

THE BI-ANNUAL PUBLICATION OF THE BREWERS OF EUROPE

# BREWUP

MAGAZINE

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**SPECIAL**

## PACKAGING & PACKAGING WASTE REGULATION

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# PRESIDENT'S FOREWORD

Dear reader,

I hope this new issue of BrewUp Magazine finds you in a good mood, looking forward to a nice summer period that will boost sales and favour memorable moments around a good beer with family and friends! We will have opportunities to enjoy good times together later this month, from the 21st to the 24th of May in Prague at the Brewers Forum, where the beer value chain from across Europe and beyond will come together to exchange about trends and best practices. This year's Forum edition will be the occasion to listen to many brewers, from small breweries to the CEOs of large companies such as Gavin Hattersley, President and Chief Executive Officer of Molson Coors Beverage Company and Paolo Lanzarotti, CEO of Asahi Europe & International and Vice-President of The Brewers of Europe. Our Secretary-General, Pierre-Olivier Bergeron, will also be discussing the future of beer with Bob Pease, President & Chief Executive Officer of the Brewers Association in the United States.

The future of beer is challenging. Since the pandemics hit us, the world of beer has gone for a rollercoaster ride, with, amongst others, carbon dioxide shortages, increases in energy prices, inflation of raw material costs, notably malt, or scarcity of glass. As part of the wider challenges, one is certainly around environmental sustainability management and the series of legislations to be adopted at European level in the next months. Whilst green claims will be regulated (the European Commission published its proposal in March), the focus is presently on the Packaging and Packaging Waste Regulation whose draft proposal was presented by the European Commission in November and is now discussed at the European Parliament. The current proposal, whilst fulfilling an overall objective that has been championed by the brewing sector for years: using less, and more sustainable packaging, still contains provisions that must be improved so that breweries be treated fairly. The Brewers of Europe is working hard on this huge dossier.

Despite the difficulties encountered, there are some good news we should be proud of. First of all, solidarity and innovation are a strong mark of the beer sector. The Brewers Forum is the occasion to meet your peers, learn from them and team up. Being creative and proactive will help us to successfully face the hurdles. Last but not least, the non- and low-alcohol segment continues to grow strongly to the benefit of breweries, consumers and society at large. This edition highlights the state of the market in Poland and a conference at the Brewers Forum will be focussing entirely on this ever more promising beer category.

Cheers!

Lasse Aho  
President  
The Brewers of Europe



# MAIN FOCUS

# PACKAGING AND PACKAGING WASTE REGULATION

BY THE EDITOR

## THE PACKAGING AND PACKAGING WASTE REGULATION: THE COMMISSION'S PROPOSAL EXPLAINED

### OUTLINE

The proposal is of major importance, as it constitutes the biggest change to the EU's Packaging and Packaging Waste Directive [94/62/EC](#) since its adoption in 1994. Previous revisions were less impactful on brewers' operations than the current proposal would be, if adopted without further changes. The scope is diverse and covers, amongst others:

- the setting of additional waste prevention and reuse obligations for EU countries, and raising recycling targets on packaging waste;
- the mandatory introduction of packaging Extended Producer Responsibility (EPR) schemes as part of the legislative proposals adopted under the circular economy package in 2018.

Compared to the various drafts that leaked during 2022, the final proposal of the European Commission at the end of last year took account of several concerns The Brewers of Europe had tabled with the European Commission's President. Notwithstanding, the proposal falls short of respecting the basic prin-

ciples of EU law: proportionality, enforceability, non-discrimination and being supportive of the Single Market. Hence, The Brewers of Europe and its membership seek to correct this in the legislative process the proposal is now going through, involving the European Council, the European Economic and Social Committee and the European Parliament.

### AIM OF THE EU PACKAGING AND PACKAGING WASTE DIRECTIVE

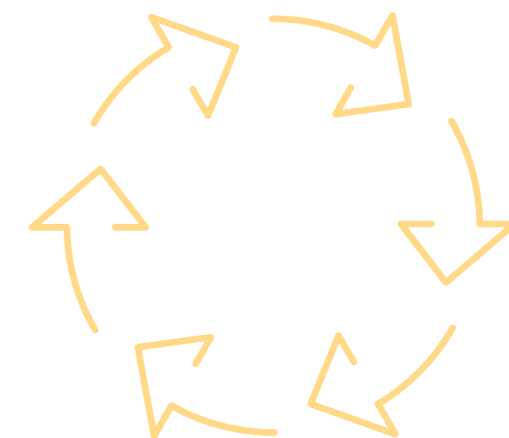
The Directive as amended covers all packaging placed on the European market and all packaging waste, whether it is used or released at industrial, commercial, office, shop, service, household or any other level, regardless of the material used.

The Directive has three main objectives:-

- to reduce the impact of packaging on the environment by limiting the amount of packaging waste going to final disposal through reuse and recovery;
- to harmonize national measures in order to prevent distortions to competition; and
- to ensure the free movement of packaged goods.

The Directive seeks to achieve its objectives in three main ways:-

- by requiring Member States to establish return, collection and recovery systems;
- by setting a number of targets for recovery, reuse and recycling; and
- by guaranteeing free circulation within the EU of packaging that meets certain essential requirements.





### TRIGGERS FOR REVISION OF THE DIRECTIVE

The Commission noted already in the [2014 Fitness Check](#) a need for clearer and more specific essential requirements. This was reconfirmed on 19 October 2020 in the European Commission's [2021 work programme](#): as part of the [European Green Deal](#) and the new [Circular Economy Action Plan](#), a revision of Directive [94/62/EC](#) on Packaging and Packaging Waste was warranted:

- to reinforce the essential requirements for packaging to ensure its reuse and recycling, to increase uptake of recycled content and improve enforceability of the requirements;
- to tackle over-packaging; and
- to reduce packaging waste.

The Council [Conclusions](#) of December 2020 welcomed the intention of the Commission to ensure that all packaging be reusable or recyclable in an economically feasible manner by 2030 and to reduce packaging, overpackaging and thereby packaging waste. The Council underlined that the revision *"should update and establish more concrete, effective and easy to implement provisions to foster sustainable packaging in the internal market and minimise the complexity of packaging in order to foster economically feasible solutions and to improve the reusability and recyclability as well as minimise substances of concern in packaging material, especially with a view to food packaging materials"*.

In its 10 February 2021 [Resolution](#) on the [New Circular Economy Action Plan](#), the European Parliament reiterated the 2030 objective. MEPs called on the Commission to present a legislative proposal without delay, including waste reduction measu-

res and targets and ambitious essential requirements in the Packaging Waste Directive to reduce excessive packaging, also in e-commerce, improve recyclability and minimise the complexity of packaging, increase recycled content, phase out hazardous and harmful substances, and promote reuse.

### COMMISSION PROPOSAL AMENDING THE PACKAGING AND PACKAGING WASTE DIRECTIVE

On 30 November 2022 the European Commission published, after months of delays, a [proposal](#) which seeks to address multiple problems, including:

- the limited competitiveness of secondary, recycled materials vis-à-vis fossil, virgin materials;
- the increasing generation of packaging waste.

For many provisions, secondary so-called "implementing" legislation must still define the rules in more details.

The first important change is that the EU legislation on packaging and packaging waste would take the form of a Regulation rather than a Directive. This, together with the harmonization clause of Article 4 of the proposed Regulation and the inclusion of certain packaging items in the definition of Article 3, is intended to limit Member States' attempts to impose additional requirements on packaging.

The draft Regulation also proposes to ban single-use packaging formats, including single-use plastic and grouped packaging used to group e.g. cans together and single-use plastic and composite trays and boxes for foods and beverages in the HORECA sector (e.g. trays or boxes used to wrap hamburgers). Unless Member States can demonstrate that the rate of separate collection is above 90% by weight, the proposed Regulation introduces mandatory deposit and return schemes for single-use plastic and metal beverage containers of up to three litres (e.g. PET beverage bottles and cans), with the exception of those for wine, spirits and milk.

The proposed Regulation establishes new criteria to assess whether packaging is reusable. To be reusable, packaging must be:

- emptied and unloaded without any damage that would prevent its re-use and without any risk to the health and safety of its user;
- conceived with the intention to be reused or refilled;
- reconditioned while maintaining its ability to perform its packaging function.

In addition, the draft Regulation imposes new combined reusability and refill targets.

Type of packaging	% of reusable packaging by 2030	% of reusable packaging by 2040
Take-away cold and hot beverages	20	80
Alcoholic beverages other than wine or spirits	10	25
Wine other than sparkling wine	5	15
Non-alcoholic beverages	10	25
Transport packaging (i.e. pallets, ...)	30	90
Transport packaging shipped domestically	100	100
Transport packaging via e-commerce	10	50
Transport packaging accessories	10	30
Grouped packaging	10	25

### PLASTICS: NEW MINIMUM RECYCLED CONTENT REQUIREMENTS

The proposed Regulation also increases the existing recycled content targets. For example, single-use plastic beverage bottles would be required to have a minimum of 30% recycled content by 1 January 2030; contact-sensitive packaging made from polyethylene terephthalate (PET) as their major component would also be required to have a minimum recycled content of 30% by 1 January 2030; contact-sensitive packaging made from other materials would be required to have a minimum recycled content of 10% by 1 January 2030; and other packaging would be required to have a minimum recycled content of 35% by 1 January 2030.

### NEW RECYCLING TARGET

The proposed packaging Regulation imposes higher recycling targets on packaging, e.g. EU Member States would be required to ensure that 65% by weight of all packaging waste generated in their territory is recycled by 31 December 2025, with specific percentages for the various packaging materials (e.g. 50% of plastic, 70% of glass, 25% of wood).

### NEW LABELLING REQUIREMENTS

The draft Regulation also requires that all packaging, with the exception of transport packaging not used for e-commerce, carry a label containing information on the material composition of the packaging.

Packaging that is subject to a deposit and return scheme would also have to display a harmonised label that the Commission still must define.

Furthermore, all reusable packaging would be required to display a label on the reusability of the packaging and a QR code or another digital data carrier with additional reusability information.



