum, lubricants)
 - ICT (Information and Communications Technology) products
- Products without an allocated framework

Coverage of EPR in the World

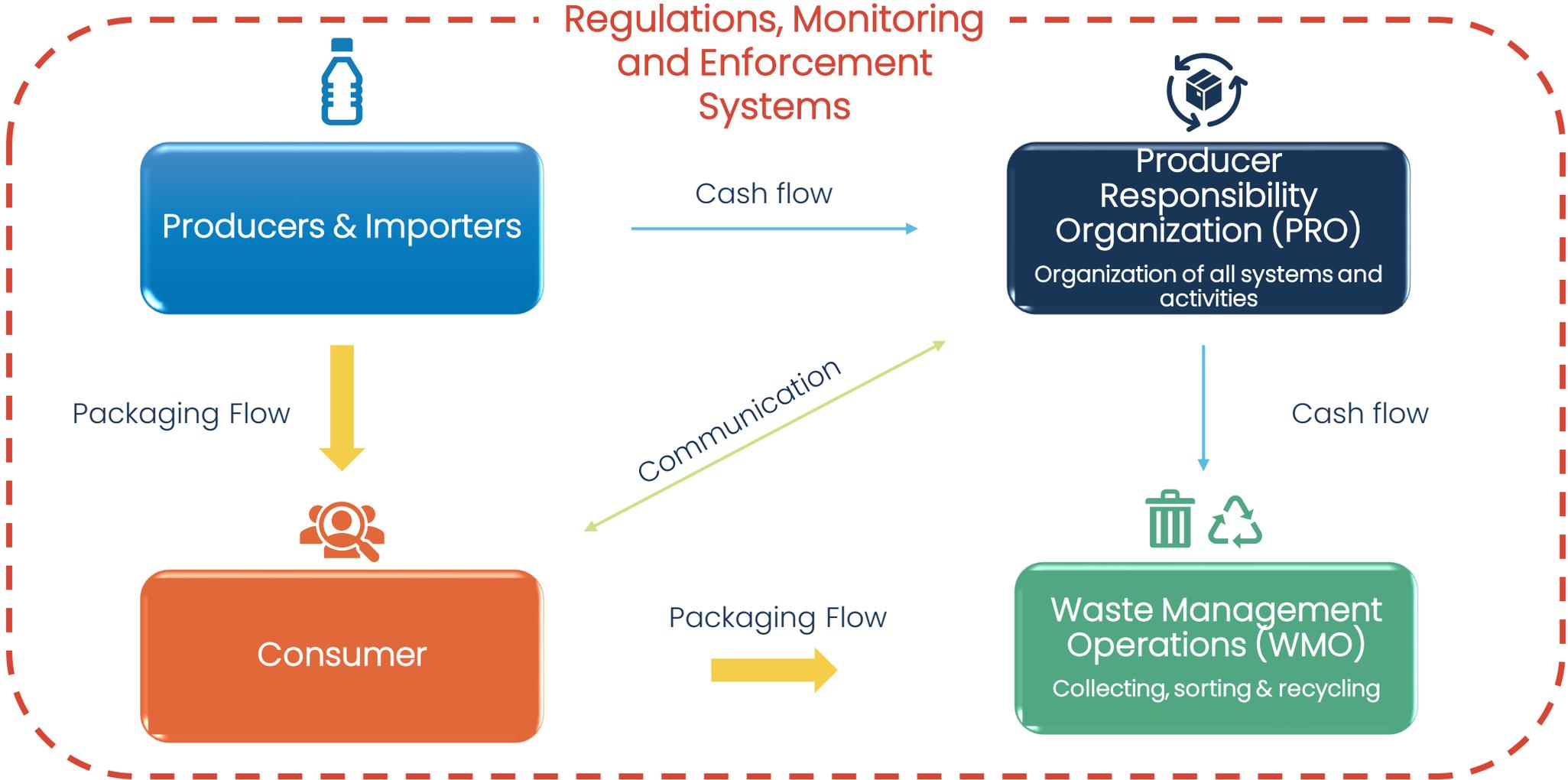


Source: <https://www.greentechknowledgehub.de/>
"Environmental Protection Worldwide" of GIZ (Deutsche Gesellschaft für Internationale Zusammenarbeit)

