Cosmetics Europe contribution to the EC roadmap public consultation on "Essential requirements for packaging and reduce (over)packaging and packaging waste"

Cosmetics Europe represents the cosmetics and personal care industry in Europe. Ranging from antiperspirants, fragrances, make-up and shampoos, to soaps, sunscreens and toothpastes, cosmetics and personal care products play an essential role in in all stages of our life. European citizens use cosmetic products as part of their daily lives, serving their essential needs and expectations. These needs and expectations drive our industry as well as delivering innovative products that enhance consumers' well-being and quality of life and boost their self- esteem.

We welcome the European Commission's European Green Deal announcement and share the overarching goals of the European Union to mitigate the impact of climate change by 2050, contribute to the United Nations Sustainable Development Goals and enhance competitiveness and growth.

In regard to the Commission's roadmap on **"Essential requirements for packaging and reduce (over)packaging and packaging waste"**, Cosmetics Europe considers the following principles are critical elements for the upcoming European Commission policy discussion:

- The European Single Market is one of the European Union's greatest achievements, underpinning the competitiveness of European businesses and establishing the EU as a key global market and export partner to third countries. A level playing field must be ensured through the Single Market protection and harmonization. The gradual fragmentation of the Single Market must be prevented, and its smooth functioning and the free movement of goods, so vital to competitiveness and growth, must be assured by removing barriers.
    - A functioning Single Market for secondary raw materials with harmonised rules on packaging is key, as it allows the free movement of packaging and packaged goods in the European Union.
- Safeguarding the specificities of the cosmetics and personal care industry as regards product safety and protection of the consumers is paramount in the context of packaging's functionality, namely its role in:
    - a) Protecting the product and through it the safety of the consumer,
    - b) Product application, enabling correct application and use of the product,
    - c) Increasing shelf-life and contributing to product waste reduction, and
    - d) Facilitating transport, handling and distribution.
  Measures to increase the recyclability and re-usability and/or to reduce waste generation must take into account the critical aspects of packaging for cosmetic products highlighted above.
- Any policy measures designed to stimulate demand for plastic recyclates must take into account the regulatory, technical, quality, and supply chain barriers to include recycled content within packaging for categories of products such as personal care products for which packaging delivers essential functionalities, as outlined above.

- The cosmetic and personal care industry believes there is a need of strengthening the market for secondary raw materials through:
  - Optimal implementation and enforcement of existent legislation,
  - Establish harmonised collection and recycling systems across Europe,
  - Timely investment in Member States' infrastructures for return/separate collection, sorting and recycling,
  - Availability of secondary raw materials at competitive prices and of appropriate quality ensuring consumer and product safety, based on EU-wide definitions of recyclability and minimum quality standards for recyclates.
- A holistic assessment of the environmental impact of packaging whereby environmental performance is assessed throughout the entire life cycle of the packaged product is key. Mechanically recycled, chemically recycling and biobased plastics should be evaluated based to their circularity potential.

Cosmetics Europe looks forward to contributing to the future policy discussions on the essential requirements for packaging and reduce (over)packaging and packaging waste.

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