THE BREWERS OF EUROPE POSITION

Europe's brewers have a strong track record in packaging sustainability, taking their responsibility to limit the environmental impact of beer packaging throughout the life-cycle, reducing, reusing and recycling our packaging. The Brewers of Europe therefore supports the overall objective of the EU Commission's proposal to minimise packaging's impact on the environment. Notwithstanding, European Brewers are concerned, though, that overly prescriptive rules or governance will actually provoke the dismantling of well-functioning existing collection systems, be they well-established reuse systems set up by the brewers in many countries or efficient recycling collection systems set up in others. As currently drafted by the European Commission the new legislation would be jeopardising the business model, including the existing sustainable packaging commitments, of multiple brewers for no environmental benefit. Equally, it is neither legally nor environmentally justified to a priori grant an EU-mandated exemption, from reuse targets or mandatory DRS, for some alcoholic beverages. The legislation is focused on packaging and should be agnostic of the contents of such containers. Whilst there may be objective criteria that apply across the board and could justify exemptions or different targets and timelines for some companies, an a priori exemption disregards the simple reality that, for example, a can is a can. Moreover, the practice of selling beer in the on-trade via large reusable packaging containers such as kegs needs to be acknowledged in the measurement of reuse targets. Any approach that seeks to categorise these "large cans" as transport packaging or failure to, for example, distinguish between a 20cl bottle and a 50 litre keg when defining a packaging unit would only serve to discourage the use of one of the best example of reusable packaging on the market for any sector.

Furthermore, the necessity of can coatings and crown cork seals to preserve the quality and safety of beverages, the full recyclability of the packaging in which they are used, the small percentage they represent in the overall package itself and the lack of existing technology to produce these using recycled content must be taken into account when setting target percentages and dates. The new legislation must also not lead to the premature destruction, wasting valuable resources, of existing packaging on the market that may not meet all the new standards, for example existing crates and pallets that have a lifespan sometimes of several decades. Finally, transition periods should be lengthy enough and only kick in once the implementing legislation is finalised, since there also remain many uncertainties as:

- a number of important decisions will be defined through secondary legislation, delaying potentially any investments or technological changes that would need to be integrated;
- Member States are encouraged to go beyond the EU legislation, jeopardising the good functioning of the Single Market.

NEXT STEPS

The European brewing sector is committed to collaborating with the legislators and the packaging supply chain to ensure that the forthcoming packaging and packaging waste Regulation contribute to the wider European Union sustainability agenda. Notwithstanding, packaging related legislative measures must abide by the general rules governing law and thus be non-discriminatory, proportionate and enforceable. They must equally not jeopardise the Single Market. In that regard The Brewers of Europe and its members are engaging and working together with the European Commission, European Parliament and Member State governments to help ensure that the final legislation meet the brewers' objectives, leading to a greener future for the European Union whilst also supporting the sustainability ambitions of the brewing sector. The race is now on to see whether new EU legislation will be adopted before the European elections in May 2024.

EU DECISION MAKING - EXPLAINED

ORDINARY LEGISLATION PROCEDURE (FORMERLY KNOWN AS "CO-DECISION")

After an Open Consultation and an Impact Assessment involving civil society, Member States, Members of the European Parliament (MEPs) and the private sector, the European Commission (EP) published a proposal which is shared with the European Parliament (EP) and the Council of the European Union.

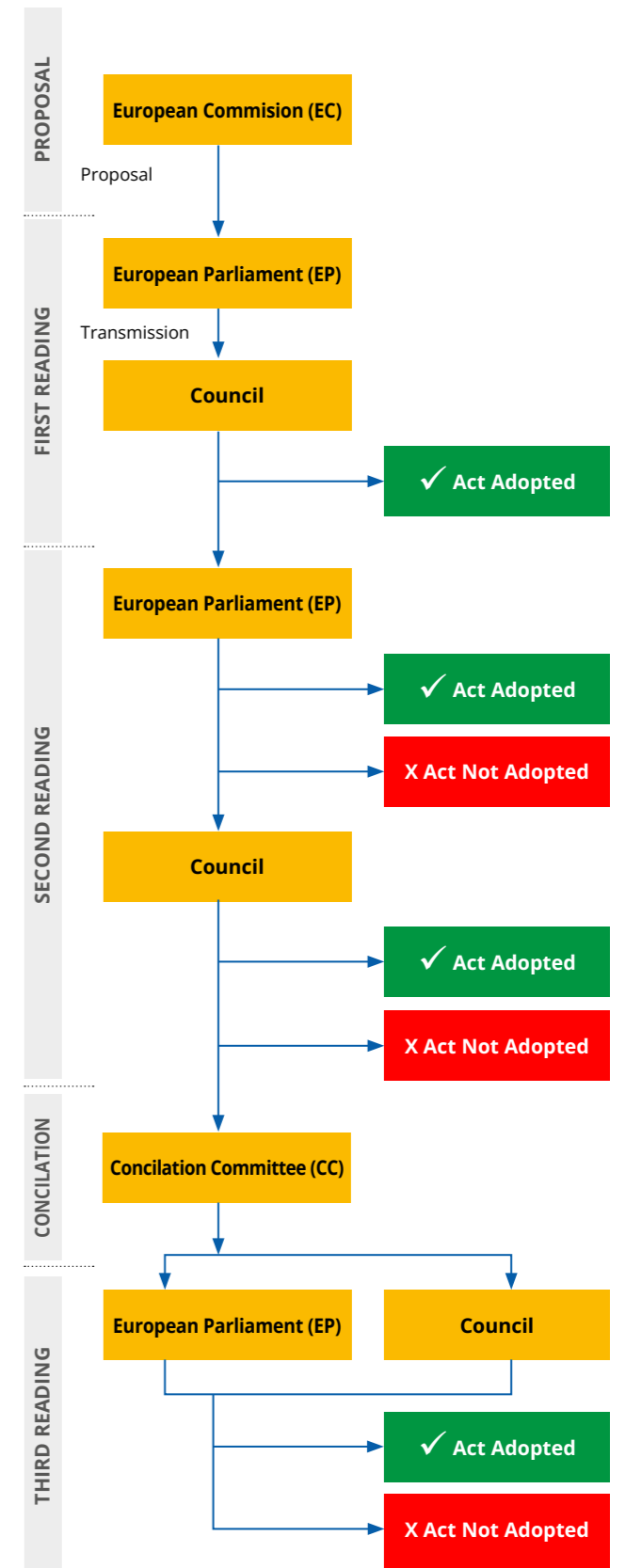
Different Committees (a Lead Committee and other consultative committees) of the EP review the proposal. MEPs can amend the proposal in Committee, and then in Plenary. Once approved in plenary, the modified proposal is shared with the Council. This can take several months. The Council - composed of Member States' representatives - reviews the revised proposal shared by the EP. If they agree to all changes without further modification, the proposal is adopted. If they further amend it, the revised proposal is shared with the Parliament for a second reading. This can take several months.

The EP reviews the revised proposal as shared by the Council. If no further changes are made, the proposal is adopted. If the EP further amends the proposal, it is not adopted and shared again with the Council for a second reading. This can take several months.

The Council reviews the revised proposal as shared by the EP. If no further changes are made, the proposal is adopted. If the Council further amends the revised proposal, a Conciliation Committee (CC) involving the EP, the EC and the Council is set up. This can take several months.

The CC discusses and aligns on a shared position on the proposal. The revised proposal is then shared with the EP and the Council for a third and final reading.

The proposal by the CC is reviewed by the EP and the Council, which can either adopt the revised proposal as such, or reject it. If the proposal is adopted by both the EP and the Council, the Act is adopted and enters into force. If both the EP and the Council, or one of them rejects the proposal, it is not adopted.





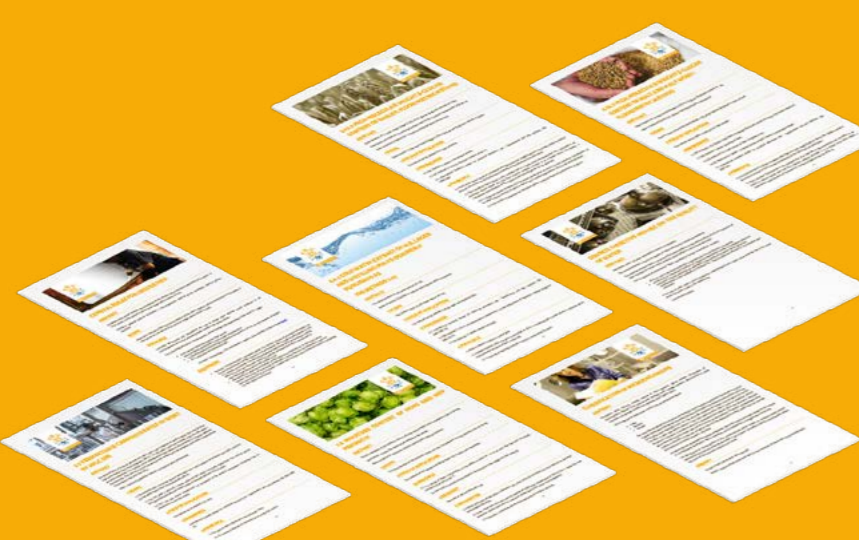
# EUROPE'S SUSTAINABLE PACKAGING RULES SHOULD BE BOLD – AND FAIR

**BY PIERRE-OLIVIER BERGERON,**  
SECRETARY GENERAL AT THE BREWERS OF EUROPE.

*This article was originally published on 16 March 2023 in euractiv.com (<https://www.euractiv.com/section/energy-environment/opinion/europes-sustainable-packaging-rules-should-be-bold-and-fair/>)*



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PACKAGING PLAYS AN ESSENTIAL ROLE IN PROTECTING PRODUCTS DURING STORAGE AND TRANSPORT, ENSURING THEIR QUALITY AND PROVIDING INFORMATION ABOUT CONTENTS AND USAGE. HOWEVER, PACKAGING WASTE TAKES ITS TOLL ON THE ENVIRONMENT. EUROPEANS GENERATE AN AVERAGE OF 180KG OF PACKAGING WASTE A YEAR, AND THE EUROPEAN COMMISSION ESTIMATES THAT WITHOUT ACTION, THIS WOULD RISE BY 19% BY 2030.

In the brewing sector, we have innovated and invested over many years to ensure our packaging becomes ever more sustainable, which is why we support the broad aims of the Commission's proposals to cut packaging waste.