Extended Producer Responsibility Workflow



Extended Producer Responsibility Workflow

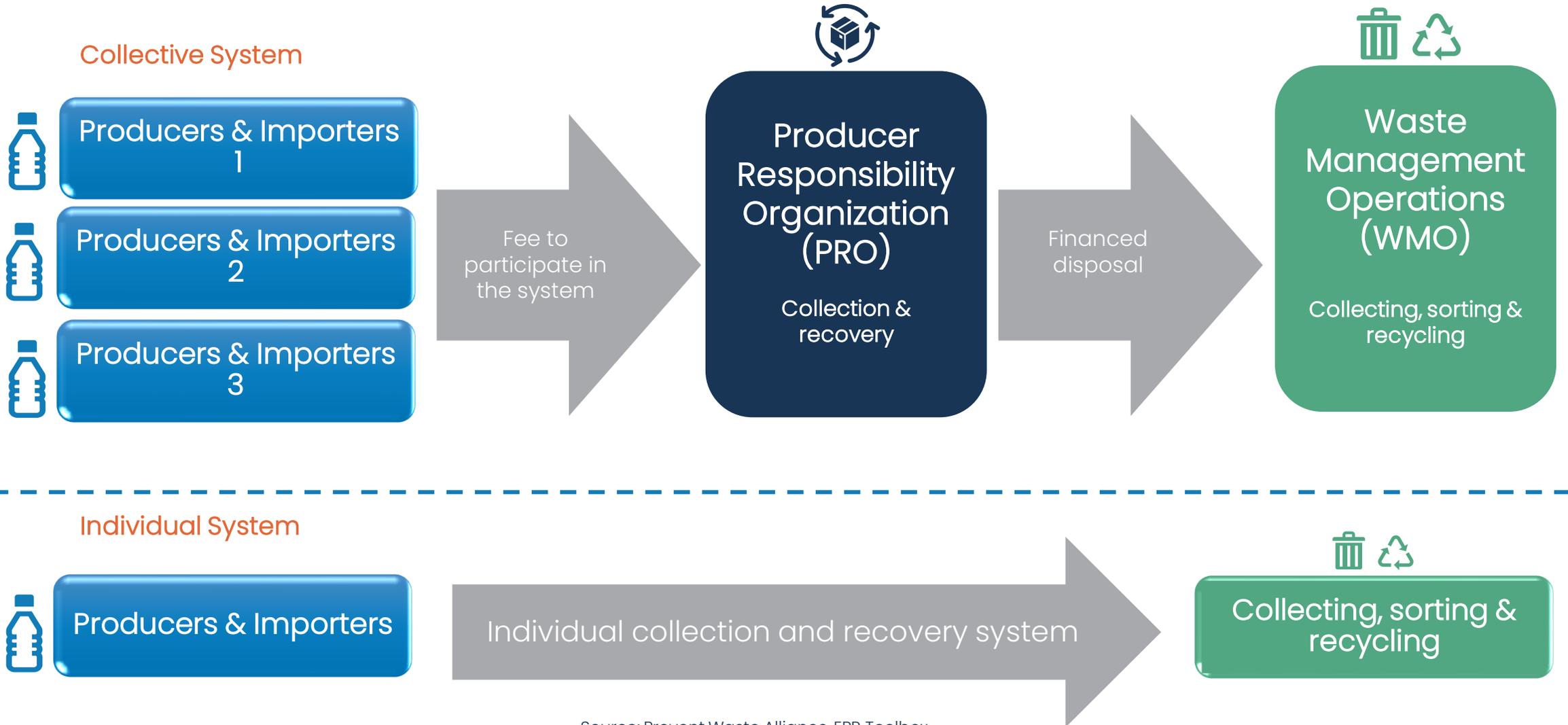


Producer Responsibility Organization (PRO)



