

Global Action Partnership for EPR





giz Deutsche Gesellschaft
für Internationale
Zusammenarbeit (GIZ) GmbH



Hosted by



PREVENT
Waste Alliance

Global Action Partnership for EPR

Thinking ahead jointly – this is our mission. As the Global Action Partnership for EPR, we **connect** practitioners and experts worldwide, **foster** collaboration, and **innovate** the global conversation on EPR.



Who we support

The GAP for EPR is available to international stakeholders as a support tool for the development and implementation of their own EPR systems during the different implementation phases.

Our target group encompasses

- Governments of partner countries that want to introduce EPR systems
- Organizations and institutions that have been mentored by their governments to set up EPR systems, especially PROs
- Other stakeholders, for instance informal sector representatives
- Practitioners and experts who seek to exchange with peers

How we work



We strive for a Common Understanding on EPR

by providing an extensive library of EPR-related documents and hosting public events.



We provide coordinated and tailored Technical Support

to policy makers and other relevant stakeholders (such as PROs) for the operationalization of EPR



We bring together an international EPR Community

- To facilitate the sharing of best practices and lessons learned
- To think ahead jointly and innovate EPR
- To contribute to relevant international processes on EPR

We provide both targeted and flexible support.



01

Targeted country support

Commissioning party: Norwegian Retailers' Environment Fund

Goal: Support of two countries (CEMPRE Argentina, MAREA Malaysia)

Duration: 6 months

02

Quick expert sessions

Commissioning party: BMZ

Goal: Flexible short/medium-term support to different stakeholders (government, PROs, informal sector associations, and others)

So far sessions organised with Mauritius, and 9 Caribbean states

Where we're going in 2024



Extension of library



Contribution to international processes



Technical support under Helpdesk



Sessions at events



Webinars on diversity of topics

Thank you for your attention!

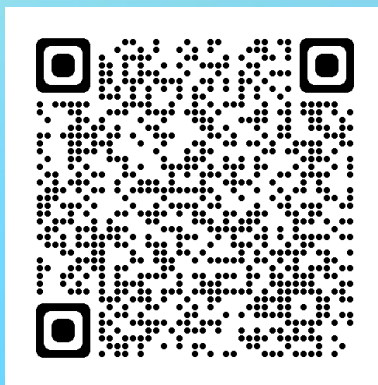
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Download the Policy Paper:



GAP for EPR Helpdesk: Learnings from the Pilot Projects in Argentina and Malaysia

November 6, 2024

Support for EPR development in Malaysia and
Argentina (Jan - Jul 2024)



Pilot funded by



Norwegian Retailers'
Environment Fund



General & Specific Scope

- Assess the status of EPR of selected countries and provide policy recommendations for effective EPR implementation based on international best practices.
- Identify a PRO model well-suited to the selected countries' contexts, including fee structure and financial mechanism.
- Technical advice and guidance for efficient waste collection, segregation, and recycling systems & technologies
- Facilitate multi-stakeholder discussions and develop a PRO strategy to ensure the inclusion of the informal sector.

1. Expanding recovery, collection and sorting capabilities, collaboration, and infrastructure

- ❖ Identifying different recovery and collection methods
- ❖ Gaining expertise in designing efficient waste collection and sorting systems,
- ❖ Getting advice on optimizing collection logistics and infrastructure.
- ❖ Identifying strategies and collaborative synergies between the PRO and collectors/aggregators/recyclers to improve recovery efforts. This covers the development of pilot projects that include the informal sector

2. Setting up fee structure and financial mechanisms

- ❖ Calculation of the fee structure and getting the buy-in from members on the proposed fee structure
- ❖ Guidance on establishing financial mechanisms such as eco-modulation or deposit-refund systems.
- ❖ Strategies for ensuring the financial sustainability of the EPR program.