The Commission's draft Packaging and Packaging Waste Regulation (PPWR) covers different containers, with a particular focus on beverage packaging. It aims to "tackle this constantly growing source of waste and of consumer frustration" as it seeks to ensure all packaging be reusable or recyclable by 2030. This could be one of the most significant pieces of EU environmental legislation of this Commission, which explains why Environment Ministers are debating the issue this week and four European Parliament committees are working on the PPWR.

As brewers, we not only understand but embrace these aims. Leading by example, brewers have a core belief that whilst making beer, we can have a positive impact on the planet. We take our responsibility to limit the environmental impact of beer packaging throughout the lifecycle by reducing, reusing and recycling. We support the circular economy and the systems intended to ensure containers be returned and don't go to landfill or end up as litter.

We are part of the solution, but need legislation to be proportionate, well-targeted, non-discriminatory, and coherent.

### WHAT DOES THAT MEAN CONCRETELY?

**Proportionate:** a sustainable brewery with one filling line and selling all its beer in recyclable cans that are collected and recycled through a well-functioning return system should not have to rush through investments in an expensive additional bottling line just to meet new producer-level reuse targets.

**Well-targeted:** a well-functioning national return system, for reuse or recycling of beer containers, that already functions sustainably and exceeds targets, should not be disrupted by new EU governance structures or cannibalised by a need to meet other arbitrary targets in the PPWR. Countries and individual companies are at differing starting points on the balance between reuse and recycling, often linked directly to the local beer culture and the business structure of the operator in question.

**Non-discriminatory:** A container is a container and the rules should be agnostic towards its content. Competing beverage sectors must not be granted a priori EU-mandated exemptions from reuse targets and obligations around deposit return systems. Non-discrimination, which is a general principle of EU law and, regarding beer, acknowledged by the European Court of Justice, allows for products to be treated differently only if justified by objective reasons.

**Coherent:** The overall objectives of the EU Single market and Green Deal must be recalled when assessing each measure. For example, beer kegs and the volumes they hold must be taken into account when measuring progress against reuse targets – a 50-litre beer keg cannot be treated as a comparable unit to a 20cl bottle or a 33cl can. Equally, for deposit systems to function optimally, priority on-label must be given to the deposit logo over any other packaging handling instructions that ultimately may distract the consumer from returning the package through the right system.

While meeting targets and obligations will be a challenge and we will need time for necessary adaptations, the brewing sector's commitment to a sustainable future for beer is real. We recognise our responsibility to continue to deliver, within a good functioning EU Single Market and an ambitious EU-wide environmental sustainability agenda, including for packaging and packaging waste.

However, for all the noble aims of the PPWR proposals, there are elements in the draft that are problematic. Some brewers, both big and small, would have to create new packaging lines purely to meet targets, even if the environmental cost was not justified. Well-functioning systems are not being ringfenced

from the impact of one-size-fits all solutions proposed in the EU Regulation. Brewers, for the simple reason they are leaders in packaging sustainability, are being discriminated against versus their closest competitors on the market. Labels may be overcrowded with multiple logos that distract from the only information the consumer needs – a deposit can be redeemed against this package. Despite kegs perhaps being the ultimate sustainable packaging solution – a large container reused time and again over more than thirty years before being recycled – they risk being discouraged in order for misplaced targets to be met.

Even once these concerns are met, brewers cannot overnight change packaging equipment and distribution schemes. It is crucial therefore that appropriate transition periods, of on average five years, kick in not just after adoption of primary legislation but also after each implementing act, many of which will determine exactly how each operator needs to adjust its business to deliver on the objectives.

We expect these to be amongst the issues MEPs and ministers continue to discuss when they debate the PPWR, including in the Environment Council.

Last week, the European Parliament Beer Club held a special briefing on the PPWR. The experts included its President MEP Ivan Štefanec, the Vice Chair of the Parliament's Intergroup on Climate Change MEP Franc Bogovič and Cor Waringa from The Brewers of Europe, as well as the European Commission's Director for the Circular Economy in DG Environment, Aurel Ciobanu-Dordea.

Mr Ciobanu-Dordea recognised that brewers are pioneers in recycling and reuse. "I encourage the beer sector to remain champions of sustainability." He also recognised that there is scope to amend provisions in the proposal. "We will reflect on your arguments," he said.

We are grateful for the Commission's willingness to review these elements. We look forward to working further with the Commission, EU Member States and the European Parliament to ensure a final Regulation that is proportionate, well-targeted, non-discriminatory and coherent.







## THE 21ST EBC STANDARD MALT IS NOW AVAILABLE!

The EBC standard malt is a pale malted barley providing actual assistance to around 150 maltsters, brewers or independent/sector laboratories of the world. It can be used for checking the results of test methods described in Analytica-EBC or for calibration of apparatus (e.g. Friabilimeter) or other methods (flow injection, near infrared reflectance etc.). The 21st Standard Malt has been accepted after analysis by the Analysis Committee of the European Brewery Convention and now replaces the 20th Standard Malt (issued in 2019).

### THE EBC STANDARD MALT IS SOLD IN CANS OF ~0,650 KG NET WEIGHT FOR 28,00 EUROS (€) EXCLUDING CHARGES.

Order can be placed to IFBM-Qualtech group (VANDOEUVRE LES NANCY, FRANCE)

The standard malt is usually shipped to foreign customers within 2 weeks (EU) or within 3 weeks (out of EU) in situation where IFBM is organizing the delivery once an official purchase order has been received\*.

\* Please note that mean delivery time may be lengthened by specific procedures of customer's import, customs inspection of goods, by specific rules set up by transport carrier in periods of COVID-19 or during the summer period in July and August. For this reason, we request to customers to anticipate as far as possible their urgent needs of EBC standard malt.



More information on the 21st EBC Standard Malt and order procedure can be found here:

[www.europeanbreweryconvention.eu/21st-EBC-Standard-Malt](http://www.europeanbreweryconvention.eu/21st-EBC-Standard-Malt)



IFBM

## BREWERS' LEADERSHIP ON PACKAGING SUSTAINABILITY MUST BE SUPPORTED, NOT PUNISHED, BY THE NEW EU PACKAGING AND PACKAGING WASTE REGULATION

BY IVAN ŠTEFANEC,  
PRESIDENT OF THE EUROPEAN  
PARLIAMENT BEER CLUB

AS PRESIDENT OF THE EUROPEAN PARLIAMENT'S BEER CLUB, IT IS MY PRIVILEGE TO HOST INTERESTING AND TIMELY POLICY DEBATES ON ISSUES THAT IMPACT BEER AND THE BEER SECTOR.



This was the case on Wednesday (8 March 2023) when I welcomed the European Commission's Director for the Circular Economy in DG Environment Aurel Ciobanu-Dordea, the Vice Chair of the European Parliament's Intergroup on Climate Change Franc Bogovič and Cor Waringa from The Brewers of Europe to discuss the Commission's proposal for a Packaging and Packaging Waste Regulation. At the EP Beer Club, we can see that European brewers take their responsibility towards sustainability seriously. And it was great to hear Cor Waringa talk about the beer sector's commitment to sustainable packaging, through reuse and recycling. As he said during the discussion, "Our strength is our diversity... there are 80 styles, 50,000 brands and 10,000 breweries in Europe," he said. "Every brewer has a tremendous power to drive change, and to be part of the transition to sustainable society. We are leading by example in the sustainability area."

It was also important to hear Aurel Ciobanu-Dordea explain the Commission's proposal. I was particularly glad to hear him describe the brewing sector "as a promoter and as a pioneer" when it comes to recycling and reuse. "I would like to encourage the beer sector to remain champions of sustainability," he said. Interestingly, he added that, "The beer sector has accumulated a certain experience ahead of the other sectors....So you can deal with stronger requirements more than say, the wine sector."



It is true. Brewers across Europe have taken decisive action to make their packaging and packaging waste more sustainable through their own innovations and through their support to systems that facilitate the return by consumers of reusable and recyclable packaging. They are leaders in the green transition, something my colleague Franc Bogovič noted as well, saying, "it is important to learn from the best." But as I said during the event, this leadership should not be punished. Rules coming from Brussels must be fair to all economic actors, in particular to ensure no discrimination amongst those drinks producers that are direct competitors.

I look forward to more discussions within the EP Beer Club and to working with the Commission, Council, brewers and other stakeholders on this and other topics impacting this important sector in Europe. We have four committees in the Parliament committed to preparing opinions on the draft proposals. I encourage all of them to be guided by four principles we discussed at the event – which should be applied to any good legislation – namely, that it should be: proportionate, well-targeted, non-discriminatory and coherent. Let me also thank all the panellists and the 60 attendees who braved a day of inclement weather, strikes and security alerts to join us, as well as our moderator Dave Keating, for guiding the discussions at this insightful event.