- Collective responsibility through a third central element for the organization of all tasks associated with the EPR system
- Not strictly necessary for the implementation of Extended Producer Responsibility (EPR) schemes, but are commonly used and highly beneficial for several reasons
- Can be set up in various ways including:
 - State-led or industry-led
 - Non-profit or for-profit
 - Single PRO or multiple PROs
 - PRO covers specific sub-category of a category (e.g. all packaging or specific packaging)
 - PRO setup depending on country context

Individual vs Collective EPR System



Source: Prevent Waste Alliance, EPR Toolbox

Supply Chain in EPR System

- PRO an important stakeholder for operating the system
- Responsible for setting up, developing and maintaining a circular economy system
- Responsible for fulfilling the take-back obligations of the obliged companies.
- Responsible for communication, providing information and research and development.



Source: Prevent Waste Alliance, EPR Toolbox

EPR Stakeholders



Stakeholders	Responsibilities
Producers	Manufacturers & Importers
Government and Regulatory Bodies	National and Local Governments & Environmental Agencies
Consumers	Individuals who purchase and use the products
Waste Management Companies	Collection and Sorting Facilities & Recyclers
Retailers and Distributors	Companies involved in the sale and distribution of products to consumers.
Municipalities	Local authorities responsible for waste management services and infrastructure
Producer Responsibility Organization (PRO)	Implementation of EPR Programs, coordination with other stakeholders, financial management and compliance and reporting
Financial Institutions	Financial services to support the development of recycling infrastructure and EPR programs

EPR Country Overviews (Packaging)



