

Recognising the contribution of packaging design to innovation, competitiveness & sustainable growth

- Our associations, representing the **spirits, wine and container glass sectors** support the objectives of the Packaging & Packaging Waste Regulation (PPWR). Our members are fully committed to **improving product sustainability and to reducing the weight of their packaging**. Light-weighting and innovation help us cut costs and carbon footprints.
- While we support the overall objective of packaging minimization, we fear that as it stands the PPWR proposal will severely restrict packaging design, with serious side-effects on **far-reaching negative consequences on consumer-choice, product value, brand identity and the competitiveness of the European industry**.
- **Design is key** to brand building, elevation, premiumisation, differentiation and recognition by consumers. Packaging represents the product it contains and its brand. No longer including 'consumer acceptance' and 'marketing and product presentation' in the performance criteria (Annex IV) related to packaging minimisation (article 9) carries the risk of having **detrimental effects on the design of packaging, leading to standardization**.
- Many packaging designs are integral to the **EU's tradition, cultural heritage and know-how**. **Intellectual Property rights (including Geographical Indications and trademarks) play a vital role** for sectors whose businesses rely directly on the added value of their innovations and on the tangible and intangible values of their products. IP rights are key to brands' competitiveness on EU and global markets, **while guarding against counterfeiting off and online**.
- On top of its **health and environmental credentials**, the unique characteristics of glass in terms of design, transparency, shapes, colours and versatility make **glass an integral part of the product**, helping brand recognition and appealing to consumers.
- Glass-packed products **promote the reputation, image, competitiveness and profitability of Europe's industry worldwide, boosting exports and helping the EU's trade balance**. Products contained in glass make up **€250 billion** of EU external trade.
- Our sectors consider that it is critical to understand and acknowledge the **value added of packaging in the product** and the **diversity of packaging functionalities to contribute to innovation, competitiveness & sustainable growth**.
- We believe that packaging should be designed so as to **optimise its volume and weight** while maintaining its ability to **perform the packaging functions** and allowing for **reasonable and proportionate design differentiation**.

About Comité Européen des Entreprises Vins (CEEV)

Comité Européen des Entreprises Vins (CEEV) represents EU wine companies in the industry and trade (still wines, aromatised wines, sparkling wines, liqueur wines and other vine products). It brings together 25 national organisations from 13 EU Member States, plus Switzerland, the UK and Ukraine, as well as a consortium of 4 leading European wine companies. The companies represented by CEEV, mainly SMEs, produce and market most quality European wines, both with and without a geographical indication, and account for over 90% of European wine exports.

About FEVE

FEVE is the association of European manufacturers of glass containers. The glass packaging industry generates 125,000 direct and indirect jobs thanks to 160 container glass production sites in Europe producing a wide range of glass packaging products for food and beverages, perfumery, cosmetics and pharmacy for European and global customers. FEVE members have plants in 23 European countries. Container glass is one of Europe's best recycled products. See more on www.feve.org.

About SpiritsEUROPE

SpiritsEUROPE represents one of Europe's most valuable agri-food export sectors, and with it the interests of 31 spirit producers' associations as well as 11 leading multinationals. Distilled spirits are as diverse as the EU itself, spanning 44 product categories and including a host of geographically-specific products that contribute to the culture of their regions (250 GIs).

SpiritsEUROPE's mission is to represent, defend and promote the European spirits sector and help members achieve sustainable business growth.