## Consultants to the Brewing Industry

30 years | 50 countries

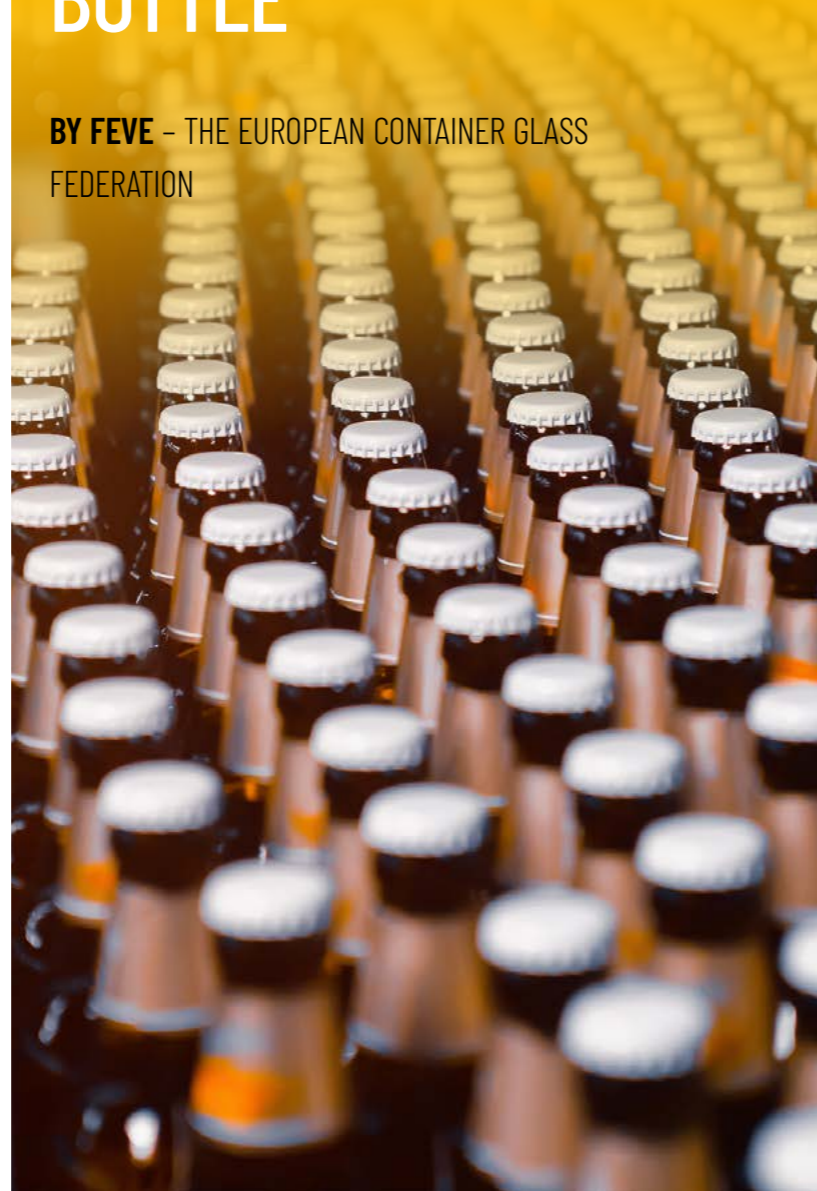
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See you in Prague at the Brewers Forum – Booth #2

# DISPATCHES FROM BRUSSELS – WHAT NEW EU PACKAGING PROPOSALS COULD MEAN FOR THE ICONIC GLASS BEER BOTTLE

BY FEVE – THE EUROPEAN CONTAINER GLASS FEDERATION



## THE PARTNERSHIP BETWEEN BREWERS AND GLASS MANUFACTURERS HAS COME A LONG WAY SINCE ITS 16TH-CENTURY ROOTS.

Today, Europe's brewers look to glass packaging not just to protect beer's taste and freshness, but to help achieve ambitious sustainability goals. And with business leaders and policymakers doubling down on their ambitions, it's no wonder glass continues to appeal.

To ensure Europe leads the world in establishing a circular, low-carbon economy, decision makers in Brussels are proposing a range of ambitious environmental policies that will touch on all sectors – brewers and container glass manufacturers included. In turn, everyday packaging is rising to the top of the political agenda, with policymakers in the European Parliament and Council debating the European Commission's proposed Packaging and Packaging Waste Regulation (known as PPWR for short).

The goal of the PPWR is one brewers and glassmakers can all get behind: reducing waste by promoting circular packaging. But with the PPWR promising far-reaching impact, how can we ensure the regulation steers clear of unintended consequences? What challenges and opportunities might lie ahead? Here's our breakdown of what new EU rules might mean for our favourite ales and lagers.

### A FOCUS ON PACKAGING WEIGHT – NOT PACKAGING WASTE

The PPWR's objective – to significantly reduce packaging waste generated in Europe – is commendable. But as it stands, by assessing a packaging's weight above all other factors, the proposal risks encouraging a market shift from heavier but truly circular materials – like glass – to packaging materials that are lighter, but harder to recycle or reuse.

Today's glass bottles are already at least 30% lighter than they were 20 years ago. Indeed, brewers themselves have made a significant contribution to bring lighter glass to the shelves, including the world's lightest bottle (a 330ml bottle that weighs just 155g!). However, despite this progress, it is unlikely that further lightweighting and reuse will go far enough to meet current PPWR reduction targets. In fact, data projections from the European Commission's own Impact Assessment reveal that glass – a permanent material that is proven to be effec-

tively collected and recycled – is set to be one of the materials most impacted by the new packaging rules.

That's why waste reduction targets should be material specific. In doing this, we ensure that all packaging materials contribute individually, equally and fairly to waste reduction. If not, there is a real risk that the iconic glass beer bottle – the packaging generations of brewers have relied upon to keep beers protected and to showcase high-quality ales – will make way for lighter but less recyclable options. That would mean losing out on glass's clear environmental benefits, such as its endless recyclability, its inertness, and its ability to protect the health of people and the planet.



### SAY GOODBYE TO DIVERSE PACKAGING DESIGN...

And that's not all: imagine if all beer bottles on the supermarket shelves looked the same. It might not be as far-fetched as you would think. By focusing so narrowly on packaging weight, the PPWR as it stands risks putting an end to unique packaging design in favour of standardisation.

Packaging has many purposes. It's designed not only to contain and protect products, convey information, and prolong shelf life, but also to help shape a brand's identity. Beers today come in a variety of sizes, shapes, and designs, from the long-neck style with its flatter shoulders, to the Belgian style with its bulbous neck. This very design is key to helping brewers build their brand, differentiate their product, and drive recognition amongst consumers. But, inevitably, these unique design choices factor into the ultimate weight of the beer bottle.

By no longer including 'consumer acceptance' and 'marketing and product presentation' in its packaging minimisation performance criteria – as the proposal currently does – the PPWR risks bringing about standardisation of primary packaging and, by extension, the loss of the unique and innovative packaging designs we see on shelves today. Yes, packaging should be designed to optimise its volume, weight, and performance, but its vital role in shaping European beer brands and the cultural heritage attached to them must not be forgotten.



### RECYCLABILITY – LET’S CLOSE THE LOOP!

Just as policymakers should be wary of unintended PPWR consequences, there’s no doubt the regulation also presents opportunities for further ambition – particularly on recycling. We should all welcome the EU’s goal to put in place a harmonised criteria for ‘recyclable packaging’ that ensures that all packaging placed on the EU market is recyclable and effectively collected, sorted, and recycled. But why not be more ambitious? Why not acknowledge the achievements of packaging sectors that are proven to prevent waste by incentivising closed-loop, high-quality recycling?

Today, Europe’s brewers play no small part in ensuring that 8 in 10 glass bottles are collected for recycling in the EU. Not only can these bottles be recycled indefinitely in a bottle-to-bottle loop without ever losing their intrinsic properties, they can also be reused up to 40 times before they are ultimately recycled. European brewers are champions of this circular model, with refillable glass bottles accounting for 25% of their glass packaging supply.

When it comes to progress on recycling, there’s a lot to raise our beer glass to. But our industry has set its sights on a bigger goal: to reach a 90% collection for recycling rate by 2030. Whith this purpose the industry has driven the building of multi-stakeholder platform “Close the Glass Loop”. The PPWR can play a role in advancing this high-quality, closed-loop recycling by recognising the contribution of ‘permanent materials’ like glass to a circular economy. This recognition would be a win-win. A win for the glass packaging manufacturers and brewers who work together to offer consumers a fully recyclable and reusable packaging option, and a win for Europe as it looks to lead the world in reducing packaging waste.

Find out more about the container glass sector position on the FEVE website: [www.feve.eu](http://www.feve.eu).

Visit the Glass Hallmark website to see how our industry is improving glass packaging’s sustainability performance: [www.glasshallmark.com](http://www.glasshallmark.com).



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## REUSE AND SINGLE-USE PACKAGING: TWO SIDES OF THE HOSPITALITY COIN

**BY MARIE AUDREN**, DIRECTOR GENERAL OF HOSPITALITY EUROPE - HOTREC (HOTELS, RESTAURANTS, BARS AND CAFÉS)

After work tapas with friends, a deal concluded over lunch in a brasserie or a hotel stay enjoyed with family: our everyday lives revolve around hospitality, whether it is part of our daily routine or while on holidays. We all came to realise it, when Hotels, Restaurants and Cafés (HORECA) had to shut down without notice during the COVID-19 pandemic.

While EU-wide lockdowns are part of the past, and face masks have (mostly) vanished, the context in which HORECA businesses operate today remains challenging to say the least, navigating between increasing energy and food costs, inflation, and labour shortages. The struggle European hospitality is facing today hit primarily our micro-enterprises and family businesses, which contribute to employment and economic prosperity in Europe.

Initiatives to transition to more sustainable practices are mushrooming across Europe as a testimony of the food revolution our industry is engaged in. From sourcing local products to better forecasting demand to reduce food waste, our establishments take action.

The HORECA industry is, however, heterogeneous, ranging from beach bars dealing with water scarcity and highly subject to seasonality, to large restaurants located in business city hubs and family hotels in remote rural areas. That is why a one-size-fits all approach to circularity in HORECA is unlikely to succeed.

Unilaterally banning single-use packaging in HORECA – as envisaged in the European Commission’s proposal on Packaging and Packaging Waste – is short-sighted. EU-level targets might have unequal consequences on hospitality businesses, as some will find it more challenging to have customers favour reuse takeaway packaging than others. For instance, businesses located in remote areas are deprived of efficient integrated reuse systems nearby. Businesses operating in a limited space without sufficient washing and storage facilities – as well as those having to deal with large variations in consumer flows during peak seasons – would also find it challenging. Derogations permitting the true coexistence of both systems in HORECA – single-use and reuse – are also needed to take into consideration situations where recyclable single-use is the most environmental option.



Finally, hygiene and food safety are paramount when it comes to reusable packaging in our sector. Cafés and restaurants should be able to refuse dirty and unsuitable containers from customers. Refill and reuse should not jeopardise food safety and the health of consumers and staff and liability always remain on end users.

To close the loop in HORECA, circular systems must be well thought and preserve consumer choice and convenience.



# BREWERS FORUM 2023



## WHY BRINGING EVERYBODY TOGETHER IS THE ONLY WAY WE CAN MAKE A DIFFERENCE

A CONTRIBUTION BY **PREETI SRIVASTAV**, GROUP  
SUSTAINABILITY DIRECTOR, ASAHI EUROPE &  
INTERNATIONAL

The war in Ukraine, record inflation, cost of living crisis and energy crisis have all underlined the need for us to do more, to play a greater role in addressing wider environmental and societal challenges impacting people, planet in a meaningful way. And to continue doing so, we as businesses have an impetus to collaboratively and collectively find, share and implement sustainability solutions at scale not only to meet our sustainability targets but also to utilize sustainability as a lever to future-proof our businesses.