Packaging Material Types



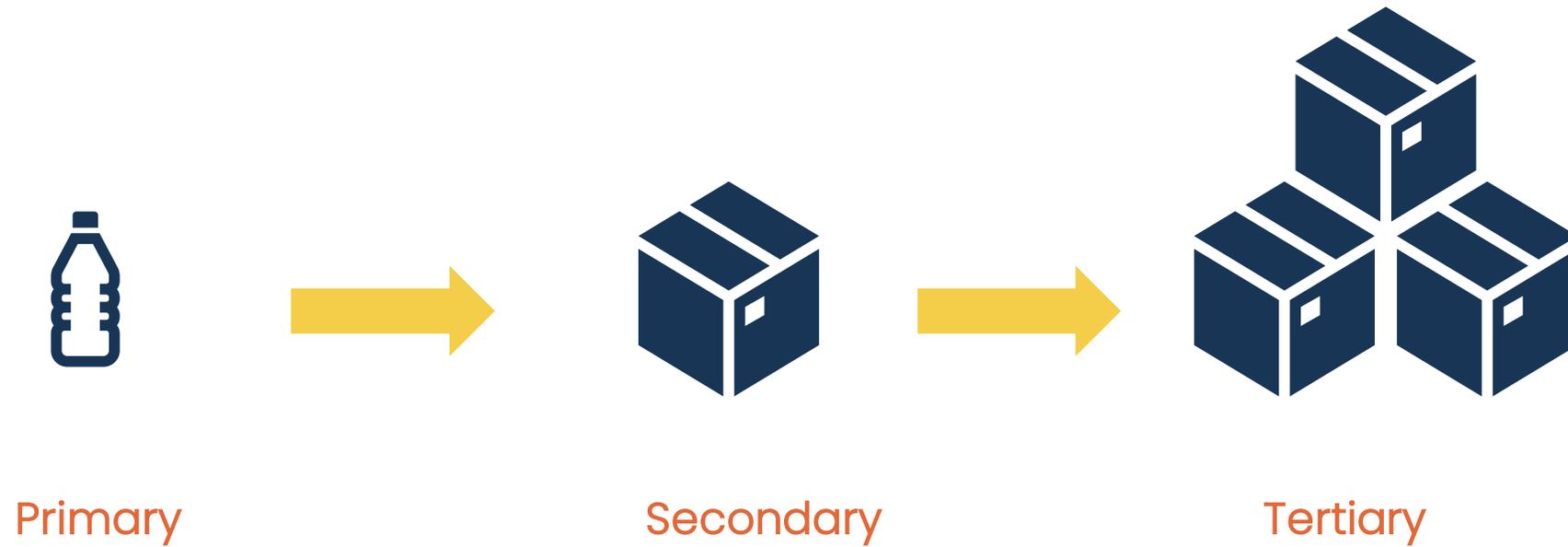
composite packaging



ferrous metals

Other materials

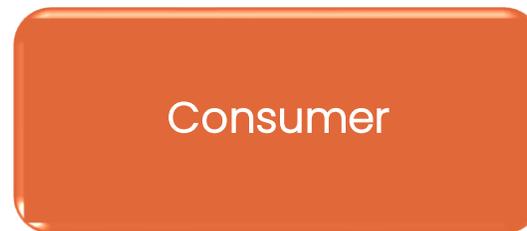
Packaging Types



Implementation and Compliance



Register with relevant authorities, report quantities of products placed on the market, and pay fees to fund the collection, recycling, and disposal processes



Participate in the proper disposal and recycling of covered products, often facilitated by municipal collection points or retailer take-back scheme



Collaborate in the collection and processing of waste materials

EPR Country Overviews



Denmark

- Implemented EPR for certain product groups including:
 - Electrical and Electronic Equipment
 - Batteries & Accumulators
 - Vehicles
 - Single-use plastics (SUP)
- The packaging directive will be implemented on 1 January 2025
- Executive Order on Certain Requirements for Packaging, BEK No. 1271 of 06/06/2021 contains provisions implementing parts of Directive 94/62/EC on Packaging and Packaging Waste
- Danish Environmental Protection Act provides a general framework on EPR and specific statutory orders lay down details on implementation

EPR Country Overviews



Italy

- Implemented EPR for certain product groups including:
 - Packaging
 - Electrical and Electronic Equipment
 - Batteries
 - Vehicles
 - Single-use plastics (SUP)
- CONAI (Consorzio Nazionale Imballaggi) manages packaging waste (PRO)
- Companies without a presence in Italy are not liable, but could voluntarily choose to fulfill EPR obligations in the place of their Italian customers (need fiscal tax representative)
- Majority of provisions on EPR are implemented through Chapter 5, Title II (Articles 217–226) of the Legislative Decree No. 152-2006

EPR Country Overviews



Germany

- Covers a wide range of product types under EPR Framework:
 - Packaging (Verpackungsgesetz (Packaging Act))
 - Electrical and Electronic Equipment
 - Batteries & Accumulators
 - Waste Oils
 - Old Appliances
 - End-of-Life Vehicles (ELVs)
 - Single-use plastics (SUP)
- The law applies to all companies, regardless of their size, registered place of business or packaging quantities.
- Examples of the producers
 - Online shop operators
 - Marketplace traders
 - Stationary dealers
 - Producers
 - Importers
 - Intermediaries

Germany

- 2017 Packaging Law requires all companies that place packaging on the German market to register with a central authority and take responsibility for its packaging
- The Packaging Law recognizes several types of material as potential packaging materials in Annex 5:
 - Six types of plastic (including polyethylene terephthalate (PET) and high-density polyethylene (HDPE))
 - Three types of paper (including corrugated paper)
 - Metals (steel and aluminum)
 - Wood products (including cork)
 - Textiles
 - Three types of glass
 - Thirteen types of composite materials

EPR Country Overviews



Germany

- Producers in Germany can choose among a wide variety of PROs, and each has its own pricing system
- Zentrale Stelle Verpackungsregister (Central Agency Packaging Register – ZSVR) keeps records on the responsible persons and packaging volumes reports placed on the German market
- Obligations:
 - Registration in the ZSVR’s LUCID Packaging Register
 - Participation in the systems
 - Volume reporting
 - Submit a declaration
- Failing registration obligation or reporting incorrect quantities can result in a fine of up to €200,000. There is also the risk of warnings from partners

