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**To:**

European Commission
Directorate-General for Environment (DG ENV)

**From:**

BGHR, a swedish industry association for sustainable chemicals in hygiene and cleaning products, Mailbox 401, 111 73 Stockholm info@bghr.se

**Subject:**
Proposal Regarding PPWR (Packaging and Packaging Waste Regulation)

Version 1.0

# Excessive plastic consumption due to unsustainable business models, hazardous chemicals, and deficient mechanical functionality in pumps within the hygiene industry

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# 1. Problematic Practices in the Hygiene Sector: Unique Dispenser Solutions and the Environmental Impact of Excessive Plastic Waste


For a long time, many hygiene product retailers have chosen to develop unique dispenser systems, often made of plastic, as a strategy to offer these dispensers for free to customers. The business model behind this is to secure long-term contracts for the supply of chemicals, which are packaged in plastic containers specifically designed to fit only within their proprietary dispenser systems.

While this approach may appear beneficial for consumers initially, it leads to several significant environmental and economic concerns. The most pressing issue is that these dispensers are often discarded when switching suppliers, despite their continued functional lifespan. This practice generates large amounts of unnecessary plastic waste, exacerbating the already critical global problem of plastic pollution.

Additionally, when a customer changes suppliers, wall-mounted dispensers, often made of plastic or metal, are frequently discarded as waste.

**Proposal for Part of the Solution:**

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A standard for refill packaging is necessary, particularly when a closed distribution system is required (e.g., for flammable liquids).

We propose that the European Union enact legislation to establish a standard for dispensers, ensuring that they are compatible across different suppliers. Such legislation would not only reduce the environmental impact by promoting the reuse and recycling of dispensers, but it would also eliminate the need for single-use, proprietary systems that encourage wasteful practices.

By creating a standardized framework for dispensers, the EU can help minimize plastic waste, improve sustainability within the hygiene industry, and encourage circular business models where products are designed to last longer and be reused across different systems.

By requiring that dispensers be purchased rather than given away for free, businesses would be incentivized to develop more durable and reusable dispensers. This would lead to fewer dispensers being disposed of after short-term use, reducing the amount of plastic waste generated. Moreover, focusing on refillable systems would promote the use of sustainable packaging and encourage recycling, further decreasing the overall environmental impact.

Introducing a ban on distributing free dispensers helps reduce plastic waste by encouraging consumers and businesses to use dispensers that are designed for long-term use and are compatible with refillable systems.

# 2. Difficult-to-Empty Solutions Creating Hazardous Waste

Packaging designed with a unique structure, which makes it difficult to replace rather than being efficient, is often hard to fully empty. This not only leads to inefficiency but also to the creation of hazardous waste, particularly if the chemicals inside are flammable, as is the case with all ethanol-based hand sanitizers.

Such packaging designs can trap chemical residues, which may pose risks to both human health and the environment. This issue becomes especially critical when the chemicals inside the packaging are hazardous, as they can create additional dangers if not properly disposed of or recycled. The challenge lies in ensuring that packaging is

both functional and safe for disposal, in order to prevent the generation of toxic waste and to improve recycling rates.

**Proposal for Part of the Solution:**

A design standard with an architecture focused on safety and effectiveness in emptying the cartridge (which is always plastic, while the dispensers can also be made of metal).

**Proposal for producer responsibility in the collection of ethanol-based and other hazardous chemicals in hygiene product containers**

In light of the challenges in properly emptying containers for ethanol-based and other hazardous chemical hygiene products, it is proposed that producers assume responsibility for the collection and proper disposal of these containers. Since these products often contain flammable or hazardous substances, improper handling can result in environmental hazards, safety risks, and potential fire hazards.

Implementing a producer responsibility scheme would ensure that manufacturers take accountability for the safe collection, recycling, and disposal of packaging that contained ethanol-based or other hazardous chemicals. This system would reduce the risk of contamination in waste streams, promote safer disposal practices, and minimize the environmental impact associated with hazardous waste.

Such an approach would align with the EU's sustainability goals, reduce safety risks for consumers and waste handlers, and contribute to better recycling and more sustainable waste management.

In line with the **"polluter pays"** principle, producers should bear the costs associated with the disposal and treatment of packaging containing hazardous chemicals. This would ensure that those who produce and profit from these products are also responsible for the environmental costs of their disposal, reducing the burden on taxpayers and waste management systems.