3. Expanding membership and producer engagement

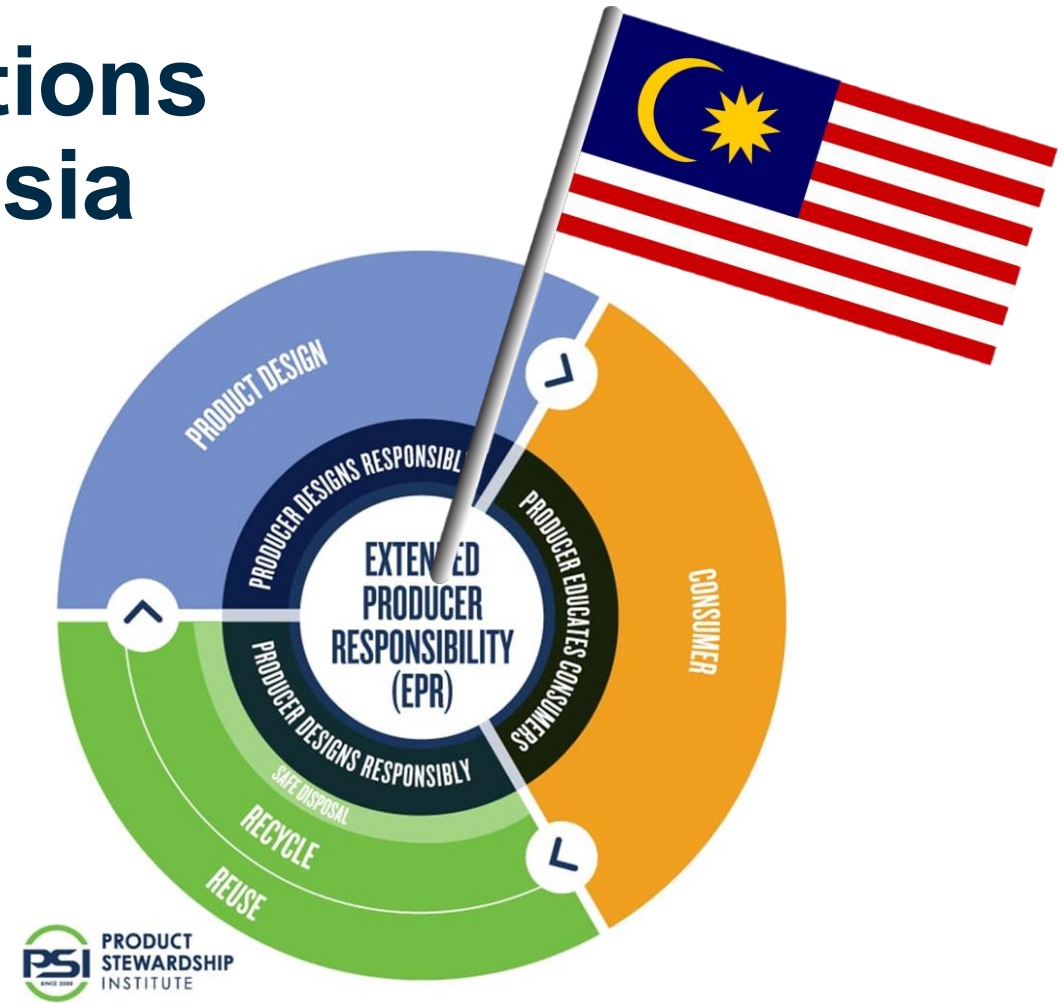
- ❖ Identifying strategies to expand membership across obliged industries and getting more local companies on board.
- ❖ Strategies for obtaining buy-in and cooperation from producers.
- ❖ Support in developing incentives for producers to participate in EPR programs.
- ❖ Guidance on promoting eco-design and eco-innovation among producers.



General Comments from both countries

- The lapse of time between the design of the ToR and the actual implementation of the projects, create needs to revise some of the deliverables to meet the most urgent needs.
- We had enough flexibility in this project to discuss and agree the revised deliverables with the clients and GAP for EPR, adjust them and provide maximum value added with our services. This has been important for both clients.
- A learning for future projects could be to include an official provision in the contract terms to revisit the deliverables right after the award of the contract between the client, GAP for EPR and the selected consultants, and revise them as needed at the time, to better meet the needs of the clients.
- In both projects it became apparent that the clients were interested to extent the collaboration with the consultants. Although this is understood that is subject to the availability of funds, it may be an issue to be considered for similar future assignments. Sometimes, as early cut off comes at the expenses of the momentum created in the project.

