



**Natural Mineral Waters Europe**  
Natural Mineral & Spring Waters



# Reshaping our approach to advocacy

*Petcore Europe Annual Conference 2024*

07 February 2024

DoubleTree by Hilton, Brussels

# Content

1. Introducing NMWE and the sector
2. NMWE's advocacy – our journey
3. Challenges faced by small (and big) associations



**Natural Mineral Waters Europe**  
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# 1. Introducing NMWE and the sector

# About NMWE



- Representing NMW and SW producers
- Founded in 2003 (successor to UNESEM, Paris, **1953**)
- Team of 5, based in Brussels
- Mixed membership base of national trade associations and companies

- Member of

- FoodDrink Europe (FDE)



- International Council of Bottled Water Associations



## National trade associations

- |  |  |
|--|--|
|  Austria  |  Luxembourg   |
|  Belgium  |  Netherlands  |
|  Bulgaria |  Poland       |
|  Croatia  |  Portugal     |
|  Czechia  |  Romania      |
|  Denmark  |  Serbia       |
|  France   |  Slovenia     |
|  Georgia  |  South Africa |
|  Germany  |  Spain        |
|  Greece   |  Turkey       |
|  Hungary  |  UK           |
|  Ireland  |  Ukraine      |
|  Italy   |  |

> 500  
PRODUCERS

## EU associations

-  Watercoolers Europe

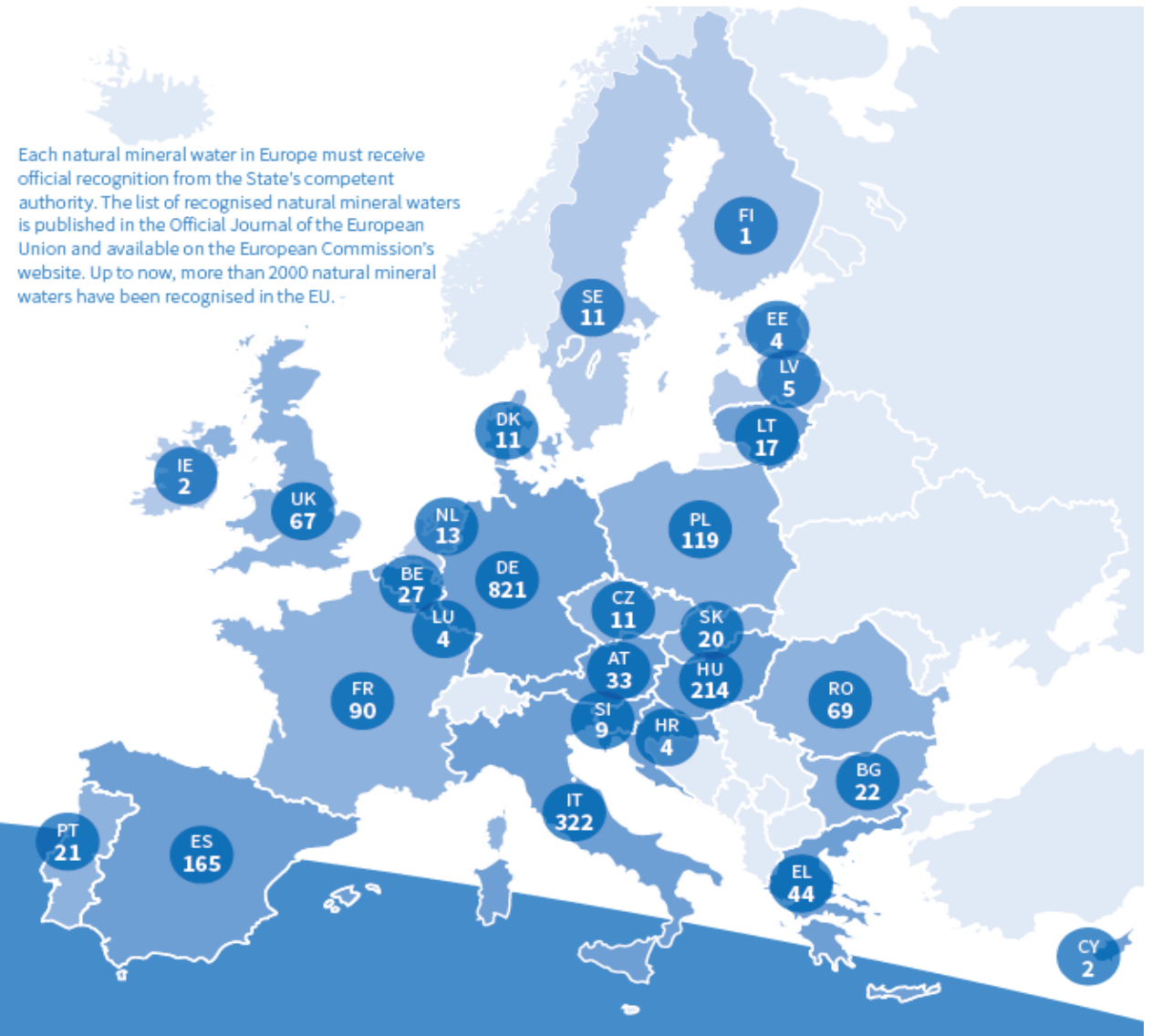
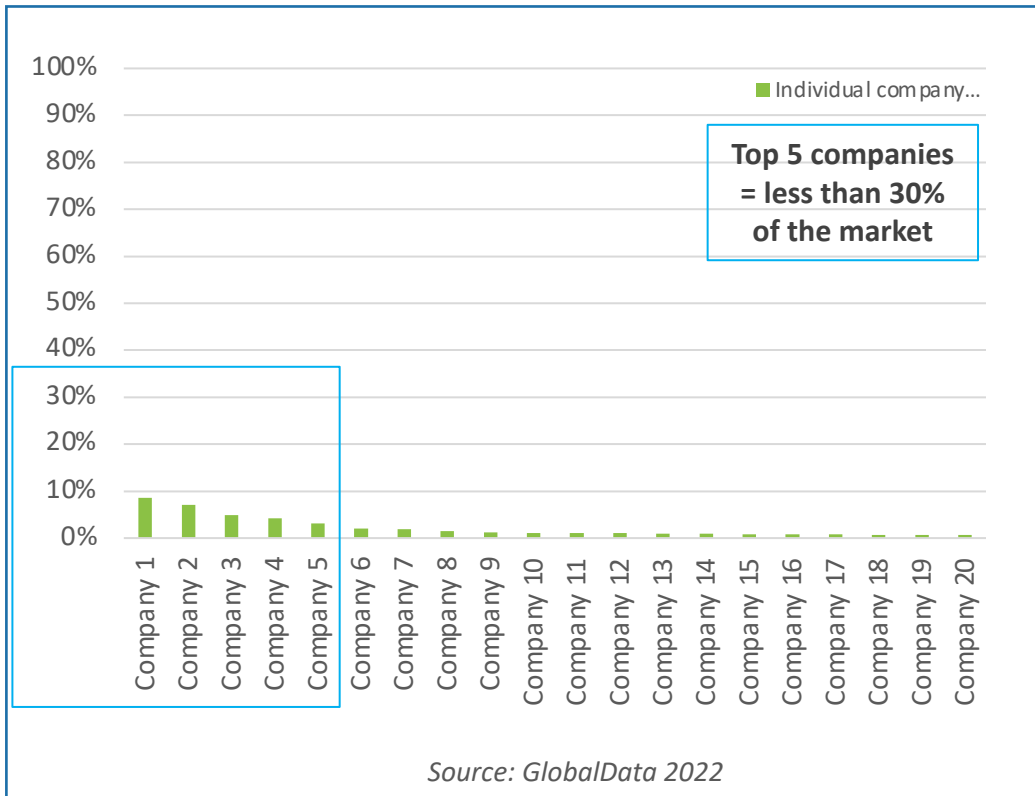
## Bottling companies



