



Procircular

Completing the circle
of circular economy

A pair of hands is shown from the bottom, cupping a small, vibrant green seedling with several leaves and a mound of dark soil. The background is a soft-focus green, suggesting an outdoor setting. The image is partially overlaid by a teal circular shape in the top right and a teal shape in the bottom left.

Business Plan on Prevention and Ecodesign.

2024-2028

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1. Introduction.

Procircular was created with the aim of contributing to improving the recovery and recycling of packaging waste in terms of both quantity and quality. To achieve this, it is absolutely necessary to effectively address the prevention of packaging waste, eco-design, reuse and recyclability.

Preventing packaging waste has been established as the first step in the waste management hierarchy since the first legislative developments were published in the mid-1990s, although many waste stakeholders recognise the complexity of putting these principles into practice.

In this sense, the Spanish Royal Decree 1055/2022, of 27 December, on packaging and packaging waste, hereinafter RDERE, takes a step forward to put prevention and reuse into practice by establishing objectives and measures to achieve them, and at Procircular we believe that PROs, due to their proximity to companies and business sectors, can and should play an active role in putting these objectives into practice.

Significant improvements in weight reduction have been made in recent years, particularly in some sectors, but there are still many opportunities to be explored in the domestic, commercial and industrial sectors. At the household level, it is essential that the recyclability of packaging plays a greater role in business decision making. In commercial and industrial packaging, there are many opportunities in terms of preparation for reuse, reuse and industrial symbiosis.

One of the tools that should become strategic for companies are the Business Plans for Prevention and Ecodesign.





1.1 What is the Prevention Plan and how are participants' responsibilities articulated?

Since 1997, Spanish legislation has been committed to establishing mechanisms to systematically organise actions to **minimise and prevent at source** the quantity and harmfulness of packaging waste generated in the activity of companies.








In the RDERE, which is a continuation of the previous regulation, the same criterion has been maintained, retaining the requirement to draw up Prevention and Ecodesign Business Plans (the PLAN) for certain producers. These obligations are reflected in Article 18 of the RDERE.

In the Plan the companies mainly:

- Study what kind of prevention measures they can apply to their packaging.
- Plan their implementation with a five-year horizon.
- Set targets that they can achieve and measure their results.

All companies are allowed to make Prevention Plans to improve their packaging, but who is obliged to do so?

In order to delimit which companies are obliged to submit the Plan, the RDERE establishes that producers of products who, over the course of a calendar year, place on the market a quantity of packaging **equal to or greater** than the following quantities are obliged to apply a business plan for prevention and eco-design on a five-yearly basis:

GLASS	STEEL	ALUMINIUM	PLASTICS	WOOD	PAPER/ CARDBOARD	MISCELLANEOUS*
						
250 t.	50 t.	30 t.	20 t.	20 t.	15 t.	300 t.

(*) if several materials are involved and none of them individually exceed the above quantities.





It is important to note that:

- By exceeding at least one of the thresholds, the producer would already be affected by the requirement.
- In calculating the thresholds, all packaging placed on the market, whether domestic, commercial or industrial and irrespective of its function as primary, secondary or tertiary, will be taken into consideration.

What are the ways in which the Plan can be presented and what are the responsibilities of each party.

The RDERE offers several options for product producers to comply with this requirement, either by submitting them individually or through the collective extended producer responsibility schemes (PRO) in which they participate.