The Brewers of Europe Forum brings a valuable opportunity for us to come together each year. This dialogue is an important part of our industry to maintain momentum forward in our drive to net zero even when the market conditions are tough. This year even more so for brewers large and small, to share and learn from one another on technologies, best practices, successes, failures to build strong long-lasting partnerships to address the challenges we are facing as a sector in this market dynamic where renewable electricity, renewable heat, water stress/scarcity have become hot topics.

Given that there are multiple areas of sustainability where we need to act, combined with the complexity of the current market and world challenges; the key is to focus rather on what we can do right now to keep moving forward.

This is where The Brewers of Europe's discussions around Renewable Electricity and heat can be a game changer.

One area making in-roads across all sectors, including ours is renewable electricity.

Solar and wind power generated a fifth of Europe's electricity in 2022, overtaking gas for the first time. The surge in renewables and a drop in electricity demand meant that the EU didn't have to rely as much on gas and coal to weather the energy crisis.

(Source: <https://www.weforum.org/agenda/2023/01/renewable-energy-electricity-record-europe/>)

At Asahi Europe & International, we have a goal of 100% renewable electricity by 2025 and we are moving forward towards our goal. We already have 100% renewable electricity in Netherlands and Poland. We are now also working on scaling up renewable heat across all our breweries. We already have renewable heat in our brewery in Netherlands and Czech Republic.

We can't do everything all at once, but we can collectively identify the important areas where we can make the most impact whether it be regional or themed. For example, the extensive work taking place in countries like Spain and France on renewables could be a focus area for those breweries based in those regions. Similarly key themes where we are collectively facing



challenges like clean heat can also serve as an opportunity to come together to share challenges and find collective solutions.

In the coming year there are some very exciting opportunities for the brewing sector to continue to thrive and grow and do so sustainably. Changing how we view sustainability; Looking at sustainability actually as an essential lever to maintain business continuity. In every challenge, there is opportunity and the coming together in Prague this year is the perfect point on which to start on a trajectory of developing new sustainable solutions for the long-term legacy of our industry.

Last year in Madrid, the Brewers of Europe Forum & EBC Congress was an important moment for us coming together. I was heartened to see that despite the difficulties around travelling we all showed up. This year's brewers of Europe Forum in Prague, called by many as the beer capital of the world - is indeed an opportunity for us to come together as a sector, join forces and accelerate climate action.



# INTERVIEW WITH ANDRÉ BRUNNSBERG, CHAIRMAN OF THE EUROPEAN BEER CONSUMER UNION (EBCU)

**BY THE EDITOR.**

THE INTERVIEW TOOK PLACE AT THE BREWERS OF EUROPE (BRUSSELS, BELGIUM), ON THE 09TH OF MARCH 2023.

**Hi André, can you introduce yourself?**

**André Brunnsberg (AB):** My name is André, I'm from Helsinki, Finland. I have been active within EBCU since 2009, when I attended my first meeting in Liverpool as a delegate from Finland (every member organisation has two delegates who can attend the bi-annual meetings organised in Spring and Autumn). I was then elected to the Executive Committee in 2017 (composed of five members) and last year elected as Chairman. My main job is in software development in supply chain management and in addition to that, I also been working on beer-related themes for the last 20 years (beer journalist, international beer judge and consultant for breweries in recipe development).

**Can you tell us more about the EBCU?**

**AB:** The EBCU, which today represents close to 180 000 beer consumers across Europe, was founded in 1990 by three national member organisations: CAMRA (United Kingdom), Objectieve Bierproevers (Belgium, now Zythos) and PINT (Netherlands). Then, in 2008, a formal constitution was signed and since then the organisation is run with a professional secretariat. Except for the secretariat, all the other activities are run on a volunteer basis.

The latest step in developing the EBCU from a formal point of view has been to register it officially in Belgium as a non-profit international NGO. We had checked the different options in different countries to register our association and concluded that the two international options were Belgium or Switzerland. We opted for Belgium, because of our love for Belgian beers and also due to our activities towards the European Union and the Commission. To register the EBCU, we worked together with a law firm to help us with the administration and the Belgian bureaucracy. Luckily, the process is now almost complete: it is only missing King Philippe's signature. And then, we will officially exist, and we can formalise our relationships with partners like The Brewers of Europe and BEUC (the European Consumer Union).

**You told us you will be developing activities towards the European Union. What are currently EBCU's policy priorities?**

**AB:** One of EBCU's priorities is to support and protect beer consumers, to protect and promote European beer styles (we have our Manifesto on our website: <https://www.ebcu.org/manifesto/>) and also fight for fair beer pricing. When it comes to prices and taxes, the Member States themselves are responsible, as the European Union does not have much power on the matter. We are also working on our long-term strategy and future goals and aims. Environmental issues will increasingly become a priority, for example with the Commission's proposal on the Packaging and Packaging Waste Regulation where we currently are collecting our national members' views. It is very interesting to see the diversity of systems in place in all the Member States and this Regulation will change a lot of things. We need to see what our position on the matter is.

Another important environmental consideration is obviously to support local beers. However, it needs to be reconciled with the desire to also discover and taste non-local beers. During the pandemic, we witnessed a clear movement to support the local brewery and this needs to be continued, from the smaller to the larger breweries.

**"WE WILL SPEAK ABOUT GENDER EQUALITY IN THE BREWING INDUSTRY AND PUBS."**

We will have our annual Spring meeting this coming Friday and Saturday (10 and 11 March 2023, Editor's note) where, among other topics, we will also speak about gender equality in the brewing industry and pubs. We have observed issues in some beer competitions where beers with offensive labels have won awards. As a beer consumer organisation, we like to endorse beer judging competitions that comply with our recommendations on the matter, including on the topic of Diversity, Equity, and Inclusion (DEI). We do not want to point fingers at the competitions we do not support, but rather emphasise positively the ones we support because they adhere to our standards (The guidance on beer competitions is available on our website: <https://www.ebcu.org/beer-competitions/>).

**"ENVIRONMENTAL ISSUES WILL INCREASINGLY BECOME A PRIORITY."**

# INTERVIEW WITH ANDRÉ BRUNNSBERG



EBCU's new Executive Committee

**In addition to being involved in policy discussions, you also offer activities for your members. Can you elaborate on them?**

**AB:** EBCU is also a networking organisation for our members, and we help them through information and best-practices sharing. A concrete example is in member retention and attracting new members. Many of our organisations lost members during the pandemic and getting them back and attracting new ones is financially important for many of them. In contrast, some national homebrewing associations have gained a lot of members. We offer practical information on how to run associations; for example, with the use of more effective digital tools, and how to organise beer festivals and beer competitions, some of which are even organised by our member organisations.

**"WE DO ORGANISE WEBINARS WHICH ARE FREE FOR ANYONE TO JOIN. THE RANGE OF COVERED TOPICS RANGE WIDELY."**

We do not organise direct gatherings of all our members. However, we do organise webinars which are free for anyone to join. The topics covered are diverse, including beer and food pairing, environmental issues, traditional beer styles (like Sahti...), and these webinars are gaining more and more attraction. This is part of the beer education that we want to promote. Additionally, homebrewing is growing a lot in many countries because there is an increasing interest in beer, the brewing process and the ingredients involved in it. We are working to help connecting national homebrewing organizations on an international level.

In general, we are trying to grow the organisation and gain more member organisations. The latest one to join is Iceland and we are now looking into Luxembourg. However, it is difficult to find members in Eastern Europe (apart from Poland and the Czech Republic, where national associations are well-organised). The biggest achievement in the last decade was creating an association in Germany (the GBCU) and having them joining EBCU. Currently, we have nineteen member associations in seventeen countries. With more members, we gain a better insight what is happening around Europe in the brewing sector and beer culture!



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# BEER TRENDS REPORT

# 2022

BY PIERRE-OLIVIER BERGERON,  
SECRETARY GENERAL, THE BREWERS  
OF EUROPE



IT HAS BECOME SOMETHING OF A CLICHÉ OVER THE PAST FEW YEARS TO SAY THAT WE ARE LIVING IN EXTRAORDINARY TIMES. THREE YEARS AGO, THE WORLD WAS STARTING TO HEAR ABOUT A ONCE-IN-A-CENTURY PANDEMIC THAT WAS SET TO UPEND ALMOST EVERYTHING IN OUR LIVES. COVID-19 STRUCK OUR FAMILIES, OUR COMMUNITIES AND OUR LIVELIHOODS. EVERYTHING SEEMED TO STOP, AND EVERYONE WAS TOLD TO STAY AT HOME. THAT INCLUDES OUR COMMUNITY: BREWERS AND THE ENTIRE BEER VALUE CHAIN, FROM FARMERS AND MALTSTERS RIGHT THROUGH TO THE BARS AND RESTAURANTS SERVING BEER.

The shutdowns and restrictions in the hospitality sector had a massive impact on beer sales and meant that some venues never reopened. And it rippled through the brewing sector, with production and consumption plummeting and knock-on effects throughout the beer value chain in terms of jobs, value added and tax revenue generation.

All that is charted in this 2022 Edition of our European Beer Trends Report, which shows the devastation of the pandemic: although there was a slight uptick in 2021, it came on the back of a dramatic fall in 2020. The figures show EU beer production in 2021 was at 34.2 billion litres, up from 34.1 billion litres in 2020, but down on 36.3 billion litres in 2019. Consumption was also slightly up in 2021, to 30 billion litres, from 29.7 billion litres in 2020, although still 2.25 billion litres below pre-pandemic levels.

We should however underline that the pandemic came on the back of eight years of stability and then growth in the European beer market. Now, the long, hard struggle to return to pre-Covid levels has begun, as both consumption and beer exports start to pick up in most countries.

Brewers are innovating to meet consumer demand for diversity and quality, ensuring that there is a beer for everyone and every occasion. Non-alcohol beer, which suffered from a bad image for so many years and was previously rather anecdotal in most countries, now represents over 5% of the European beer

market. And this expansion in choice is not solely due to established breweries widening their offering but also new breweries springing up, including outside the traditional beer heartlands of Europe.