## Suppliers



# Fragmented industry contributing to local development

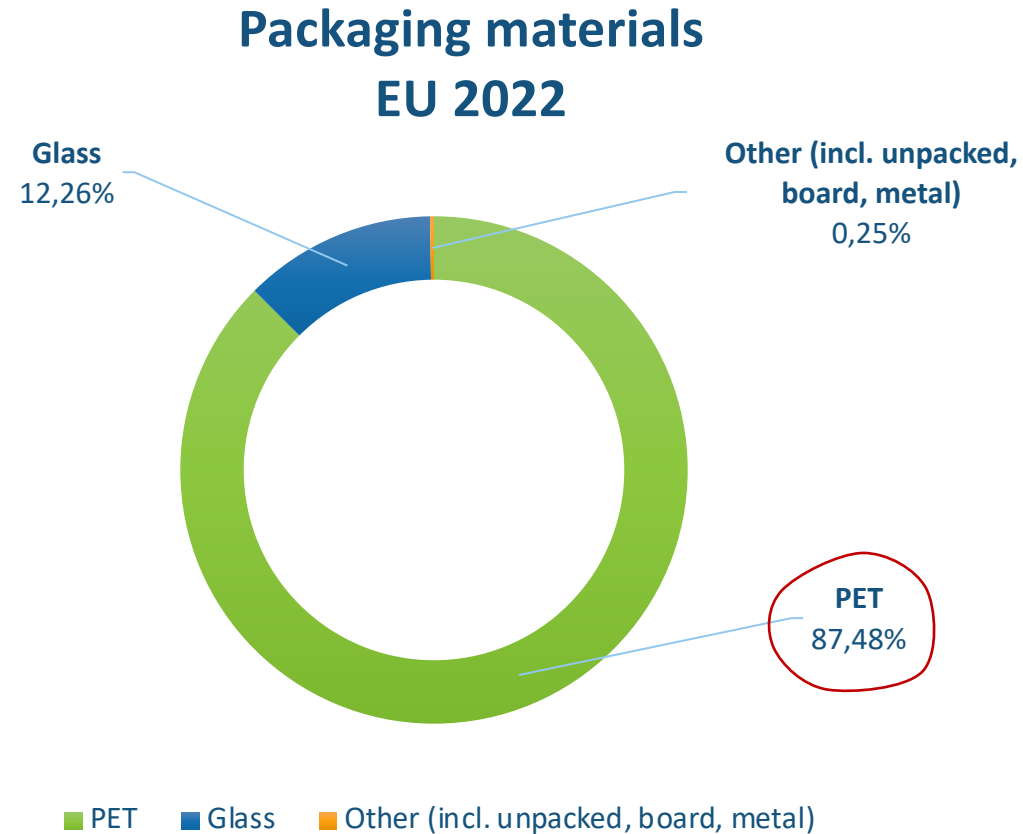


# Existential relationship with the environment

- Natural mineral and spring waters are a part of a water cycle fed by the nature.
- Obligation to be 'pure at source' implies a high degree of protection upstream
  - Thousand hec (772)



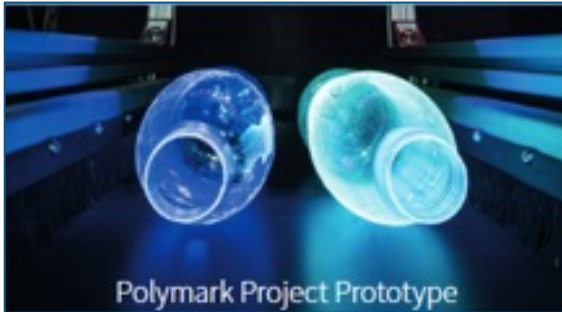
# PET – key component of NMWE’s circularity strategy



Source: GlobalData Soft Market Insights - 2022 Cycle



# Petcore Europe: a natural partner



Polymark



Brussels, 14 March 2023  
 Subject: Cross-industry coalition calls for a better impact assessment of the proposal for a Packaging and Packaging Waste Regulation

Dear Permanent Representations,  
 Ahead of the EU Environment Council meeting of 16 March, the undersigned associations, representing the large majority of the European beverage industry, its packaging value chain and the hospitality industry, would like to share with you their common concerns regarding the impact assessment accompanying the Proposal for a Packaging and Packaging Waste Regulation (PPWR).  
 In the absence of a proper impact assessment taking account of environmental, consumer behaviour and economic implications, there is no guarantee that the proposed measures will have the desired benefits. On the contrary, they could have a detrimental impact on our environment; on consumer access, choice and convenience; and on many companies in our sectors operating in the EU (including small and medium-sized enterprises).



**PET MARKET IN EUROPE STATE OF PLAY 2022**

PRODUCTION, COLLECTION AND RECYCLING

Potential areas for future collaboration  
 e.g. decarbonisation

<b>Guidelines for Non-Intentionally Added Substances (NIAS) evaluation in PET &amp; rPET</b>				
Reference : NIAS_guidelines_document		Version : 1		Date : Nov. 07 <sup>th</sup> 2019
<u>Discussion:</u>  This document explains the tests to be conducted to evaluate the (NIAS) in resins and/or PET articles.				