Gap Analysis, recommendations and conclusions for Malaysia

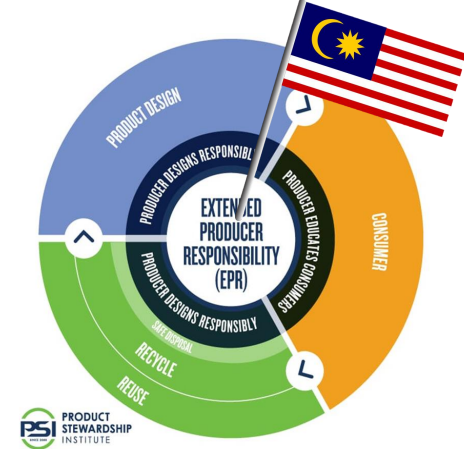


EPR Status Quo in Malaysia - Gap Analysis

Main gaps that prevent the evolution of EPR for packaging in Malaysia

| GAP Identified | GAP identified |
|---|---|
| Lack of legal framework for EPR | Limited initiatives for organised private waste management |
| Fragmented waste-related legal framework in place | Significant informal sector operators |
| Lack of detailed recycling targets | Lack of initiatives to integrate the informal sector |
| Lack of ownership of the recycling targets | Limited availability of data, upstream and downstream |
| Lack of effective mechanisms for the enforcement of the legislation | Limited awareness for sorting at source and recycling |
| Confusing roles of the relevant stakeholders | Very limited Sorting at Source happening |
| Fragmented institutional framework relating to waste | Lack of direction at state level |
| Lack of monitoring mechanisms | Lack of clear signals by the state to the industry |
| Waste fees are unrealistically low | Intentions seem to be more ambitious than actual implementation |
| High dependance on landfills | Lack of direction at industry level |
| Imports of recyclables consumes local capacity | Limited interest by the bulk number of packaging producers |
| Fluctuating recycling capacities | Understanding the difference of Voluntary Vs mandatory EPR |
| Over-dependance on the informal sector | |

Challenges faced by MAREA



- Represents some major producers, but its challenging to attract more producer to join
- In a voluntary EPR ecosystem, the division between individual CSR initiatives of producers Vs the common EPR projects is blurred, and MAREA faces this challenge as it attempted to create more common EPR projects
- Despite the involvement of the Malaysian government in many international initiatives for the management of packaging and plastics, its commitment to EPR remains still vague
- In promoting new common EPR pilot projects, the issue of sharing the cost between the participating producers is challenging under voluntary EPR
- The agendas of an increasing number of contributors are not necessarily aligned between them and the body that represents them, in the current context
- The decision of the state authorities to propose to MAREA to act as a simulator of a PRO under mandatory EPR has not been monolithic (varying agendas by state institutions)
- State authorities do not seem to appreciate the complication of being in a voluntary regime and at the same time expected to act as if EPR was mandatory
- The collection of MSW is entrusted to some very strong waste operators, whose interest are not aligned with the promotion of sorting at source