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# 3. Deficient Mechanical Functionality in Pumps Prevents Full Emptying of Bottles

A common issue with pumps used in hand sanitizer bottles is that they often do not empty the bottle completely. Typically, up to 7% of the contents remain trapped in the bottle, which can lead to inefficiencies and unnecessary waste. This residual liquid, especially if the sanitizer is ethanol-based, can create significant environmental concerns. The remaining solution is considered hazardous waste due to its flammability and chemical composition.

In many cases, cleaning companies that manage refill services replace products even earlier than necessary. This is done to ensure that the dispensers are fully functional and stocked when customers use them in their workplaces, leading to further premature disposal of partially used bottles. The remaining solution is often discarded without being fully emptied, increasing waste generation and contributing to the creation of hazardous waste.

When these bottles are discarded without properly emptying the contents, the leftover chemicals can contaminate waste streams, leading to the creation of toxic waste. Moreover, this issue compounds the environmental burden, as the packaging is often discarded prematurely, further contributing to unnecessary waste generation.

**Proposal for Part of the Solution:**

Requirement for pumps with improved efficacy

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# The Impact of Increased 3R Requirements on Sustainability in the Hygiene Sector

An increased emphasis on the 3Rs would encourage more customers to choose sustainable chemicals for their hygiene products, ultimately reducing both plastic waste and, most importantly, hazardous waste.Currently, many hazardous chemicals require specialized packaging materials to withstand strong substances and permits for open handling, which is not conducive to the 3Rs (Reduce, Reuse, Recycle). However, by focusing on refill solutions, there would naturally be a shift towards more sustainable chemicals, this would not only reduce environmental harm but also encourage the adoption of more eco-friendly packaging materials and enable refilling without the risk of fire or the need for a permit.

This shift would lead to a reduction in overall waste, as well as a decrease in hazardous waste generation. Additionally, it could enable easier recycling, reuse, and the prevention of dangerous waste formation. With the focus on refillable solutions and safer, more sustainable chemical alternatives, we can significantly minimize the environmental impact and promote a circular economy within the hygiene industry.

Most suppliers of ethanol-based hand sanitizers also offer their own solution for dry hands and cracks, such as hand cream. Hand softening becomes less of an issue if the skin's natural oils are not stripped away by harsh chemicals, thus reducing the consumption of unnecessary packaging. This aligns with the waste hierarchy, especially when transitioning to more sustainable chemicals.

The number of landfill fires in Sweden is increasing, highlighting the urgent need for cleaner waste fractions to improve material recycling rates. When waste is contaminated or mixed with other materials, it becomes more difficult to recycle efficiently, which directly impacts the quality and quantity of recyclable materials. By ensuring that waste is sorted more effectively and cleaner waste streams are established, we can significantly enhance the material recovery rate, reduce environmental risks, and prevent hazardous incidents such as landfill fires.

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**Misleading guidelines due to pressure from existing stakeholders**

The **Swedish Environmental Protection Agency (SEPA)** has provided guidance stating that, in most cases, packaging from products such as hand sanitizers should be treated as non-hazardous waste. However, according to the EU's classification of packaging waste, these containers do not even qualify as packaging waste but should instead be considered residual waste. In the case of ethanol-based hygiene products, the packaging is classified as hazardous waste due to the chemicals involved.

This distinction is important for proper waste management, as it influences how such products are handled, recycled, and disposed of. While SEPA's guidelines might offer a more lenient approach, the classification according to EU standards suggests a more stringent need for careful handling of packaging that contains hazardous substances.

**Proposal for Part of the Solution:**

To ensure the effective implementation of EU standards and frameworks, it is essential to provide support to the authorities of member countries. Existing stakeholders may engage in lobbying efforts to maintain the status quo, so it is important to offer the necessary resources, expertise, and guidance to local authorities to overcome resistance and ensure compliance with the new regulations. By strengthening capacity and ensuring proper enforcement, the EU can create a more sustainable and responsible framework for the management of hazardous waste, including packaging from hygiene products.

# Conclusion

Distributing free dispensers, locking customers into supplier-specific formats, the lack of efficacy in pumps, and improper waste sorting will not lead us toward a circular economy.

Authorities need to adhere to directives that make it easier for customers to choose sustainable options.

With an industry history where the most concentrated chemical provides "the most value for money," offering a free dispenser to dispense it is the opposite of a circular economy.

Regulations, oversight, and economic instruments are crucial for leveraging existing innovations and preventing unnecessary plastic consumption.

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