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## 2. NMWE's advocacy - our journey

# The beginnings of NMWE (EFBW)

- Mission of the association focused on **regulatory advocacy** consisting in:
  - Providing industry data to policymakers where required
  - Identifying regulatory gaps and suggesting measures to address them
  - Propose EU-validated self-regulation (GMP Code)
  - Strong role of Expert Committees and Comitology
- No dedicated staff other than SG



# Evolving environment



**ENVIRONMENTAL CONCERNS**

Green EU agenda

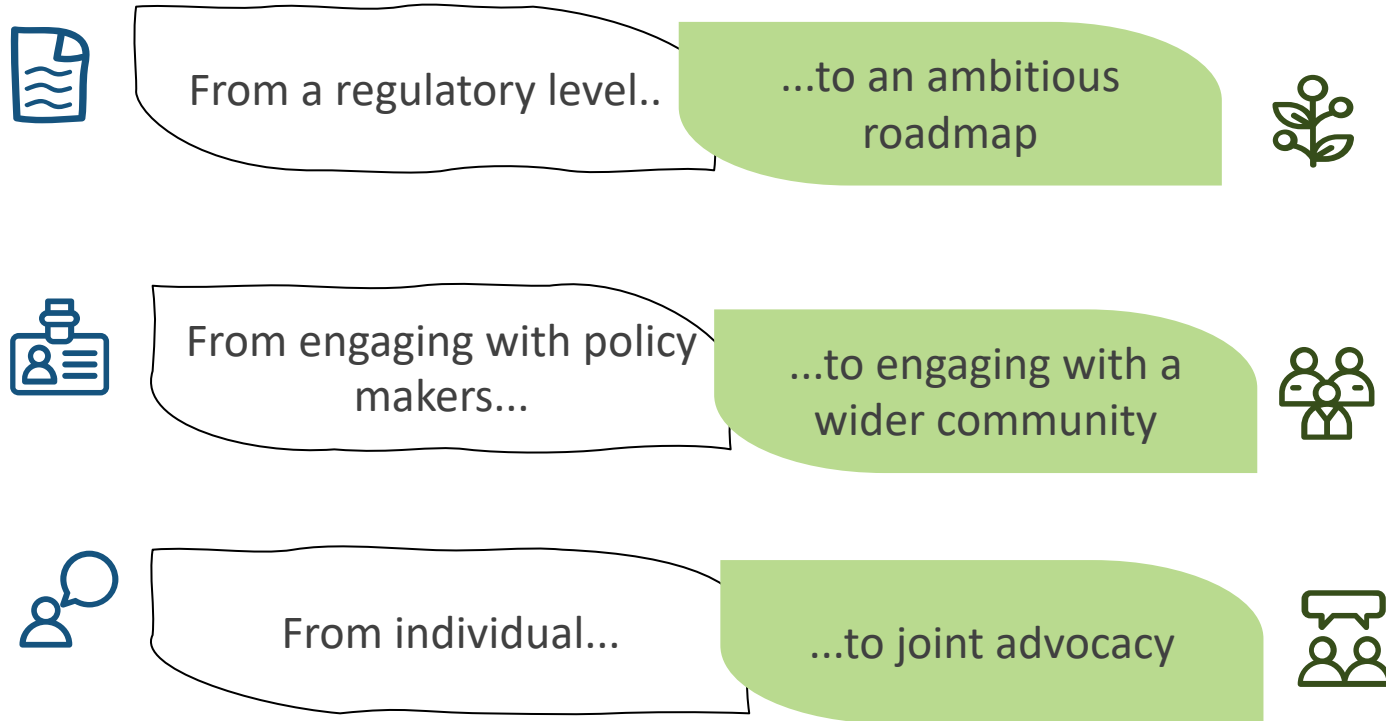
Pressure from civil society

Expectations from stakeholders

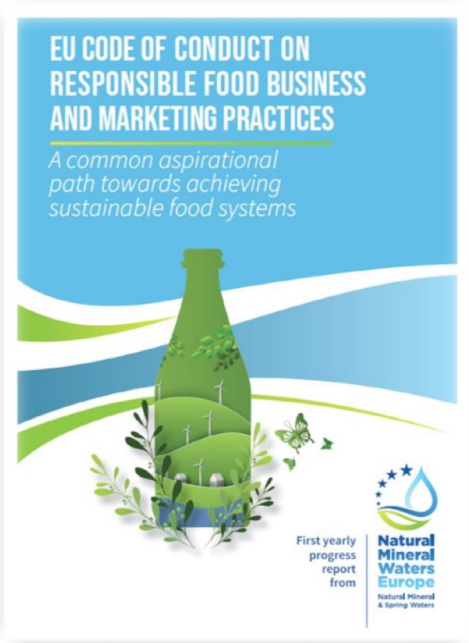
**Need to be an actor of change!**

**Wider remit and engagement**

# Re-shaping our approach




# Providing the sector with an ambitious roadmap




**Decarbonisation**

1. 