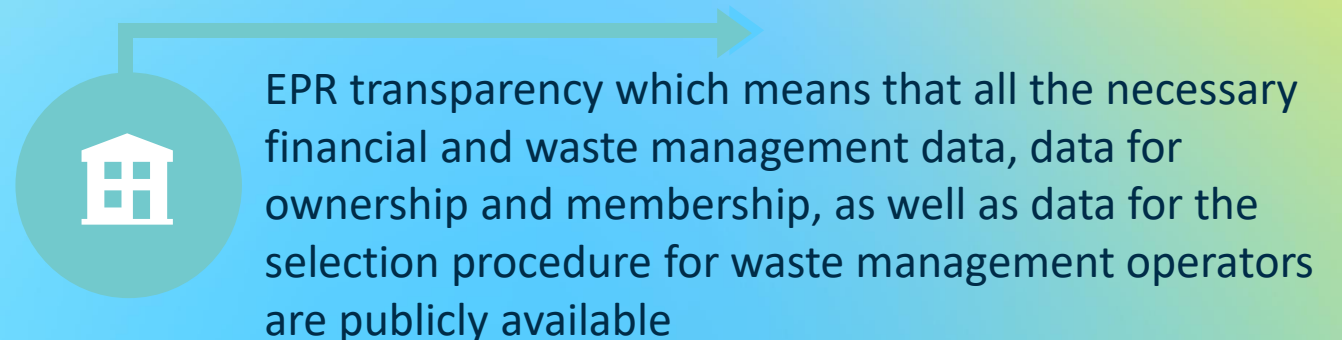
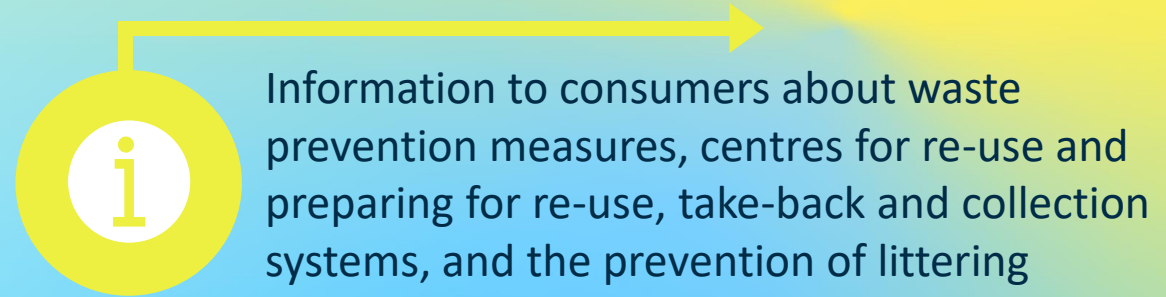
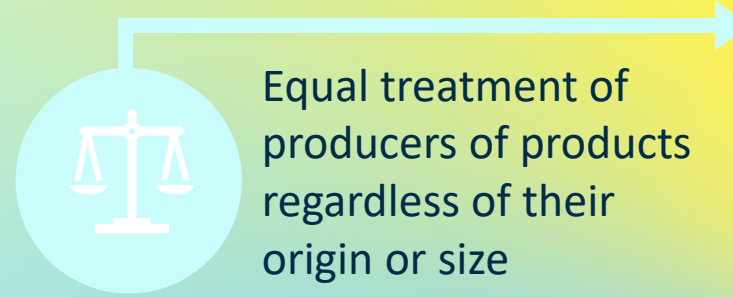
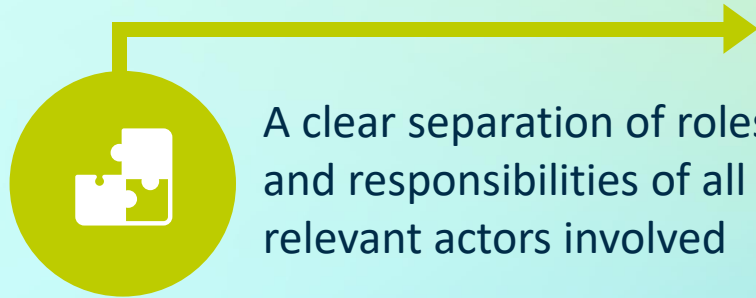
EPR Options Analysis - **SAMPLE**

