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Study to support the development of implementing acts and guidance under the Directive on the reduction of the impact of certain plastic products on the environment

Service Request under the Multiple Framework Contract
with re-opening of competition

"Assistance to the Commission on the implementation of the revised waste legislation, assessment of Waste Management Plans and monitoring of compliance with the Waste Framework Directive"

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WP 5 Draft final report

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CONTENT

WORK PACKAGE 5: DRAFT FINAL REPORT	5
LIST OF ABBREVIATIONS	5
1. INTRODUCTION	6
1.1 Objective and scope of work package 5.....	6
1.2 Work phases and methodologies applied	9
1.2.1 Data collection and analysis	9
1.2.2 Development of methodologies for calculation of consumption reductions of SUP cups for beverages and food containers in accordance with Article 4(1) of the SUP Directive as well as formats for reporting of information and quality check reports and measures taken to achieve consumption reductions	10
1.2.3 Assessment of administrative and financial burdens	11
1.3 Report structure.....	11
2. MAIN FINDINGS FROM DATA COLLECTION AND ANALYSIS	13
2.1 Assessment of potential data sources and types of organising data collection	13
2.2 Taking account of existing methodologies concerning annual consumption reductions of products and existing formats for reporting on consumption reductions	21
2.2.1 Relevant definitions	21
2.2.2 Calculation of quantities of products placed on the market.....	21
2.2.3 Rules and methodologies for data collection	22
2.3 Examples of existing measures to achieve consumption reductions in Member States	24
2.3.1 Examples of (consumption reduction) targets.....	24
2.3.2 Examples of marketing restrictions and bans of SUP products	26
2.3.3 Examples of making available reusable alternatives / alternatives that do not contain plastic	28
2.3.4 Examples of economic incentives.....	33
3. TASK A: DRAFT RULES AND METHODOLOGIES FOR CALCULATION AND VERIFICATION OF CONSUMPTION REDUCTIONS OF SUP CUPS FOR BEVERAGES AND FOOD CONTAINERS	36
3.1 Calculation of consumption reductions: formula and variables.....	36
3.2 Calculation of the quantities of products placed on the market: formula and general rules	36
3.2.1 Formula.....	36
3.2.2 Metric	37

3.2.3	Inclusion of caps and lids.....	37
3.2.4	Inclusion of empty receptacles suitable for use as SUP cup for beverage or SUP food container under the scope of the Directive	38
3.2.5	Measurement point of products placed on the market	38
3.2.6	Data sources and organisation of data collection.....	39
3.2.7	Verification and cross-checking of data.....	39
4.	TASK B AND C: FORMATS AND GUIDANCE FOR DATA AND INFORMATION REPORTING AND QUALITY CHECK REPORTS AND FOR A DESCRIPTION OF MEASURES ADOPTED BY MEMBER STATES	40
4.1	Draft formats and guidance	40
4.2	Development and contents of draft formats	40
5.	ASSESSMENT OF FINANCIAL AND ADMINISTRATIVE BURDENS	41
5.1	The EU standard cost model	41
5.2	Factors influencing administrative and financial burdens	41
	ANNEX A – SUPPORTING DOCUMENTS.....	45
A.1.	RELEVANT LEGAL PROVISIONS AND SECONDARY LITERATURE.....	45
	Existing legal provisions.....	45
	Secondary literature.....	46
	Relevant stakeholder position papers	49
A.2.	STAKEHOLDER CONSULTATIONS	50
	Questionnaire online survey	50
	Contributions to online survey	50
A.3.	SOURCES, DATA MANIPULATION AND MODELING APPLIED FOR THE ASSESSMENT OF ADMINISTRATIVE AND FINANCIAL BURDENS	54
	Data modeling.....	54
	Data sources	54
	Data manipulation	55
	ANNEX B - REPORTING FORMATS.....	56
B.1.	FORMATS AND GUIDANCE FOR DATA AND INFORMATION REPORTING AND QUALITY CHECK REPORTS	57
B.2.	FORMAT FOR MEMBER STATES TO REPORT A DESCRIPTION OF MEASURES ADOPTED PURSUANT TO ARTICLE 4(1).....	72

List of tables

Table 1 Assessment of potential data sources and types of organising data collection	14
Table 2 Illustrative examples of targets to reduce consumption levels of SUPCfB and SUPFC	24
Table 3 Illustrative examples of marketing restrictions and bans of SUPCfB and SUPFC	26
Table 4 Illustrative examples of making available alternative products to SUPCfB and SUPFC	29
Table 5: Illustrative examples of economic incentives to reduce consumption levels of SUPCfB and SUPFC	34
Table 6 Assessment of administrative and financial burdens per type of activity	43
Table 7 Total number of responses and shares of total responses per type of stakeholder .	50
Table 8 List of stakeholders that contributed to the survey (if entered name of organisation)	50
Table 9 Stakeholder interviews: Stakeholders contacted and feedback received	53
Table 10 List of stakeholders that contributed (have participated or have provided written input) in stakeholder interviews	53

Work package 5: draft final report

List of abbreviations

Abbreviation	Meaning
CfB	Cups for beverages
CN	Combined Nomenclature
DRS	Deposit refund scheme
EPR	Extended producer responsibility
FC	Food containers
HORECA sector	Hotel, retail and catering sector
MS	Member State
PoM	placed on the market
SUP	single-use plastic
SUP Directive	Directive (EU) 2019/904

1. INTRODUCTION

1.1 Objective and scope of work package 5

The objective of work package 5 (WP 5) was to:

- A. provide options for rules and methodologies for the calculation of consumption reductions of single-use plastic (SUP) cups for beverages and food containers in accordance with Article 4(1) of Directive (EU) 2019/904 (SUP Directive);
- B. develop options for formats and guidance for annual data and information reporting and quality check reports on SUP cups for beverages and food containers placed on the market of a Member State each year, to demonstrate consumption reductions in accordance with Article 13(4); and
- C. develop options for a format for Member States to report, two years after the entry into force of the Directive, a description of measures that Member States adopted pursuant to Article 4(1) of the Directive.

WP 5 relates to the implementing act foreseen in Article 4(2) and 13(4) read in conjunction with Article 13(1)(a)(b) of the Directive and the report that Member States should submit to the Commission in accordance with Article 4(1) of the Directive.

Included under the scope of WP 5 are products covered by Part A of the Annex of the SUP Directive, namely SUP cups for beverages and food containers. Detailed definitions of products covered by this product categories are provided in the *Guidelines for the implementation of Directive (EU) 2019/904 on the reduction of the impact of certain plastic products on the environment* to be published by the European Commission.

A - Development of options for rules and methodologies for the calculation of consumption reductions:

Options for rules and methodologies for the calculation of consumption reductions of single-use plastic cups for beverages and food containers shall be developed in accordance with Article 4(1) of the Directive.

Box 1 Consumption reduction – Article 4(1) of Directive (EU) 2019/904

*1. Member States shall take the necessary **measures to achieve an ambitious and sustained reduction in the consumption** of the single-use plastic products listed in Part A of the Annex, in line with the overall objectives of the Union's waste policy, in particular waste prevention, **leading to a substantial reversal of increasing consumption trends**. Those measures shall **achieve a measurable quantitative reduction** in the consumption of the single-use plastic products listed in Part A of the Annex on the territory of the Member State by 2026 compared to 2022.*

[...]

The measures may include national consumption reduction targets, measures ensuring that re-usable alternatives to the single-use plastic products listed in Part A of the Annex are made available at the point of sale to the final consumer, economic instruments such as instruments ensuring that those single-use plastic products are not provided free of charge at the point of sale to the final consumer and agreements as referred to in Article 17(3). Member States may impose marketing restrictions in derogation from Article 18 of Directive 94/62/EC for the purposes of preventing such products from becoming litter in order to ensure that they are substituted with alternatives that are

re-usable or do not contain plastic. The measures may vary depending on the environmental impact of those single-use plastic products over their life cycle, including when they become litter.

Measures adopted pursuant to this paragraph shall be proportionate and non-discriminatory. Member States shall notify the Commission of those measures in accordance with Directive (EU) 2015/1535 of the European Parliament and of the Council (23) where so required by that Directive.

In order to comply with the first subparagraph of this paragraph, each Member State shall monitor the single-use plastic products listed in Part A of the Annex placed on the market and the reduction measures taken and shall report on progress made to the Commission in accordance with paragraph 2 of this Article and Article 13(1) with a view to the establishment of binding quantitative Union targets for consumption reduction.

Emphasis added by the author.

The consumption reduction of single-use plastic cups for beverages and food containers, as listed in part A of the Annex of Directive (EU) 2019/904, will be measured by the quantities of such products placed on the market in the territory of a Member State per year.

As part of developing options for the rules and methodologies for the calculation and verification of consumption reduction, the extent to which existing data bases, in particular PRODCOM and Combined Nomenclature (CN), can be used to report on the level of consumption shall be verified. In this context, it shall be assessed whether a revision of PRODCOM and/or CN is feasible for the purposes of the reporting obligations listed in Article 13(1)(a)(b). Furthermore, existing methodologies for calculating annual consumption levels and experience gained under similar EU legislation and relevant implementing acts from similar EU-legislation shall be taken into account.

An assessment is included concerning administrative and financial burdens that occur for the different stakeholders involved in data collection, calculation and reporting according to the rules and methodologies determined in the work package.

B - Options for formats and guidance for annual data and information reporting and quality check reports to demonstrate consumption reductions:

In accordance with Article 13(4) read in conjunction with Article 13(1)(a) and (b), formats and guidance for annual data and information reporting and quality check reports to demonstrate consumption reductions of SUP cups for beverages and food containers placed on the market of a Member State in a calendar year shall be developed.

Box 2 Monitoring of Consumption reduction – Article 4(1) of Directive (EU) 2019/904

[...] In order to comply with the first subparagraph of this paragraph, each Member State shall monitor the single-use plastic products listed in Part A of the Annex placed on the market and the reduction measures taken and shall report on progress made to the Commission in accordance with paragraph 2 of this Article and Article 13(1) with a view to the establishment of binding quantitative Union targets for consumption reduction.

Box 3 Data reporting - Article 13(1)(a) and (b) and 13(4) of Directive (EU) 2019/904

1. Member States shall, for each calendar year, report to the Commission the following:

(a) data on single-use plastic products listed in Part A of the Annex that have been placed on the market of the Member State each year, to demonstrate the consumption reduction in accordance with Article 4(1);

(b) information on the measures taken by the Member State for the purposes of Article 4(1); [...]

Member States shall report the data and information electronically within 18 months of the end of the reporting year for which they were collected. The data and information shall be reported in the format established by the Commission in accordance with paragraph 4 of this Article.

The first reporting period shall be the calendar year 2022, with the exception of points (e) and (f) of the first subparagraph for which the first reporting period shall be the calendar year 2023. [...]

4. By 3 January 2021, the Commission shall adopt implementing acts laying down the format for reporting data and information in accordance with points (a) and (b) of paragraph 1 and with paragraph 2 of this Article.

The **reporting formats** shall include:

- data on SUP cups for beverages and food containers placed on the market in a Member State;
- information on measures taken by Member States under Article 4(1) of the Directive, including a list of illustrative examples of such measures;
- options for reporting on consumption levels linked to specific measures taken under Article 4(1); and
- clear distinctions between packaging and non-packaging items.

Quality check reports shall cover the key elements of the methodologies for calculation of consumption reduction and all questions necessary to verify reported data. This includes information regarding:

- organisation of the collection of the data and information;
- sources of data and information;
- methodologies applied; and
- completeness, reliability, timeliness and consistency of reported data and information.

The rules and methodologies, as well as the resulting formats for reporting and guidance should be designed in a way that can be used as a building block for the Implementing Act that the Commission will lay down in accordance with Article 13(4) of the Directive.

Finally, an assessment is included concerning administrative and financial burdens that occur for the different stakeholders involved in data collection, calculation and reporting according to the rules and methodologies determined in the work package.

C: - Options for a format for Member States to report a description of measures that Member States adopted pursuant to Article 4(1) of the Directive:

Task C of work package 5 aims at developing formats and guidance for a report that Member States have to submit to the Commission two years after the entry into force of the Directive containing a description of measures that Member States have adopted pursuant to Article 4(1) of the Directive.

Box 4 Notification to the Commission of measures taken by Member States – Article 4(1) of Directive (EU) 2019/904

1. [...] By 3 July 2021, Member States shall prepare a description of the measures which they have adopted pursuant to the first subparagraph, notify the description to the Commission and make it publicly available. Member States shall integrate the measures set out in the description into the plans or programmes referred to in Article 11 upon the first subsequent update of those plans or programmes in accordance with the relevant legislative acts of the Union governing those plans or programmes, or into any other programmes drawn up specifically for that purpose.

Emphasis added by the author.

1.2 Work phases and methodologies applied

Work package 5 included three main work phases:

- data collection and analysis;
- development of methodologies for calculation of consumption reductions of SUP cups for beverages and food containers in accordance with Article 4(1) of the SUP Directive as well as formats for reporting of information and quality check reports and measures taken to achieve consumption reductions ; and
- assessment of administrative and financial burdens of these options.