Whilst we saw an inevitable slowdown in the last two years as the crisis in the hospitality sector decimated a key sales channel for many breweries, the journey towards 10,000 breweries in the EU continues and is far exceeded if we also consider our non-EU members from Norway, Switzerland, Turkey and the UK. Brewery numbers have kept rising, to 9,436 in the EU in 2021, from 9,206 in 2020 and 8,851 in 2019. We are though far from the growth we were seeing in the years immediately prior to the pandemic, when there were on average two new breweries opening every day in the EU. It will be fascinating to see the 2022 numbers when they come out, as



this year has been marked by quite a number of high profile announcements of breweries closing definitively.

For all the challenges to our businesses, brewers have shown remarkable resilience. Breweries can be proud of how, mostly, they have weathered the storm of adversity through strength, innovation and solidarity amongst brewers and along the chain from grain to glass. The pandemic is now hopefully mostly behind us, and we are looking to our recovery. But it is not the only crisis that we have been faced with.



As I write this, the war in Ukraine is still raging. This is a human tragedy, of course. It has also added to the disruption in the brewing sector. Supplies of the raw materials and ingredients on which brewers depend have been severely impacted by the food security crisis as the cultivation and trade of cereals and malt, but also the availability of packaging – glass bottles and aluminium cans – and carbon dioxide were disrupted. Not to mention the spiralling energy costs for breweries and our suppliers.

And we cannot forget the climate crisis. We have seen over the past two summers an unprecedented number of floods and fires, which can be directly linked to the changing climate. These events show how important it is for our value chain to further invest in more sustainable systems, be it upstream (production of raw materials), in the brewery (production process, energy and heat recovery) or downstream (beer distribution).

Still, brewers are naturally positive people. We are creative, adaptable and resourceful. We have pioneered many sustainability innovations and want to be part of the solution. We know we should – and we can – transition towards a clean, stable, circular economy.

And we can do all this, and continue to innovate, even as we rebuild. Brewers are resourceful and creative, and we are still brewing the greatest drink in the world!

The full Beer Trends Report is available on The Brewers of Europe's website: <https://brewersofeurope.org/uploads/mycms-files/documents/publications/2022/european-beer-trends-2022.pdf>



[WWW.EUROPEANBREWERYCONVENTION.EU](http://WWW.EUROPEANBREWERYCONVENTION.EU)

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# EUROPEAN COMMISSION'S PROPOSAL TO REGULATE THE USE OF "GREEN CLAIMS"

BY ANNA-MARIA DE SMET (SENIOR DIRECTOR: REGULATORY AND PUBLIC AFFAIRS) AND SIMON SPILLANE (DIRECTOR: COMMUNICATIONS AND PUBLIC AFFAIRS)



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FERMENTATIONS AS AN OPPORTUNITY FOR  
SUSTAINABLY BREWED AND HIGH-QUALITY PRODUCTS

ON 22 MARCH 2023, THE EUROPEAN COMMISSION PRESENTED ITS PROPOSAL FOR AN EU DIRECTIVE ON GREEN CLAIMS. IT COMPLEMENTS THE EARLIER PROPOSAL FOR A DIRECTIVE EMPOWERING CONSUMERS FOR THE GREEN TRANSITION THROUGH BETTER PROTECTION AGAINST UNFAIR PRACTICES AND BETTER INFORMATION. THE GREEN CLAIMS PROPOSAL AIMS AT CREATING A COMMON METHODOLOGY FOR THE SUBSTANTIATION OF GREEN CLAIMS THAT CONCERN THE ENVIRONMENTAL FOOTPRINT OF PRODUCTS, SERVICES AND COMPANIES. WHILE DOING SO, THE NEW DIRECTIVE SHOULD REDUCE GREENWASHING AND ENABLE CONSUMERS TO TAKE INFORMED PURCHASING DECISIONS BASED ON RELIABLE INFORMATION ABOUT THE SUSTAINABILITY OF PRODUCTS AND TRADERS.



## BACKGROUND

The proposal seeks to support the implementation of one of the commitments in the European's Commission's flagship European Green Deal initiative, namely to ensure that consumers be empowered to make better informed choices and play an active role in the ecological transition. More specifically, the European Green Deal sets out a commitment to tackle false environmental claims by ensuring that buyers receive reliable, comparable and verifiable information to enable them to make more sustainable decisions and to reduce the risk of so-called 'greenwashing'.

According to the European Commission, in spite of consumers' willingness to contribute to a greener and more circular economy in their everyday lives[1], their active and effective role in this green transition is hampered by a lack of trust in the credibility of environmental claims and the proliferation of misleading commercial practices related to the environmental sustainability of products. Misleading practices, such as greenwashing, a lack of transparency and the dubious credibility of some environmental labels, occur at various stages of the consumption journey: during the advertising stage, the purchasing stage or during the use of the products.

## SCOPE

The proposal on empowering consumers for the green transition defines an environmental claim as "any message or representation, which is not mandatory under Union law or national law, including text, pictorial, graphic or symbolic representation, in any form, including labels, brand names, company names or product names, in the context of a commercial communication, which states or implies that a product or trader has a positive or no impact on the environment or is less damaging to the environment than other products or traders, respectively, or has improved their impact over time". Examples given are mentions such as 'sustainable', 'eco-friendly', 'packaging made of 100% recycled plastic' and 'climate neutral'.

## CONSISTENCY WITH EXISTING LEGISLATION

The Unfair Commercial Practices Directive regulates misleading practices and misleading omissions with general provisions that can be applied to environmental claims in business-to-consumer transactions when they negatively affect consumers' transactional decisions. It calls on Member States' consumer protection authorities to assess these practices case-by-case. It also establishes a blacklist of commercial practices that must in all circumstances be regarded as unfair without the need for case-by-case assessment. Non-compliance with the requirements of the Directive can be pursued by the consumer submitting a complaint or a competent authority acting on its own initiative.

This proposal on substantiating and communicating environmental claims complements as so-called "lex specialis" the existing set of EU rules on consumer protection. It covers claims that are made on a voluntary basis by businesses towards consumers, relate to the environmental impacts, aspects or performance of a product or the trader itself and are not currently covered by other EU rules (for example, products carrying an organic claim).

## LEGAL BASIS

The proposal is based on Article 114 of the Treaty of the Functioning of the European Union (TFEU), which applies to measures that aim to establish or ensure the functioning of the internal market, while taking as a base a high level of environmental protection. Different requirements imposed by national legislation or private initiatives regulating environmental claims create an unnecessary burden for companies when trading cross-border, as they need to comply with different requirements in each country. This affects their capacity to operate in and take advantage of the internal market. It also confuses the consumer who may see differing environmental labels or claims on the same product, depending on the market it is sold. The measures proposed in the Directive are designed to:

1. increase the level of environmental protection, while leading to further harmonisation regarding the regulation of environmental claims, and
2. avoid market fragmentation due to diverging national approaches that were introduced or would be introduced in the absence of rules at EU level.

The proposal introduces minimum requirements on substantiation and communication of environmental claims which are subject to third party verification to be delivered prior to the

claim being used in commercial communications. While this measure is expected to eliminate misleading or false claims and will help to ensure proper enforcement, it will put an additional cost on economic operators wishing to make such claims. The impact on smaller enterprises is expected to be proportionately higher than on larger companies. For this reason, and to ensure that the smallest companies are not disproportionately affected by this additional administrative cost, the proposal exempts microenterprises (fewer than 10 employees and annual turnover does not exceed EUR 2 million) from the obligations of the legislation, once it is adopted. However, in case these smallest companies nevertheless wish to receive a certificate of conformity of the environmental claim that will be recognised across the Union, they should comply with all requirements of this proposal.

## EXPECTED IMPACTS OF THE REQUIREMENTS ON SUBSTANTIATION OF CLAIMS

By forbidding claims that do not meet the minimum criteria, the reliability of the information provided to consumers will be guaranteed. This should have a positive impact on the decision-making of consumers, facilitating the choice of products offered.



ring better environmental performance, and thus truly contributing to positively impacting the environment.

In terms of impacts on businesses, claims that do not meet these minimum criteria will have to be removed. The removal of the claims will require adjustments to product packages, flyers, etc.

In addition, businesses will have to bear the cost of substantiation of claims. This cost will depend to a large extent on the type of environmental claim the company voluntarily wishes to make and for how many products. Claims regarding environ-

mental impact of a product along the life-cycle (e.g. reduction of greenhouse gas (GHG) emissions across the life-cycle and value chain) will require a significantly higher investment than claims focusing on a specific environmental aspect (e.g. recycled content in the packaging). Depending on the nature and complexity of the claim, the related substantiation cost can vary significantly.

In the end, it remains a voluntary decision of companies to include (or not) environmental claims in their commercial communications. This means that companies can control their costs by determining the scope of the claim (if any), considering its expected return on investment. In short, the costs of substantiation are of a voluntary nature to companies as they are part of one's marketing strategy.

## THE ROLE OF ENVIRONMENTAL FOOTPRINT METHODOLOGIES

Even if the environmental footprint methods are helpful to businesses to identify the areas where they should improve their environmental impact and performance, and can adequately substantiate certain claims on several product categories, the methods do not yet cover all relevant impact categories for all product types. For example, as regards food and agricultural products, farm level biodiversity and nature protection, as well as different farming practices, are not yet addressed by the methodology. Therefore, the use of the Product Environmental Footprinting (PEF) methodology could give an incomplete picture of the environmental credentials of a product in the green claims context. In addition, many environmental claims are also made on environmental aspects - e.g. durability, reusability, recyclability, recycled content, use of natural content - for which the environmental footprint methods are not suited to serve as the only method for substantiation. Thus, prescribing a single method like the environmental footprint as the standard methodology of substantiation for all environmental claims would not be appropriate and poses a risk for companies not being able to communicate on relevant environmental aspects or performance in relation to their products or activities. For these reasons a more flexible approach is proposed by the European Commission.



- provides information on whether the product performs environmentally significantly better than what is common practice;
- identifies whether a positive achievement leads to significant worsening of another impact;
- requires greenhouse gas offsets to be reported in a transparent manner;
- includes accurate primary or secondary information.

Further requirements for claims that state or imply that a product or economic operator has less or more environmental impacts or performs better or worse regarding environmental aspects than other products or economic operators are:

- the use of equivalent information for the assessment of environmental impacts, aspects or performance of compared products;
- the use of data generated or sourced in an equivalent manner for the products or traders that are subject to comparisons;
- the coverage of stages along the value chain is equivalent for the products and traders compared, while ensuring that the most significant stages are taken into account for products and traders compared;
- the coverage of environmental impacts, aspects or performances is equivalent for the products and traders compared and ensures that those most significant are taken into account for all products and traders compared;
- the assumptions used for the comparison are set consistent for the products and traders compared;
- for comparative claims on improvement of impacts (compared to earlier version of product) include explaining the impact of improvement on other aspects and impacts and stating the baseline year.

