

December 2024

Evaluation of the Single-Use Plastics Directive

Effectiveness and Compliance across
Europe



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#Break
Free
From
Plastic

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INTRODUCTION

Six years after the start of the implementation of the Single-Use Plastics (SUP) Directive across EU Member States, the European Commission is required to evaluate the effectiveness of the Directive, identifying its shortcomings and addressing any gaps and challenges that may have arisen. This evaluation process will begin in 2025, engaging all relevant stakeholders to prepare the ground for a potential revision of the SUP Directive, possibly with adjusted and/or more measures or items covered. The new EU packaging regulation (PPWR) also recently added some items to the current list of market restrictions in the SUP Directive, such as protection chips used for transport and parcels, luggage wrap in airports, and multipack plastic rings for grouped packaging.

The Rethink Plastic alliance, together with the wider Break Free From Plastic movement have carried out an evaluation of the Directive implementation, building on the previous transposition and implementation assessments published by the Rethink Plastic alliance to monitor developments since 2019, as well as recent assessments from our members on the state of play in their respective countries. We also highlight the positive impact that the SUP Directive has had, both in raising general awareness about single-use plastic pollution and promoting a preventive approach to the global plastic pollution crisis, as opposed to relying on clean-up and recycling-focused approaches.

This report provides an overview of the implementation of the Directive including its successes and identified challenges using examples across EU Member States. It discusses the effectiveness of the SUP measures with a particular focus on those that delivered the greatest benefits and inspired the dissemination of best practices on the ground. It concludes with a set of recommendations to provide input for the EU level evaluation of the Directive.



CHAPTER 1. COMPLIANCE ASSESSMENT

Implementation: Biggest progress and remaining issues

1.1. Legal issues with transposition

The transposition and implementation of the SUP Directive faced delays. One of the reasons used by Member States to explain this delay was the COVID-19 pandemic which hit Europe in February 2020. As a consequence, many EU Member States did not meet the official transposition deadline of 3 July 2021.

In light of these delays, in 2022, the European Commission initiated infringement procedures against 11 Member States for failing to fully transpose the Directive or meet the required deadline (see details [here](#)).

These Member States were: **Belgium, Croatia, Denmark, Estonia, France, Finland, Ireland, Latvia, Poland, Portugal**, and **Slovenia**. All of the infringement cases have now been closed, with the exception of three: **Belgium, Denmark** and **Finland**.

In 2023, the European Commission started conformity checks of the national measures, transposing the SUP Directive in the Member States. The outcome of this assessment is still pending, however, from the perspective of the NGOs, **Italy's** transposition is problematic due to its introduction of exemptions which exclude certain biodegradable and compostable plastics (those certified in compliance with UNI EN 13432) from the mandated market restrictions, as well as single-use plastic items containing less than 10% plastic such as lined plastic cups. These exemptions were not foreseen by the original Directive. On the contrary, the guidelines on single-use products - in addition to the recitals and definitions set in the Directive - confirm that such exemptions are not in line with the EU text. We also found a similarly problematic exemption in **Latvia** where polystyrene food containers can still be used for takeaway services. In other Member States, legal issues with transposing the Directive appear to have been identified and resolved which is positive.



1.2 - Recent changes and evolution across EU Member States

Since 2022, when we published our last report which included a colour-coded assessment across all measures of the Directive, quite a few Member States have seen an improvement of the situation at their national level, with more measures and secondary legislation adopted. This was, for example, the case of **Austria, Belgium, Croatia, Ireland, Netherlands**. As a result, **Austria** and **Ireland** now appear in the green category of our assessment.

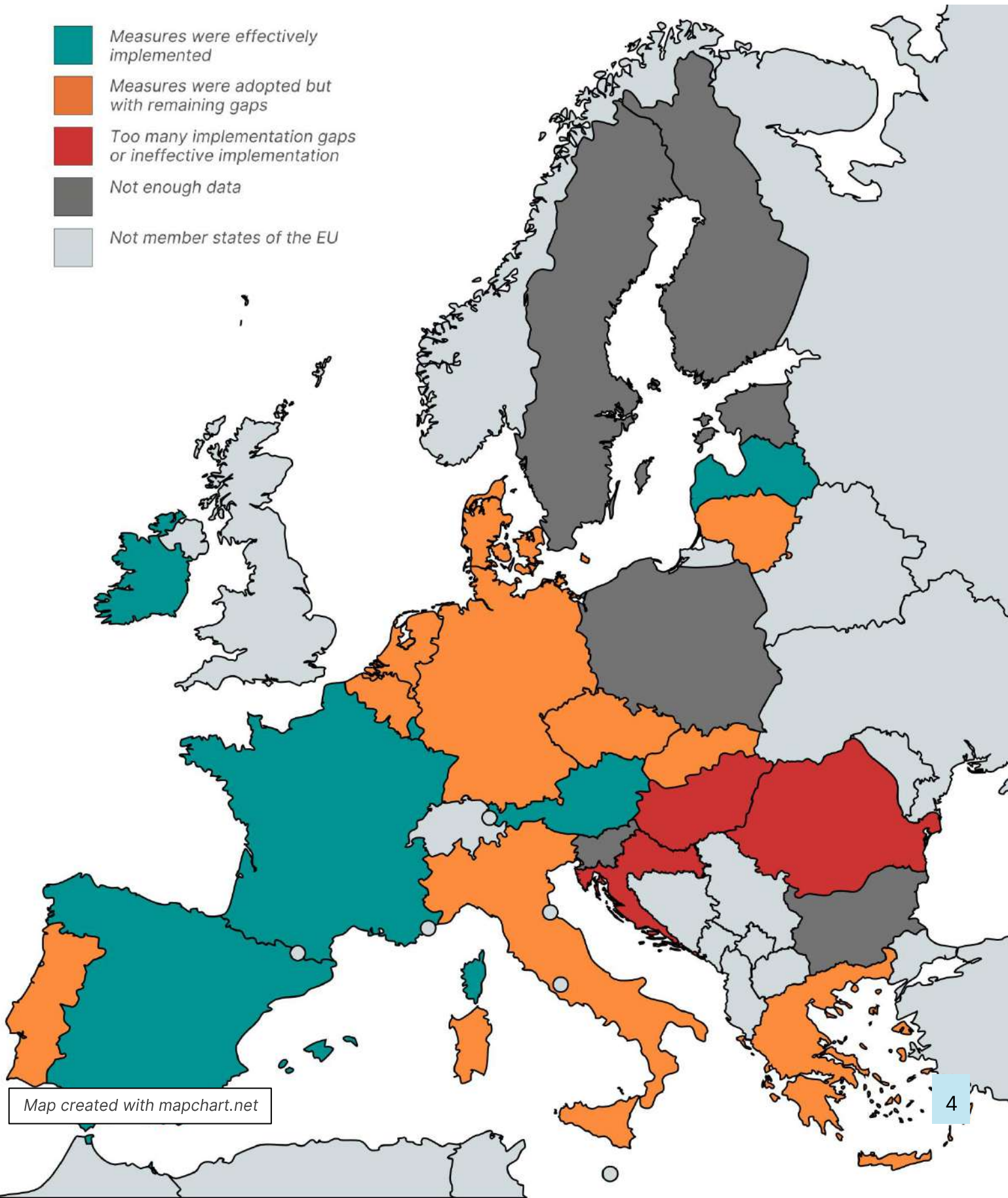
There is a small group of countries, namely **Cyprus, Germany, Greece, Ireland, Portugal**, which initially introduced rather ambitious plans. However, a closer examination reveals a more nuanced reality, with a decrease in their original level of ambition. **Greece, Ireland, and Portugal**, for example, remain at the forefront of the fight against marine pollution from SUPs. However, they have failed to fully implement the ambitious transposition measures they adopted back in 2021, with delays in key technical decisions such as consumer taxes for Ireland, a national Deposit Return System in **Portugal** and clear measures to achieve consumption reduction targets in **Greece**. **Greece** and **Ireland** are also facing difficulties to enforce certain local bans, due to the lack of inspections and enforcement mechanisms. This problem also persists in other countries such as **Croatia, Cyprus** and **Latvia**.