Details of the different work phases are provided in the following subchapters.

1.2.1 Data collection and analysis

Subject of data collection

The subject of data collection was information concerning:

- existing and potential future **practices of data gathering and reporting** on SUP cups for beverages and food containers placed on the market or imported and exported, including the use of PRODCOM and CN data bases;
- existing methodologies for calculation of consumption levels or for calculation of quantities of products placed on the market under existing EU-legislation; and

- existing and potential future measures that Member States apply to achieve consumption reductions of SUP cups for beverages and food containers in accordance with Article 4(1) of the SUP Directive.

Methodologies and sources of data collection

The following methodologies and sources of data collection were applied:

- examination of relevant legal documents, secondary literature and stakeholder statements (Annex A.1);
- consultation of stakeholders via an online survey (Annex A.2); and
- consultation of stakeholders via targeted telephone interviews (Annex A.1).

Objective of data analysis

The analysis of data followed the objective to identify:

- potential data sources for calculation and reporting of consumption levels of SUP cups for beverages and food containers;
- necessary rules and definitions concerning the organisation of data collection from different data sources, including rules concerning estimates and corrections;
- challenges in collection of reliable and complete data on consumption levels and in methodologies for calculation of consumption levels;
- potential synergies of data collection and reporting with other reporting obligations;
- necessary elements for verification and quality check, including completeness, reliability, timeliness and consistency of reported data and information; and
- examples of existing and potential types of measures aiming at consumption reductions of SUP cups for beverages and types of information necessary for reporting on such measures.

Summary of main findings from data collection and analysis

The main findings from data collection and analysis are summarised in chapter 2, including the following subchapters:

- an assessment **of advantages and disadvantages** of different data sources and types of organisation of data collection was conducted (chapter 2.1),
- **overview of existing rules and methodologies** for calculation of consumption reductions and the amount of products placed on the market (chapter 2.2); and
- an overview of examples of existing measures to achieve consumption reductions of SUP cups for beverages and food containers (chapter 2.3).

1.2.2 Development of methodologies for calculation of consumption reductions of SUP cups for beverages and food containers in accordance with Article 4(1) of the SUP Directive as well as formats for reporting of information and quality check reports and measures taken to achieve consumption reductions

Development of rules and methodologies

Based on the main findings of data collection and analysis, rules and methodologies for the calculation of consumption reductions of SUP cups for beverages and food containers were developed.

Key considerations leading to the methodologies as well as building blocks for an implementing act to be adopted by the European Commission in accordance with Article 13(4) of the SUP Directive are provided in chapter 3.

Development of formats for reporting of information and quality check reports and of measures adopted by Member State (MS) to achieve consumption reductions

Formats for reporting of information and quality check reports were developed

- to cover the reporting issues identified in the rules and methodologies for calculation of consumption reductions of SUP cups for beverages and food containers;
- to provide information on measures taken by MS to achieve consumption reductions, including a list of illustrative examples of different types of measures; and
- to provide the necessary information for the Commission to review reported data and information in accordance with Article 13(3) of the SUP Directive.

For development of the formats, existing formats, especially those developed under the packaging and packaging waste Directive were taken into account.

The list of illustrative examples of types of measures was based on the analysis of existing measures to achieve consumption reductions summarised in chapter 2.3.

Inclusion of feedback from stakeholders and MS experts

(Draft) options for calculation, reporting and verification of data and draft formats were presented to and discussed with stakeholders and Member State experts during:

- a stakeholder workshop held in Brussels on 24th February 2020; and
- a Member State expert group meeting on 11th March (online).

Another Member State expert group meeting is planned for 8th September 2020 (call).

1.2.3 Assessment of administrative and financial burdens

The assessment of financial and administrative burdens can be differentiated into two major working steps:

- Firstly, the **feasibility in terms of administrative and financial burdens** was taken into consideration during the assessment of data sources and types of organisation of data collection for calculation and reporting of the amount of SUP cups for beverages and food containers placed on the market. To this end, synergies with existing practices of data collection and reporting were examined during the data collection phase described in chapter 2.1.
- Secondly, a **detailed assessment of administrative and financial burdens implied in the finalised options** was conducted (chapter 5). Following the EU standard cost model, the assessment was based on an examination of administrative and financial burdens implied in different activities that are to be conducted by different stakeholders for calculation, reporting and verification of data. Details concerning sources, modelling and manipulation of data are described in Annex A.1.

1.3 Report structure

The draft final report is structured as follows:

- **Chapter 2** summarises **main findings from data analysis**, including an

- assessment of potential data sources and types of organising data collection for the calculation of consumption reductions of cups for beverages and food containers;
 - an overview of existing relevant methodologies for calculation of consumption levels and quantities of products placed on the market; and
 - a compilation of illustrative examples of existing measures to achieve consumption reductions of SUP cups for beverages and food containers.
- **Chapter 3** presents draft rules and methodologies for the calculation of consumption reductions of SUP cups for beverages and food containers including key considerations leading to these methodologies.
- **Chapter 4** includes formats and guidance for reporting of information and quality check reports.
- **Chapter 5** includes an assessment of financial and administrative burdens of collection of data and reporting on the amount of SUP cups for beverages and food containers placed on the market.
- **Annexes A.1 to A.3** provide information on
 - supporting documents, namely legal provisions and secondary literature (annex A.1);
 - stakeholder consultations, including the questionnaire for the online survey, contributions from the online survey and interviews, relevant written stakeholder input and relevant written stakeholder position papers (annex A.2); and
 - data sources, data manipulation and data modelling applied to the assessment of administrative and financial burdens (annex A.1).
- **Annexes B.1 and B.2** include
 - the draft formats and guidance for data and information reporting and quality check reports (annex B.1); and
 - the draft format for Member States to report a description of measures adopted pursuant to Article 4(1) (annex O).

2. MAIN FINDINGS FROM DATA COLLECTION AND ANALYSIS

2.1 Assessment of potential data sources and types of organising data collection

Concerning the sources of data collection, one task of this study was to analyse the extent to which existing data bases, and especially the **PRODCOM and Combined Nomenclature (CN)**, can be used to report on the level of consumption of SUP cups for beverages and food containers.

To address this task and develop methodologies to ensure completeness and reliability of data, the project team examined potential data sources as to:

- relevant data that are already collected and reported to MS;
- whether relevant data exist and could be collected and reported in the future; and
- the advantages and disadvantages of potential data sources concerning completeness and reliability of data and administrative and financial burdens of data collection.

The results of the assessment are summarised in **Table 1**.

Table 1 Assessment of potential data sources and types of organising data collection

Type of data source /organising data collection	Relevant data already collected by MS	Potential to report data in the future	Level of completeness of data	Level of reliability of data	Level of administrative and financial burdens	Other issues	Suitability of data source / type of organising data collection
Data from distributors	✗	✓	■ ■ ■ ■ □	■ ■ ■ ■ □	■ ■ ■ ■ □		✓
		<p>Most (large) distributors have precise data on the number of SUP cups for beverages and food containers placed on a Member State's market.</p> <p>For distributors of empty receptacles, additional data collection might be necessary to avoid underreporting. This concerns data on the use of empty receptacles as SUP product under the scope of the directive and data on whether empty receptacles are used as SUP food containers or SUP cups for beverages as some empty receptacles are suitable for use under both product categories.</p>	<p>Compilation and verification of data from large numbers of distributors implies medium to high administrative burdens.</p>	<p>Confidentiality of reported data needs to be ensured by the responsible authority.</p>			
Data from manufacturers	✗	(✓)	(■ ■ ■ □ □)	(■ ■ ■ ■ ■)	■ ■ ■ ■ □		(✓)
		<p>Manufacturers have precise data on the quantities of receptacles produced. Yet, in most cases they do not know</p> <ul style="list-style-type: none"> - in which Member States their empty products are placed on the market; and - whether their products are placed on the market with the intention to be used as a SUP cup for beverage or food container. <p>Some manufacturers might however directly place products on a Member State's market. In that case, they can provide reliable data on the quantities of SUP products placed on a Member States market. Yet, it can be assumed that manufacturers directly placing products on a Member States market can only account for a small share of relevant products placed on a Member State's market.</p> <p>For manufacturers of empty receptacles, additional data collection might be necessary. This concerns the use of empty receptacles as SUP product under the scope of the directive and data on whether</p>	<p>In case manufacturers directly place product on the market, it can be assumed that they already have detailed data on the amount placed on the market. Administrative and financial burdens for manufacturers are therefore rather low.</p> <p>As manufacturers are assumed to only account for a small share of products placed on the market, responsible authorities would have to collect data from multiple sources. This leads to medium to high burdens for collection and verification of data.</p>	<p>Confidentiality of reported data needs to be ensured by the responsible authority.</p>	<p>Only where manufacturers place their products directly on a Member State's market.</p>		

Type of data source /organising data collection	Relevant data already collected by MS	Potential to report data in the future	Level of completeness of data	Level of reliability of data	Level of administrative and financial burdens	Other issues	Suitability of data source / type of organising data collection
		empty receptacles are used as SUP food containers or SUP cups for beverages as some empty receptacle are suitable for use under both product categories.					
Data from importers	✘	✓	■ ■ ■ ■ ■ □	■ ■ ■ ■ ■ □	■ ■ ■ ■ ■ □		✓
		Importers have precise data on the quantities of receptacles and on the Member State in which they place these quantities on the market. Yet, for empty receptacles, they might lack knowledge on whether their products are placed on the market with the intention to be used as a SUP cup for beverage or food container. For importers of empty receptacles, additional data collection might be necessary. This concerns the use of empty receptacles as SUP product under the scope of the directive and data on whether empty receptacles are used as SUP food containers or SUP cups for beverages as some empty receptacle are suitable for use under both product categories.	Importers are assumed to have detailed data on the amount of relevant products placed on the market. For authorities, administrative and financial burdens are assumed medium to high as data would need to be collected from a large number of importers and further sources which leads to high efforts for data collection and verification.	Confidentiality of reported data needs to be ensured by the responsible authority.			
Data from EPR schemes (type of organising data collection)	✘	✓	■ ■ ■ ■ ■ □	■ ■ ■ ■ ■ □	■ ■ ■ ■ □ □		✓
		Some extended producer responsibility (EPR) schemes already collect placed on the market (PoM) data from initial distributors, manufacturers and importers by material . If mandated accordingly, data collection by EPR systems could be adapted to specify on SUP cups for beverages and food containers. As data are based on information from distributors, manufacturers and importers, additional data collection might be necessary concerning the intended use of empty receptacles (see above).	General infrastructure for data collection and reporting already exists at initial distributors, manufacturers, importers and EPR schemes. Existing infrastructure (e.g. IT-systems) would have to be adapted. Central data collection via EPR schemes would limit financial and administrative burdens of data verification and compilation for responsible authorities.	Corrections necessary concerning free riders or possible de minimis rules.			
		✓	■ ■ ■ ■ ■ □	■ ■ ■ ■ ■ □	■ ■ ■ ■ □ □		✓

Type of data source /organising data collection	Relevant data already collected by MS	Potential to report data in the future	Level of completeness of data	Level of reliability of data	Level of administrative and financial burdens	Other issues	Suitability of data source / type of organising data collection
Data from electronic registries (type of organising data collection)	✗	Collection of data from distributors, manufacturers and importers can be organised by electronic registries. As these are considered to have precise data on the quantities of products they place on the market, there is a high level of reliability. Central collection by one registry ensures completeness of data. As data are based on information from distributors, manufacturers and importers, additional data collection might be necessary concerning the intended use of empty receptacles (see above).			Central collection and compilation of data by a registry (instead of submission of data from each distributor to the responsible authority) limits the costs for data verification for the responsible authority.	By organising data collection and collation via an electronic registry, data confidentiality can easily be ensured.	
Sample data from waste composition / litter analyses	✗	✗	not applicable		not applicable		✗
		Waste analyses are not applicable to determine the amount of SUP cups for beverages and food containers placed on the market. The reason for this is that receptacles that can be used as SUP cups for beverages or food containers can also be placed on the market for other purposes. From the waste product, it cannot be concluded whether it was placed on the market with the intention to be used as SUP cup for beverages or food container.					
Surveys on consumer behaviour	✗	✗	■ ■ ■ ■ ■	■ ■ ■ ■ ■	not applicable		✗
		Reliability and completeness of data is limited as studies on consumer behaviour are based on subjective assessments of consumers which are likely to deviate from actual behaviour.			Conducting a consumer survey for verification of data is considered to imply medium administrative and financial burdens.	<u>Minimum requirements to ensure reliability and completeness:</u> Surveys would need to include multiple samples covering consumers from different environments.	Only recommended for verification and cross-checking of data.
	✗	✗	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■		✗

Type of data source /organising data collection	Relevant data already collected by MS	Potential to report data in the future	Level of completeness of data	Level of reliability of data	Level of administrative and financial burdens	Other issues	Suitability of data source / type of organising data collection
Data collection from the point of sale		Final vendors have knowledge of whether their products are placed on the market as SUP cups for beverages or food containers. However, the very large and heterogenous number of final vendors implies a high risk of underreporting and makes reporting and collation of data very burdensome for vendors and authorities and verification data impossible. It is thus not considered as a suitable source for data collection. However, data from final vendors can be used for data verification in order to collect sample data on the amount of empty receptacles placed on the market as SUP cup for beverage or food container.			Implies reporting obligations for a very large number of stakeholders, including very small vendors. Verification of data would imply very high burdens for the responsible authority.	Where used for additional data collection by sampling, it needs to be ensured that all relevant types of final vendors / points of sale are included in sampling.	Only recommended for verification and cross-checking of data.
PRODCOM data / national production statistics (data from producers)	✗	✗	■□□□□	■□□□□	Not applicable		✗
		Existing PRODCOM- or national codes lack sufficient detail to provide information on SUP cups for beverages or food containers. An adaption of codes is only possible to a limited degree as data are based on information from producers. However, producers cannot submit reliable information concerning <ul style="list-style-type: none"> - the Member State on whose market their products are placed; and - whether their products are placed on the market as SUP products or not. 					
Tax statistics	✗	✗	Not applicable	Not applicable	Not applicable		✗
		In case of an introduction of a tax on SUP cups for beverages and food containers, this could provide reliable data.					
Import / export statistics (CN)	✗	✗	■ ■ ■ □ □	■ □ □ □ □	Not applicable		✗
		Existing CN-codes lack sufficient detail to provide information on SUP cups for beverages or food containers. In contrast to manufacturers, importers are assumed to have information on the					

Type of data source /organising data collection	Relevant data already collected by MS	Potential to report data in the future	Level of completeness of data	Level of reliability of data	Level of administrative and financial burdens	Other issues	Suitability of data source / type of organising data collection
		Member State on whose market their products are being placed. However, they still lack reliable information on whether empty products are placed on the market as SUP products or not and whether empty receptacles are used as SUP cup for beverage or SUP food container.					

