

Specialised Nutrition Europe¹ (SNE) Position on the proposed EU Regulation on Packaging and Packaging Waste

In a nutshell

Specialised Nutrition Europe (SNE) supports FoodDrinkEurope's position 'A circular economy for food and drink packaging'² and welcomes the objectives of the Commission's proposal³. However, some important adaptations are required to **make the proposal's environmental objectives compatible with the specific use and the especially strict safety requirements for foods for vulnerable groups**. Unfortunately, current recycling technologies do not yet enable an adequate supply of high grade recycled plastics and they are not specifically designed to reach consistency of quality among batches for the packaging of foods intended for infants and young children, as well as foods for special medical purposes (FSMP)⁴. SNE therefore recommends **treating foods for vulnerable groups the same way as medicines and medical devices** – which are exempted from the proposal's requirements for recyclability (until 2034 – Art. 6) and for minimum recycled content (indefinitely, Art. 7).

Any foods intended for infants and young children and foods for special medical purposes (FSMP) should also be exempted from the proposal's provisions on re-use and refill (Art. 26) and on deposit and return schemes (Art. 44). Furthermore, especially for Foods for Special Medical Purposes (FSMP), the use of digital labels (e. g. QR code) should be allowed (Art. 11). SNE also recommends promoting the future availability of recycled plastics suitable for foods intended for infants and young children and foods for special medical purposes.

- **Recyclable packaging (Art. 6)**

In order to protect the high quality and safety of foods for vulnerable groups, a lot of effort is being put into preventing the migration of substances into the food. This could be done by applying functional barriers in multi-layer materials, as envisaged by the regulation on plastic materials intended to come into contact with food⁵. While these multi-layer systems help to protect the product and enhance its shelf life (thereby reducing food waste), they might have detrimental effects on the recyclability of the packaging material. To simultaneously enhance recyclability and integrate recycled content, more time is needed to find technical solutions that do not compromise the quality and safety of the products for vulnerable groups.

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