Countries where the situation remains unchanged compared to 2022 include **Czech Republic, Denmark, Italy, Luxembourg, and Sweden**.

Countries that continue to lag behind with very low ambition on the topic include: **Bulgaria, Hungary, Poland, Romania** which are joined by **Croatia** and **Cyprus** in the red category due to major remaining gaps with implementation in these countries.

Effectiveness of measures in EU Member States

-  Measures were effectively implemented
-  Measures were adopted but with remaining gaps
-  Too many implementation gaps or ineffective implementation
-  Not enough data
-  Not member states of the EU



Map created with mapchart.net

Updated table of national situations regarding implementation

EU Member States	Art 4 CR	Art 5 Bans	Art 6-7 Design & Marking	Art 8 EPR	Art 9 Sep Coll	Art 10 AR	Overall assessment
Austria	Green	Green	Green	Green	Green	Green	Green
Belgium	Green	Green	Green	Orange	Orange	Red	Orange
Croatia	Red	Green	Green	Orange	Green	Red	Red
Cyprus	Red	Red	Orange	Red	Orange	Red	Red
Czechia	Red	Green	Green	Orange	Green	Orange	Orange
Denmark	Orange	Green	Green	Green	Green	Orange	Orange
France	Green	Green	Green	Orange	Green	Orange	Green
Germany	Orange	Green	Green	Orange	Green	Orange	Orange
Greece	Green	Orange	Green	Orange	Orange	Orange	Orange
Hungary	Red	Green	Green	Red	Green	Red	Red
Ireland	Green	Green	Green	Orange	Green	Orange	Green
Italy	Orange	Red	Green	Orange	Orange	Orange	Orange
Latvia	Green	Orange	Green	Green	Green	Orange	Green
Lithuania	Orange	Green	Green	Green	Orange	Orange	Orange
Luxemburg	Green	Green	Green	Green	Green	Orange	Green
Netherlands	Orange	Green	Green	Red	Green	Red	Orange
Portugal	Green	Green	Green	Orange	Orange	Orange	Orange
Romania	Orange	Orange	Green	Orange	Orange	Red	Red
Slovakia	Green	Green	Green	Orange	Green	Red	Orange
Spain	Green	Green	Green	Orange	Green	Orange	Green

Colour-code for the table: green for effectively implemented measures, orange for measures addressed but with remaining gaps, red for measures with too many implementation gaps or ineffective implementation.

1.3 - Implementation success stories

1.3.1. A wide implementation of SUP bans (Article 5)

Among the measures of the SUP Directive that were very well implemented across the board are the bans on certain single-use plastic items, also called “market restrictions”, introduced by Article 5. These market restrictions target unnecessary and replaceable items such as single-use plastic straws, plates, cutlery, polystyrene cups, cotton buds, stirrers, and balloon sticks, which represent the top most polluting items on EU beaches.

Even if some of these banned items can still be found on the EU market (either online or through local distributors selling old stock), infringements generally remain very local. The implementation of the Directive led to a widespread phase-out of these single-use items, significantly increasing public awareness about the pollution they cause and highlighting the importance of reducing the production and use of single-use plastics overall.

At the other end of the spectrum, **some Member States have exceeded the Directive’s ambitions, and have adopted additional bans** on items that have been identified as contributing to an acute pollution in their country.

This is the case in Belgium, France, Spain, Portugal and Greece, for example, which banned single use plastic items related to beverages and food.

Portugal and Luxembourg adopted a ban on SUP packaging for fresh fruits and vegetables, with exemptions and with several deadlines running until 2026 for certain fruits and vegetables.

Spain adopted a similar ban for portions under 1.5 kg, albeit with an exemption for easily damaged products. The 2023 Spanish Waste Law also leaves the door open for adopting additional bans in the future, with Article 37 stating that marketing restrictions may happen “where it is demonstrated that the waste generated by such products have a very significant and negative impact on human health or the environment.” Ambitious measures were also adopted at the regional level in Spain.

Further details of these measures and their contribution to an effective implementation of Article 4 can be found in the second chapter of this report.

1.3.2. Design requirements (Article 6)

Design provisions, such as tethered bottle caps, have increased single-use plastic awareness in both producers and consumers. However, as the implementation deadline was recent, we cannot clearly assess this design measure's effectiveness across the EU. Additionally, due to historical pollution, recent litter monitoring activities in countries like Croatia, France, the Netherlands, and Ireland have not yet shown a significant reduction in the presence of plastic caps.

Still, some Member States were proactive and quick in enforcing this requirement:

- In **Spain**, starting from July 3, 2024, only single-use plastic products with lids and caps that remain securely attached to the container during its intended use may be placed on the market.
- In **Denmark**, since the beginning of 2024, as above, only single-use plastic products with lids and caps that remain securely attached to the container during its intended use may be placed on the market.
- The obligation is also respected in **Romania**, with some companies even choosing to attach lids to bottles with a capacity higher than 3 litres.
- In **France**, the same requirement entered into force on July 3, 2024.



1.3.3. Marking requirements (Article 7)

Marking requirements - a visible label on packaging to indicate the presence of plastic and its associated environmental impact - for non-banned SUP items such as tobacco products, wet wipes, beverage cups and sanitary items (Article 7) has **generally been very well implemented** across Europe with some touristic countries even choosing to include the warning message in various languages (e.g. **Croatia, Portugal, Spain**).

Occasionally, non-marked items can be found, however this is quite rare and local and mostly attributed to old stocks. Some focus could be given to local enforcement with periodic spot checks at main distributors' resellers' facilities.

The resulting consumer awareness of what constitutes safe disposal is difficult to assess. However, given that many of the items covered by the marking requirements were not widely recognised as containing plastic, the added value in raising consumer awareness is clear. The label's format also makes a difference, depending on its size and presentation. For example, labels engraved on transparent cups are barely visible, and most certainly need to be reconsidered to maximise the impact of marking requirements.



1.3.4. Awareness provisions (Article 10)

Compared to our 2022 assessment report, some progress on Article 10 has been made concerning **awareness-raising provisions**, with reusable alternatives to single-use plastics being now more common, particularly at public events or in the food and drink services sector. However, significant efforts are still required to fully implement the provisions of the SUP Directive.

Many Member States, such as **France**, **Germany** and **Latvia**, still rely on packaging producer responsibility organisations (PROs) that have established campaigns around consumer awareness of littering and correct disposal, or on existing campaigns dating from before the Directive. However, no additional efforts have been introduced to further raise awareness, as sought by the Directive's objectives. The awareness provisions of the SUP Directive (Article 10) were, in fact, going much further than this, with specific requirements on the active promotion of reusable alternatives and providing information on the environmental impacts of plastic pollution in the marine environment.