Legend: ■■■■■ very low to ■■■■■ very high

Summary of key considerations from the assessment of data sources and types of organising data collection

Given the analysis summarised in **Table 1**, currently no data are reported to Member States or any official statistics that are detailed enough to provide information on quantities of single-use plastic products placed on the market. It is therefore necessary that Member States introduce new reporting obligations concerning the amount of SUP cups for beverages and food containers placed on the market.

Possible sources for data collection

Possible sources to collect data from are distributors and importers. In case that manufacturers directly place their products on a Member State's market, reliable data can also be collected from manufacturers. As products are placed on the market by multiple actors, data need to be obtained from multiple sources.

For distributors, importers of manufacturers of **empty receptacles**, additional data collection might be necessary to avoid underreporting. This concerns the use of empty receptacles as SUP product under the scope of the directive and data on whether empty receptacles are used as SUP food containers or SUP cups for beverages as some empty receptacle are suitable for use under both product categories.

Use of PRODCOM and CN data

So far, PRODCOM and CN data bases provide no codes that are detailed enough to account for quantities of SUP cups for beverages and food containers placed on the market.

To be used as a data source for reporting on quantities of SUP cups for beverages and food containers placed on the market, PRODCOM and CN codes would need to be revised. However, a revision of codes is not considered as leading to reliable data as:

- most manufacturers cannot provide reliable information on the Member State on whose market their products are placed;
- manufacturers and importers of empty receptacles lack knowledge on whether or not their products are placed on the market as SUP products under the scope of the Directive; and
- manufacturers and importers of empty receptacles lack knowledge on whether empty receptacles are placed on the market as SUP cup for beverage or SUP food container.

Sources for additional data collection and verification

While not suitable as main data source to determine the quantities SUP cups for beverages and food containers placed on the market, surveys or studies on consumer behaviour can provide information for cross-checking and verification of data.

Furthermore, sample data from final vendors at the point of sale can be a source for collection of additional data for cross-checking and verification of the quantities of receptacles that are placed on the market as SUP cups for beverages or food containers at the point of sale. Where such sample data are collected, it needs to be ensured that all relevant types of final vendors / points of sale are included in sampling.

Waste data are not considered suitable for collection of data for verification and cross-checking of data. This is because relevant receptacles may be used both as products that fall or do not fall under the scope of the Directive. Furthermore, some receptacles may be used both as cup for beverages or food container. Waste data do not provide any information on the intended use for which the product was placed on the market.

Types of organising data collection

As data concerning the quantities of SUP cups for beverages and food containers need to be collected from multiple sources, organising data collection via a central body seems important to improve completeness and consistency of data and limit administrative and financial burdens. For organising data collection, both electronic registries and EPR systems seem suitable. Where already in place, the advantage of EPR systems is that distributors, importers and manufacturers already register the products they place on the market by materials. Therefore, the general infrastructure and know-how already exists. However, to collect product specific data on SUP cups for beverages and food containers, a respective mandate would need to be given to EPR systems and data collection infrastructure would need to be adapted. Yet, for EPR systems, necessary corrections concerning free-riders and de-minimis rules need to be included in the calculation methodology and reporting formats.

2.2 Taking account of existing methodologies concerning annual consumption reductions of products and existing formats for reporting on consumption reductions

To ensure consistency and synergies with existing EU-legislation, the project team reviewed existing legislation under similar regulatory contexts. Relevant results of the review are provided below.

In addition to the legislation listed below, the work on the development of an implementing act for the calculation and verification of the attainments of the separate collection target laid down in Article 9(1) of Directive 2019/904 was taken into account. Due to the draft stage of the implementing act at the time of writing this report, it is not quoted below.

2.2.1 Relevant definitions

Regulation (EU) 2019/1020 includes relevant definitions concerning distributors, importers and manufacturers. According to Article 3:

- *“importer” means any natural or legal person established within the Union who places a product from a third country on the Union market”;*
- *“distributor” means any natural or legal person in the supply chain, other than the manufacturer or the importer, who makes a product available on the market”;* and
- *“manufacturer” means any natural or legal person who manufactures a product or has a product designed or manufactured, and markets that product under its name or trademark”.*

2.2.2 Calculation of quantities of products placed on the market

Commission Implementing Decision (EU) 2018/896 includes rules and methodologies for the calculation of the annual consumption of lightweight plastic carrier bags. Articles 2 and 3 provide rules and methodologies for calculation by weight and number of products.

According to Article 2(1)

- *“Where a Member State calculates and reports the annual consumption of lightweight plastic carrier bags by numbers, it shall use either of the following:*
 - a) the total number of lightweight plastic carrier bags placed on its national market;*
 - b) the sum of: (i) the number of lightweight plastic carrier bags calculated on the basis of the revenues from mandatory taxes, charges or levies charged to consumers per unit of lightweight plastic carrier bags as declared or reported by economic operators in accordance with national law; and (ii) the number of lightweight plastic carrier bags exempt from those taxes, charges”*

According to Article 3(1,2)

- *“Where a Member State calculates and reports the annual consumption of lightweight plastic carrier bags by weight, it shall use either of the following:*
 - a) the total weight of lightweight plastic carrier bags placed on its national market;*
 - b) (b) the sum of: (i) the weight of lightweight plastic carrier bags calculated on the basis of the revenues from mandatory taxes, charges or levies charged to consumers per unit of lightweight plastic carrier bags as declared or reported by economic operators in accordance with national law; and (ii) the weight of lightweight plastic carrier bags exempt from those taxes, charges or levies, placed on its national market as reported by economic operators in accordance with national law.”*

- *“Member States reporting the annual consumption of lightweight plastic carrier bags in accordance with this Article shall require economic operators to provide information about the average weight of lightweight plastic carrier bags.”*

Commission Implementing Regulation (EU) 2017/699 provides rules and methodologies to calculate the weight of products placed on the market.

Article 3 provides that:

- A Member State shall *“calculate the weight of EEE placed on its market in a given year on the basis of the information provided by producers of EEE, or their authorised representatives, where applicable, in accordance with Article 16(2)(c) of Directive 2012/19/EU and Part B of Annex X to that Directive;”* and that
- *where “a Member State is not able to calculate the weight of EEE placed on its market in accordance with paragraph 1, it shall instead make substantiated estimates of the weight of EEE placed on its market in the year concerned on the basis of data on domestic production, imports and exports of EEE in its territory. For this purpose, the Member State shall use the methodology set out in Annex I to this Regulation.”*

In annex I it is specified that

- *“Substantiated estimates of the weight of EEE placed on the market of a Member State in a reference year shall be calculated by using the apparent consumption method, which is based on the equation:*

$$EEE \text{ placed on the market}(t) = \text{Domestic production}(t) + \text{Imports}(t) - \text{Exports}(t).”$$

2.2.3 Rules and methodologies for data collection

2.2.3.1 Sources and organisation of data collection

Commission Implementing Decision (EU) 2019/1004

According to Article 6(1):

- *“Member States shall obtain data directly from establishments or undertakings managing waste, as appropriate.”*

Furthermore, **Commission Implementing Decision (EU) 2018/896** includes provisions for sources of data collection:

According to Article 3(3 and 4)

- *“Member States reporting the annual consumption of lightweight plastic carrier bags in accordance with paragraph 1(a) shall require economic operators to report the total weight of lightweight plastic carrier bags placed by them on the market of their territory for each calendar year”;* and
- *“Member States reporting the annual consumption of lightweight plastic carrier bags in accordance with paragraph 1(b) shall require economic operators to report the total weight of lightweight plastic carrier bags that are exempt from the taxes, charges or levies placed by them on the market of their territory for each calendar year.”*

Commission Implementing Decision (EU) 2019/1004 includes provisions concerning the organisation of data collection.

According to Article 6(2)

- *"Member States shall consider the use of electronic registries to record data on municipal waste."*

2.2.3.2 Minimum requirements for collection of data by means of surveys

According to Article 6(3) of **Commission Implementing Decision (EU) 2019/1004**

- *"Where data collection is based on surveys, those surveys shall fulfil the following minimum requirements: (a) they shall be carried out at regular, specified intervals, and shall adequately meet the variation in the data to be surveyed; (b) they shall be based on a representative sample of the population to which their results are applied."*

2.3 Examples of existing measures to achieve consumption reductions in Member States

Desk research was conducted concerning existing measures targeting consumption reductions.

Examples of existing consumption reduction measures are summarised in the sub-chapters below, including the following **types of measures**:

- (consumption) reduction targets;
- marketing restrictions;
- making available re-usable alternatives or alternatives that do not contain plastics at the point of sale; and
- economic instruments, e.g. ensuring that SUP products are not made available free-of charge at the point of sale.

2.3.1 Examples of (consumption reduction) targets

(Quantitative) targets aiming at consumption reductions are included in several private-public plastic pacts. Yet, existing pacts are voluntary. Furthermore, concerning consumption reductions of SUP products, targets from such plastic pacts are rather vague instead of a measurable quantitative target.

A legally binding and measurable quantitative consumption reduction target could be identified for Spain. It addresses reusable containers in the sector of hotel, retail and catering (HORECA) and beverage containers sold in shops.

Table 2 Illustrative examples of targets to reduce consumption levels of SUPCFB and SUPFC

MS	Description	Implementation stage	Liability	Scope	Target group
ES	<p>Law 14/2018, of June 18, on Waste and its Taxation¹.</p> <p>Includes a re-use target for beverage containers in the HORECA sector:</p> <ul style="list-style-type: none"> - By 2028, 80% of beer, 70% of soft drinks and 40% of water must be served in reusable containers. - By 2028, 15% of beverage containers sold in shops must be reusable. 	in force	legal obligation	national	HORECA sector / Vendors of on-the-go beverages

¹ <https://www.boe.es/buscar/pdf/2018/BOE-A-2018-8953-consolidado.pdf>

MS	Description	Implementation stage	Liability	Scope	Target group
FR	<p>National Pact on Plastic Packaging²</p> <p>The French Government commits to</p> <ul style="list-style-type: none"> - encourage the elimination of problematic or unnecessary plastic packaging, starting with the ban of the use of EPS in food containers and single use plastic cups but also by encouraging the elimination of PVC in household, commercial and industrial packaging by 2022. <p>French Businesses commit to</p> <ul style="list-style-type: none"> - end the use of PVC in household, commercial and industrial packaging by 2022, and take steps to eliminate other problematic or unnecessary plastic packaging by 2025, starting with EPS. - by 2025, test and if possible, develop commercial reuse, and bulk sale models for families of products not affected by these models until now. 	launched February 2019	voluntary	national	French Government and businesses in the plastics supply chain
NL	<p>Plastics Pact NL 2019-2025³</p> <p>Voluntary agreement of businesses and organisations in the plastics supply chain that committed to the following targets until 2025:</p> <ul style="list-style-type: none"> - Ensuring all plastic products and packaging will be reusable where possible and appropriate, and in any case, 100% recyclable; - Using 20% less plastic compared to the reference year 2017, by avoiding unnecessary use, increased reuse and alternative, sustainable materials; - Effectively recycling at least 70% of all single-use plastic products and packaging disposed of in the Netherlands to a high standard 	launched 2019	voluntary	national	Businesses in the plastics supply chain

² https://www.gouvernement.fr/sites/default/files/locale/piece-jointe/2019/06/11_french-national-_pact-on-plastic-packaging_pdf_0.pdf

³ <https://www.circulairondernemen.nl/uploads/0e657a0084a4f18d2ff61335794ea3c7.pdf>

MS	Description	Implementation stage	Liability	Scope	Target group
	<ul style="list-style-type: none"> - Using the highest possible amount of recycled plastics in all single-use plastic packaging and products, with an average of at least 35% per participating plastics-using company. 				
UK	<p>The UK plastics pact⁴</p> <p>Under the UK plastics pact businesses from UK's plastics supply chain have committed to four targets to reduce plastic waste by 2025. Among these is the target of 100% of plastics packaging to be reusable, recyclable or compostable. The UK plastics pact provides a framework of actions and measures to be taken in order to achieve the targets.</p>	started 2018	voluntary	UK	plastics supply chain

2.3.2 Examples of marketing restrictions and bans of SUP products

Marketing restrictions and bans of plastic products were identified as restrictions for public administrations or schools to purchase such products, or more comprehensively, as a general marketing restriction of certain products for a whole region or country.