Eco-design and Sustainability: The Eco-design for Sustainable Product Regulation (ESPR)



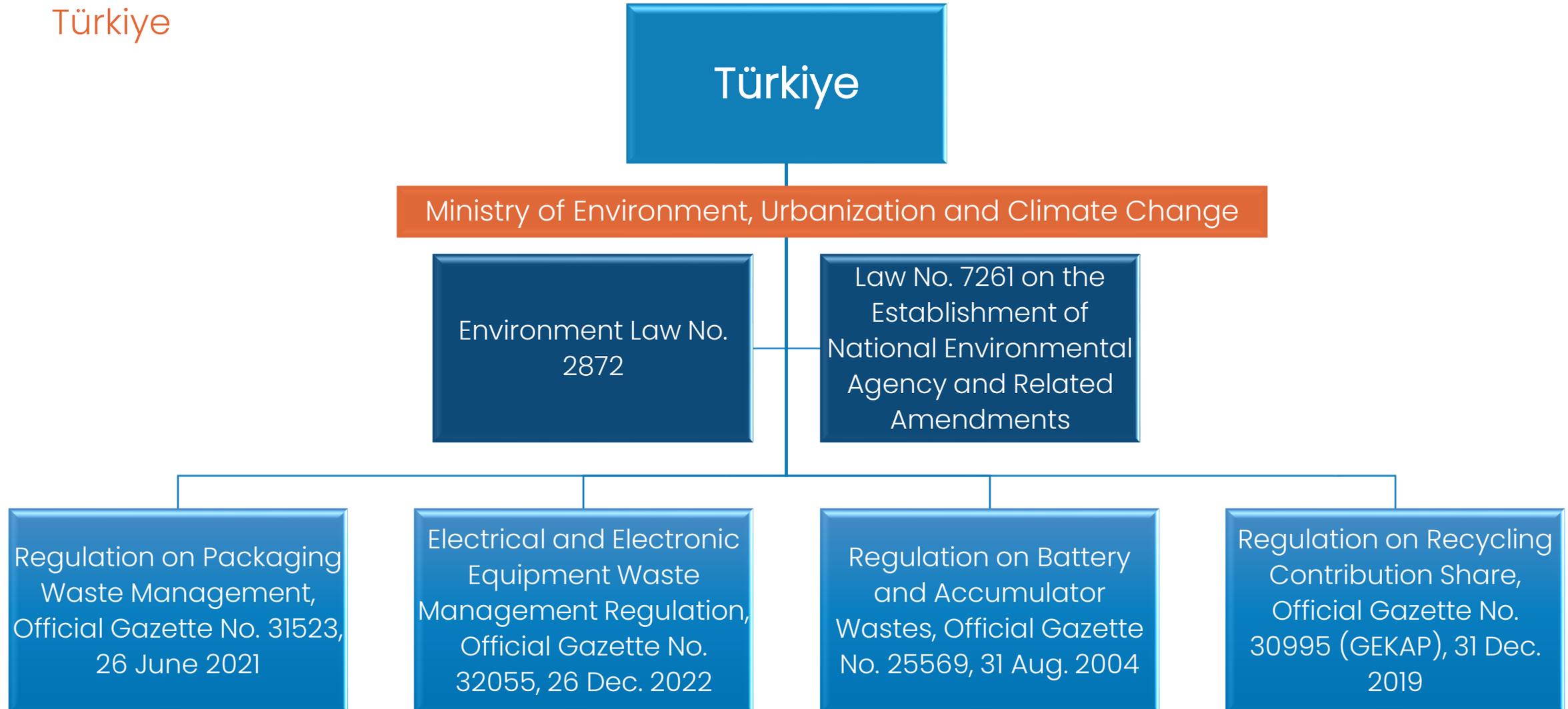
Extended Producer Responsibility in Middle East (West Asia) & Africa



EPR Country Overviews (Packaging)