## MINIMUM REQUIREMENTS ON SUBSTANTIATION OF ENVIRONMENTAL CLAIMS

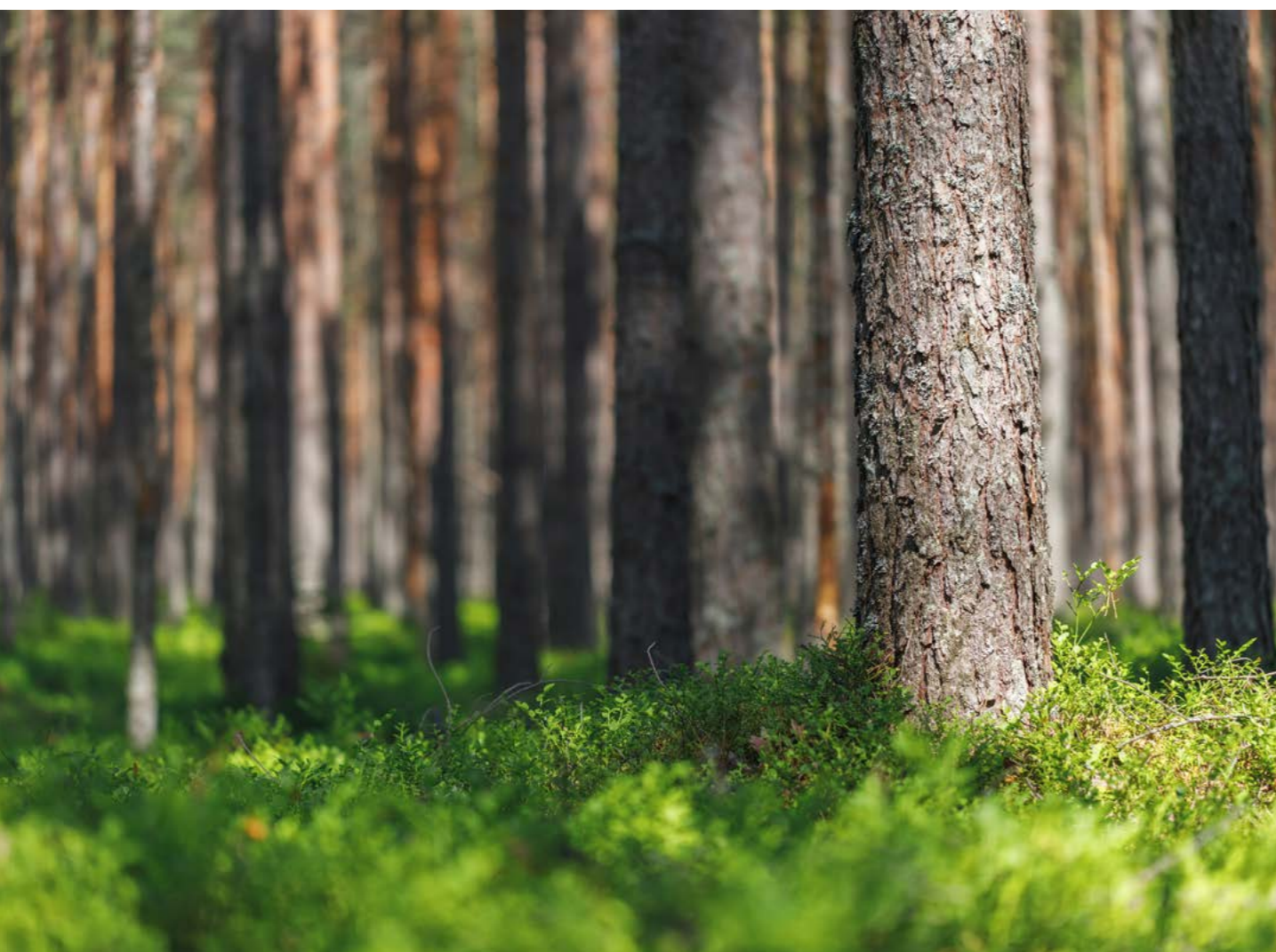
The proposal requires that the substantiation of explicit environmental claims shall be based on an assessment that meets the selected minimum criteria to prevent claims from being misleading, namely that the underpinning assessment:

- relies on recognised scientific evidence and state of the art technical knowledge;
- demonstrates the significance of impacts, aspects and performance from a life-cycle perspective;
- takes into account all significant aspects and impacts to assess the performance;
- demonstrates whether the claim is accurate for the whole product or only for parts of it (for the whole life cycle or only for certain stages, for all the trader's activities or only a part of them);
- demonstrates that the claim is not equivalent to requirements imposed by law;



Different types of claims will require different levels of substantiation. The proposal does not prescribe a single method and does not require conducting a full life-cycle analysis for each type of a claim. The assessment used to substantiate explicit environmental claims needs to consider the life-cycle of the product or of the overall activities of the economic operator in order to identify the relevant impacts which are subject to the claims, and to enable the trader to avoid omissions of any relevant aspects. This is also necessary to check if the benefits claimed result in a transfer of impacts to other stages of the life cycle or to significant increase of other environmental impacts. For the assessment to be considered robust, it should include primary, company-specific data, for relevant aspects contributing significantly to the environmental performance of the product or economic operator referred to in the claim.

For climate-related claims, the proposal requires reporting separately from greenhouse gas emissions any GHG emissions offsets used by the economic operators, as additional environmental information. This mirrors the approach followed by the product environmental footprint/organisation environmental footprint methods. In addition, this information should also specify whether these offsets relate to emission reductions or removals and ensure that the offsets relied upon are of high integrity and accounted for correctly to coherently and transparently reflect the claimed impact on climate.



## CERTIFICATE OF CONFORMITY OF SUBSTANTIATION AND COMMUNICATION OF ENVIRONMENTAL CLAIMS

The substantiation and communication of environmental claims and labels will have to be third party verified and certified to comply with the requirements of the Directive before the claim is used in a commercial communication. An officially accredited body (the 'verifier') will carry out this ex-ante verification of claims submitted by the company wishing to use it. This measure will ensure every claim that the consumer will be exposed to has been verified to be reliable and trustworthy. The proposal also defines detailed requirements for 'verifiers' to fulfil in order to be accredited by the Member States. Once the 'verifier' has carried out the verification of the submitted claim, it will decide to issue (or not) a certificate of conformity. This certificate will be recognised across the EU, shared between Member States via the Internal Market Information System and will allow companies to use the claim in a commercial communication to consumers across the internal market. The certificate of conformity of claims will provide businesses with certainty that their certified claim will not be challenged by the competent authorities in another Member State.

## THE BREWERS OF EUROPE POSITION

The Brewers of Europe supports the development of an EU-harmonised legislative framework to substantiate environmental footprint claims or any labelling scheme. The proposal should foster harmonisation across the markets in the EU in order to:

- increase consumer understanding and trust in product environmental footprint information;
- create a level playing field for industry and companies wishing to measure and communicate about their environmental benefits and impacts;
- help drive a real shift towards more sustainable products (in line with the EU Green Deal);
- facilitate the verification by authorities of the scientific substantiation behind environmental footprint claims across the EU.

The Brewers of Europe is critical of the fact that, in the European Commission's Proposal for an EU Directive on Green Claims, Product Environmental Footprint Category Rules (PEFCRs) are not mandatory for the substantiation and design of voluntary environmental claims. For Europe's brewers it is important that

the legislation eliminate "cherry picking" (e.g. selecting calculation approaches that favour for example one packaging type over another) so that companies "do not fight about the environmental matrix, but compete around the solution". The flexibility provided by the proposal to opt for any methodology strongly undermines the European Commission's objective of halting confusing and misleading green claims in sectors like brewing that have committed to developing a PEFCR and thus does not guarantee a better sustainable economy. The Brewers of Europe is committed to continuing working with the EU institutions and other interested parties, to further develop the PEFCR methodology so as to ensure that legislation sets it as the most appropriate methodology to substantiate claims relating to the environmental impacts the methodology covers and thus requires the PEFCR to be followed.

## NEXT STEPS

The Commission's proposal is going through the Ordinary Legislative Procedure, which means that the European Parliament is able to amend the proposal in first reading, before passing the amended proposal to the Council of the European Union (composed of the EU's Member States) which can also amend the text. In case a compromise is found at the end of the first reading between the three institutions (the Commission, the Parliament and the Council), then the text will be adopted, published and enter into application 18 months later. If no compromise is found, a second reading will have to take place at the Parliament and then at the Council.

More information on the proposal can be found on the European Commission's dedicated webpage:  
[https://environment.ec.europa.eu/topics/circular-economy/green-claims\\_en](https://environment.ec.europa.eu/topics/circular-economy/green-claims_en)



## СЪЮЗ НА ПИВОВАРИТЕ В БЪЛГАРИЯ: ЗЕЛЕНИТЕ ИНИЦИАТИВИ СА НАШ ПРИОРИТЕТ

By the Union of Brewers in Bulgaria

Инвестициите в зелени решения са приоритет на Съюза на пивоварите в България (СПБ). За последните 3 години те надхвърлят 60 милиона лева, като вече са в ход още значителни вложения в бъдещи проекти. Широката листа от иновативни еко решения на бирената индустрия включва изграждане на фотоволтаични паркове, производствено, логистично и енергийно оборудване с висок коефициент на пестене и оползотворяване на природни, енергийни и други ресурси. Въвеждането на олекотени материали за милионите бирените опаковки върви заедно с национални кампании за разделно събиране на пластмасови опаковки и проекти за връщане на стъклени бутилки за многократна употреба. В България годишно над 55% от отпадъците от пластмасови бутилки се рециклират.