Table 3 Illustrative examples of marketing restrictions and bans of SUPcFB and SUPFC

MS	Description	Implementation stage	Liability	Scope	Target group
BE	<p>Regional law banning SUP products in the workplace and at public events⁵</p> <p>Regional law in the Belgian region of Flanders prohibits local authorities from serving drinks in disposable cups (regardless of the material) in the workplace and at public events unless organisers can ensure the separate collection and recycling (90% by 2019, 95% by 2022).</p>	in force (since 01.01.2020)	legal obligation	regional (Flanders)	public administration

⁴ www.wrap.org.uk/sites/files/wrap/The-UK-Plastics-Pact-Roadmap-v3.pdf

⁵ <https://www.vlaanderen.be/nbwa-news-message-document/document/090135578027434e>

MS	Description	Implementation stage	Liability	Scope	Target group
FR	<p>Loi relative à la lutte contre le gaspillage et à l'économie circulaire⁶</p> <p>From 1st January 2020: ban of cups for beverages and further SUP products.</p> <p>From 1st January onwards: ban of EPS boxes and other SUP products like cutlery, stirrers, and straws.</p>	in force (since 10.02.2020)	legal obligation	national	Vendors and consumers of beverages in SUP cups for beverages and SUP products made of EPS.
ES	<p>Law 8/2019, of February 19, on contaminated waste and soil of the Balearic Islands⁷</p> <p>From 2021 onwards the following bans emerge for the Balearic Islands:</p> <ul style="list-style-type: none"> - Use of single-dose food products and one-use-only tools at HORECA sector for the consumption of food or drink at the same place (except cellulose ones). - Distribution and selling of one-use-only plastic glasses (except composting ones). - One-use-only coffee, herbal teas and beverages capsules, sold must be made of compostable materials or (organically or mechanically) easily recyclable. - Distribution of beverages in one-use-only packages in buildings hosting Public Service. 	in force	legal obligation	regional	HORECA sector / Vendors and consumers of beverages in SUP cups for beverages.
IE	<p>Ban of purchasing SUP products for government departments and schools</p> <p>Since January 2019: Irish government departments and schools no longer purchase single-use plastic cups, cutlery, and straws.</p>	in force	obligatory	national	public administration

⁶ <https://www.legifrance.gouv.fr/eli/loi/2020/2/10/TREP1902395L/jo/texte>

⁷ <https://www.boe.es/eli/es-ib/l/2019/02/19/8>

MS	Description	Implementation stage	Liability	Scope	Target group
SE	<p>Planned legislation on marketing restrictions (currently tested in pre-studies)⁸</p> <ul style="list-style-type: none"> - Possible ban of plastic cups and food containers (paper mugs with plastic film inside excluded); - Possible implementation act for limiting the serving of food and beverages in disposable plastic products. 	planned	/	/	Vendors and consumers of beverages in SUP cups for beverages.

2.3.3 Examples of making available reusable alternatives / alternatives that do not contain plastic

National measures to achieve consumption reductions include laws that oblige or encourage businesses, institutions or organisers of events to provide reusable packaging. There are however also a large number of business models that aim at providing reusable and non-plastic alternatives. The examples listed below include return schemes of reusable cups for beverages or food containers a service that provides returnable packaging to offices, cafés or universities. A further measure to promote the use of reusable receptacles would be to allow consumers to bring their own receptacles.

⁸ Swedish Environmental Protection Agency (2019): Implementation of the Disposable Plastic Directive reporting requirements, retrievable from: <https://www.naturvardsverket.se/upload/miljoarbete-i-samhallet/miljoarbete-i-sverige/regeringsuppdrag/2019/skrivelse-ru-engangspplast.pdf>, last access: 10.03.2020.

Table 4 Illustrative examples of making available alternative products to SUPCfB and SUPFC

MS	Description	Implementation stage	Liability	Scope	Target group
ES	<p>Law 8/2019, of February 19, on contaminated waste and soil of the Balearic Islands⁹</p> <p>By 2021, on public events, including sport events, alternatives to the selling and distribution of one-use-only beverage containers must be implemented and access to non-packaged water supply or in reusable bottles must be guaranteed for public events supported by the public sector.</p>	in force	legal obligation	regional	organisers of public events
FR	<p>National Pact on Plastic Packaging¹⁰</p> <p>see Examples of (consumption reduction) targets</p>	launched February 2019	voluntary	national	French Government / Vendors of products in plastic packaging.

⁹ <https://www.boe.es/eli/es-ib/l/2019/02/19/8>

¹⁰ https://www.gouvernement.fr/sites/default/files/locale/piece-jointe/2019/06/11_french-national-_pact-on-plastic-packaging_pdf_0.pdf

MS	Description	Implementation stage	Liability	Scope	Target group
FR	<p>Loi relative à la lutte contre le gaspillage et à l'économie circulaire¹¹</p> <p>From 2023 onwards, fast food restaurants are obliged to use re-usable packaging and cutlery.</p>	entered into force on 10.02.2020	legal obligation	national	fast food restaurants
DE	<p>RECUP Germany¹²</p> <p>Deposit refund scheme (DRS) for cups for beverages used by almost 3,000 vendors in over 450 cities in Germany</p>	launched Mai 2017	voluntary DRS systems / re-use business model	national	Consumers and vendors of on-the-go beverages

¹¹ <https://www.legifrance.gouv.fr/eli/loi/2020/2/10/TREP1902395L/jo/texte>

¹² <https://recup.de/>

MS	Description	Implementation stage	Liability	Scope	Target group
DE	<p>FreiburgCup¹³</p> <p>Local DRS for cups for beverages introduced by city of Freiburg and the local waste management organisation.</p>	launched 2016	voluntary DRS systems	local	Consumers and vendors of on-the-go beverages
DE (CH)	<p>ReCircle¹⁴</p> <p>DRS for food containers with over 800 partner restaurants in Switzerland and 27 in Germany and over 70,000 reusable containers in circulation</p>	launched 2018	voluntary DRS systems / re-use business model	(pan-) national	Consumers and vendors of on-the-go meals in food containers

¹³ <https://freiburgcup.de/de/wir.php>

¹⁴ <https://www.recircle.de/>

MS	Description	Implementation stage	Liability	Scope	Target group
NL	<p>Plastics Pact NL 2019-2025¹⁵</p> <p>see examples of (consumption reduction) targets</p>	launched 2019	voluntary	national	Businesses in the plastics supply chain
SE	<p>Legislation on marketing restrictions currently tested (pre-studies)¹⁶</p> <ul style="list-style-type: none"> - Possible implementation act requiring on-the-go food and beverage services to allow customers to use their own reusables ('Bring your own'); and - Possible implementation act requiring restaurants to provide multiple-use options for disposable plastic products. 	planned	/	/	Vendors and consumers of beverages in SUP cups for beverages

¹⁵ <https://www.circulairondernemen.nl/uploads/Oe657a0084a4f18d2ff61335794ea3c7.pdf>

¹⁶ Swedish Environmental Protection Agency (2019): Implementation of the Disposable Plastic Directive reporting requirements, retrievable from: <https://www.naturvardsverket.se/upload/miljoarbete-i-samhallet/miljoarbete-i-sverige/regeringsuppdrag/2019/skrivelse-ru-engangsplast.pdf>, last access: 10.03.2020.

MS	Description	Implementation stage	Liability	Scope	Target group
UK	<p>CupClub™¹⁷</p> <p>CupClub™ is a returnable packaging service for drinks that uses radio-frequency identification (RFID) technology and cloud-based internet of things (IoT) software to provide cup traceability, helping brands to track products and offer an in-built loyalty scheme.</p>		voluntary re-use business model		Consumers and vendor of beverages in offices, university campuses, airports and festivals
UK	<p>The UK plastics pact¹⁸</p> <p>Target of 100% of plastic packaging to be reusable, recyclable or compostable.</p> <p>See reduction targets</p>	launched June 2019	voluntary business initiative	UK	plastics supply chain

2.3.4 Examples of economic incentives

The examples below include two examples of taxes on SUP products making single-use plastic products more expensive than reusable alternatives or products that do not contain plastic. Economic incentives do however also include discounts for the use of reusable packaging.

¹⁷ <https://cupclub.com/>

¹⁸ www.wrap.org.uk/sites/files/wrap/The-UK-Plastics-Pact-Roadmap-v3.pdf

Table 5: Illustrative examples of economic incentives to reduce consumption levels of SUPCfB and SUPFC

Country code	Description	Implementation stage	Liability	Scope	Target group	Further information / Link
FR	<p>National Pact on Plastic Packaging¹⁹</p> <p>The French Government inter alia commits to explore the implementation of various financial mechanisms to incentivize redesign of products, particularly regarding recyclability, reuse and integration of recycled material.</p>	launched February 2019	voluntary	national	French Government / Vendors of products in plastic packaging	
UK	<p>Plastic Packaging Tax²⁰</p> <p>Introduction of a new tax on plastic that does not contain at least 30% recycled plastic.</p>	Taking effect from April 2022	legal obligation	national	Producers and importers of plastic packaging, their business customers and consumers who buy plastic packaging	Policy paper on Plastic packaging tax ²¹

¹⁹ https://www.gouvernement.fr/sites/default/files/locale/piece-jointe/2019/06/11_french-national-_pact-on-plastic-packaging_pdf_0.pdf

²⁰ <https://www.gov.uk/government/publications/introduction-of-plastic-packaging-tax/plastic-packaging-tax>.

²¹ <https://www.gov.uk/government/publications/introduction-of-plastic-packaging-tax/plastic-packaging-tax>.

Country code	Description	Implementation stage	Liability	Scope	Target group	Further information / Link
IT	Tax of 0,45 €/per kilo for release for consumption of certain plastic products, including plastic bottles, carrier bags, PE food containers and EPS packaging (exemption for medical products and biodegradable plastics).	Taking effect from January 2021	legal obligation	national	Producers and importers of relevant products, consumers who buy relevant product	2020 Budget Law (Law n. 160 of 2019)

3. TASK A: DRAFT RULES AND METHODOLOGIES FOR CALCULATION AND VERIFICATION OF CONSUMPTION REDUCTIONS OF SUP CUPS FOR BEVERAGES AND FOOD CONTAINERS

3.1 Calculation of consumption reductions: formula and variables

The calculation of consumption reductions of single-use plastic cups for beverages and food containers is based on the following **provisions of Directive (EU) 2019/904**:

- According to Article 4(1) of the Directive, consumption reduction measures shall achieve a *'measurable quantitative reduction'* in the consumption of the defined single-use plastic products *"on the territory of the Member State by 2026 compared to 2022"*.
- Member States shall monitor the placing on the market and, according to Article 13(1)(a), report *"data on single-use plastic products listed in Part A of the Annex that have been placed on the market of the Member State each year, to demonstrate the consumption reduction in accordance with Article 4(1)"*.
- Data shall be reported by each Member State to the Commission *"for each calendar year"*.

Given the provision of the Directive, Member States shall calculate the consumption reductions of SUP products in the reporting calendar year in comparison to 2022 by applying the following formulas:

For SUP cups for beverages: $ConRed_{CfB} = PoM_{CfB(2022)} - PoM_{CfB(RCY)}$

For SUP food containers: $ConRed_{FC} = PoM_{FC(2022)} - PoM_{FC(RCY)}$

Where:

ConRed means consumption reduction in a Member State per calendar year;

CfB means SUP cups for beverages;

FC means SUP food containers;

PoM means total of single-use plastic cups for beverages / food containers placed on the market in a Member State in a given calendar year;

RCY means reporting calendar year.

3.2 Calculation of the quantities of products placed on the market: formula and general rules

3.2.1 Formula

Measuring the quantities of single-use plastic products placed on the market requires taking account of data on their production as well as external trade data.

Therefore, Member States shall calculate the total of single-use plastic cups for beverages and food containers placed on the market in a Member State in a calendar year based on the following formulas:

For SUP cups for beverages: $PoM_{CFB} = Prod_{CFB} + Imp_{CFB} - Exp_{CFB}$

For SUP food containers: $PoM_{FC} = Prod_{FC} + Imp_{FC} - Exp_{FC}$

Where:

<i>PoM</i>	means total of single-use plastic cups for beverages / food containers placed on the market in a Member State in a given calendar year;
<i>Prod</i>	means total of single-use plastic cups for beverages / food containers produced in the Member State in a calendar year;
<i>Imp</i>	means total of single-use plastic cups for beverages / food containers imported to the Member State in a calendar year;
<i>Exp</i>	means total of single-use plastic cups for beverages / food containers exported from the Member State in a calendar year.