Türkiye



EPR Country Overviews



Türkiye

- Products that are subject to Recycling Contribution Fee (GEKAP)

- Single-use plastics (SUP)
- Tires
- Batteries & Accumulators
- Vegetable Oil
- Mineral Oil
- Electrical and Electronic Equipment
- Packaging
- Drugs



Annex-1 of the
Environment Law No.
2872

EPR Country Overviews

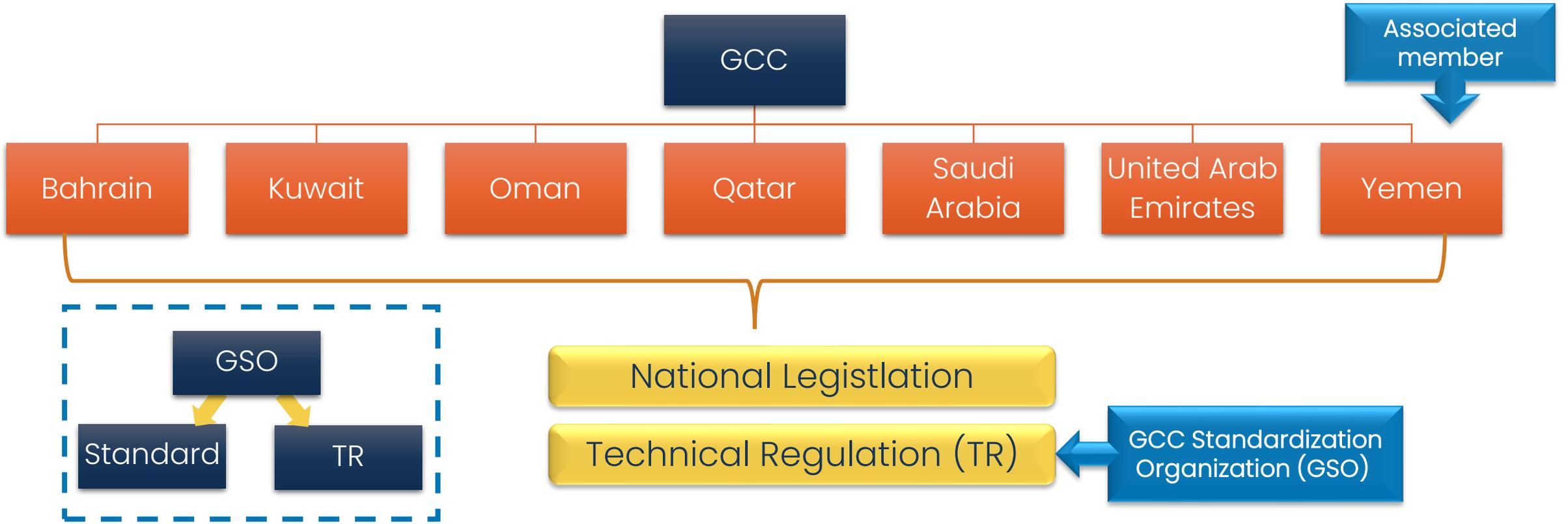


Gulf Cooperation Council (GCC)

- EPR schemes are under development
- Prioritization of electrical and electronic equipment (EEE) and plastic waste in their EPR schemes
- Clear trend towards adopting EPR as a key component of national waste management strategies

Chemical Regulatory Framework in The Middle East

Regulatory Framework of The Gulf Cooperation Council (GCC)



Gulf Cooperation Council (GCC)

- Restriction of Hazardous Substances (RoHS) in Electrical and Electronic Equipment (EEE):
 - Saudi Arabia: Technical Regulation for Restriction of Hazardous Substances in EEE, Official Gazette No. 4890, 9 July 2021 (entered into force in July 2022)
 - UAE: Cabinet Decision No. 10 of 2017, Official Gazette on 27 April 2017, regulating the restriction of hazardous substances in electrical and electronic equipment (RoHS)
 - Oman: Ministerial Decree Obligating European directive 2011/65/EU, 2021
 - GCC: GSO Draft Technical Regulation Restricting the Use of Certain Hazardous Substances in EEE

