



## The coexistence of single and multiple use packaging in HORECA should be preserved

Brussels, 30 November 2022: **HOTREC**, the voice of European hospitality, takes note of the European Commission's proposal for a regulation on Packaging and Packaging Waste. HOTREC abides by the EU Green Deal's objective to enhance a low-carbon circular economy.

While the European Commission's intent to prevent packaging waste goes in the right direction, its ambition to ban single-use packaging in HORECA is concerning. To better answer the heterogeneous nature of our industry, seasonality and local specificities, the coexistence of the two systems – single and multiple use – should be preserved.

*'Switching to reuse and refill in restaurants and hotels should not be rushed, carefully considered and implemented to avoid compromising food safety, health and hygiene'* says Marie Audren, Hotrec Director General.

### Ban of single-use packaging in HORECA (article 22 and Annex V)

With regards to restrictions on the use of certain packaging formats in HORECA, we welcome the exemption of micro-enterprises (from point 3 of Annex V) whose business models rely on single-use packaging only while eating in. We welcome the exception to the ban of single-use packaging for condiments in takeaways (point 4 of Annex V). In addition, we believe that **transition periods - beyond the date of entry into force of the regulation** - to allow businesses to adapt are required.

### Reuse targets for HORECA (article 26)

**Reuse targets for HORECA should be science-based, proportionate and feasible.** Shifting to reuse will require a structural change in our industry's operations. Establishments would have to source reusable packaging suppliers and invest to set up reuse cleaning and storage facilities within their premises. The scope should be reviewed to exclude storage and dispatch areas from the maximum sales area of economic operators (para 15).

### Obligations related to refill (article 25)

Packaging needs to be clean, hygienic, and suitable. But staff in cafés or restaurants cannot see with their own eyes whether a container is likely to contaminate the food/beverage placed inside. **Accepting 'bring your own containers' from clients should remain voluntary.** Businesses should not be liable if something goes wrong.

HOTREC stands ready to work with the European Commission, Member states and the European Parliament to achieve our joint objectives towards enhanced circularity while supporting food businesses and hotels' realities.

For further information: [www.hotrec.eu](http://www.hotrec.eu)

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#### What is HOTREC?

HOTREC is the umbrella association of Hotels, Restaurants, Bars and Cafés and similar establishments in Europe, which brings together 46 National associations in 35 countries, and is the voice of European hospitality. HOTREC's mission is to represent and champion its interests towards the EU and international institutions, foster knowledge sharing and best practices among its members to further promote innovation, and act as a platform of expertise for the hospitality sector.