3.2.2 Metric

Directive (EU) 2019/904 does not explicitly define the metric by which quantities of SUP products listed in Annex A of the Directive shall be measured. However, the text of the Directive refers to SUP "products" throughout the relevant articles 4(1) and 13(1)(a):

- Article 4(1) of Directive (EU) 2019/904 requires Member States to take "*measures to achieve an ambitious and sustained reduction in the consumption of the single-use plastic **products** listed in Part A of the Annex*" (emphasis added). Furthermore, these measures shall lead to a "*measurable quantitative reduction in the consumption of the single-use plastic **products** listed in Part A of the Annex*" (emphasis added).
- According to Article 13(1)(a), Member States shall report placed on the market data of "*single-use plastic **products** listed in Part A of the Annex*" (emphasis added).

Where consumption reductions shall be measured by reduction of *products* placed on the market, these reductions cannot be measured by weight. This is because measurement by weight includes the risk that reductions are caused by mere reduction of product weight and not by quantity of products placed on the market. This could for example be the case where wall-thickness or volume of products is reduced.

Therefore, Member States shall measure the quantities of cups for beverages and food containers placed on the market by products placed on the market.

3.2.3 Inclusion of caps and lids

According to Part A of the Annex of Directive (EU) 2019/904, single-use plastic products covered by Article 4 on consumption reduction include:

- cups for beverages, *including their covers and lids*; and
- food containers [...] *with or without a cover*.

Therefore, *Member States need to ensure that covers and lids placed on the market with the intention to be used in combination with SUP cups for beverages and food containers are included in data on SUP cups for beverages and food containers placed on the market.*

3.2.4 Inclusion of empty receptacles suitable for use as SUP cup for beverage or SUP food container under the scope of the Directive

For empty receptacles, stakeholders emphasised that it might not be possible to clearly determine whether they will be used as a SUP product under the scope of the SUP Directive and whether they will be used either as cups for beverages or food containers.

Therefore, for empty receptacles suitable for use as SUP cups for beverages or food containers, the amount placed on the market shall be the amount that is placed on the market with the intention to be used as a SUP cup for beverages or SUP food containers.

Furthermore, to avoid underreporting, Member States shall verify completeness of data on empty receptacles placed on the market with the intention to be used as SUP cups for beverages and/or food containers under the scope of the Directive.

3.2.5 Measurement point of products placed on the market

According to Article 3 of Directive (EU) 2019/904,

- *“placing on the market” means the first making available of a product on the market of a Member State”; and*
- *“making available on the market” means any supply of a product for distribution, consumption or use on the market of a Member State in the course of a commercial activity, whether in return for payment or free of charge”.*

Therefore, the amount of single-use plastic cups for beverages and food containers placed on the market shall be measured at the point where they are first made available on the market of a given Member State.

Products can be first made available on the market of a given Member State by distributors, importers, or manufacturers.

According to Article 3 of Regulation (EU) 2019/1020,

- *“importer” means any natural or legal person established within the Union who places a product from a third country on the Union market”;*
- *“distributor” means any natural or legal person in the supply chain, other than the manufacturer or the importer, who makes a product available on the market”; and*
- *“manufacturer” means any natural or legal person who manufactures a product or has a product designed or manufactured, and markets that product under its name or trademark”.*

As was emphasised by stakeholders during the consultations, manufacturers in most cases do not place products directly on a Member States market but sell their products to retailers. Therefore, manufacturers usually neither have data nor knowledge of the Member State on whose market their product is placed and whether it is placed on the market as a SUP product falling under the scope of the Directive.

Thus, SUP plastic cups or beverages and food containers can only be measured at the point where they are made available by the manufacturer if the manufacturer directly places its product on a Member State’s market.

3.2.6 Data sources and organisation of data collection

As a result from the analysis of potential data sources for the amount of SUP cups for beverages and food containers placed on the market of a Member State, it is considered that distributors, importers and manufacturers can provide the most reliable data.

Existing data bases like PRODCOM or CN, are not considered suitable as these are not detailed enough to provide data on SUP cups for beverages and food containers. A revision of these data bases is not considered suitable for collection of relevant data (see chapter 2.1).

It is therefore considered that, Member States shall obtain data directly from manufacturers, importers or distributors who first make single-use cups for beverages and food containers available on the market of a Member State.

Given that data on the amount of SUP cups for beverages and food containers need to be obtained from a large number of sources, it is considered that collection of data from a central electronic registry improves consistency and completeness of data.

Therefore, Member States shall consider the use of electronic registries to collect data on the amount of SUP cups for beverages and food containers placed on the market.

Furthermore, Member States shall ensure confidentiality of data collected.

3.2.7 Verification and cross-checking of data

For the purposes of verifying the accuracy of the data on the total of single-use plastic cups for beverages and food containers placed on the market, Member States shall ensure that the data collected is verified and cross-checked with other sources of data to, inter alia, prevent double counting or underreporting.

To verify completeness of data on **empty receptacles** placed on the market with the intention to be used as SUP cups for beverages and/or food containers under the scope of the Directive, Member States may collect sample data from the point of sale.

Collection of sample data shall reflect at least the following factors:

- data collection shall take account of all relevant points of sale of SUP cups for beverages and food containers;
- data collection shall be carried out at regular, specified intervals, and shall adequately reflect the variation in the data to be surveyed; and
- data collection shall be based on a representative sample of the population to which their results are applied.

4. TASK B AND C: FORMATS AND GUIDANCE FOR DATA AND INFORMATION REPORTING AND QUALITY CHECK REPORTS AND FOR A DESCRIPTION OF MEASURES ADOPTED BY MEMBER STATES

4.1 Draft formats and guidance

Development of formats for data and information reporting includes two sets of formats:

- formats related to task B of this work package, namely
 - formats and guidance for annual data and information reporting and quality check reports on SUP cups for beverages and food containers placed on the market of a Member State each year, to demonstrate consumption reductions in accordance with Article 13(4); and
- formats related to task C of this work package, namely:
 - a format for Member States to report, two years after the entry into force of the Directive, a description of measures that Member States adopted pursuant to Article 4(1) of the Directive.

Formats for data reporting and quality check reports are provided in Annex B.1.

Guidance notes complementing the formats for data reporting and quality check reports are provided as notes below the tables.

The formats for Member States to report a description of measures are provided in 0.

4.2 Development and contents of draft formats

The following existing formats were taken into consideration:

- reporting formats provided in Commission Implementing Decision (EU) 2019/665;
- reporting formats provided in Commission Implementing Decision (EU) 2018/896; and
- draft reporting formats developed for reporting of data and quality check reports concerning the calculation of the separate collection target laid down in Article 9(1) of Directive (EU) 2019/904 (forthcoming).

The formats for reporting of data were developed to cover the key reporting issues identified in the rules and methodologies developed in chapter 3.

5. ASSESSMENT OF FINANCIAL AND ADMINISTRATIVE BURDENS

5.1 The EU standard cost model

The assessment follows the **EU's standard costs model**. It is thus based on costs of activities that occur only in order to fulfil the obligations to report and verify data on consumption reductions of SUP cups for beverages and food containers in line with Articles 4(1) and 13(1) of the SUP Directive. Any activities that would have been done also in absence of the reporting obligations of the SUP Directive are not taken into account for the calculation of administrative and financial burdens.

The calculation of administrative and financial burdens is based on the **price** of different stakeholder activities necessary to fulfil the reporting requirements multiplied by the **number** of how often these activities are necessary.

It is furthermore distinguished between one-off and recurring costs.

The overall administrative and financial burden is then the sum of administrative and financial burdens of all activities necessary to fulfil the obligation of data reporting and verification.

The main factors influencing the costs for collection and reporting of data on SUPCfB and FC under the standard cost model are summarised in below (chapter 5.2).

5.2 Factors influencing administrative and financial burdens

Table 6 depicts the different administrative and financial burdens assumed per activity and stakeholder for the EU average. Due to the large variance among Member States, costs are presented in ranges. Detailed information concerning the data basis and data manipulation are provided in Annex A.1.

The main factors influencing the level of administrative and financial burdens are summarised in the following.

Cost for distributors, manufacturers or importers who first make receptacles available on the market of a Member State:

- It is assumed that distributors, manufacturers or importers who first make empty receptacles available on the market in most cases have precise data on the number of products placed on the market, so that costs for data collection are low.
- For empty receptacles, distributors, manufacturers or importers are assumed to have knowledge on their intended use as SUPCfB or SUPFC.
- In case they do not have knowledge on the intended use, additional data collection is necessary. The costs for distributors, manufacturers or importers thus vary depending on the extent to which additional collection of data is necessary to determine the amount of empty receptacles placed on the market as SUPCfB and SUPFC. However, due to the large variety of possible methodologies of collecting such data, no reliable assessment of the level of such costs can be made at this stage.

Costs for Member States/ responsible authorities

- **Adaption or new introduction of IT infrastructure:** Administrative and financial burdens vary for Member States depending on whether there already exists suitable IT infrastructure for collection of data on the amount of products placed on the market. Where existing IT infrastructure can be adapted according to the specific requirements of data collection concerning the amount of SUPCfB and SUPFC, the level of administrative and financial burdens is lower than for countries where new IT- infrastructure needs to be established.
- **Existing types of data collection systems:** Next to existing IT infrastructure, existing systems and practices of data collection have an influence on the level of administrative and financial burdens. Where placed on the market data are already collected by EPR schemes or national registries, there already exists the necessary know-how for data collection and processing.
- **Synergies with other reporting obligations:** Administrative and financial burdens for collection and reporting of data on the separate collection target furthermore depend on whether other reporting obligations require similar IT or data collection methodologies and reporting systems. Synergies are for example likely with the collection and processing of data on SUP beverage bottles placed on the market.

Table 6 Assessment of administrative and financial burdens per type of activity

ID	Activity	Frequency	Annual burden per activity / entity	Stakeholder involved	Additional notes	Number of stakeholders
I Establishment of legislative background						
I.1	Establishment of legislative background	one-off	€ 50,000 - € 100,000	Ministry		≥ 1
II Collection of data on the amount of SUP CfB and FC PoM						
II.1	Collection and reporting of SUP CfB and FC placed on the market	yearly	€ 450 - € 700	Distributors, manufacturers, or importers who first make SUPCfB or SUPFC available on the market	Potential synergies in data reporting, e.g. in relation to the Packaging Directive. Actual costs may be higher in case distributors, manufacturers or importers need to collect additional data on the intended use of products. Due to the large variety of possible methodologies of collecting such data, no reliable assessment of the level of such costs can be made at this stage.	medium
II.2	Establishment of IT infrastructure	one-off	€ 300,000 - € 500,000	Responsible authority or delegated institution	potential synergies with other data collection / reporting obligations, e.g. concerning SUP beverage bottles	≥ 1
II.3	Adaption of existing IT infrastructure	one-off	€ 6,000 - € 10,000	Responsible authority or delegated institution	potential synergies with other data collection / reporting obligations, e.g. concerning SUP beverage bottles	≥ 1
II.4	Maintenance of IT infrastructure (only if new IT infrastructure was established)	yearly	€ 1,200 - € 1,500	Responsible authority or delegated institution	potential synergies with other data collection / reporting obligations, e.g. concerning SUP beverage bottles	≥ 1
II.5	Collection of additional data for verification and completeness of reported information	yearly	€ 40,000 - € 55,000	Responsible authority or delegated institution	e.g. study / survey for verification of reliability and completeness of data on empty receptacles placed on the market with the intention to be used as SUP cups for beverages and/or food containers under the scope of the Directive.	≥ 1
II.6	Processing, compilation, verification	yearly	€ 6,000 - € 8,000	Responsible authority or delegated institution		≥ 1
III Collection and reporting of information on measures taken by MS to achieve consumption reductions according to Article 4(1) of the SUP Directive						

ID	Activity	Frequency	Annual burden per activity / entity	Stakeholder involved	Additional notes	Number of stakeholders
III.1	Collection and reporting of information on measures adopted by MS in accordance with Article 4(1) of the SUP Directive.	yearly	€ 4,500 - € 7,000	Responsible authority or delegated institution		≥ 1
IV Submission of data to European Commission						
IV.1	Quality check report and crosschecking	yearly	€ 2,000 - € 3,000	Responsible authority or delegated institution		1
IV.2	Data assessment, verification, compilation	yearly	€ 10,000 - € 12,000	Responsible authority or delegated institution		1

Source: Own compilation based on sources listed in annex A.1

Annex A – Supporting Documents

A.1. RELEVANT LEGAL PROVISIONS AND SECONDARY LITERATURE

Existing legal provisions

In order to identify possible synergies, existing methods for calculation and reporting applied in similar regulatory contexts were taken into account. This included:

- The Packaging and Packaging Waste Directive²² with the corresponding implementing acts:
 - o Commission Implementing Decision (EU) 2019/665 of 17 April 2019 amending Decision 2005/270/EC establishing the formats relating to the database system pursuant to European Parliament and Council Directive 94/62/EC on packaging and packaging waste; and
 - o Commission Implementing Decision (EU) 2018/896 of 19 June 2018 laying down the methodology for the calculation of the annual consumption of lightweight plastic carrier bags and amending Decision 2005/270/EC;
- The Waste Framework Directive²³ with the corresponding implementing act:
 - o Commission Implementing Decision (EU) 2019/1004 of 7 June 2019 laying down rules for the calculation, verification and reporting of data on waste in accordance with Directive 2008/98/EC of the European Parliament and of the Council and repealing Commission Implementing Decision C (2012) 2384,
- The Directive on Waste Electrical and Electronic Equipment²⁴ with the corresponding implementing act:
 - o Commission Implementing Regulation 2017/699 of 18 April 2017 establishing a common methodology for the calculation of the weight of electrical and electronic equipment (EEE) placed on the market of each Member State and a common methodology for the calculation of the quantity of waste electrical and electronic equipment (WEEE) generated by weight in each Member State;
- Regulation (EU) 2019/1020 of the European Parliament and of the Council of 20 June 2019 on market surveillance and compliance of products and amending Directive 2004/42/EC and Regulations (EC) No 765/2008 and (EU) No 305/2011; and
- Directive on End-of Life Vehicles²⁵ : no relevant approaches.