Encouragingly, several countries are implementing effective **awareness measures with the objective to promote reuse and refill**. For example, **Portugal** has introduced binding measures for the takeaway sector, requiring businesses to provide refillable or reusable alternatives to SUP packaging (these measures are due to enter into force in June 2025). **Croatia** had a similar measure adopted in 2024 for coastal takeaway services. In **Germany**, the RECUP system (best practice reuse system for food and drink containers in the HORECA sector) has now received public funding for national-level promotion. Additionally, **Greece** has enacted a legislation that requires businesses to offer discounts to customers who bring their own cups or containers.



Já é da casa?

é cliente regular de um restaurante com takeaw...
leve sempre o seu recipiente reutilizável

1.4. Difficulties with the enforcement of specific measures

1.4.1. Bans or market restrictions (Article 5)

Relating to **market restrictions**, banned items are still widely sold in supermarkets and used free of charge in restaurants, cafes, and takeaway outlets in the **Republic of Cyprus**. **Greece** is also facing challenges in effectively enforcing the bans, particularly with illegal sales of certain banned items like plastic straws. Furthermore, and as mentioned earlier in this report, **Italy** has inadequately transposed the Directive by introducing an exemption for UNI EN 13432 compliant industrially compostable single use plastics covered by the SUP Directive's market restriction measures.

In some countries such as **Belgium, Bulgaria, Cyprus, France, Ireland, Netherlands, Portugal, Spain** and **Romania**, some distributors have continued to sell single-use plastic plates and/or cutlery, bearing labelling indicating the item is “reusable”. Disposable plastic items marked as reusable encourage **greenwashing practices** and may give the flawed idea that single-use items are sustainable.

Such concerning practices were denounced in a dedicated campaign by Surfrider Europe (SURE campaign carried out in autumn 2021) and, in the case of **France**, the Environmental Ministry put an end to these illegal practices by stating that “merely adding a reusable label on a product presenting the same characteristics as a single-use product is not sufficient to relieve this product from the market restrictions”. In **Ireland**, the Environmental Protection Agency sent warning letters to wholesalers along with a questionnaire to remind them that these activities are illegal, which led to visible and quick results.

SUP items which have been banned by the SUP Directive can also be found and purchased either online or in local shops with the claim that these items are permitted to be sold, as part of efforts to deplete remaining stock. In 2024, evidence of this could be found in **Slovakia** (straws, cutlery, polystyrene containers), **Croatia** (straws, stirrers), **Spain, Belgium** (cutlery), **France** (straws), **Cyprus** and **Greece, Romania** (straws), **Hungary** (balloon sticks), **Italy** (cups).

In **Latvia**, a local exemption of banned SUP items made from foam polystyrene used to contain takeaway foods is highly problematic. This stands in stark contrast to the otherwise good implementation of the rest of the SUP bans (see also section 1.3.1.). In **Denmark**, expanded polystyrene food containers are still being sold online, targeting restaurants. The Danish Environmental Protection Agency does not actively monitor potential infringements of the new rules and, as a result, does not conduct investigations into the presence of banned products. This is unlike their Irish counterparts. The agency does, however, respond to substantiated notifications regarding potential infringements.



1.4.2 Awareness-raising provisions (Article 10)

Since 2019, there has been a significant lack of **awareness-raising** efforts on the environmental impacts and alternatives to single-use plastics in some countries, such as **Belgium, Croatia, Cyprus, France, Germany, Hungary, Lithuania, Netherlands, Poland, Romania and Slovakia**. In these countries, efforts have been minimal or non-existent, with no visible campaigns to increase the public understanding of SUP-related environmental concerns. **Cyprus** has failed to implement any of the awareness-raising measures mandated in the Directive, and is also falling behind on the separate collection targets for plastic bottles, with no measures currently in place to achieve the reduction goals. In some countries, like **Croatia and Romania**, existing campaigns remain focused on waste sorting by citizens. **Hungary**, on the other hand, launched a campaign in 2024 to explain the national Deposit Return System and the operation of collection machines.

1.4.3. Consumption reduction (Article 4)

Ambitious targets to reduce the consumption of SUP items by 2030 have been set in **Portugal** (90%), **France** (100% for packaging, 50% for bottles), **Sweden** (70%), **Spain** (70%), **Slovenia** (80%) and **Greece** (80%), yet it is difficult to assess if these countries have already put sufficient measures in place to achieve these targets.

Denmark has set a voluntary 50% target for cups and food containers by 2026, while **Austria** and **Slovakia** have established binding 20% consumption reduction targets. **Luxembourg** has introduced a progressive approach, aiming for a 20% SUP reduction to be achieved by 2026 (compared to 2022). Additionally, from 1 January 2026, **Luxembourg** will impose an annual reduction of at least 10% compared to the quantities of SUP placed on the market during the previous year.

In chapter 2 of the report, we will dive into individual measures adopted at the national level that can actually contribute to that reduction goal and help effectively implement Article 4 of the SUP Directive.

1.4.4. Learnings from SUP pollution monitoring activities

It is important to acknowledge that while the SUP Directive has been instrumental in addressing plastic pollution, **evidence provided by NGOs' through litter monitoring shows that SUP pollution remains an issue in many areas**. This suggests that, while progress has been made – such as the ban of commonly littered items and the increase in public awareness – the problem is deeply entrenched and will require continued efforts over time.

In the **Netherlands**, the Clean Rivers project led by North Sea Foundation shows that the introduction of deposit systems for small bottles (as of July 1, 2021) and cans (as of April 1, 2023), and the ban on single-use plastic products such as cotton buds, cutlery, plates, and straws (as of July 3, 2021), have not yet led to a clear reduction of these items in riverine litter. This may partially be due to "historical waste", which has been present in the river for a longer time and continues to be washed up. However, inputs of SUP items into the environment are still expected to occur although to a lesser extent.

In **Ireland**, the 2024 results of the NGO Coastwatch’s autumn litter survey have just been published, showing a reduction in beverage containers (following the recent introduction of a national Deposit Return Scheme), as well as a reduction in plastic straws. The amount of bottles has also declined but they can still be found in 67% of the surveyed sites (compared to 72% last year). Additionally, in spite of the separate collection measures in the Directive, fishing and aquaculture gear are widely present, in 70% of the surveyed sites for fishing gear (top item) and in 25% for aquaculture gear and traps. Such results have been confirmed by the broader [OSPAR monitoring results](#), which confirm that fishing gear remains an important component of marine litter washed up on EU beaches. Other identified items that contribute to the acute local pollution are made out of polystyrene (EPS /XPS), a material found in takeaway packaging and fishing pontoons, geotextiles and tobacco vapes.

In **Croatia**, marine litter monitoring results show that single-use plastics still constitute the majority of marine litter found along the coast, with plastic bags being most common, followed by polystyrene packaging, plastic caps, bottles, cutlery and food containers.

Regarding the EU overall, Surfrider Foundation Europe has published a 10 year report on citizen science, highlighting that cigarette butts are the most prevalent form of litter collected. The report also shows that 70% of quantified litter is single-use, with 64, 6% of that being single use plastic.

1.4.5. EPR implementation (Article 8)

Austria, France, and Portugal are the most ambitious Member States for Extended Producer Responsibility (EPR) schemes. However, even leading countries like **France** face challenges in fully implementing EPR schemes. In some Member States, not all companies have signed up to the EPR scheme. This lack of enforcement, according to some national authorities, is based on “uncertainties” that the Packaging and Packaging Waste Regulation adoption might entail (for example in **Denmark**).