**Biodiversity**

2. 

**Water efficiency**

3. 

**Packaging circularity**

4. 

# From policy makers to a wider community

- Biodiversity project with IUCN
- EU Commission's Business and Biodiversity Platform
- «Water Protect» project: best practice sharing with scientific community, drinking water suppliers, etc.
- Water stewardship: NMWE as a driver of collaboration with local partners
  - Environmental NGOs
  - Farmers
- Engagement with value chain on decarbonisation



# Getting heard : from individual to joint advocacy

Brussels, 17 April 2023

## Safeguarding the Internal Market Legal Basis of the Packaging and Packaging Waste Regulation to obtain better results

The undersigned industry associations express their concerns regarding the Commission's ambition to transform the Packaging and Packaging Waste Regulation (PPWR) into a regulation with a legal basis (Article 114 TFEU) as a step to a market legal basis. In the next step forward, we are...

**Subject: Cross-industry coalition calls for a better impact assessment for the Packaging and Packaging Waste Regulation**

Dear Permanent Representations,

Ahead of the EU Environment Council meeting of 16 March, 2023, representing the large majority of the European beverage industry, the hospitality industry, would like to share with you their common concerns and assessment accompanying the Proposal for a Packaging and Packaging Waste Regulation.

In the absence of a proper impact assessment taking account of environmental and economic implications, there is no guarantee that the proposed Regulation will deliver the intended benefits. On the contrary, they could have a detrimental impact on our industry, access, choice and convenience; and on many companies in our sector (including small and medium-sized enterprises).

**NGO-industry coalition calls on the European Parliament to create a mechanism for closed-loop recycling in the EU Packaging and Packaging Waste Regulation**

Dear ENVI Rapporteur and Shadow Rapporteurs,

In the context of your discussions on the Proposal for an EU Packaging and Packaging Waste Regulation (PPWR), the undersigned organisations would like to raise your attention to the issue of preferential access to some specific feedstock for recycling in order to ensure a closed-loop recycling system and put an end to the downcycling of those materials meeting certain criteria (e.g. recycled PET).

Our organisations welcome the Commission's ambition to achieve a circular economy. However, a pre-condition to this ambition is the creation of a market for recycled materials that:

- gives the sectors covered by the scope of the regulation access to recycled materials to actually be able to meet the targets;
- avoids downcycling, whenever preserving the quality of recycled materials makes more sense from an environmental and economic perspective.



**The European natural mineral water and soft drink sectors raise concerns on the Commission's ambition to increase the reuse & refill targets in the PPWR**

NMWE and UNESDA, representing respectively natural mineral water and soft drink makers, are highly concerned with the Commission's ambition to increase the reuse and refill targets in the Packaging and Packaging Waste Regulation (PPWR) without further impact assessment.

**Cross-industry coalition's concerns about the current discussions on the proposed measures and targets on reuse & refill in the Packaging and Packaging Waste Regulation**

The signatories to this letter welcome the ambition towards more resource efficiency in Europe, but call on decision-makers not to propose new or increased measures or targets on reuse and refill in the Packaging and Packaging Waste Regulation (PPWR) without further impact assessment and to provide enough flexibility to the relevant sectors to invest in the best packaging mix.

While reuse and refill have a role to play in reducing packaging and packaging waste in Europe, the real impact of scaling up those systems across the EU is not yet fully understood. Furthermore, the Commission's impact assessment of the proposed targets lacked the granularity to properly assess their actual impact in different Member States, sectors and distribution channels. It only presents EU aggregated numbers that do not allow a breakdown per country, product category or even per reusable or refill solution.