The following legal provisions concerning **general aspects of reporting and statistical data collection** were considered by the project team:

²² European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste (incl. amendments).

²³ Directive (EC) No 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives.

²⁴ Directive 2012/19/EU of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (WEEE).

²⁵ Directive 2000/53/EC of the European Parliament and of the Council of 18 September 2000 on end-of life vehicles (including amendments).

- Commission Implementing Regulation (EU) 2019/1776 of 9 October 2019 amending Annex I to Council Regulation (EEC) No 2658/87 on the tariff and statistical nomenclature and on the Common Customs Tariff;
- Council Regulation (EEC) No 2186/93 of 22 July 1993 on Community coordination in drawing up business registers for statistical purposes;
- Regulation (EC) No 223/2009 of the European Parliament and the Council of 11 March 2009 on European statistics and repealing Regulation (EC, Euratom) No 1101/2008 of the European Parliament and of the Council on the transmission of data subject to statistical confidentiality to the Statistical Office of the European Communities, Council Regulation (EC) No 322/97 on Community Statistics, and Council Decision 89/382/EEC, Euratom establishing a Committee on the Statistical Programmes of the European Communities; and
- Directive (EU) 2015/1535 of the European Parliament and of the Council of 9 September 2015 laying down a procedure for the provision of information in the field of technical regulations and of rules on Information Society services (codification).

The following legal provisions concerning **hygiene of food stuffs and food contact materials** were considered as to relevant issues for reporting on measures taken by Member States to achieve reductions in the consumption of SUP cups for beverages and food containers.

- Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety;
- Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs;
- Commission Regulation (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food; and
- Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 April 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC.

Secondary literature

Concerning (existing) Measures to achieve consumption reductions on SUP cups for beverages and food containers:

Althammer et al. (2017): Die Umweltauswirkungen der FreiburgCup - Eine Ökobilanzierung und Evaluierung des Freiburger Mehrwegsystems für ToGo-Becher ("The environmental impact of the FreiburgCup - A life cycle assessment and evaluation of the Freiburg reusable system for ToGo cups"), retrievable from: https://www.researchgate.net/publication/329911412_Die_Umweltauswirkungen_der_FreiburgCup_Eine_Okobilanzierung_und_Evaluierung_des_Freiburger_Mehrwegsystems_fur_ToGo-Becher, last access: 10.03.2020.

Boletín Oficial del Estado (2019): Law 8/2019, of February 19, on contaminated waste and soil of the Balearic Islands (Spain), retrievable from: <https://www.boe.es/eli/es-ib/l/2019/02/19/8>, last access: 10.03.2020.

- Boletín Oficial del Estado (2018): Law 14/2018, of June 18, on Waste and its Taxation, retrievable from: <https://www.boe.es/buscar/pdf/2018/BOE-A-2018-8953-consolidado.pdf>, last access: 10.03.2020.
- European Commission (2020): Guidelines for the implementation of Directive (EU) 2019/904 on the reduction of the impact of certain plastic products on the environment.
- European Environmental Agency (2019): Preventing plastic waste in Europe, retrievable from: <https://www.eea.europa.eu/publications/preventing-plastic-waste-in-europe>, last access: 14.07.2020.
- Greenpeace (2019): The smart supermarket report. Contains supermarket related examples of packaging reduction measures and how to utilise reusable systems, retrievable from: <https://www.greenpeace.org/usa/wp-content/uploads/2019/11/SMART-SUPERMARKET-How-retailers-can-innovate-beyond-single-use-plastics-packaging.pdf>, last access: 10.03.2020.
- Håll Sverige Rent / The Keep Sweden Tidy Foundation (2019): Lika mycket kaffe men färre muggar – en kopprapport från Håll Sverige Rent ("Just as much coffee but fewer cups - a cup report from the Keep Sweden Tidy Foundation"). Part of the campaign "Hej då engångsmugg!" (" Goodbye single-use Cup!") with the purpose to reduce the use of SUP products that are commonly littered, retrievable from: https://www.hsr.se/sites/default/files/kopprapporten_digital_hall_sverige_rent.pdf, last access: 10.03.2020.
- HM Revenue and Customs (2020): Policy paper plastic packaging tax, retrievable from: <https://www.gov.uk/government/publications/introduction-of-plastic-packaging-tax/plastic-packaging-tax>, last access: 14.07.2020.
- House of Commons Environmental Audit Committee (UK, 2017): Disposable Packaging: Coffee Cups. Second Report of Session 2017-19. Environmental study of issues related to coffee cups in the UK and recommendation on measures, retrievable from: <https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/657/657.pdf>, last access: 10.03.2020.
- Livsmedelsverket / Swedish Food Agency (2019): Guidelines regarding the use of own food containers and cups when purchasing food and beverage, retrievable from: <https://www.livsmedelsverket.se/livsmedel-och-innehall/tillagning-hygien-forpackningar/hygien/egen-matlada-och-mugg-nar-du-koper-mat-och-dryck?AspxAutoDetectCookieSupport=1>, last access: 10.03.2020.
- Ministère de la transition écologique et solidaire (2019) National pact on plastic packaging, retrievable from: https://www.gouvernement.fr/sites/default/files/locale/piece-jointe/2019/06/11_french-national-_pact-on-plastic-packaging_pdf_0.pdf, last access: 14.07.2020.
- Plastics Pact NL (2019): Plastics Pact NL 2019-2025, Frontrunners to do more, with less plastic in the circular economy, retrievable from: <https://www.circulairondernemen.nl/uploads/Oe657a0084a4f18d2ff61335794ea3c7.pdf>, last access: 14.07.2020.
- Poortinga / Whitaker (2018): Promoting the Use of Reusable Coffee Cups through Environmental Messaging, the Provision of Alternatives and Financial Incentives, retrievable from: <https://orca.cf.ac.uk/109996/1/sustainability-10-00873.pdf>, last access: 10.03.2020.

- République française (2020): LOI n° 2020-105 du 10 février 2020 relative à la lutte contre le gaspillage et à l'économie circulaire, retrievable from: <https://www.legifrance.gouv.fr/eli/loi/2020/2/10/TREP1902395L/jo/texte>, last access: 14.07.2020.
- Rethink Plastics Alliance / Break Free from Plastics Collectively (2019): Moving away from single-use, guide for national decision makers to implement the single-use plastics Directive, retrievable from: https://rethinkplasticalliance.eu/wp-content/uploads/2019/10/2019_10_10_rpa_bffp_sup_guide.pdf, last access: 10.03.2020.
- Rethink Plastic Alliance / Break Free from Plastic Movement (2019): Reusable solutions: How governments can help stop single-use plastic pollution, retrievable from: https://www.foeeurope.org/sites/default/files/materials_and_waste/2019/reusable_solutions.pdf, last access: 10.03.2020.
- Swedish Environmental Protection Agency (2019): Implementation of the Disposable Plastic Directive reporting requirements, retrievable from: <https://www.naturvardsverket.se/upload/miljoarbete-i-samhallet/miljoarbete-i-sverige/regeringsuppdrag/2019/skrivelse-ru-engangspplast.pdf>, last access: 10.03.2020.
- University of Gothenburg/Where is My Pony (2019): Barriärer vi användningen av egen matlåda vid upphämtning av restaurangmat ("Barriers when using your own food box when picking up restaurant food"). A qualitative study that highlights the psychological obstacles that exist for people to replace the disposable food container and instead buy lunch in their own box. Part of the ongoing pilot project "Buy lunch in your own lunchbox" in the city of Gothenburg, retrievable from: https://www.goteborg.com/globalassets/filer/artikel_uppsats_engangsfritt.pdf, last access: 10.03.2020.
- UK Parliament (2018): Disposable Packaging: Coffee Cups: Government's Response to the Committee's Second Report, retrievable from: <https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/867/86702.htm>, last access: 10.03.2020.
- WRAP (2018): The UK Plastics Pact: A Roadmap to 2025, retrievable from: <https://www.wrap.org.uk/sites/files/wrap/The-UK-Plastics-Pact-Roadmap-v3.pdf>, last access: 14.07.2020.
- Zero Waste Europe (2018): The story of Freiburgcup – How a city is ditching disposable coffee cups. Case-study on measures to reduce the use of disposable coffee cups, retrievable from: <https://zerowasteurope.eu/wp-content/uploads/2018/09/FreiburgCupfinal.pdf>, last access: 10.03.2020.
- Zero Waste Europe (2018): The story of Recircle – Zero waste consumption & production. Case-study on reusable meal boxes, retrievable from: <https://zerowasteurope.eu/wp-content/uploads/edd/2018/07/reCircleFNLcompressed.pdf>, last access: 10.03.2020.

Methodologies for data collection and reporting:

- Eunomia (2016): Study to assist the commission to develop a methodology for calculation of annual consumption of lightweight plastic carrier bags.
- Gesellschaft für Verpackungsmarktforschung (2019): Aufkommen und Verwertung von Verpackungsabfällen in Deutschland im Jahr 2017, retrievable from:

https://www.umweltbundesamt.de/sites/default/files/medien/2546/publikationen/2019_11_19_aufkommen_u_verwertung_verpackungsabfaelle_2017_final.pdf, last access: 10.03.2020.

Sismega/ Ffact (2013) EPR data verification study. Summary reports for Member States.

General aspects of reporting and statistical data collection

Eurostat (2020): European Statistical System handbook for quality and metadata reports, retrievable from: <https://ec.europa.eu/eurostat/documents/3859598/10501168/KS-GQ-19-006-EN-N.pdf>, last access: 26.03.2020.

Eurostat (2017): European statistics code of practice, retrievable from: https://www.stat.fi/static/media/uploads/org_en/periaatteet/cop_principles_en_2017.pdf, last access: 26.03.2020.

Eurostat (2006): Handbook on Data Quality Assessment Methods and Tools, retrievable from: <https://ec.europa.eu/eurostat/documents/64157/4373903/05-Handbook-on-data-quality-assessment-methods-and-tools.pdf/c8bbb146-4d59-4a69-b7c4-218c43952214>, last access: 25.05.2020.

Eurostat et al (2016): Methodology for data validation 1.0, retrievable from: https://ec.europa.eu/eurostat/cros/system/files/methodology_for_data_validation_v1.0_rev-2016-06_final.pdf, last access: 26.03.2020.

Other

Eunomia (2020b): Extended Producer Responsibility, Final guidance.

Eurostat (2020): Labour cost levels by NACE Rev. 2 activity; retrievable from: https://ec.europa.eu/eurostat/en/web/products-datasets/-/LC_LCI_LEV, last access: 25.05.2020.

European Commission: The standard cost model for estimating administrative costs, retrievable from: https://ec.europa.eu/info/sites/info/files/file_import/better-regulation-toolbox-60_en_0.pdf, last access: 25.05.2020.

Relevant stakeholder position papers

EUROPEN (2018): Position on the Proposal for a Directive on the Reduction of the impact of certain plastic products on the environment.

FoodDrinkEurope (2018a): FoodDrinkEurope's policy recommendations in view of trilogues on Extended Producer Responsibility and litter clean-up (Article 8).

IG Plastics (2017) Recommendations towards the EU Plastics Strategy, retrievable from: https://www.umweltbundesamt.de/sites/default/files/medien/2546/dokumente/170526_epa_network_recommendations_towards_the_eu_plastics_strategy.pdf, last access: 16.03.2020.

Interest Group Plastics of the EPA Network (2019): Internal working paper on littering.

Zero Waste Europe (2019): Unfolding the Single-Use Plastics Directive

A.2. STAKEHOLDER CONSULTATIONS

Questionnaire online survey

Please refer to the attached pdf.