Generally speaking, most Member States are late in establishing EPR schemes for fishing and aquaculture gear and might benefit from specific guidance from the European Commission (DG MARE). The [European standard series EN 17988:2024 on the circular design of fishing gear and aquaculture equipment](#) was only just published on 27 November 2024. In addition, many Member States transposed the Directive’s Article 8 on EPR by directly copying the text into national legislation, without adapting it to the local context or providing more concrete action. This approach led to confusion during the transposition phase.

In the **Czech Republic** and **Latvia**, only EPR schemes for tobacco SUP items have been put in place (missing EPR measures for wet wipes, packets and wrappers). This is also the case for a majority of EU Member States, where the EPR for tobacco products only started on the 1st of January 2024.



In **Spain**, the EPR decree on tobacco was only adopted in October 2024. Moreover, the EPR scheme for wet wipes has not yet been established and is unlikely to be implemented before 2026.

In **Greece**, there have been delays and issues with developing EPR schemes for products like tobacco filters, wet wipes, and packaging.

In **Luxembourg**, EPR for tobacco has also not yet been implemented.

In **Cyprus**, none of the EPR provisions of the SUP Directive for tobacco or the other SUP items have been adopted.

In **France** the EPR on wet wipes has not yet been adopted, with the consultation process only initiated in July 2024.



1.4.6. Data reporting

The enforcement issue goes beyond non-compliance of specific SUP Directive measures, it is also associated with inconsistent reporting and calculation methodology used by some EU countries, which affects the correct measurement of compliance with certain measures. For example, the compliance with Article 9 of the SUP Directive, which establishes mandatory targets for the separate collection of single-use plastic beverage bottles, implies correct data collection and reporting methods by Member States. This, however, was recently found to not be the case of **Spain**, where the national Producer Responsibility Organisation (PRO) was found to have misreported results, so as to prevent the government from adopting a mandatory deposit return system (DRS). Thanks to, among others, the [exposure](#) of these flaws relating to reporting and calculation, the Spanish government has [announced](#) the adoption of DRS by 2026.

CHAPTER 2: EVALUATION OF THE EFFECTIVENESS OF SUP MEASURES

Solutions for a successful SUP strategy

This chapter further investigates what concrete and effective results the main provisions of the SUP Directive have brought about and which measures contributed to inspire the development of national best practices across Europe.

2.1 - Further market restrictions

Among the various measures introduced by the SUP directive, the **bans or market restriction measures** were the ones that generated the most awareness and interest across Europe. This was evident from the unprecedented media coverage received following the official adoption of the Directive, a level of attention rarely seen before due to the lack of general public awareness or interest in the single-use plastic issue. Even beyond the EU, the bans generated an incredible ripple effect, influencing countries around the world, such as Chile, China, India, Japan, and the United States. Since 2019, numerous countries have introduced similar bans, such as Brazil, Canada, Chile, China, Colombia, Ecuador, India, Japan, Mexico, Panama...and more are to come.

Interestingly, various European Member States decided to go beyond the market restriction requirements of the SUP Directive and proceeded to **implement additional bans to reduce the consumption of SUP products**. Such provisions also allow individual Member States to deal with acute local pollution generated by specific items (for example the widespread use of synthetic wet wipes and beverage cups in **Ireland**).

Some of these measures could potentially be extended to the rest of the EU, such as: **The ban of single-use plastic cups, trays and food containers at all public events**, applied in [Luxembourg](#) as of January 2023, and as of January 2025 for takeaway services. The **ban on dine-in SUP consumption** in hospitality (HORECA) in **Luxembourg** as from 1st January 2023.

- **The ban of SUP film packaging for small portions (under 1.5 kg) of fresh fruits and vegetables (Luxembourg (from January 2023), Portugal, Spain...)**. In **France**, however, a similar measure introduced in 2020 faced a setback when the decree was [annulled](#) in November 2024, for administrative reasons.
- **The general ban on single-use packaging is to be implemented by France by 2040**, supporting broader European Union objectives for waste reduction and the transition to a truly circular economy.



A gradual ban of Single Use cups based on plastic content:

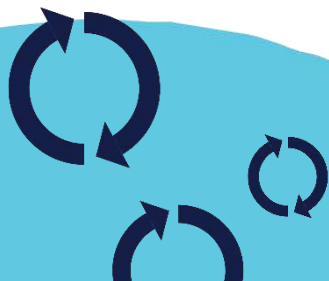


- **An immediate ban of single use cups fully made of plastic as of 2024 and an upcoming ban of food containers and cups with more than 10% plastic content as of 2026** have been adopted in **Belgium**, both for “eat in” and “on the go” food and drink consumption (cf. the Royal Decree SUP 2, which entered into force in July 2024). The measure is progressive with a general ban of all food containers and cups including more than 3% plastic in 2030 (for takeaway purposes, the threshold is loosened to 6%).
- **A ban on plastic cups with more than 15% plastic** was implemented as of 2022 in **Sweden**.
- In **France**, **cups must contain no more than 8% plastic** (compared with 15% in 2022) from 1 January 2024. However, the text provides for an interim review to be carried out in 2024 ‘to assess the technical feasibility of plastic-free cups authorised from 1 January 2026’.
- **France banned bottled water** in public administrations and events as of 2022, confetti, tea and herbal tea bags (except for biodegradable ones), and plastic wrap for press publications and advertising.
- **France** will introduce in 2025 a **ban on plastic containers used for cooking, reheating, and serving food** in school catering and in pediatric, obstetric, and maternity wards.
- A **ban on the use and sale of disposable vapes** containing nicotine has already been adopted in **Portugal and Ireland**, is set to come into force in **Belgium**, and is also under consideration for approval in **France**.
- **Regional and local bans:**
 - **Balearic Islands** banned other single-use items such as **food trays, candy sticks and single serve food packaging** as well as other SUP in the hospitality sector (HORECA) as of 1st January 2021,
 - **Canary Islands** banned the use of SUP at public events and of bottled water in public services as of 1 January 2021, and
 - **Catalonia** banned SUP food packaging as of 1 January 2024
- A **ban on the use of SUP cups during concerts and festivals** was also implemented as of 2020 in many European cities such as Copenhagen, Lisbon and Riga.

2.2 - Measures aiming at promoting reuse and refill as an alternative to SUP

Going beyond market restrictions, **additional measures to reduce the consumption of SUP items, including by promoting reusable and refill alternatives**, have been implemented in some Member States. Prioritising this type of measures over material substitution is essential to truly achieve a reduction in single-use product pollution and avoid simply shifting environmental impacts. For example:

- In **Croatia**, all coastal takeaway services such as beach bars and food trucks must provide reusable alternatives.
- **Germany** mandated that as of 2023 restaurants and takeaway establishments over a certain surface and staff number are required to use **reusable cups and food containers**.
- **Portugal** mandated that, as of 2024, restaurants providing takeaway or home delivery services must provide **reusable packaging** to their customers with a deposit system.
- **Slovenia** has set out obligations for public events, beverage vending machine operators and food and drink operators to provide **reusable alternatives** including by promoting the use of deposit return schemes.
- **France** has implemented measures to promote the use of reusable alternatives in the food service sector. By 2023, restaurants and fast-food establishments in France are required to use reusable tableware for on-site catering.
- **Latvia** mandated takeaway establishments to inform consumers of the possibility of **bringing their own cups and food containers** as of 2021. In addition, takeaway SUP containers should be priced separately by merchants and **reusable alternatives should be promoted** in places where take away services are available.
- Starting from May 2025 in **Lithuania**, for any takeaway SUP item provided, **an alternative must be offered to consumers**. Regrettably, in this case, this alternative can also be a non-plastic, single-use item.
- **Local initiatives:**
 - The new **deposit return scheme**, set up in 2024 in **Aarhus, Denmark, for reusable coffee cups**.
 - In **France**, 34 local projects have been financed by the French PRO Citeo and the Ademe agency since 2024, as part of a **“ReUse” program** to experiment reuse systems.
 - In **Belgium**, both Flanders and Wallonia have made the use of **reusable cups binding for public events** and Flanders established a fine for event or festival organisers that use SUP cups.
 - **Catalonia, in Spain**, is the first region in the world to **provide free, reusable menstrual products**.