Main options for the evolution of EPR for packaging in Malaysia

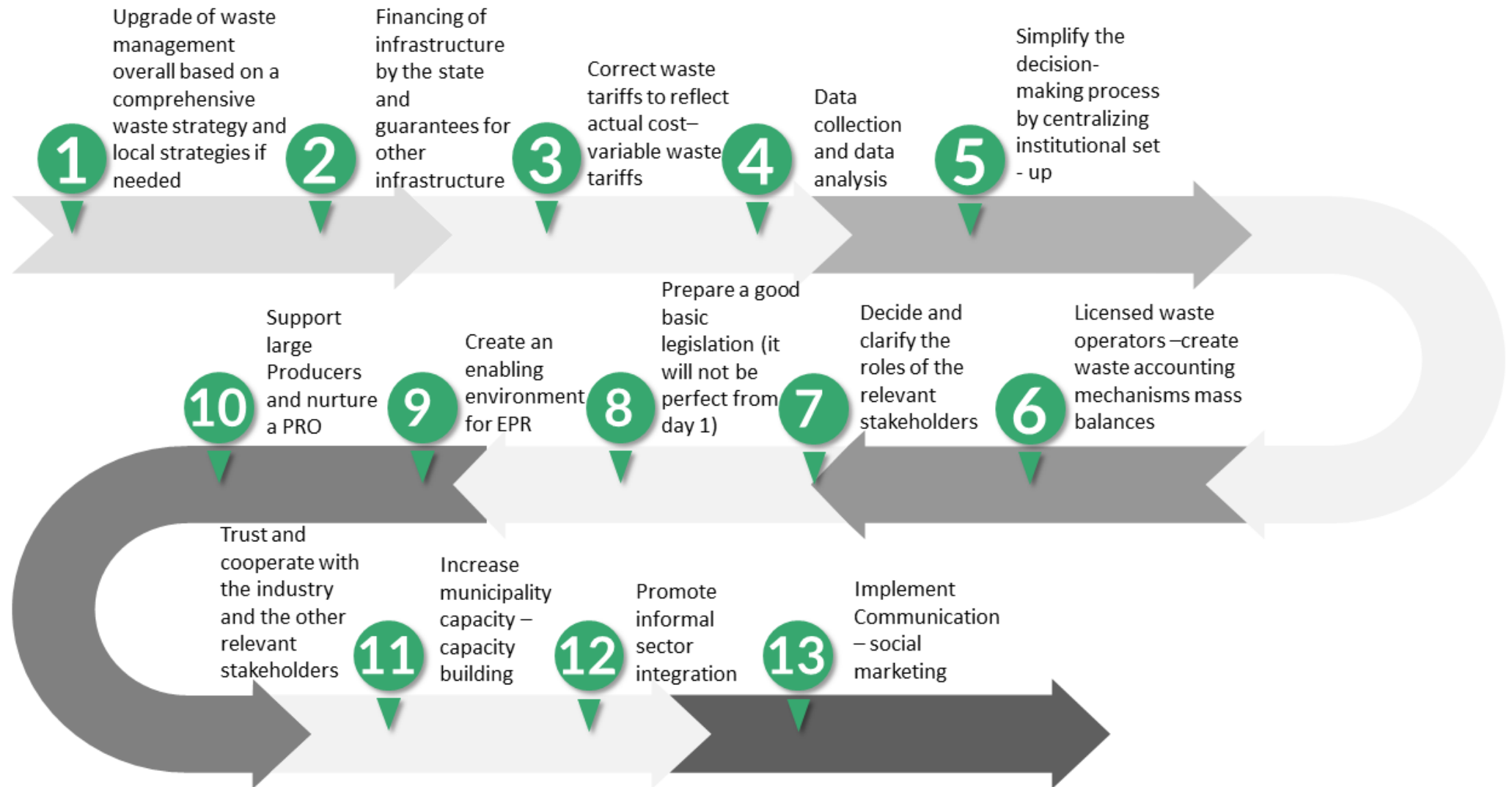
| GAP Identified | Options | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|---------|------|------|-----------------|-----|-----|-----|-----------|-------|-----|-----|--------|-----|-----|-----|------------------|-----|-----|-----|-------------|--|-----|-----|---------|-----|-----|-----|---------------------|-----|-----|-----|--|
| <p>Lack of legal framework for EPR</p> | <p>Government has to make decisions and proceed with the drafting of a legal framework for EPR This can take alternative formats:</p> <ol style="list-style-type: none"> A dedicated EPR law in primary legislation and packaging specific EPR act in secondary legislation EPR provisions in the Waste law in primary legislation and stream specific EPR acts in secondary legislation <p>The legislation will need to address issues of ownership of EPR, clear definitions of the producer, enforcement mechanisms, incentives to producers, targets, material scope, PRO licensing details, individual Vs Collective responsibility of producers, monitoring mechanisms etc.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Fragmented waste-related legal framework in place</p> | <p>Waste legislation needs to be aligned in the whole country to facilitate consistency in implementation and monitoring. Waste targets need to be consistent; the obligations and the roles of key stakeholders need to be aligned and monitoring should be consistent. Especially if responsibility is to be assigned to producers for the end-of-life management of their products, they should have a clear and consistent obligation to develop and finance systems to cover the whole of the county within a reasonable timeframe.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Lack of detailed recycling targets</p> <table border="1" data-bbox="242 882 682 1146"> <caption>Recycling targets for packaging</caption> <thead> <tr> <th></th> <th>Current</th> <th>2025</th> <th>2030</th> </tr> </thead> <tbody> <tr> <td>▪ All packaging</td> <td>55%</td> <td>65%</td> <td>70%</td> </tr> <tr> <td>▪ Plastic</td> <td>22,5%</td> <td>50%</td> <td>55%</td> </tr> <tr> <td>▪ Wood</td> <td>15%</td> <td>25%</td> <td>30%</td> </tr> <tr> <td>▪ Ferrous metals</td> <td>50%</td> <td>70%</td> <td>80%</td> </tr> <tr> <td>▪ Aluminium</td> <td></td> <td>50%</td> <td>60%</td> </tr> <tr> <td>▪ Glass</td> <td>60%</td> <td>70%</td> <td>75%</td> </tr> <tr> <td>▪ Paper & cardboard</td> <td>60%</td> <td>75%</td> <td>85%</td> </tr> </tbody> </table> | | Current | 2025 | 2030 | ▪ All packaging | 55% | 65% | 70% | ▪ Plastic | 22,5% | 50% | 55% | ▪ Wood | 15% | 25% | 30% | ▪ Ferrous metals | 50% | 70% | 80% | ▪ Aluminium | | 50% | 60% | ▪ Glass | 60% | 70% | 75% | ▪ Paper & cardboard | 60% | 75% | 85% | <p>It is not sufficient to have recycling targets only on the total waste stream, or only landfill diversion rates for the municipal solid waste. Especially when the intention is to transfer responsibility to the producers for the end-of-life management of their products, there should be specific recycling targets for each waste stream and for each type of material ideally on an annual basis. PROs are designed and deployed to meet specific recycling targets per year, and this guides their geographical coverage, intensity of efforts, investments, communication campaigns etc.</p> <p>Targets will have to be ambitious but should remain realistic, because recycling of packaging takes time to evolve. Non-realistic recycling targets may deter the industry from trying to meet them</p> <p>A good guide for target setting could be provided by the evolution of EU packaging recycling targets, since they reflect the practical implications for meeting these targets. The Table in the left reflects those targets currently and, in the future.</p> |
| | Current | 2025 | 2030 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ▪ All packaging | 55% | 65% | 70% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| ▪ Paper & cardboard | 60% | 75% | 85% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Lack of ownership of the recycling targets</p> | <p>When setting recycling targets, the obligations to meet them should cascade down to all the stakeholders that have a role to act in meeting them. For packaging, besides the obligations transferred to producers to organise and finance the collection and recycling of packaging, the regions and the local authorities have a major role to play since they may be involved in collection, in communication initiatives, in monitoring SAS, in facilitating the development of infrastructures and the quality of materials, etc. If the local authorities are not bound by time related recycling targets in their territories, is possible to be indifferent and that makes the meeting of targets very difficult.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

