

# **MBB Assessment Report**

## **Packaging & Packaging Waste Regulation**

Gabriel Cassar  
Manager – EU Policy (Sustainability)



# Malta Business Bureau

- The MBB is the EU business advisory organisation of The Malta Chamber and the Malta Hotels and Restaurants Association.
- Partner of the Enterprise Europe Network.
- Offices in Malta & Brussels.
- Two key roles:
  - EU policy lobbying & advocacy
  - EU & national project implementation

# Subject Companies

- Consulted companies operating in the following industries and sectors likely to be impacted:



## Design

Food and Beverage  
manufacturers  
Packaging manufacturers

## Production

Food and Beverage  
manufacturers  
Packaging manufacturers

## Management

Food and Beverage  
manufacturers  
Packaging manufacturers  
Retail  
Importers and Distributors  
HORECA

## Key Concerns Highlighted

Lack of specificity in terms of targets & obligations

Uncertainty surrounding required change

Unclear transition periods

Unintended consequences of compliance

Deficient harmonization with other legislation and policies

Absence of supporting infrastructure to enable feasibility

## Recommendations

- The proposal holds a general positive purpose but can be carefully amended to facilitate implementation and reduce transition costs.

### Clearer guidelines on scope, definitions and exemptions

- What constitutes suitable packaging – e.g. recyclability criteria.
- Clarify exemptions for certain HORECA establishments.
- Health & Safety concerns.

# Recommendations

Justifications of certain targets, and bans must be clarified

- High reuse targets in HORECA.
- General ban of certain packaging features (e.g. double walls and false bottoms) is considered arbitrary.

Need to provide sufficient transition periods

- Changes will take time and involve significant costs.
- Built up stock would be discarded at no environmental benefit.

# Recommendations

## Appropriate infrastructure and consumer buy-in is needed

- Need to ensure that business investments are not wasted due to lack of proper infrastructure or consumer negligence.

## Provision of solutions & acknowledge gaps

- Solutions need to be cost-effective and maintain business competitiveness.
- Public support would be beneficial to ease the transition.
- Adequate solutions may not exist in all situations – e.g. high-flow areas, food packaging and effect on shelf-life.

# Recommendations

Companies should review materials and packaging used

- Identify areas of improvement.
- Take up ecodesign principles.

Invest in educational campaigns targeting consumers



## **Gabriel Cassar**

Manager - EU Policy  
(Sustainability)

[gcassar@mbb.org.mt](mailto:gcassar@mbb.org.mt)

*The Malta Business Bureau is the EU business advisory organisation of The Malta Chamber and The Malta Hotels and Restaurants Association. It is also a partner of the Enterprise Europe Network.*