2.3 - National consumption reduction strategies



In order to meet the Directive's consumption reduction goal, some Member States adopted consumption reduction targets at the national level, but how to achieve these targets needs to be further refined.

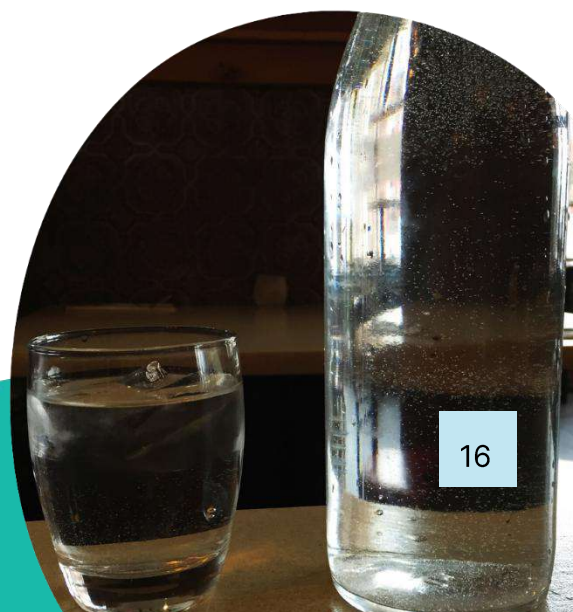
Many countries have therefore developed **dedicated national strategies and action plans** to reduce the consumption of single-use plastics. Examples include **Portugal's** 'strategy for coastal areas', **Ireland's** 'national waste action plan', **Luxembourg's** new 'circular economy framework', **France's** 'circular economy roadmap', **Austria's** comprehensive and circular economy dedicated national action plan, and the development of action plans in several regions of **Spain** (Catalunya, Balearic islands and Canarias).

These strategies have in common a coherent and comprehensive approach, seeking to link the phase out of SUP with complementary measures to reduce pollution and waste such as: the promotion of reuse and repair of durable products over the recycling of short-lived products, national consumption reduction targets, the promotion of bulk sales and accessibility of tap water, the prevention of waste at the source, public awareness measures, robust producer responsibility schemes, prevention of microplastic emissions, events policy, and eco-design requirements. Certain countries have made it mandatory for stores over a certain surface to dedicate a specific space to the sale of loose or bulk products (**France, Spain**).



Some of the national strategies emerged from participatory processes, for example in **Spain** and **Luxembourg**. We have identified elements in the national strategies which are both effective and easy to replicate in other countries. This included the legislation on the **right for citizens to be provided with tap water in the hospitality sector (HORECA)**, like in **Portugal** or **France**, the **provision of water fountains in public buildings and services**, the **set-up of a pilot DRS at regional level in Spain**, the integration of SUP restrictions in the green procurement rules of the local administration in **France, Portugal and Luxembourg**, the **promotion of reuse and refill alternatives** such as in **Austria** (see [official guide for municipalities here](#)) and the publication of information factsheets for businesses on the available alternatives to banned SUP in **Luxembourg** ([which can be found here](#) on the government's environment portal).

In order to enable the shift from SUP to reusable products and packaging, some countries have given a clear preference to the **promotion of reuse and refill over single-use**, by making it binding that reusable alternatives to SUP should be provided by businesses. This is especially true for festivals and public events, where several Member States made it binding to offer a reusable alternative to SUP cups (**Portugal, France, Ireland, Germany, Luxembourg, Spain...**)



Other replicable and effective national initiatives on reuse include measures targeting coastal businesses and service providers. In **Croatia** for example, coastal businesses are **mandated to use reusables in catering and to provide reusable options to consumers for take away or beach bars**. In **Portugal**, the **mandatory offer of a reusable alternative for take away will start in 2025** (instead of January 2024 as initially planned), and single use cups are already banned for restaurants, bars and events in the coastal area. Over time, these measures have the potential to generate awareness of local consumers and tourists alike, and they can also be strengthened to include alternatives to more SUP items. In **France**, the law states that takeaway vendors should charge less when the drink is sold in a reusable container provided by the consumer than when the drink is served in a disposable cup.

In spite of these initiatives, some countries like the **Netherlands** have left local businesses with the option to opt out from reusables by guaranteeing high recycling rates for SUP products they use: for on-site consumption, reuse became the norm as of January 2024, which means that in principle a reusable option (e.g. reusable 'hard cups') should be provided by local businesses. However, the Dutch ministerial regulation provides the flexibility for these to prioritise recycling over reuse (and thus favour disposable 'soft cups' over reusable hard cups), provided a large percentage – namely 90% - is collected by 2027. As a result, festival and event organisers have been quick to opt for a system based on high recycling rates, whose implementation maintains the current linear practice of disposable cups and packaging. There are examples, e.g. at local carnival events, where the streets are full of waste because of this reusables opt-out possibility. As established in the EU's Waste Framework Directive, whenever possible, reuse systems should be prioritised over recycling, because they are less resource-intensive and more efficient at preventing waste.

Beyond existing examples in Member States, providing incentives for governments and businesses to promote reusable over disposable containers for food and drinks, hotel toiletries, and shipment wrapping would further promote and prioritise reuse.



2.4 - Economic incentives to support waste reduction

Some countries have implemented **economic and/or fiscal** incentives to support their action on single-use plastics, such as

- **Lithuania:** Starting in 2025, all plastic packaging in the country will be subject to a 100% recycling target. If this target is not met, a **tax** of 0.8 EUR per kilogram will be levied **on non-recycled plastic packaging**, adding a financial incentive for adherence to recycling goals. In addition, **Lithuanian** Law establishes as from May 1st 2024, that single-use plastic coffee cups cannot be distributed for free.
- **Ireland** has adopted a tax or “latte levy” to promote reusable cups over single-use ones.
- **Portugal** has adopted a tax on plastic take away food containers but with a number of exemptions.
- **Greece** introduced a mandatory environmental fee of €0.05 per item for SUP cups and food containers (with an additional charge of €0.05 for the lid) as of January 1, 2022.
- In **Latvia**, an additional charge should be added to single-use plastic items, the exact amount is to be decided by the hospitality sector (HORECA).
- In the **Czech Republic**, a financial incentive has been implemented to support waste prevention, including through reusable alternatives, and some municipalities have already requested to make use of this budget to implement local prevention measures.
- In **Denmark**, the government has unlocked 800,000 euros per year to support partnerships with the hospitality sector (HORECA) to develop a system for reuse for packaging as part of their [finance act](#).
- In **Romania**, economic operators that either sell the targeted products or use them in the retail process are required to:
 - Provide consumers with reusable, suitable, and durable alternatives at the point of sale, or alternatives that do not contain plastic.
 - Impose a sale price on single-use plastic products.
 - Clearly itemize the price of single-use plastic products on sales documents and prominently display this information at the point of sale to ensure consumer awareness.