**Recognising the complementarity of reuse and recycling does not mean lacking ambition**

Ahead of the plenary vote on the Packaging and Packaging Waste Regulation (PPWR), the signatories to this letter would like to share some of their concerns regarding the approach adopted by the Parliament's Environment Committee (ENVI) on 24 October.

While we recognize the good progress made on the text in a number of areas which will help the industry to achieve its circular ambitions, we are highly concerned with the amendments to Art. 26 of the draft PPWR which have been adopted by the ENVI Committee, and in particular:

1. The possibility provided to Member States to go beyond the proposed increased reuse targets without any justification needed.
2. The absence in the proposal of a mechanism which would allow for single-use recyclable packaging as an alternative to packaging for reuse if a better overall environmental outcome on the basis of a waste management or life cycle assessment can be achieved.

The Strategy presented by the Commission in the 'Circular Textiles Strategy' is of concern the accuracy of green claims. It suggests that polymers where these polymers do not come from PET bottles, but come instead from PET bottles, via a closed-loop recycling system for food contact materials, according to the Strategy adds that textile businesses should be encouraged to "prioritise fibre-to-fibre recycling and rather make claims on achievements to be an important challenge in closing the loop for textile products."



**NGO-industry's comments on the European Commission's proposal for a Regulation on circularity requirements for vehicle design and on management of end-of-life vehicles**

The undersigned organisations would like to encourage EU decision-makers to further promote closed-loop recycling in the Commission's proposal for a Regulation on circularity requirements for vehicles design and on management of end-of-life vehicles.

Natural Mineral Waters Europe (NMWE), The ReLoop Platform, UNESDA Soft Drinks Europe and Zero Waste Europe applaud the Commission's ambition to support closed-loop recycling in its proposal on end-of-life vehicles but would like to prevent some possible undesirable effects of the proposed text.





# PPWR - A unique opportunity to enable circularity

The screenshot shows a webpage from 'The Parliament' with a yellow header. The main article is titled 'The PPWR should help, not hinder businesses seeking sustainability' and includes a quote: 'Ambition must go hand-in-hand with enablers if the PPWR is going to succeed'. Below the text is a large landscape photograph of a valley with mountains and a green field. To the right, there is a 'PARTNER CONTENT' section with five article teasers, each with a small image and text. At the bottom left of the article area is the logo for 'Natural Mineral Waters Europe' and the text 'By Natural Mineral Waters Europe' followed by a short description and the date '12 Jan 2024'.

**The Parliament** | Subscribe to The Parliament | SUBSCRIBE NOW

## The PPWR should help, not hinder businesses seeking sustainability

“Ambition must go hand-in-hand with enablers if the PPWR is going to succeed”

**PARTNER CONTENT**

- The legal dispute over Russia's largest ammonia plant**  
24 Jan | by Daniel Mitov
- Making Europe the most efficient and environmentally friendly sky to fly in the world: The time is now!**  
17 Jan | by SESAR JU
- Levelling the EU's currency conversion playing field: promoting inclusion and consumer choice**  
17 Jan | by Gino Ravaioli
- Safeguarding the European Salmon Processing Industry: A Plea for Reasonable Regulation**  
16 Jan | by Polish Association of Fish Processors and the Danish Seafood Association
- What does it take to foster balanced diets in Europe?**  
16 Jan | by Nicholas Hodac
- Mental resilience in an era of permacrisis: discovering the health roots of happiness**

By **Natural Mineral Waters Europe**  
Natural Mineral Waters Europe is the voice of more than 550 European Natural Mineral and Spring Water producers. They work in partnership to safeguard the environment, protect water resources and achieve full circularity.  
12 Jan 2024

- **PPWR = opportunity to increase resource efficiency BUT need for**
  - Necessary enablers
  - Science-based approach
  - Preservation of value chain's investments towards circularity
  - Make it work for SMEs (a bottling line costs millions and is for 20 years...)



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# 3. Challenges faced by small (and big) associations

# Advocacy – challenges faced



- Tight deadlines
- Multiplication of responsible stakeholders due to extension of policies' scope
- Increased complexity requiring highly sophisticated data
- Dogmatism (scientifically-supported decision-making?) and tabloid-style communication
- Addressing local specificities while speaking with one voice and preserving internal market
- How do you get our SMEs on Board?



It is all about collaboration.

**We look forward to strengthening  
our collaboration with Petcore.**



# Thank you!

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Secretary General

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## Follow us!



**Natural Mineral Waters Europe  
(NMWE)**



**@NMWE\_Europe**