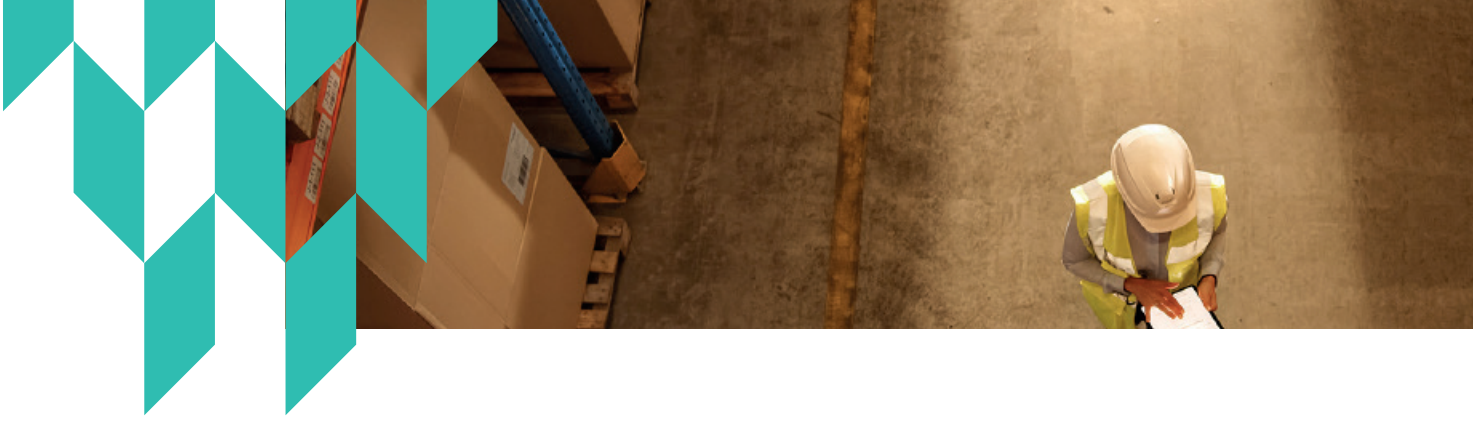
In the Plan prepared by Procircular,

- The PRO will be responsible for:
 - Drawing up the Plan and submitting it every 5 years, as well as responding to the possible requirements of the authorities and implementing the necessary control mechanisms.
 - Write the final report reflecting the achievements.
- The company shall:
 - Organize the measures you plan to implement, implement these improvements on your packaging and report this process to the system, allowing the necessary review actions to be carried out by the system.
 - Submit the packaging declaration with all the necessary data by 28 February.
 - Contribute to meeting the costs of preparing and maintaining the Plan. According to article 23.6 of Royal Decree 1055/2022, when the option to collectively comply with the submission of the Plan through a system is chosen, the costs must be borne solely by the product producers who comply with the obligation to implement these plans through these systems.

Procircular will inform companies wishing to participate in the Plan of the costs associated with their inclusion in the collective initiative.

In the individual option, the company would add to its responsibilities all the documentary processes for the preparation and monitoring of the Plan before the Public Administrations.





1.2 Context of Procircular's producers.

Procircular has been set up as an Extended Collective Producer Responsibility System aimed at supporting producers who place packaging on the market for domestic, commercial and industrial use.

Considering this scope, the profile of companies that can participate in the Plan is particularly interesting as it can offer multiple views on the experience, potential and needs of different value chain actors.

Activities as diverse as extraction of raw materials, transformation of raw materials into manufactured for industry, manufacturing of packaging, the act of packaging, distribution, sale of the finished product, etc. could be found in the role of product producers. Therefore, the spectrum of producers that can potentially participate in the Plan is widely broad.

Primary, secondary and tertiary packaging with very different technical characteristics and functionalities are used in these activities. Hence the possibility of being able to observe in a collective Plan how the different producers respond to the stimulus of prevention, for example:



1.

A producer who can use a Big Bag to transport goods that can be stacked will focus his efforts, for example, on increasing the strength of the materials and thus improve his impact by increasing the number of units per pallet.



2.

A producer packaging a substance that chemically reacts with some materials must take these interactions into consideration and may choose to go to the minimum possible thickness that the technology allows in the material compatible with the properties of the product being packaged.



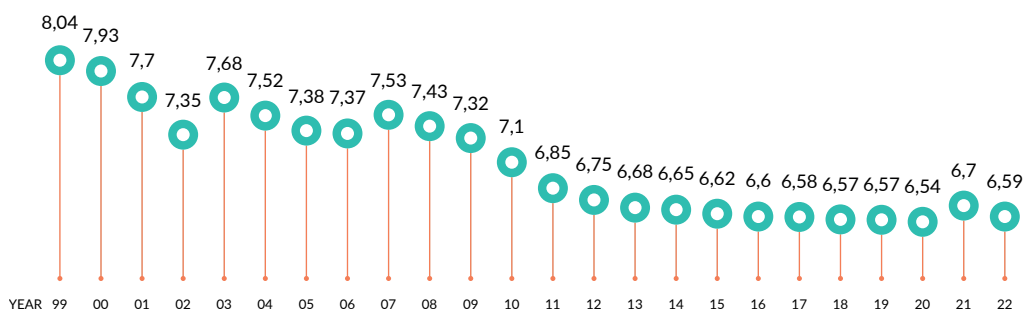
2. Starting point.

During this period, Procircular is presenting its first Business Plan for Prevention and Eco-design. In order to have a reference on the degree of compliance with previous plans, we have analysed the existing information on prevention parameters that is handled publicly from systems in operation in previous years.

The indicators commonly used are mainly Kr/Kp (total amount, by weight, of packaging waste generated in a year and the total amount, by weight, of packaged products consumed in the same year) and the distribution of the number of measures implemented according to the type of prevention measures carried out.