Contributions to online survey

Feedback to online survey per type of stakeholders

Table 7 Total number of responses and shares of total responses per type of stakeholder

Type of Stakeholder	Number of responses per type of stakeholder	Share of total responses per type of stakeholder (in %)
Manufacturer or respective association	41	51
Retailer or respective association	6	8
Waste Management Organisation or respective association	5	6
NGO	6	8
Science, research and development	0	0
Other	3	4
Member States / national authorities	19	24
Total	80	101

Please note that the list provided in Table 8 does only depict those stakeholders that have voluntarily provided the name of their organisation. Therefore, the number of stakeholders listed differs from the number of all stakeholders that have participated in the survey as some stakeholders did participate anonymously.

Table 8 List of stakeholders that contributed to the survey (if entered name of organisation)

Organisation	Type*
Å&R Carton Lund AB	Manufacturer or respective association
EDA	Manufacturer or respective association
APOH	Waste Management Organisation or respective association
AR PACKAGING	Manufacturer or respective association
Valorlux	Waste Management Organisation or respective association
INCOM d.o.o.	Manufacturer or respective association
Graphic Packaging Int. LLC	Manufacturer or respective association
CEPI	Manufacturer or respective association
Swedish food retailers federation	Retailer or respective association
Huhtamaki	Manufacturer or respective association

Organisation	Type*
NousFiber Consulting	Manufacturer or respective association
Colruyt Group	Retailer or respective association
Valpak	Waste Management Organisation or respective association
European Carton Makers Association	Manufacturer or respective association
Alexir Packaging Ltd	Manufacturer or respective association
Westrock, Multi packaging solutions	Manufacturer or respective association
Fiskeby Board AB	Manufacturer or respective association
MACPAC SA	Manufacturer or respective association
Klockner Pentaplast	Manufacturer or respective association
Danish Plastic Federation	Manufacturer or respective association
Seda International Packaging Group	Manufacturer or respective association
The British Plastics Federation	Manufacturer or respective association
McDonald's	Retailer or respective association
FCIO	Manufacturer or respective association
Stora Enso	Manufacturer or respective association
Afvalfonds Verpakkingen	Manufacturer or respective association
EuPC	Manufacturer or respective association
PlasticsEurope	Manufacturer or respective association
Federchimica	Manufacturer or respective association
Kotkamills	Manufacturer or respective association
VBO-FEB	Manufacturer or respective association
LyondellBasell	Manufacturer or respective association
Seda Germany GmbH	Manufacturer or respective association
Citeo (the french EPR organisation for household packaging and graphic papers)	Waste Management Organisation or respective association
SEDA UK LTD	Manufacturer or respective association
EurEau	Waste Management Organisation or respective association
dm-drogerie markt GmbH + Co. KG	Retailer or respective association
Estonian Recovery Organisation	NGO
BVE Federation of German Food and Drink Industries	Manufacturer or respective association
SEAS AT RISK	NGO
FoodDrinkEurope	Manufacturer or respective association
Conscious Cup Campaign	NGO
Gate gourmet scandinavia	Manufacturer or respective association
A.C. Laskaridis Foundation	Other
ELIPSO	Manufacturer or respective association

Organisation	Type*
Sea First Organisation	NGO
Faerch S/S	Manufacturer or respective association
Der Grüne Punkt Duales System Deutschland GmbH	Other
Croatian Chamber of Economy	NGO
EUROCHAMBRES, The Association of European Chambers of Commerce and Industry	Other
The British Plastics Federation (BPF)	Retailer or respective association (<i>type of organisation allocated by project team</i>)
The Ministry of the Environment of the Czech Republic	MS stakeholder / public authority
State Food and Veterinary Service (Lithuania)	MS stakeholder / public authority
Delano (Lithuania)	MS stakeholder / public authority
Competition Council of the Republic of Lithuania	MS stakeholder / public authority
Swedish EPA	MS stakeholder / public authority
Department of Waste Management Ministry of the Climate (Poland)	MS stakeholder / public authority
Ministry of Sustainability and Tourism (Austria)	MS stakeholder / public authority
Danish Environmental Protection Agency	MS stakeholder / public authority
OVAM: Public Flemish Waste Agency (Belgium)	MS stakeholder / public authority
Rijkswaterstaat (The Netherlands)	MS stakeholder / public authority
Department of Communications, Climate Action and Environment (Ireland)	MS stakeholder / public authority
Inter-regional Packaging Commission (Belgium)	MS stakeholder / public authority
Deputy Directorate on Waste (Ministry for the Ecological Transition) (Spain)	MS stakeholder / public authority
Environmental protection department (Lithuania)	MS stakeholder / public authority
Ministry of the Environment of Estonia	MS stakeholder / public authority
Umweltbundesamt Deutschland / German Federal Environment Agency	MS stakeholder / public authority
the Ministry of Transport and Environment / Recycling Network Benelux (the Netherlands)	MS stakeholder / public authority
Ministry of the Environment (Finland)	MS stakeholder / public authority
APA - Agência Portuguesa do Ambiente (Portugal)	MS stakeholder / public authority

* Data refer to the stakeholders' own statements in the survey. Where no type of organisation was provided by stakeholders the project team has allocated a type as indicated in the table.

Stakeholder's contributions to interviews

Table 9 Stakeholder interviews: Stakeholders contacted and feedback received

Interview status	Number
Number of stakeholders contacted for interviews	86
Number of stakeholders that provided feedback (via telephone skype interview, or written mail input)	17

Table 10 List of stakeholders that contributed (have participated or have provided written input) in stakeholder interviews

MS	Organisation	Type
BE	IVCIE - belgische Durchfuhrbehörde (für die Verbringung von Abfällen)	MS stakeholder / public authority
DE	Zentrale Stelle Verpackungsregister	Other
DE/ EU	Spiriant Germany	Association
EE	Ministry of Environment	MS stakeholder / public authority
ES	Ministerio para la Transición Ecológica	MS stakeholder / public authority
ES	ECOEMBES	EPR system
EU	Reloop	NGO
EU	Pro Europe (Packaging Recovery Europe)	Association
EU	Danone	Retailer
EU	Pack2Go Europe	Association
EU	Håll Sverige Rent (Keep Sweden Tidy)	NGO
EU	EuroCommerce	Association
EU	EXPRA Extended Producer Responsibility Alliance (Packaging)	Association
HR	Ministry of Environment and Energy	MS stakeholder / public authority
IE	Department of Communications, Climate Action and Environment	MS stakeholder / public authority
PL	Department of Waste Management Ministry of the Climate	MS stakeholder / public authority
SK	Slovak Environment Agency	MS stakeholder / public authority

A.3. SOURCES, DATA MANIPULATION AND MODELING APPLIED FOR THE ASSESSMENT OF ADMINISTRATIVE AND FINANCIAL BURDENS

Data modeling

Following the EU standard costs model, administrative and financial burdens were determined **per relevant stakeholder activity**. Furthermore, a rough estimation was made concerning the number of how often the activity has to be conducted.

Relevant stakeholders and stakeholder activities were determined for the different working phases:

- I. Establishment of legislative background;
- II. Collection of data on the amount of SUPCfB and SUPFC placed on the market;
- III. Collection and reporting of information on measures taken by MS to achieve consumption reductions according to Article 4(1) of the SUP Directive; and
- IV. Submission of data to the EU.

Data sources

The assessment of administrative and financial burdens is based on several data sources.

- **Stakeholder online survey:** The online survey contained questions concerning existing data collection and reporting infrastructure in order to determine where synergies can be used and where new data collection and reporting infrastructure needs to be established. The results of the online survey thus provided an important basis to assess which financial and administrative burdens only occur in order to fulfil the obligations to report on and verify the number of SUPCfB and SUPFC placed on the market.
- **Consultation of stakeholders during expert interviews and stakeholder workshops:** During expert interviews and discussions at the stakeholder workshop, different options for data collection and reporting were discussed in detail. While methodologies for data collection and reporting were not finalised at this stage of the work package, it could be discussed which factors lead to higher or lower administrative and financial burdens under different options.

Feedback from the online survey, expert interviews and the stakeholder workshop were used to develop options for calculation, verification and reporting of PoM data on SUPCfB and SUPFC by making use of as many synergies as possible to keep administrative and financial burdens at a reasonable level.

- **Burden-specific interviews:** Additional expert interviews were conducted with stakeholders to discuss administrative and financial burdens implied in the different steps of collection, processing and reporting.
- **Administrative and financial burdens of additional research:** To assess administrative and financial burdens of collecting sample data or conducting other types of additional studies for data verification, input from stakeholders and Member States was complemented by information from consultants experienced in conducting relevant studies. Information provided by consultant was collated with own consulting experience and information from Member States.

- **Secondary research:** Additional research was conducted concerning costs of implementation, adaption and maintenance of IT infrastructure and collated with information provided by Member State's authorities and stakeholders.

Data manipulation

Comparison and assessment of data from different Member States and Stakeholders

Even though burden-specific interviews were targeted at administrative and financial burdens of specific activities, feedback from Member States and stakeholders diverged concerning the scale and steps included in these activities. Therefore, feedback from Member States and stakeholders had to be compared, assessed and averaged by the project team.

Normalisation to EU-27 average labour costs

Data on **labour costs** were mostly provided in person days or hours by Member States and stakeholders. Some information concerning costs of single studies or additional research concerning costs of IT-related burdens were provided in euro. For normalisation of data to an EU average and calculation of average labour costs, data were taken from eurostat. To obtain most accurate data, it was differentiated between three different types of activities. As these did not fully correspond with the types of activities listed at eurostat, labour costs for conducting additional studies are based on information from interviews with stakeholders and consultants experienced in relevant studies. The following average costs per working hour were assumed for different types of activities:

- 28 euro per working hour for administrative activities;²⁶
- 38 euro per working hour for activities related to set-up or adaption of IT infrastructure²⁷; and
- 100 euro per average working hour related to additional studies²⁸.

Due to the high level of differences among Member States, administrative and financial burdens are provided in ranges.

²⁶ Based on eurostat data for the branches „industry, construction and services“, “services of the business economy“ and “administrative and support service activities“: https://ec.europa.eu/eurostat/en/web/products-datasets/-/LC_LCI_LEV.

²⁷ Based on eurostat data for the branch „information and communication“: https://ec.europa.eu/eurostat/en/web/products-datasets/-/LC_LCI_LEV.

²⁸ Ibid.

Annex B - Reporting formats

B.1. FORMATS AND GUIDANCE FOR DATA AND INFORMATION REPORTING AND QUALITY CHECK REPORTS

A. FORMAT FOR THE REPORTING OF DATA

1. Format for reporting on the quantities of single-use cups for beverages and food containers placed on the market in the territory of a Member State per calendar year

1	2
	(number of products, in thousands)
Total number of single-use plastic cups for beverages placed on the market ⁽¹⁾⁽²⁾	
Single-use plastic cups for beverages manufactured in the Member State ⁽²⁾	
Single-use plastic cups for beverages imported to the Member State ⁽²⁾	
Single-use plastic cups for beverages exported from the Member State ⁽²⁾	
Total number of single-use plastic food containers placed on the market ^{(1) (2)}	
Single-use plastic food containers manufactured in the Member State ⁽²⁾	
Single-use plastic food containers imported to the Member State ⁽²⁾	
Single-use plastic food containers exported from the Member State ⁽²⁾	

(1) Data shall include the total number of SUP cups for beverages and SUP food containers manufactured, plus total number of products imported, minus the total number of products exported.

(2) In case covers or lids are placed on the market/imported/exported separately from cups for beverages and food containers, these shall be included in the data.

B. FORMAT FOR THE QUALITY CHECK REPORT ACCOMPANYING THE DATA REFERRED TO IN PART A

I. General Information

1. Member State:
2. Organisation submitting the data and the description:
3. Contact person / contact details:
4. Reference year:
5. Delivery date / version:
6. Link to data publication by the Member State (if any):
7. Description of the parties involved in the data collection:

Name of institution	Description of key responsibilities

Add rows as appropriate.

8. Data can be made available to the public? (yes/no/partly)

In case your answer was "no" or "partly", please explain.

Add rows as appropriate.

II: Information on single-use plastic cups for beverages and food containers placed on the market

1. Methods for determining SUP cups for beverages and food containers placed on the market.

Methods	Contribution to data collection concerning			Description of methods applied
	SUPCfB placed on the market (yes/no)	SUPFC placed on the market (yes/no)	Adjustments to account for covers and lids or empty receptacles PoM with the intention to be used as SUP product ⁽¹⁾	
Data from producers or organisations implementing extended producer responsibility obligations on their behalf				
Data from distributors or organisations implementing extended producer responsibility obligations on their behalf				
Data from importers or organisations implementing extended producer responsibility obligations on their behalf				
Data from a central registry on SUPCfB and SUPFC placed on the market ⁽²⁾				
Surveys				
Electronic registry				
Other sources (specify)				

⁽¹⁾ Indicate if methods or data sources have been used to verify or control that covers and lids placed on the market are included in the reported data or to verify completeness of data on empty receptacles placed on the market with the intention to be used as SUP cups for beverages and/or food containers under the scope of the Directive.

(2) Central registries that collect and compile data from distributors, importers or producers who first make SUPCfB or FC available on the market.