„Важно е потребителите да знаят, че устойчивото развитие на бранша зависи от всеки етап в производството на бира – от веригата на доставките до дистрибуцията и консумацията на бира. Например разделното събиране на отпадъци може да доведе до понижаване на потреблението на енергия и суровини от 70 до 90% и същевременно намалява замърсяването на въздуха и водите.“, коментира Ивана Радомирова, изпълнителен директор на СПБ. Национално представително изследване показва, че всеки пети българин знае за зелените послания на СПБ, а в екологичните инициативи на организацията през 2022 г. пряко са се включили над 8000 души на възраст от 7 до 78 г. За своите постижения Съюзът на пивоварите е отличен с награда за устойчиво развитие, връчена от министъра на земеделието.

През 2022 г. акцентът на еко кампаниите на българските пивовари е върху разделното събиране на отпадъци

от опаковки и ангажиментите на индустрията съгласно Директивата за намаляване на въздействието на пластмасите върху околната среда. Инициативата е част от информационната кампания на СПБ „ИзБИРАме устойчиво бъдеще“. Всички материали, от които са направени бирените опаковки са стопроцентово рециклируеми с възможност за многократен цикъл на употреба. Като доброволна инициатива на СПБ арт кошове за разделно събиране на пластмасови бутилки са поставени в градовете, в които има бирени заводи. Специално изработените в арт стил контейнери са безвъзмездно предоставени на общините от Съюза на пивоварите. Неслучайно под мотото „Код: Отговорни заедно“ браншовата организация обединява хората в стремежа им да опазват околната среда, да участват в различни зелени дейности и събития. Сред амбициозните инициативи, посветени на еко решенията, са и станалите емблематични за пивоварите зелени творчески ателиета, които се провеждат на бирени и арт фестивали. В тях бирените опаковки заживяват нов живот като произведения на изкуството. Известни художници, илюстратори и актьори с ентузиазъм и вещина показват на публиката различни техники, с които да ги декорират като интериорни акценти за дома и офиса. Така се демонстрира връзката между съвременните приоритети за устойчивост, новаторските подходи и креативност.



През настоящата 2023 г. инициативите на СПБ вече се надграждат с кампанията „Върни ме“. Тя включва редица активности за насърчаване на потребителите да връщат обратно стъклените опаковки за многократна употреба. Всяка пивоварна компания е определила национална мрежа от магазини, в които ще бъдат поставени специални стикери с QR кодове. Те ще насочват консуматорите на бира как могат да върнат бутилките за многократна употреба. Заедно с това Съюзът на пивоварите в България е и активен участник в проекта за въвеждане на DRS в страната, по който вече е създадена широка партньорска мрежа на заинтересованите страни.

За повече информация: [www.pivovari.com](http://www.pivovari.com)

## UNION OF BREWERS IN BULGARIA: BEING GREEN IS OUR KEY PRIORITY

By the Union of Brewers in Bulgaria

Investing in green solutions is a priority for the Union of Brewers in Bulgaria (UBB). For the last 3 years, these investments exceed € 30 million and future significant projects are already underway. The wide list of innovative eco-solutions of the beer industry includes construction of photovoltaic parks, production, logistics and power equipment with high savings coefficient and recovery of natural, energy and other resources. Introducing lightweight packaging materials goes together with communication campaigns for separate collection of plastic packaging and reusable glass bottles (RGB) projects. In Bulgaria, over 55% of plastic bottle waste is recycled annually.

“It is important for consumers to know that each stage of the beer production counts for the sustainable development of the industry - from supply chain through distribution and beer consumption. Separate waste collection can decrease energy and raw materials consumption by 70 to 90%, while at the same time reducing air and water pollution.”, comments Ivana Radomirova, executive director of UBB.



A nationwide representative study indicates that every fifth Bulgarian is aware of the green messages of UBB, while in 2022 more than 8,000 people were directly involved in the environmental initiatives of the organization. For its achievements in



the field of sustainable development UBB was awarded by the Minister of agriculture.

In 2022, the emphasis of the eco campaigns of the Bulgarian brewers was on separate collection and recycling of packaging waste and the industry's commitment to the implementation of the Directive on the reduction of the impact of plastic products on the environment. The initiatives are the core of the information campaign of UBB “Choosing a sustainable future”. All beer packaging materials - glass, polyethylene terephthalate and aluminum - are 100% recyclable and reusable. Art bins for separate collection of plastic bottles have been placed by UBB in cities where the breweries are located. The creatively designed containers are donated to the municipalities by the Union of Brewers in Bulgaria. Under the motto “Code: Responsible together”, the branch organization unites people in their aspiration to protect the environment, by involving them in various green activities and events.

Among the ambitious initiatives dedicated to eco-solutions are the unique creative green studios that take place at major art festivals. There, beer bottles and cans take on a new life as works of art. Famous artists enthusiastically and skillfully guide the audience through various techniques to create decorative art accessories for the home and office, thus demonstrating the connection between modern sustainability priorities, innovative approaches and creativity.

In the current year 2023, the UBB initiatives have already been upgraded with the “Return me” campaign, which encompasses a number of activities to encourage consumers to return reusable glass bottles. Each brewing company has designated a national network of stores where special stickers with QR codes are placed. They direct beer drinkers how they can return reusable bottles. Along with this, the Union of Brewers in Bulgaria is also an active participant in the project to introduce DRS in the country, for which a wide partner network of interested parties has already been created.

For more information visit: [www.pivovari.com](http://www.pivovari.com)



## POLISH CONSUMERS GO FOR NOLO

By the Polish Brewers

POLAND HAS BECOME EU'S FOURTH LARGEST PRODUCER OF NABS IN JUST FIVE YEARS, ACHIEVING 12% SHARE OF THE EU NON-ALCOHOLIC BEER MARKET<sup>1</sup>. THE SEGMENT'S GROWTH HAS BEEN MAINLY DRIVEN BY 0.0% BEERS WHICH GRADUALLY OUTPERFORMED BEERS WITH UP TO 0.5% ALCOHOL CONTENT. TODAY, 9 IN 10 NON-ALCOHOLIC BEERS SOLD IN POLAND ARE BEERS WITH ZERO ALCOHOL.

IN 2022 NAB CATEGORY GREW BY 8% IN VOLUME WHILE REGULAR STRENGTH BEERS DECREASED BY 7%<sup>2</sup>, WHICH CONFIRMS POLISH CONSUMERS' GROWING TREND TOWARDS HEALTHIER AND MORE CONSCIOUS CONSUMPTION HABITS.

### FIVEFOLD INCREASE IN 5 YEARS

The NAB category practically did not exist in Poland until 2016. Some breweries had rare products that were usually not alcohol-free but contained up to 0.5% alcohol.

The category truly gained momentum in 2017 when its sales value fetched PLN 287 million (over EUR 61 million) and 2% of share in the beer market<sup>3</sup>. The segment was dominated by beers with up to 0.5% alcohol content (77%), while alcohol-free beer accounted for merely 23%. The true 0.0% beer revolution began a year later. In 2018, the category went up by 85% in terms of volume and its value nearly doubled<sup>4</sup>.

Currently, more than 90% of the non-alcoholic beer category accounts for 0.0% beer, while the size of the segment has grown more than 3.5 times to reach a value nearly five-fold versus 2017 (PLN 1.32 billion in 2022 / EUR 283 million)<sup>5</sup>. It is more than the entire breakfast cereal market or the chewing gum market in Poland. And Nielsen predicts that if its momentum continues, non-alcoholic beer will soon become a bigger category on the food market than tea (and Poland is the third biggest market for tea in Europe).

Today, the NAB category holds 6,3% share in the total value of the beer market in Poland<sup>6</sup>.

1 Source: Eurostat  
2 Source: NielsenIQ  
3 Source: NielsenIQ  
4 Source: NielsenIQ  
5 Source: NielsenIQ  
6 Source: NielsenIQ

## POLISH CONSUMERS GO FOR NOLO

While the NAB category in Poland has been demonstrating double-digit growth year-to-year, alcoholic lagers, and especially the segment of strong lagers has been witnessing a decline for past few years - in 2022 it shrank almost by 13% in volume. The NAB category in Poland covers three segments: lager, flavoured beer (mainly radlers/shandies), and beer specialties. The last one grew by 21,8% in 2022 and non-alcoholic flavoured beers by 5%.

These two parallel trends are contributing to a decrease in the average alcohol content in beer and the share of beer in alcohol consumption in Poland (down to 52,5% which has been the lowest for over 20 years)<sup>7</sup>.



## ZERO ALCOHOL BEER AS A RESPONSE TO THE BFY TREND: REDUCE ALCOHOL AND CUT CALORIES.

The dynamic development of the NAB category in Poland comes as a direct response to a consumer trend that is dominating the global food market: the quest for BFY (Better for You) products. We want to have a healthy diet, because we believe that good food is the cornerstone of healthy life. The COVID pandemic had also a great impact on this trend. In 2021, nearly three quarters of Polish consumers interviewed by IPSOS argued that food had big, very big or even decisive impact on their health. Only one in three respondents agreed with this statement in 2008. In case of beverages BFY products are products that enable users to reduce alcohol consumption and slash the number of calories. Zero alcohol beers are perfectly aligned to the BFY trend and are in fact the largest category among alcoholic beverages to embrace so broadly the consumer demand for products that come with no alcohol, are low in calories and, on top of that, taste like beer.

Research conducted in July 2022 by IQS for the Union of Brewing Industry Employers in Poland reveals that 78% of consumers aged 18-64 consume NABs with varied frequency. 46% drink non-alcoholic beer at least once a month, while 16% have it at least once a week. Women are keener to opt for NAB than males - half of them drink non-alcoholic beer at least once a month (vs. 42% of males). Females also declare that unlike males, they tend to choose non-alcoholic beer over its alcoholic varieties. Reasons that drive consumers to choose zero alcohol beer are rational and testify to the growing sense of responsibility for one's health and actions. Numerous studies conducted both in Poland and globally provide one simple answer to the question "why do we choose non-alcoholic beer?" - because we like the taste of beer, but we don't want to be under the influence of alcohol. Consumers choose not to drink alcohol in many situations - while sitting at the wheel, looking after children, or relaxing on the waterfront. These reasons continue to be listed by respondents as drivers that most frequently motivate them to opt for zero alcohol beer. In the past, non-alcoholic beer was seen as an inferior substitute of "regular beer," primarily for drivers. Today, it is a complete product category with diverse varieties, flavours and aromas. It satisfies consumer expectations for beer as a refreshing beverage we like to relish in the company of others and for sheer pleasure.



7 Source: Statistics by the State Agency for the Prevention of Alcohol Related Problems





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