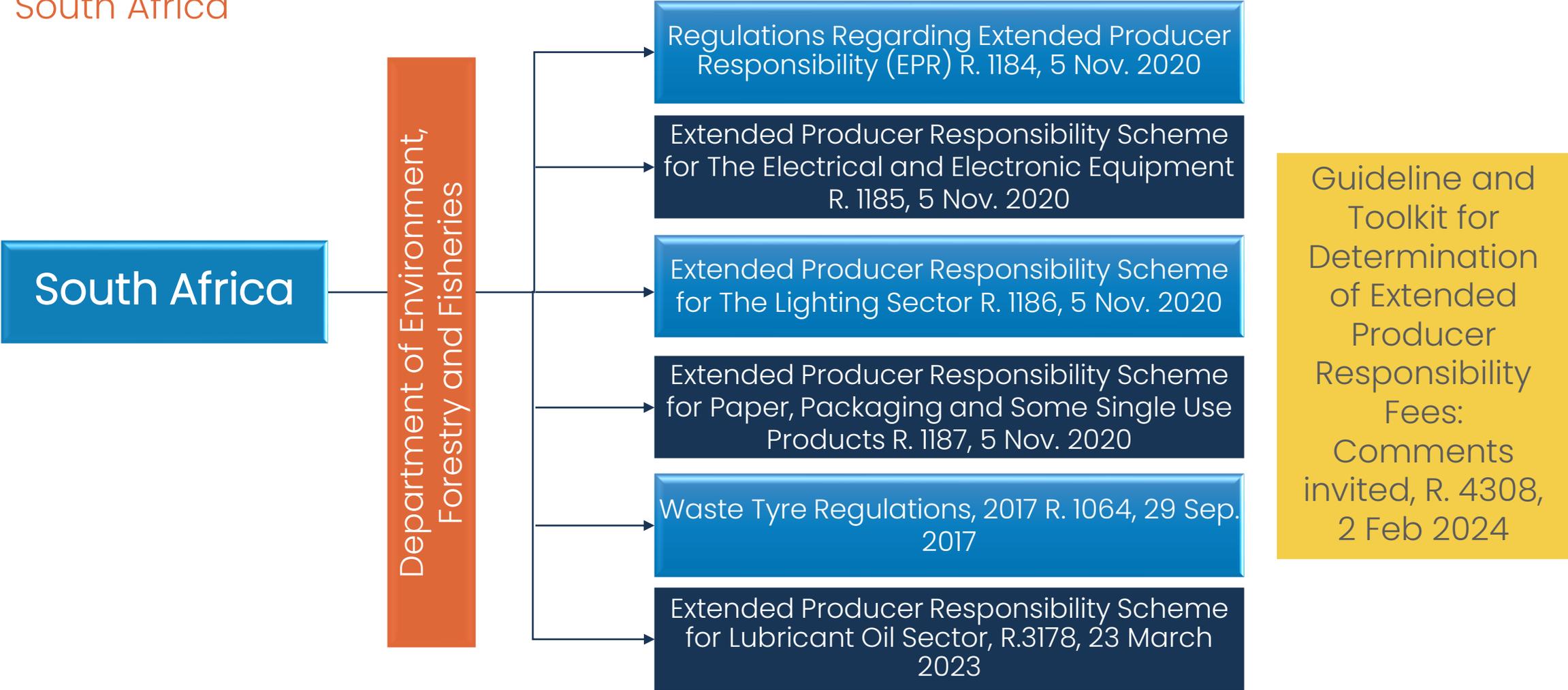
Gulf Cooperation Council (GCC)