Helpdesk Pilot: EPR Options Analysis

Minimum requirements for the successful implementation of EPR



Roadmap for EPR implementation



SAMPLE

| Roadmap for engaging with Producers | 2024 | 2025 | 2026 | 2027 |
|--|-------------|------|------|------|
| Legislation finalised (waste law – EPR framework – packaging law) | End of 2024 | | | |
| Simplify the waste governance structure at Government level | | | | |
| Communicate publicly the commitment to EPR at the highest political level | | | | |
| Prepare a state online platform to share information and FAQs about EPR | | | | |
| Prepare roadshows to explain EPR | | | | |
| Explain EPR to smaller producers | | | | |
| Establish a state Packaging Registry and ask Producers to annually report their packaging put on the market | | | | |
| Organise a high level EPR conference to present the EPR legal framework once its final | | | | |
| Set – up a small coordination committee between the Ministry and MAREA to facilitate the development of a PRO | | | | |
| Develop and enforce a Green Procurement Guide for the state and greater state departments and encourage the purchases only from producers that undertake their producer responsibility | | | | |
| Limit the participation to public tenders for the purchase of products, only to companies that undertake their producer responsibility | | | | |
| Time provider to the Producers to set – up and apply for license PRO(s) | | | | |
| License of PRO(s) | | | | |
| Time provider to start full scale PRO operations | | | | |
| Start penalizing free riders | | | | |
| Make sorting at source an obligation to citizens | | | | |
| Install recycling targets for Municipalities | | | | |