2.5 - Separate collection targets

Concerning the achievement of the EU's **separate collection targets for SUP bottles**, most Member States have implemented deposit return schemes (DRS) for the recycling of beverage packaging, including **Croatia, Denmark, Estonia, Finland, Germany, Hungary** (since June 2024), **Latvia, Lithuania, Malta, the Netherlands, Slovakia, Sweden** and **Romania**. Outside the EU, **Iceland** and **Norway** have also adopted such schemes.

Several other countries, such as **Portugal** and **Ireland**, are planning to implement DRS by 2025, **Spain** by 2026, and some are in discussion (**Czech Republic**), as a way to help meet the separate collection and recycled content requirements for bottles set under the SUP Directive. This system, however, is most often intended to ensure high recycling rates rather than promoting reuse. Only a few countries have introduced DRS for reuse: **Germany and Latvia**.

The Ministry for Ecological Transition in **Spain** has published a [report](#) in November 2024 challenging the previously reported official recycling rates. According to the ministry's calculations, the separate collection rate for SUP bottles is only 43.5%. Since the EU's target of 70% has not been met, the implementation of a deposit return system will be established within two years.

To reduce the consumption of SUP bottles, additional measures have also been adopted in certain Member States:

- **Austria** has set up **binding reuse quotas** on a series of beverage containers, a percentage of which local distributors now have to provide in **reusable bottles** as of 2024: 15% for beer and water and 10% for juices, soft drinks and milk. Such quotas could be revised over time to be increased in light of the market response.
- Even higher **reuse targets for beverages** (80% for beer, 70% for soft drinks and 40% for water) have been set for the hospitality sector (HORECA) in both the **Navarra region and Balearic Islands in Spain**.
- **France** has set national reduction targets for SUP bottles (50% reduction target by 2030).
- **Italy** has set up a vast network of **public water fountains** (water houses across Italian cities) and **France** made these obligatory in all public spaces (stations, administration buildings, airports...).
- Several Member States chose the **promotion of tap water** (in **Greece, France, Portugal** and **Belgium**), with free access to tap water in the hospitality sector (HORECA) in France complemented with a legal requirement for such businesses (restaurants, bars, etc.) to inform customers about the availability of free drinking water.
- Other countries have **banned the use of bottled water and other relevant SUP items in public events or services** (**Spain, France, Luxembourg**).



- **Denmark** is well on track to exceed the EU's separate collection target as the country has operated a national and official DRS since 2000, achieving a 92% return rate for bottles through the system in 2023. Danish bottling plants also incorporated 52% recycled content in beverage bottles that year, surpassing the targets set by the SUP Directive. However, it is important to note that Denmark's DRS primarily focuses on recycling, with comparatively less emphasis on reuse. The mayors from the three biggest municipalities called out the Parliament for not being ambitious enough regarding a national reuse system.
- In **Romania**, based on RetuRO's 2024 report on collection data, in September 2024 the return rate was: 79% for plastic, 82% for metal, 82% for glass. For the whole year 2024 (data collected by 1st October), the rates were 50% for plastic, 48% for metal and 47% for glass.
- **A general ban on small water bottles** is in discussion in **France**: On October 29th, a bill was published on the National Assembly's website proposing a ban on plastic bottles smaller than 50 cl starting in 2027. Shortly after, on November 4th, another bill was introduced in the Senate advocating for an earlier ban from 2026. This second proposal expands the scope to include additional items such as small format plastic containers in the hospitality sector (HORECA) and single-use decorative products. It also seeks to ban all packaging containing any amount of plastic to prevent a shift toward hybrid materials like cardboard and plastic composites.

2.6 - Marking/Labelling

Another provision which was well implemented across the board is **the marking of several SUP items** with a specific label to raise consumer awareness on the plastic content of these items (wet wipes, cigarette butts, lined cardboard cups and sanitary items). Such marking appeared surprisingly quickly on most of these products, with some touristic countries seizing the opportunity to broaden the message by using several languages, for example in **Croatia** and **Spain**. For the purposes of this report, we could not measure how effective marking and labelling has been in driving public awareness without specific and expensive consumer testing studies, but national NGOs have reported seeing members of the public react and ask questions relating to cigarette butts and wet wipes as it made them aware of the plastic content in those products.

Chapter 3: Policy recommendations for the EU evaluation process

This final section of the report aims to provide Rethink Plastic’s initial input into the ongoing EU-level evaluation process, with our recommendations on which new items should be covered next, but also on possible additional measures for the Commission to consider in the future.

The SUP Directive has been a pivotal policy tool in addressing the issue of single-use plastic pollution. Its implementation has driven long-term effort in reducing plastic waste. These efforts have not only contributed to environmental protection but also to the transition to a circular economy by encouraging innovation in reusable and sustainable alternatives and systems. The directive remains highly relevant in the current context, where plastic pollution continues to threaten ecosystems, biodiversity and human health.

Nevertheless, the scope of the Directive remains limited, as the single-use pollution and waste crisis extends beyond plastics, and generates broader impacts that surpass a top 10 items list. In addition, some of the wording within the Directive has left room for loopholes and interpretations that are misaligned with the overarching goal of the Directive.

It is important to draw lessons from the way the Directive has been transposed, implemented and applied since 2021, to ensure any future revision or extension of these measures to new items take these lessons onboard. There is still room to expand the scope of items to address the toxicity of plastic and its impacts on both the environment and health, and more widely tackle the impacts of plastics all along the value chain. This includes considering the pollution generated by single-use items before they reach their end-of-life. Revising the measures while addressing the EU Circular Economy, zero-pollution and toxic-free environment goals will help ensure that it fully delivers on its objectives.

To start with, a material-neutral approach would be crucial to avoid substitution to other materials (such as paper-based applications, which, as evidence in this report has shown, has happened in many countries). Single-use paper-based applications also bring a huge cost to the environment as shown in a collaborative effort by the Rethink Plastic alliance together with deforestation NGOs in [a recent study](#).



Let us first consider the items already covered by the Directive but which still need to be further addressed for single-use plastic pollution to be held in check:

- **Single-use cups and food containers** deserve an **EU-wide consumption reduction target**. These items are widely consumed for take away and represent a significant part of municipal waste. It is estimated that more than 16 billion units of single-use cups and food containers were used in take away services of the EU-28 in 2019. In Ireland, a study estimated that between 2012 and 2017, approximately €409 million has been spent by 24 Councils on street cleaning, litter and street rubbish bin collections. This equates to an average of €68 million per year. Also, their end-of-life disposal consists of incineration and landfill in most cases. Since these items were not properly addressed in the Packaging and Packaging Waste Regulation, it is crucial to tackle this issue in a potential revision of the SUP Directive. **It is important, however, that these items are addressed under a material neutral approach, including paper-based applications.**
- **Cigarette butts** are also among the most widespread forms of litter in the European environment (ranking 1st in Seas At Risk members' litter monitoring in France and Spain and 3rd in Italy, and in the top 10 for 30% of survey sites in the OSPAR's latest assessment) and are for now only addressed by the SUP Directive through marking and awareness-raising requirements and the development of a dedicated EPR scheme - which demonstrates gaps and malfunctions in its enforcement. Some EU Member States are even considering a national ban on cigarette filters, such as in the **Netherlands** where a study has shown that cigarette filters actually have no health benefits, contrary to what most people think. We recommend to **consider such a ban in future EU legislation**. In parallel, smoking bans have been implemented at local or national level, which are bringing some results in reducing local pollution but remain difficult if not impossible to enforce.
- **Sanitary towels, tampons and applicators** also have potential to be further addressed. Taking the example of the Catalonia government in Spain, and also in line with the European Parliament INI report on the situation of sexual and reproductive health and rights in the EU (Art. 24), a good addition would be a measure to encourage the **widespread availability of toxic-free and reusable menstrual products**, in particular in large retailer outlets and pharmacies across the EU (which should at least match the proportion of single-use items on sale), accompanied by awareness-raising measures on the benefits of reusable compared to single-use menstrual products.



