

## Recommendations from the European Breakfast Cereals sector

### Draft EU study to support the development of implementation acts and guidance under the Directive on the reduction of the impact of certain plastic products on the environment

#### CEEREAL company members' actions to transition to a circular economy

CEEREAL supports the objectives of preventing and reducing the impact of single-use plastic products on the environment and promoting the transition to a circular economy. Breakfast cereal packaging falls within the scope of Directive 94/62/EC on packaging and packaging waste and, as such, it is subject to the provisions of that Directive after it has been used.

In addition to our obligations under Directive 94/62/EC, breakfast cereal producers are also working towards improving the circularity of packaging, while ensuring that its key functions such as protecting the safety and quality of breakfast cereals are maintained.

#### Recommendations

Following the publication of the draft EU study to support the development of implementation acts and guidance under the Directive on the reduction of the impact of certain plastic products on the environment, CEEREAL, which represents the breakfast cereal and oat milling industry, would like to offer the following recommendations in relation to parts of the report, which may related to the packaging of breakfast cereals.

##### *Type of packet or wrapper (Section 3.3.2, Table 3-2)*

- CEEREAL welcomes the assessment of breakfast cereal bags and the recognition that that breakfast cereals are not intended for immediate consumption and are generally further prepared before consumption, as breakfast cereals are not generally consumed directly from the bag: they are first poured into a bowl and milk is added 95% of the time<sup>1</sup>.
- Breakfast cereals can be sold in a bag-in-box format as well as in bags without a box. Hence, CEEREAL recommends **changing the wording to "bags of cereal"** to encompass both cases.

##### *"Multiple-sized portion" (Section 1.3.1)*

- CEEREAL welcomes the distinction between single-serve packs that are consumed in one occasion with a tendency to be littered and multi-portion packs that are consumed over multiple occasions.

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<sup>1</sup> Research by Dipsticks in the UK which shows that 95% of cereal consumption occasions are with milk.

- However, we do not understand the reference to “multi-sized portions” within the same pack. Portions are a well-established concept for the breakfast cereals category<sup>2</sup>.
- For clarity, we recommend **referring to “multiple” portions** within the same pack.

***Ready to be consumed without any further preparation (Section 1.3.2, Table 1-2 and Section 3.3.2, Table 3-2)***

- In tables 1-2 and 3-2, the guidance on “ready to be consumed without any further preparation” should be the same. For instance, Table 1-2 mentions that adding cold water is a further preparation step, but in Table 3-2 that mention is missing.
- We would further suggest the following addition to both sections: *“There is no requirement to add boiling or cold water before the consumption of the foodstuff such as in the case of dry or pre-cooked noodles, pasta and rice, **cereal and/or powder preparations to which hot or cold liquid must be added before consumption.**”*

CEEREAL appreciates this opportunity to contribute its expertise to the EU study and remains ready to provide additional information as needed.

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<sup>2</sup> CEEREAL Portion Sizes Rationale, September 2008. [http://ceereal.eu/images/technical-docs/CEEREAL\\_Portion\\_Sizes.pdf](http://ceereal.eu/images/technical-docs/CEEREAL_Portion_Sizes.pdf)