Deliverables

- Desktop Research and Research Summary with key findings – Interviews with key stakeholders was not considered by the client an appropriate and timely approach to collect information.
- MAREA already had a plan and a budget in place for a number of pilots to test different collection approaches. A Workshop was designed and presented to the key contributors that facilitated an agreement on a budget for the pilot projects
- GAP Analysis and Options Analysis for the implementation of EPR, including a road map and a relevant timeframe
- Support to MAREA on a position paper for the expansion of voluntary EPR initiatives through MAREA
- Report (ppt) on the Collaboration between key stakeholders, the purpose of Pilot programs and the integration of the informal sector
- Report and ppt presentation on “Setting up a PRO in mandatory EPR conditions - Key steps and parameters”
- Workshop for MAREA Steering Committee to present key findings of the work done in the project, and suggestions on the steps that MAREA should take in the context of acting as a simulator for expanded EPR implementation
- Support to MAREA on site with a trip in Kuala Lumpur to capacitate the local MAREA team and also participated in meetings with key stakeholders and state authorities
- Support to MAREA for the preparation of a more detailed plan by MAREA for its expansion, and for its preparation as a PRO in a future mandatory EPR context
- Final Report
- Post project support with a report on packaging registry for the PRO (current and future scoping)



Key Achievements of the Pilot

- The Pilot in Malaysia worked to support mostly MAREA and its contributors. One of the key challenges was, and is, the alignment of Agendas while under a voluntary EPR context, and the pilot has contributed to this alignment. It has also helped to create an urgency to the key contributors to act proactively and push for more common actions
- The pilot also helped to highlight to both MAREA, its contributors and the state, that there is so much you can do in a voluntary EPR context and that you cannot expect the development of a fully fledged PRO before you make the necessary commitments to move to mandatory EPR
- The pilot contributed to further capacitating the MAREA team and the Steering Committee of MAREA on the implementation of EPR
- The main contribution towards the state authorities was to clarify that EPR implementation by the industry requires a lot of support and nurturing work by the state, along with close monitoring by the authorities to make EPR a success. Examples from mature markets demonstrate that these are common characteristics in successful EPR implementations
- Certain aims have been revised or omitted while they were in the initial planning (i.e. calculation of the fee structure and getting the buy-in from members on the proposed fee structure, guidance on establishing financial mechanisms such as eco-modulation or deposit-refund systems, guidance on promoting eco-design and eco-innovation among producers), because these are elements of a developed EPR evolution and were not relevant to MAREA at this point in time – its too early for these issues

Gap analysis, recommendations and conclusions for Argentina



Diagnosis

1. Documentary review

2. Interviews (20)

- CADIBSA
- ECOPLAS
- COPAL
- IAE
- Nestle
- AB InBev
- Bimbo group
- Ball Corporation
- Ministry of Tourism, Environment and Sports
- CEMPRE
- Arcor
- ARS
- CPA
- RUO Cooperative
- El Ceibo RSU Cooperative
- CABA Under secretariat of Urban Hygiene
- D.O.W.
- ADIMA

3. Field visits and interviews



4. Pinamar Workshop April 18-19: “Proposal of bases for the creation of a voluntary PRO”



Some of the gaps identified

Lack of:

1. A mandatory packaging EPR
2. Adequate separation at the source
3. A national eco-design policy
4. Trust between stakeholders
5. Harmonized waste management systems at a national level
6. Alignment on the role of the “Producers” and other participants
7. Cost-efficient infrastructure and collection systems at a national level
8. Monitoring and traceability of packaging waste management
9. Cooperation between different PROs initiatives
10. Taking advantage of the high degree of professionalism and leadership present in all stakeholders





General recommendations

1. Establish economic incentives to avoid disposal in landfills (taxes) and to promote innovative recycling infrastructure (subsidies)
2. Establish a national policy for the integration of informal workers
3. Establish a national “Just Transition” table with all stakeholders to ensure not leaving behind informal workers and other vulnerable communities
4. Harmonization of waste management standards (policies) to facilitate the EPR implementation
5. Ensure cost-efficient packaging waste management based on international references
6. Improve monitoring and traceability → there is a project in progress
7. Incorporation of performance indicators in current agreements in between municipalities and waste pickers cooperatives
8. Implement a separate collection of used glass bottles from other types of packaging materials

Recommendation of phases for the implementation of a PRO

PHASE 0

(Current situation)

Without EPR regulation

- Individual Approach
- Few Producers
- Few Materials
- Few Territories
- Few incentives
- No traceability
- Focus: compliance with corporate sustainability and SCR policies

PHASE I

(2 to 4 years)