2. Indicate the share of SUPCfB and SUPFC placed on the market covered by the used methods referred to above.

Share of SUPCfB placed on the market covered by data sources (%)	
Share of SUPFC placed on the market covered by data sources (%)	

3. If the share covered by the methodologies described in point 1 is less than 100%, indicate and describe additional data sources and methodologies used to prevent and complete data gaps and to what extent data gaps are closed.

Methods	Contribution to data collection			Share of SUPFC covered (%)	Additional information
	SUPCfB placed on the market (yes/no)	SUPFC placed on the market (yes/no)	Share of SUPCfB covered (%)		
Administrative reporting ⁽¹⁾					
Production statistics - PRODCOM codes					[name the codes]
Production statistics - national codes					[name the codes]
Foreign trade statistics ⁽²⁾					[name the codes]
Tax statistics ⁽³⁾					
Industry statistics ⁽⁴⁾					
Others (specify)					
No additional methods used to prevent and complete data gaps					

⁽¹⁾ Information from an administration which regularly collects and collates information from enterprises or institutions. Administrative sources can be e.g. public institutions (environment agencies and other supervising authorities) and/or associations and organisations in the public sector.

⁽²⁾ Foreign trade statistics can serve as additional data source for the calculation of PoM.

⁽³⁾ Tax statistics can serve as additional data source for the calculation of PoM.

⁽⁴⁾ Industry associations which are active in the field of packaging material are often running internal statistics on packaging materials.

4. Methods for determining SUPCfB and SUPFC placed on the market with regard to certain modes of making SUPCfB and SUPFC available on the market.

Specific issues considered	Description of the applied methods
Free riders ⁽¹⁾	
Private imports / exports ⁽²⁾	
On-line sales ⁽³⁾	
De-minimis rules ⁽⁴⁾	
Others (specify)	

⁽¹⁾ A free rider is a producer or distributor that places SUPCfB and SUPFC on the market but is not registered with an EPR system.

⁽²⁾ Private imports may result international tourism.

⁽³⁾ Due to on-line sales trade additional quantities of SUPCfB and SUPFC might be placed on the market.

⁽⁴⁾ De-minimis rules applied for reporting on SUPCfB and SUPFC placed on the market.

5. Description of the methods to adjust the number of SUPCfB and SUPFC placed on the market.

Adjustments	Adjustments applied (yes/no)	Description of the applied methods to determine and apply adjustments
Inclusion of covers and lids (differentiate between covers and lids)		
Verification of completeness of data on empty receptacles placed on the market with the intention to be used as SUP cups for beverages and/or food containers under the scope of the Directive		
Other (specify)		

III. Data verification and control system

1. Verification of data on SUPCfB and SUPFC placed on the market.

Verification and control procedures	Applied for data on			Additional comments, if relevant
	SUPCfB placed on the market (yes/no)	SUPFC placed on the market (yes/no)	Adjustments to account for covers and lids or empty receptacles PoM with the intention to be used as SUP product (1)	
Data completeness checks				
Cross-checks				
Time-series checks				
Audit checks				
Other (specify)				

(1) Indicate if verification method has been applied to verify or control that covers and lids placed on the market are included in the reported data or to verify completeness of data on empty receptacles placed on the market with the intention to be used as SUP cups for beverages and/or food containers under the scope of the Directive

2. Description of main factors affecting the accuracy of data on SUPCfB and SUPFC placed on the market.

Potential factors affecting reliability of data	Relevant data			Description how accuracy of data is affected and which methodologies are applied to minimise the impact
	SUPCfB placed on the market (yes/no)	SUPFC placed on the market (yes/no)	Adjustments to account for covers and lids or empty receptacles PoM with the intention to be used as SUP product ⁽¹⁾	
Sampling errors ⁽²⁾ (e.g. coefficients of variation)				
Coverage errors ⁽³⁾ (e.g. de-minimis rules, regional coverage)				
Measurement errors ⁽⁴⁾ (e.g. measurement unit, empty receptacles that are not placed on the market with the intention to become a SUP cup for beverage / food container, differentiation between empty cups for beverages and empty food containers)				
Data collection test instruments ⁽⁵⁾ (e.g. testing of questionnaires)				
Processing errors ⁽⁶⁾ (e.g. identification of errors, correction of errors)				
Non-response errors ⁽⁷⁾				

Potential factors affecting reliability of data	Relevant data			Description how accuracy of data is affected and which methodologies are applied to minimise the impact
	SUPCfB placed on the market (yes/no)	SUPFC placed on the market (yes/no)	Adjustments to account for covers and lids or empty receptacles PoM with the intention to be used as SUP product ⁽¹⁾	
Model assumption errors ⁽⁸⁾				
Other (please specify)				

⁽¹⁾ Verification or control that covers and lids placed on the market are included in the reported data or verification of completeness of data on empty receptacles placed on the market with the intention to be used as SUP cups for beverages and/or food containers under the scope of the Directive.

⁽²⁾ Describe the estimated coefficients of variation and the methodologies applied for variance estimation.

⁽³⁾ Describe the type and size of coverage errors.

⁽⁴⁾ Describe the instruments to reduce potential risks and avoid errors.

⁽⁵⁾ Describe the instruments and methodologies applied for securing quality and relevance of data collection instruments.

⁽⁶⁾ Describe the processing steps between data collection and production of statistics and list processing errors identified and their extent.

⁽⁷⁾ Describe the unit and item non-response rates for the main variables and the imputation methods (if any).

⁽⁸⁾ Describe the type and size of model assumption errors.

3. Explanation of the scope and validity of surveys to collect data on SUPCfB and SUPFC placed on the market.

Add rows as appropriate.

4. Differences from the data reported for the previous years

Significant methodological changes in the calculation method used for the current reference year in relation to the calculation method used for previous reference years, if any (in particular retrospective revisions, their nature and whether a break in the series has to be flagged for a certain year).

Add rows as appropriate.

5. Explanation detailing the causes of the difference in number (which estimates have caused the difference, and what the underlying cause is) for any component of SUPCfB and/or SUPFC placed on the market which shows greater than a 10 % variation from the data submitted for the previous reference year.

SUPCfB and/or SUPFC placed on the market	Variation (%)	Main reason for variation

Add rows as appropriate.

IV. Information on measures taken by Member States under Article 4(1) of the Directive

1. Measures planned or implemented to achieve consumption reductions of SUP cups for beverages and food containers.

Type of measure ⁽¹⁾	Application for achievement of consumption reductions		Start of measure / Entry into force	Liability ⁽²⁾	Scope ⁽³⁾	Target group ⁽⁴⁾
	SUPCfB (planned - implemented - no)	SUPCfB (planned - implemented - no)				
Quantitative (reduction) target						
Qualitative (reduction) target						
Measures ensuring that reusable alternatives are made available at the point of sale to the final consumer						
Measures ensuring that alternatives not made of plastic are made available at the point of sale to the final consumer						
Economic instruments						
Marketing restrictions						
Cooperation with businesses						
Awareness raising campaigns						
Others, please specify						

Add rows as appropriate.

(1) Please see list of illustrative examples of measures to achieve consumption reductions of SUP cups for beverages and food containers.

(2) Provide information whether measure is voluntary or obligatory.

(3) Provide information whether measure is local, regional, national or other.

(4) Provide information on the target group that the measure addresses, e.g. producers, importers, vendors, or consumers of SUP plastic cups for beverages and food containers.

2. List of illustrative examples of types of measures to achieve consumption reductions according to Article 4(1) of Directive (EU) 2019/904

Type of measure	Examples of types of measures
Quantitative (reduction) target	<ul style="list-style-type: none"> - Quantifiable reductions of, for example, SUP products placed on the market, imported, served or sold until a defined point in time, e.g. a reduction of 80% of beverages sold in SUP cups for beverages until 2026 in comparison to 2022. - Quantitative targets can also aim at increasing the amount of beverages and food served in reusable receptacles to a defined share of products placed on the market until a defined point in time.
Qualitative reduction target	<ul style="list-style-type: none"> - For example, targets referring to testing alternative products, providing a legal framework, conducting studies, or taking any preparatory steps until a defined point in time.
Measures ensuring that reusable alternatives are made available at the point of sale to the final consumer	<ul style="list-style-type: none"> - Legal obligations for businesses, institutions, or organisers of events to provide reusable alternatives. - Introduction of a legal framework ensuring that “bring-your-own” systems allow consumers to bring their own receptacles. - Introduction of a national deposit refund scheme for reusable packaging. - Support of business models that provide alternative products such as reusable cups or food containers in a deposit system.
Measures ensuring that alternatives not made of plastic are made available at the point of sale to the final consumer	<ul style="list-style-type: none"> - Legal obligations for businesses, institutions, or organisers of events to provide alternative products that do not contain plastic. - Business models that provide alternative products.
Economic instruments	<ul style="list-style-type: none"> - Taxes on SUP cups for beverages or food containers. - Reduced taxes on reusable products. - Instruments ensuring that SUP products are not made available free of charge at the point of sale. - Instruments ensuring discounts where reusable cups for beverages or food containers, receptacles not made of plastic or own receptacles brought by the consumer are used.
Marketing restrictions	<ul style="list-style-type: none"> - Restrictions of placing on the market SUP cups for beverages and food containers in certain environments, such as public administrations, or in general.

Type of measure	Examples of types of measures
Cooperation with businesses	<ul style="list-style-type: none"> - Cooperation between businesses and public administration to reduce the consumption levels of SUP cups for beverages and food containers placed on the market.
Awareness raising campaigns	<ul style="list-style-type: none"> - Awareness raising months / weeks / events. - Organisation of public discussions. - Consumer confrontation: e.g. cooperation with undertakings managing waste and collection of litter to raise awareness for the negative impact of SUP products. - Promotion of potential alternatives (e.g. reusables). - Promotion of venues connected to reusable schemes ("bring your own").

3. Description of the measures applied or planned to achieve consumption reductions of SUP cups for beverages and food containers. Specify separately in relation to all measures listed in point 1 that are being applied in a given Member State.

Add rows as appropriate.

4. Description of intended measurable (quantitative) effects on consumption levels intended by the measure. Specify separately in relation to all measures listed in point 1 that are being applied in a given Member State.

Add rows as appropriate.

5. Description of methods applied or planned to measure the (quantitative) effect of measures on consumption reductions. ⁽¹⁾
Specify separately in relation to all measures listed in point 1 that are being applied in a given Member State.

Add rows as appropriate.

(1) E.g. evaluations or studies to measure the quantitative or qualitative effect of measures on consumption levels of SUP cups for beverages or food containers or monitoring of the achievement of quantitative or qualitative targets.

B.2. FORMAT FOR MEMBER STATES TO REPORT A DESCRIPTION OF MEASURES ADOPTED PURSUANT TO ARTICLE 4(1)

I. Description of measures taken or planned by Member States to achieve consumption reductions according to Article 4(1) of the Directive to be submitted to the Commission by 3 July 2021.

- Measures planned or implemented to achieve consumption reductions of SUP cups for beverages and food containers.

Type of measure ⁽¹⁾	Application for achievement of consumption reductions		Start of measure / Entry into force	Liability ⁽³⁾	Scope ⁽⁴⁾	Target group ⁽⁵⁾
	SUPCfB (planned - implemented - no) ⁽²⁾	SUPCfB (planned - implemented - no) ⁽²⁾				
Quantitative (reduction) target						
Qualitative (reduction) target						
Measures ensuring that reusable alternatives are made available at the point of sale to the final consumer						
Measures ensuring that alternatives not made of plastic are made available at the point of sale to the final consumer						
Economic instruments						
Marketing restrictions						

Type of measure ⁽¹⁾	Application for achievement of consumption reductions		Start of measure / Entry into force	Liability ⁽³⁾	Scope ⁽⁴⁾	Target group ⁽⁵⁾
	SUPCfB (planned - implemented - no) ⁽²⁾	SUPCfB (planned - implemented - no) ⁽²⁾				
Cooperation with businesses						
Awareness raising campaigns						
Others, please specify						

Add rows as appropriate.

(1) Please see list of illustrative examples of measures to achieve consumption reductions of SUP cups for beverages and food containers.

(2) Please enter whether a type of measure is planned, implemented or not planned or implemented.

(3) Provide information whether measure is voluntary or obligatory.

(4) Provide information whether measure is local, regional, national or other.

(5) Provide information on the target group that the measure addresses, e.g. producers, importers, vendors, or consumers of SUP plastic cups for beverages and food containers.

2. Description of the measures applied or planned to achieve consumption reductions of SUP cups for beverages and food containers. Specify separately in relation to all measures listed in point 1 that are being applied in a given Member State.

Add rows as appropriate.

3. Description of intended measurable (quantitative) effects on consumption levels intended by the measure?
Specify separately in relation to all measures listed in point 1 that are being applied in a given Member State.

Add rows as appropriate.

4. Description of methods applied or planned to measure the (quantitative) effect of measures on consumption reductions ⁽¹⁾.
Specify separately in relation to all measures listed in point 1 that are being applied in a given Member State.

Add rows as appropriate.

(1) E.g. evaluations or studies to measure the quantitative or qualitative effect of measures on consumption levels of SUP cups for beverages or food containers or monitoring of the achievement of quantitative or qualitative targets.
