

[REDACTED]

Subject:

[REDACTED]

Written input on guidance on identifying and describing the products covered by the SUP

[REDACTED],

First of all thank you very much for giving stakeholder the opportunity to submit feedback to the above mentioned topic. We followed the webinar on April 3 with great interest. From our point of view, there are promising approaches to better identify the products in need of clarification. However, we still have questions on some points. We would like to share these aspects with you below:

- **Use of recycled material in beverage bottles:** Beverage bottles are defined as bottle containers including lids. Do the targets for the use of recycled material (2025/2030) also apply to the caps and banderoles of the bottles?
- **Very light weight plastic carrier bags:** The directive on the reduction of plastic bags explicitly exempts very light weight plastic carrier bags (plastic carrier bags with a wall thickness below 15 microns) from the obligations. Does this exemption also apply to the obligations under the SUP directive?
- **Definition of food container: point of sale as an indicator?:** Should the point of sale serve as an indicator in the assessment if certain products are considered as food container? At this stage we have assumed that the structural components of the product are decisively, not the point of sale.
- **Difference food container - packets and wrappers:** We see the risk that for some products a distinction between food container and packets and wrapper could be complicated. Some packaging consists, for example, of a relatively rigid PET tray and a flexible wrapper. Does this packaging count as a food container and is therefore subject to the objectives of consumption reduction or does it fall under the exceptions of packets and wrappers? Is there a percentage threshold value to expect?

We would be very pleased if the aspects mentioned could be included in the forthcoming work on the guidelines.

Please do not hesitate to contact us if you have any questions.

Kind regards

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