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AESGP Meeting: Medicine Packaging Exemption 'Not Helpful' For Circular Economy

by [David Ridley](#)

Should the consumer health industry be exempt from the EU Packaging and Packaging Waste Directive? This question is hotly debated by representatives from major flexible packaging supplier Amcor and OTC manufacturer Perrigo at the 60th AESGP Annual Meeting in Brussels, Belgium.

Thanks to amendments from the European Parliament and Council, it looks likely that medicines and medical devices will be exempt from the EU Packaging and Packaging Waste Directive (PPWD), at least until 2035.

While avoiding the requirement to make all packaging recyclable by 2030 might seem like an “easy way out” for Europe’s consumer health industry, major packaging supplier Amcor Flexibles said it is “not really helpful” for achieving a circular European economy.

Speaking at the Association of the European Self-Care Industry’s 60th Annual Meeting in Brussels, Belgium, Amcor Flexible’s sustainability director Gerald Rebitzer went so far as describing industry’s attitude towards blister pack recycling as “a bit arrogant.”

This arrogance might come back to haunt companies, Rebitzer suggested, because, if all other packaging is in future

EU Parliament Stricter Than Council On Medicines And Medical Devices Packaging

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recyclable, in line with PPWD, OTC medicines will stand out for their negative quality of being unrecyclable.

Non-recyclable products like medicines and medical devices might even have to make this fact clear, for example with label warnings, such as “please do not put me in the recycling bin,” to prevent contamination of household recycling streams, Rebitzer predicted.

“The healthcare sector doesn't want to be the bad kid on the block,” he added.

Don't Forget EPR

Whether or not medicines and medical devices are exempt from PPWD, they will still be subject to various EU member state extended producer responsibility (EPR) schemes, Rebitzer pointed out.

Non-recyclable products will incur far higher EPR fees than recyclable ones, he explained. For example in Belgium, PVC-based plastic packaging costs €4,000 (\$4,350) per ton in EPR fees, versus €1,000-€1,500 per ton for recyclable packaging.

The fact that non-recyclable blister packs will be two or three times more expensive in terms of EPR “should be another driver” of change, Rebitzer argued.

“I think it's now uncontested that EPR systems, where the producer of the packaged product pays for the collection, sorting and recycling of the packaging, is essentially the only system that works,” Rebitzer added. “Europe is really a frontrunner here, and I think this will also be strengthened.” (Also see "[There's 'No Silver Bullet' For Making Medicines Packaging Sustainable](#)" - HBW Insight, 16 Apr, 2024.)

Not So Easy

Rebitzer argued that there is “not really a reason for healthcare packaging not to be recycled.” Speaking on the same panel, Perrigo's senior manager for sustainability Kristina Andersson agreed that medicine blister packs are technically recyclable if PVC alternatives like polypropylene (PP), polyethylene (PE) or terephthalate (PET) were to be used.

However, when the strict regulations around safety and stability of medicines are considered, all of these alternatives present issues. Both PP and PE provide only a medium moisture barrier,

Health and Food Safety committee takes a compromise position with regards to the Packaging and Packaging Waste Directive. Medicines and medical devices should be exempt, but only until 2035, at which point the European Commission should check whether the development of materials and the recycling process have progressed, and may adjust this exemption accordingly.

[Read the full article here](#)

Andersson explained, and are harder to run on existing manufacturing lines than PVC-based blisters.



KRISTINA ANDERSSON

While PET has a similar machinability as PVC, it has an even lower moisture barrier than PP and PE, making it unsuitable for many medicines.

Alternatives to plastics like aluminum are also recyclable and provide exceptional barriers to both moisture and gases. However, aluminum blister packs are larger than their PVC equivalents and have a higher carbon footprint, she pointed out.

Paper and pulp based alternatives are also currently being developed and many consumer health companies have joined partnerships like the Blister Pack Collective. However, these are still under development and also not suitable for use at scale.

(Also see "[Over The Counter: Solving The Sustainable Pill Pack Puzzle, With PA Consulting's Tony Perrotta](#)" - HBW Insight, 8 May, 2024.)

On the recycling side, blister packs also present difficulties, Andersson said. Their small size means they are hard to sort, especially if compressed and/or teared and they are often contaminated by print – medicines are often required to have information printed on the blister packs – and product residues.

EU member states also have different recycling systems, making pan-European manufacturing difficult for multinational companies.

Industry Initiative

“So we have some challenges,” Andersson concluded. Nevertheless, industry is working together to solve these problems, for example as part of the Global Self-Care Federation.

Following the launch of the GSCF’s Charter for Environmentally Sustainable Self-Care in 2021 – which calls on members to commit to concrete pledges addressing three priority areas: plastics and packaging, pharmaceuticals in the environment and CO2 footprint – signatories have been collectively working on three specific objectives relating to blister packs. (Also see "[GSCF Launches Global Self-Care Industry Sustainability Charter](#)" - HBW Insight, 25 Nov, 2021.)

Firstly, GSCF is developing a roadmap for blister packs, to help industry transition to newer recycle ready blisters. Secondly, the association is investigating waste management and global

recycling streams. And thirdly, it is mapping relevant international standards on recycled content in blister packs. (Also see "[Over The Counter 9 May 2023: Progressing The Global Self-Care Industry's Sustainability Agenda With GSCF's Padmaja Kamath](#)" - HBW Insight, 9 May, 2023.)

At the close of the session, Rebitzer acknowledged that blister pack recycling is a tricky issue. Nevertheless, he urged consumer health companies to "get ahead of the curve."

"Like Kristina [Andersson] rightly said, the solutions are there but they will take some time to implement. But I think companies should really get ready."

Read about AESGP president Jonathan Workman's rousing call to action on day one of the association's Annual Meeting [here](#).