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Dr. Ignasi PUIG VENTOSA | ENT Environment & Management

# **The concept of Generalised Extended Producer Responsibility**

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Governance: Governance Arrangements and Market Structure**

EUI Florence School of Regulation

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# Extended Producer Responsibility (EPR)



- According to the OECD, Extended Producer Responsibility **“aims to make producers responsible for the environmental impacts of their products throughout the product chain, from design to the post-consumer phase”** [1].
- EPR alleviates the burden of Public Administrations for managing end-of-life products, while -if properly designed- incentivising waste prevention and recycling.

**[1]** OECD (2016), Extended Producer Responsibility: Updated Guidance for Efficient Waste Management, OECD Publishing, Paris. DOI: <http://dx.doi.org/10.1787/9789264256385-en>

# Alternatives to materialize EPR

- **Collective EPR -> by means of Producer Responsibility Organisations (PROs)**
  - **Material EPR:** PRO (financed by producers) are directly in charge of collection and treatment of the materials.
  - **Financial EPR:** The Administration performs the material management (or part of it) and the producers are the ones who assume the costs.
- **Individual EPR:** Each producer is responsible for the collection and recycling of waste from their own products (e.g. some toner companies collect their own waste, or a good part of the reusable packaging is collected by the same companies that put them in the market).

# EPR in the European Union

- The concept of Extended Producer Responsibility (EPR) has been part of the waste policy of the European Union for years.
- Included in the Waste Framework Directive (art. 8 and 8.a).
- Mandatory for: Household electrical and electronic waste; batteries and accumulators; end-of-life vehicles.
- Not mandatory, but generalized for: packaging, tires, used oils, medicines.
- The Directive 2019/904 on the reduction of the impact of certain plastic products on the environment (SUP Directive) introduces EPR for food and beverage containers, lightweight plastic carrier bags, wet wipes, balloons, tobacco products with filters and tobacco filters, etc.

# Limitations of EPR

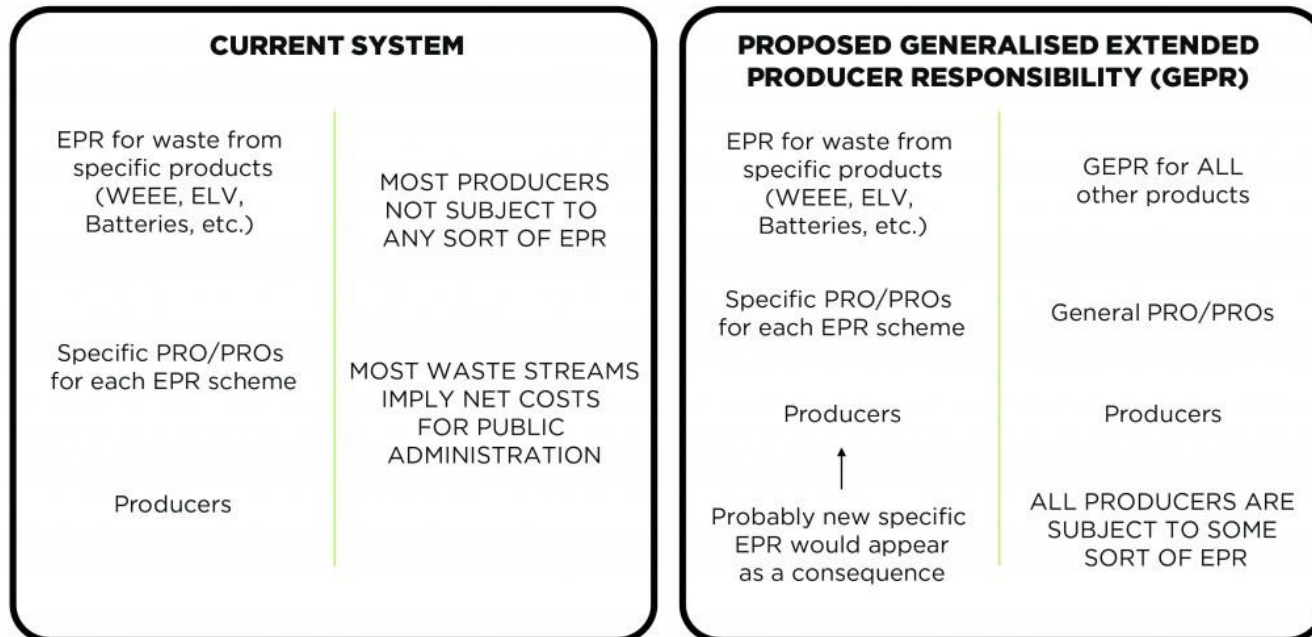
- Application of EPR still in development, but:
  - It has still produced **insufficient results**.
  - PROs often **do not assume the total cost** of managing the corresponding waste fractions.
  - The **lack of transparency with respect to quantities put in the market** makes it difficult for Public Administrations to assess compliance with recycling objectives.
  - It has not succeeded in avoiding **littering** in general.

The WFD just transposed by MS or under transposition should help minimise some of these problems.

- **The main limitation of EPR is that for most products, it simply does not exist.** Producers are allowed to put any product on the market, no matter how difficult and costly to manage it is when it turns into waste.
- It seems unlikely that extending EPR on a product-by-product approach will manage to cover a broad range of products soon.

# The concept of Generalised EPR

Whereas in traditional EPR, there is one or more PRO for each specific waste stream, in GEPR, specific EPR schemes could continue to exist, and maybe a few more would be created, but there would be also **general PRO for all those products with no specific EPR schemes:**



# The concept of Generalised EPR

- Public administrations would need to define how the different products contribute to collection and treatment costs (including street cleaning, littering prevention and clean-ups, etc.), and allocate the costs to the different EPR/GEPR schemes.
- Probably only costs related to biowaste –as they derive from endosomatic consumption of energy– should be borne by public administrations and transferred to taxpayers; all other costs should be borne by some PRO and transferred to producers, and from them to consumers.
- Many details would need to be discussed (e.g. links among existing EPR and new GEPR schemes and the corresponding PROs, legal nature, compatibility with other existing or potential economic incentives, etc.).
- Implementation of GEPR would entail paperwork and the need of additional data on impact and cost of the different waste streams. But this would be less burdensome, faster and cheaper to regulate and monitor than the never-ending process of creating one new EPR scheme after another.



**Ignasi PUIG VENTOSA**

**ipuig@ent.cat**

**@I\_PuigVentosa**

**www.ent.cat**



**Thanks for your  
attention**