Without EPR regulations

- Collective Voluntary PRO
- More Producers
- More Materials
- More Territories
- Incentives for the entire value chain except collection
- Eco-design and use of recycled material
- Focus: EPR principles, traceability, social inclusion and cost-efficient systems

Public-private collaboration to set up the EPR regulation

PHASE II

(2 years)

EPR Packaging Decree-Law already enacted

- Collective Mandatory PRO
- All Producers
- All Materials
- All Territories
- Financing of the entire value chain
- **Focus: implementation of the EPR model, gradualness and costs**

PHASE III

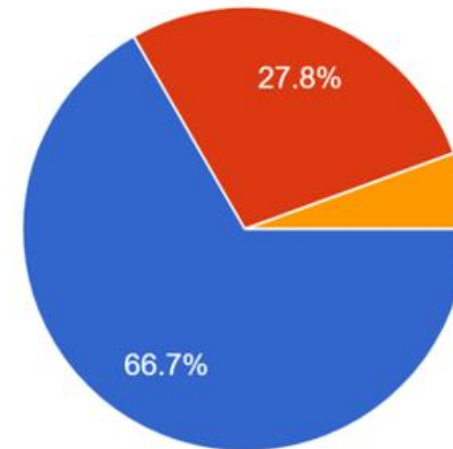
- Packaging Decree-Law
- Collective Approach: Mandatory PRO
- All Producers
- All Materials
- All Territories
- Financing of the entire value chain
- **Focus: achievement of goals, cost control, optimization, monitoring, free riders**

Closing workshop

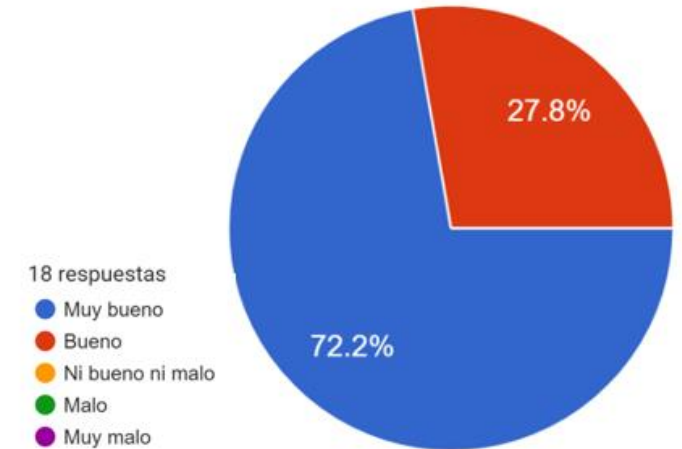
- The event was considered a starting point for the implementation of a voluntary packaging PRO in Argentina
- CEMPRE highlighted the participation and commitment of the environmental authority with this industry initiative.
- The commitment of the different stakeholders was reflected in the large number of attendees (71)
- The exchanges promoted by this event allowed to perceive the good predisposition of other voluntary packaging PRO initiatives to coordinate a collaborative work.
- Press notes and expressions on social networks are testimony to the high impact of this event.



How do you evaluate the contribution of GAP for EPR's international consultancy in Argentina for the implementation of a Voluntary PRO (SGV)?



How do you evaluate the contribution of the GAP for EPR international advisory consultants in Argentina for the implementation of a Voluntary PRO (SGV)?



18 respuestas
● Muy bueno
● Bueno
● Ni bueno ni malo
● Malo
● Muy malo



Conclusions regarding Argentina

1. Industry is expected to work on a transition from small-scale and low-budget individual initiatives to a collective approach with greater technical, financial and social requirements.
2. Argentina is expected to take advantage of the great progress that has been made in some provinces (Buenos Aires) regarding the inclusion of the informal sector
3. The large existing infrastructure for collecting and sorting packaging waste and the wide network of waste pickers cooperatives in charge of this in the city of Buenos Aires is a solid base for the implementation of EPR in Argentina but it is necessary to focus on costs and efficiency
4. One of the main challenges is to generate the necessary trust between the different stakeholders
5. Any new EPR legislative initiative will require the support of other regulatory bodies to encourage separation at source, discourage landfilling, boost the recycling industry and a just transition for the integration of waste pickers and other vulnerable communities
6. As a result of the consultancy process today the main Producers organisations are pretty aligned and ready for a collaborative work with a very committed environmental authority



Thank you