Building on the latest research on the topic and in light of marine and riverine litter monitoring activities carried out by NGOs, which are a good indicator of the state of plastic pollution, we also recommend the following new items to be added to the scope of the Directive, in particular under SUP market restrictions or consumption reduction measures:

Multilayered packaging materials, such as beverage cartons and cans, which either contain plastic or are coated with plastic inside, and which remain one of the items most often found in clean-ups whether on land or on beaches. It is therefore important to include cans in consumption reduction measures in addition to cups and food containers. A number of EU Member States have already established Deposit Return Schemes (DRS) which help maximise the collection of single-use beverage cans and cans have been included in the mandatory DRS provision of the PPWR. As regards multilayered beverage cartons, we question the added value of keeping such multilayered packaging on the market and recommend bans given reusable alternatives exists.

Other tobacco-related products such as disposable vapes are an increasing concern. As a consequence of the current consumption boom, their presence in the environment is on the rise according to recent litter monitoring carried out in the ocean and rivers. To address this threat and considering the availability of reusable alternatives, **several countries have already banned or are preparing to ban the sale and use of disposable vapes**. These include **Belgium** (effective in 2025), **Portugal** (with local bans), and the **UK**, while **France** and **Ireland** are also exploring such measures—potentially setting the stage for a future EU-wide ban.

Polystyrene in all its forms is a problematic material due to its capacity to easily and quickly break into microplastics, and it is in the top 10 most abundant marine litter items found by various NGOs conducting marine litter surveys in Europe (ranking 2nd in Italy, 3rd in Spain, 4th in France, and 6th in Ireland). Plastic foam sponge and foam packaging such as **EPS and XPS, also rank very high in OSPAR marine litter monitoring** (ranking 1st or 5th most found item depending on size and 6th for foam sponge) and should not only be banned under limited criteria (as for food containers, intended for immediate consumption, consumed from the receptacle and ready to be consumed without further preparation) as set in the SUP Directive. **The ban on polystyrene should extend to cover packaging generally**, since the material is widely used for on-site and packaging purposes that are also single-use and prone to degrade rapidly into microplastics during normal use and abrasion from handling and shocks during transport.



- **Fireworks with plastic pieces** should be banned since there are now plastic-free fireworks as well as LED-based fireworks alternative options widely available in Europe and beyond. So far, only local bans have been put in place since that type of pollution is affecting touristic places or cities, but some EU Member States have a much more traditional and widespread use of fireworks making the pollution even more acute (**Portugal, Netherlands** or **Belgium** for example). There are already local bans in **Germany** and the **Netherlands, Denmark** has adopted a national phase out and the HELCOM regional sea convention is also working on a regional phase out in the near future. An EU-wide ban would be welcomed for such items.
- There are still too many ways to bend the rules by using other forms of disposable packaging. For example, **packets and wrappers** (flexible packaging) are not yet sufficiently covered by the SUP rules (with the exception of EPR and awareness raising obligations), which opens the door to an increase in products packed in this form. This is worrying because candy, snack and crisps packaging score high on local lists of most frequently found plastic items such as North Sea Foundation's list for Dutch riverbanks or OSPAR's regional marine litter monitoring (found on 73% of the survey sites and accounting for 9% of beach litter in the whole OSPAR region). These items are also non-recyclable (certainly not at scale), and therefore should be phased out from the EU market.
- We also recommend that products such as **wet wipes** be covered under the EPR schemes to cover, at the very least, for the collection and treatment of waste resulting from wet wipes including at wastewater treatment plants, and not only make producers pay for awareness-raising campaigns and clean-up costs.



As far as **fishing and aquaculture gear** is concerned, there have been no market restrictions nor consumption reduction mandated in the SUP Directive, only EPR schemes development and reporting of collected waste from fishing gear. An important step forward would therefore be to **impose market restriction measures on items for which more sustainable alternatives exist**.

This is especially true for **EPS/XPS buoys, floats and fish boxes** (see for example [reusable fish boxes](#) and [cardboard ones](#)), but also for **oyster or mussels nets** (in OSPAR's top 20 most widespread items) and stoppers, which do not need to be made of plastic or could be replaced by reusables. **Spain, Italy, France, Netherlands and Ireland** are big mussels and oyster producers and aquaculture gear accounts for considerable local pollution in all these countries.

Best practice measures should also be included in the awareness raising measures of the Directive to target, for example, the bad practice of disposal of **net cuttings** by fishers overboard. Dedicated bins carried onboard together with some awareness and training activities targeting the fishing and aquaculture sector have proved to be an effective way forward (see for example KIMO International's training and educational activities in various EU Member States).



The extended producer responsibility (**EPR**) **schemes for plastic-containing fishing gear** were expected to be in place across Europe by the end of 2024, which makes it too early for an assessment. Yet, we hope that the evaluation process to be conducted at EU level will also consider recommendations on the following obligations:

- Obligation for producers to disclose quantities **by type** of fishing gear placed on the market as well as collected (e.g. quantities of dolly rope, quantities of rope, quantities of nets, quantities of pots and traps) rather than general quantities across all fishing and aquaculture gear.
- We also recommend that EPR schemes for fishing and aquaculture gear should include and cover the costs of best practices' sharing, such as training and education tools for fishers for instance.

Ambitious measures going beyond the current requirements of the SUP Directive have been identified in Chapter 2 which **should also be considered in the evaluation process**, such as: national consumption reduction targets and strategies, the promotion of packaging-free sales and reusable alternatives including with binding quotas; additional bans to reduce the consumption of cups and food containers in the hospitality sector (HORECA), at public events or in the public space; phasing out single-use plastic packaging at the regional or national level; banning bottled water in public administrations and services; banning the use and sale of disposable vapes at national level; mandating restaurants, home delivery and takeaway services to provide alternatives to single-use; setting up reuse-compatible deposit return schemes for cups, food containers and beverage containers.

Other needs have been identified by Contracting Parties and NGOs within the **OSPAR Regional sea convention** where a task group has been working for a year on potential additional measures to the Regional Action Plan to further reduce SUP contribution to marine litter. The need for a broader scope to cover all main problematic SUP items identified in yearly beach and river monitoring reports (OSPAR official Marine Strategy Framework Directive marine litter monitoring, SAR members' individual monitoring reports) is now clearly established, and a priority list of items for additional measures has been agreed on which includes **beverage cups and cans, single-serve packaging, aquaculture and fishing gear, plastic containing fireworks, cigarette butts, tobacco vapes, polystyrene (EPS / XPS / styrofoam), small packaging seals and plastic films, packets and wrappers, wet wipes and sweet sticks.**

Since some of the SUP items mentioned above have been partly addressed in the recent revision of the EU legislation on **packaging** and packaging waste (PPWR), it is worth to mention how both pieces of legislation are expected to interact and what it means for national implementation. See the following section:



THE INTERPLAY BETWEEN THE SUP DIRECTIVE AND THE PPWR

The SUP Directive has encouraged and driven Member States to adopt effective and sometimes broader measures when it comes to addressing single-use and waste generation at source, even though the SUP directive is reduced in its scope and very targeted (10 items most found on EU beaches).