- The Use of Single-Use Plastic (SUP) Bags:
 - Bahrain: Ministerial Order No. 14 of Year 2022 on Banning the Manufacture, Import and Use of Single-use Plastic Bags with Thickness less than 35 Microns
 - Oman: Ministerial Order No. 519 of Year 2022 on Banning the Import of Single-use Plastic Bags
 - Qatar: Ministerial Decision No. 143 of 2022 on Banning the Use of Single-use Plastic Bags
 - UAE: as of 2024, ban of single-use plastic bags in Dubai, Abu Dhabi, Sharjah and Umm al Quwain

EPR Country Overviews



South Africa



South Africa

Regulations Regarding Extended Producer Responsibility (EPR) R. 1184, 5 Nov. 2020

- Provides minimum requirements to fulfill for EPR schemes
- Came into effect on 5 November 2020 under Section 18 of National Environmental Management: Waste Act 59 of 2008 (NEMWA)
- Transitioned EPR scheme from voluntary to a mandatory scheme to be followed by producers and importers

EPR Country Overviews



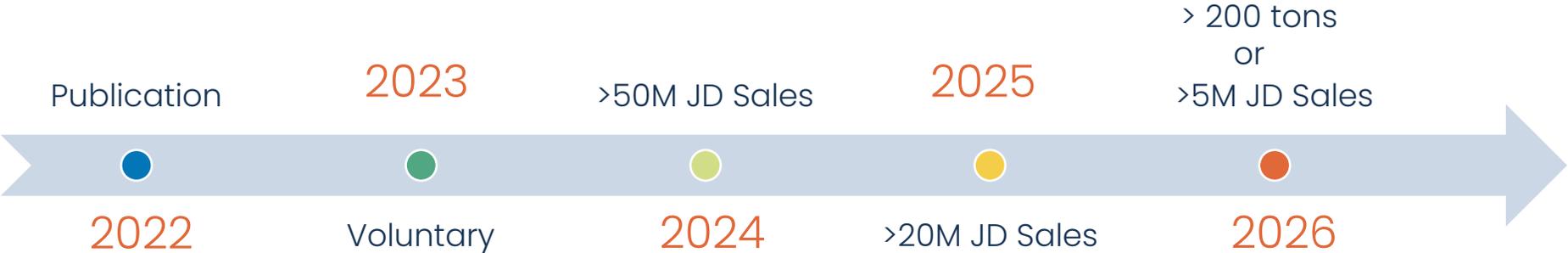
Jordan

Ministry of Environment



The Waste Management Framework Law
No. 16 of 2020

Local Sales & Timeline of Implementing EPR for Packaging



EPR Country Overviews



Jordan

Initiative: GIZ on behalf of the BMUV "Export Initiative Environmental Protection"

- A 2-stage cooperation initiative to support the development of an EPR system

	GIZ: Jordan EPR	GIZ: Jordan EPR 2
Time frame	8 January 2019 – 31 March 2023	4 January 2023 – 31 March 2025
Title	Introduction of an Extended Producer Responsibility system for packaging	Support for the establishment of a system for extended producer responsibility in Jordan
Results	<ul style="list-style-type: none">• Development of EPR legislation for packaging• Four electric collection vehicles and trolleys• A packaging market analysis carried out by Gesellschaft für Verpackungsmarktforschung (GVM)	<ul style="list-style-type: none">• Train staff at the Jordanian Ministry of Environment to implement the EPR-system and provide the steering committee• Set-up of an EPR registration tool for producers and importer• A mobile app called "Sort it Right"

Takeaways



- EPR is extending to beyond packaging to new product categories, including textiles, furniture, and other consumer goods.
- The complexity of reporting requirements is increasing with producers/importers needing to differentiate fees based on specific materials used.
- There are differences in the incorporation of EPR schemes based on WFD into national legislation of Member States.
- Eco-design for Sustainable Product Regulation (ESPR) is gaining prominence in the EU.
- Circular economy is recognized in the MEA region and countries are moving towards it.
- Time will be needed for the implementation of EPR regulations in the countries that have recently laid out a framework.
- The degree of implementation of EPR regulations varies among the countries.
- Transition of national strategies into implemented legislation is an ongoing process in MEA.

Thank you

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