Some of the best practices mentioned in Chapter 2 are further market restrictions on single-use products (e.g: wraps on fruits and veggies, reusables for in-house consumption in the hospitality sector (HORECA) and reusable take away packaging), promotion of reuse and refill measures, obligation to provide tap water, among others.

The Member States that have legitimately adopted more ambitious measures should not be prevented from fully implementing such measures on their territory, especially as they are aligned with the greater EU Circular Economy and Green Deal objectives. Reinforcing this, while the PPWR restrains Member States from prohibiting, restricting or impeding the placing on the market of packaging that complies with the regulation (Article 4(3)), an exception is that Member States that already have existing packaging bans for fruit and vegetable wraps and for in-house consumption of single-use packaging (e.g: **France, Spain and Luxembourg**), Member States can maintain these bans until 1 January 2030 according to Article 70 (4) of the final PPWR text.



Also, Article 25 (2) of the final PPWR text explicitly allows Member States to keep their national bans that have been adopted before Jan 2025.

Unfortunately, what NGOs have witnessed is that national progressive leaders (e.g: from **France and Spain**) have been ordered by the European Commission to stall these more ambitious measures on the grounds that the revised EU Packaging and Packaging Waste Regulation (PPWR), expected to come in force by mid-2026, would address some of these measures.

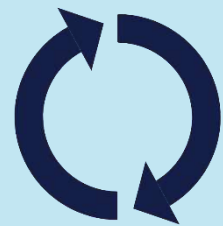
In fact, the revised PPWR puts forward various measures which complement the ambition under the SUP Directive, including: overall waste reduction targets 5%-10%-15% (2030/35/40), direct ban on PFAS in packaging, sector specific reuse targets for transport packaging (including e-commerce) of 40% and 70% (2030/2040), grouped packaging 10% and 25% (2030/2040), beverage packaging (alcoholic and non-alcoholic) of 10% and 40% (2030/2040); reuse and refill obligations for the hospitality sector (HORECA); mandatory DRS for plastic bottles and cans by 2029, mandatory dedicated amount of EPR fees to waste prevention activities, bans on certain single-use plastic packaging items (wraps on fruits and veggies; very lightweight carrier bags; grouped packaging wrapping; single-servings, such as sugar, cream, ketchup; in-house consumption in the hospitality sector (HORECA); miniature hotel toiletries; EPS and XPS containers for food and beverages, and airport suitcase wrapping.



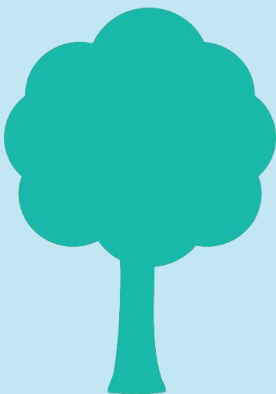


When it comes to some potential cross-cutting measures in the SUP Directive and PPWR, the PPWR explicitly states that it trumps the SUP Directive provisions. However, both legislations should be seen as complementary and both the SUP Directive and PPWR allow Member States to adopt further measures in order to achieve their consumption and reduction objectives. This reasoning will also be further clarified in the Q&A page announced by the European Commission which is intended to facilitate the implementation of the PPWR.

The PPWR expressly allows Member States to: set higher waste prevention & reuse targets; set new reuse targets for other packaging types (e.g: takeaway); set DRS for other types of packaging (e.g: glass, carton) and to include reusable packaging within that system; set economic incentives to boost prevention and reuse (e.g: additional fees on single-use packaging, dedicated EPR fees for prevention and reuse and including litter clean-up costs under EPR); develop a strategy for and work towards the interoperability of different reuse packaging systems (including transnational); further restrict the presence of chemicals that potentially negatively affect the re-use and recycling of materials; promote and support the development of tap/public water consumption, and others.



The extent of the ambition of these measures, however, varies depending on the several exemptions and conditions in the final adopted text. For instance, single-use paper and cardboard packaging were exempted from the bans and from the reuse targets. This is very unfortunate since, there was a big shift towards paper-based applications after the adoption of the SUP directive, although they also have great environmental and health impacts.



A good practice and recommendation would be for Member States to adopt measures with a material-neutral approach, making sure the end goal is met: to move away from single-use materials and products, while reducing waste generation and preserving resources through the development of efficient reuse systems.

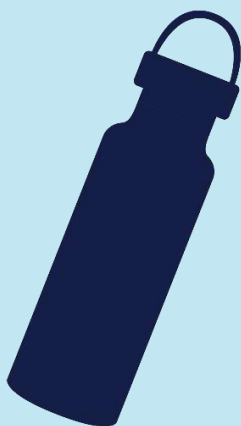
In this report, there are examples of Member States that are on the right track on many of these measures. For example:

DRS for reuse: In **Germany** and **Latvia**, DRS is implemented for both recycling and reuse, and also includes further packaging materials. In Latvia, for instance, DRS accommodates both single-use and reuse PET, cans and glass bottles, with great performance (89% return rate).

Material-neutral approach: A good practice to highlight is the case of **Luxembourg's** market restriction on all single-use materials for takeaway. By targeting single-use in general, it avoids the simple shift from one material to another (consequently transferring the respective impacts), and supports the development of reuse systems that addresses waste at source.

Economic incentives: **Lithuania, Ireland, Portugal, Greece, Latvia, Czech Republic** and **Romania** have put forward fees on SUP to discourage its use and at the same to support the use of reusable alternatives.

EPR: **France, Portugal** and the **Netherlands** have set a percentage of EPR fees to finance the development of reuse systems.



Reuse and refill obligations: **Lithuania, Croatia, Germany, Portugal, Slovenia, France** and **Latvia** have included in their national legislation obligations to offer reuse alternatives to single-use in different environments, such as in the hospitality sector (HORECA) and at public events.

Promotion of tap water: **Italy, France, Greece, Portugal, Belgium, Spain,** and **Luxembourg** have adopted measures to encourage the consumption of tap water, either by making it obligatory in public spaces, by increasing the availability of water fountains across the country or by banning SUP bottles in some cases.

CONCLUSION

The evaluation of the effectiveness of the Single-Use Plastic Directive across EU Member States reveals both remaining challenges and significant successes. The legislation has already led to notable progress, such as reductions in the use of certain banned items, including plastic straws and cutlery, and an increased focus on producers' accountability.

Many Member States have implemented ambitious measures aligned with the Directive, resulting in heightened public awareness and a shift towards more sustainable alternatives.

However, the Directive's continued success will depend on addressing gaps related to the diversity of national contexts as well as the insufficient drivers to promote prevention and reuse in a large part of the EU. To overcome these shortcomings, a clear and detailed guidance is necessary, both coming from the EU and the national institutions involved in the implementation and enforcement of the Directive. Dedicated funding should be made available to support the identification of local infringements, as well as the promotion of prevention and reuse solutions that are available locally and regionally.

As evidence gathered in our past implementation assessment reports has shown - which is still reflected in the present report, some Member States remain not fully compliant with key provisions of the Directive. While some Member States still struggle with compliance, the European Commission's infringement procedures demonstrate the commitment to ensuring timely, correct and ambitious application of the Directive. Those steps are proof of the necessity and potential of the Directive to initiate a meaningful change in production and consumption habits and to ultimately reduce pollution effectively.

In moving forward, stricter enforcement tools combined with the inclusion of new pollution sources should support the effectiveness of the SUP Directive. Unfortunately, this challenge is not unique to the SUP Directive, but also relates to various other existing EU laws and measures.