With regard to the first parameter, Kr/Kp, it is significant to note that depending on the type of companies adhering to the systems, its value will be in a different order of magnitude. Thus, the companies adhering to a system that handles household packaging made of light materials will have experienced evolutions such as the following, which is currently around 6.59:

EVOLUTION OF KR (PACKAGE WEIGHT)/ KP (PRODUCT WEIGHT).



SOURCE
Ecoembes.

On the other hand, companies that mostly use glass as a packaging material will be in a Kr/Kp range of around 0.17 (Source: Ecovidrio).

Regardless of the ratio of the parameter, what can be observed in the historical data is a progressive improvement, tending towards stabilisation, in the ratio of packaging weight to product weight, which reflects the efforts made by the companies to reduce the use of packaging material to market their products.

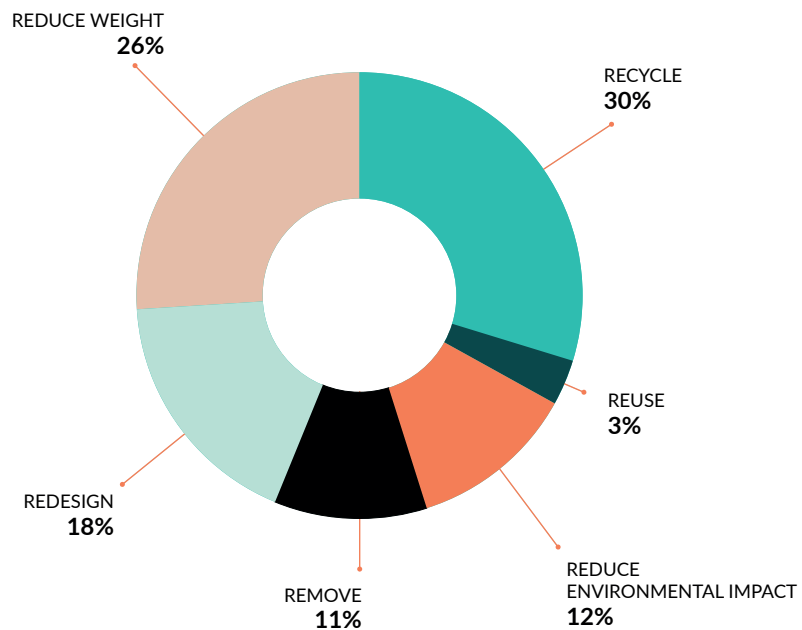




It is also interesting to note the evolution of the other monitoring parameter indicated, the number of prevention measures implemented. Two key points can be observed:

- Year after year, companies continue to be committed to prevention by contributing a large number of measures to the company prevention plans.
- The measures in the first instance and during the first periods of the Plans have been very homogeneously oriented towards packaging weight reduction policies and still represent a very high percentage of them (more than 50%). However, there is an increase in the measures implemented in relation to the improvement of recyclability and the incorporation of secondary raw materials from recycling.

PREVENTION MEASURES 2021-2023



SOURCE

Approximate breakdown by prevention policy of the number of measures implemented by companies adhering to the Ecoembes 21-23 Plan.





3. Business Plan on Prevention and Ecodesign 2024-2028.

For more than two decades, the Business Prevention Plans have been a tool for packaging companies to **plan, organise, analyse and set out** what kind of actions were being carried out to improve the packaging placed on the market.

The RDERE has continued to support this figure of prevention, adding to its previous description the word **Ecodesign**, which is so fundamental in the process of packaging conception.

The idea of planning, considering the impact reduction aspects of activities related to the use of packaging, can include targets such as:

- To have the **knowledge** to identify what actions can lead to creating packaging options that maintain the right balance between functionality, consumption of raw materials, recyclability...
- **Share** prevention criteria **across the board** within organisations so that the different decision-makers have sufficient information to select alternatives with a lower impact (that fit in terms of logistics, packaging process, consumer information, etc.).
- Propose the **collaboration of value chain actors** to find optimal solutions for all involved.

It is an opportunity for producers to take steps towards a vision from all perspectives on product eco-design considering all agents: packaging manufacturers, raw material suppliers, distributors, end customers, recyclers... and to move towards a circular economy scenario that leads to the sustainability of economic activities.

In this vision and this exchange between organisations, the aim is for **co-creation processes** to take place, seeking between all those involved to produce a **mutually valuable result**, since it is likely that several members of the chain will come together in the obligations, generating:

- *Incremental innovations*, on existing products, where such trade-offs lead to improvements.
- *Disruptive innovations*, inspired or driven by the acquisition of knowledge and the desire to have sustainability objectives on the roadmap.

The the Plan should therefore be an instrument at the service of companies and a means for public administrations to monitor the progress of prevention.





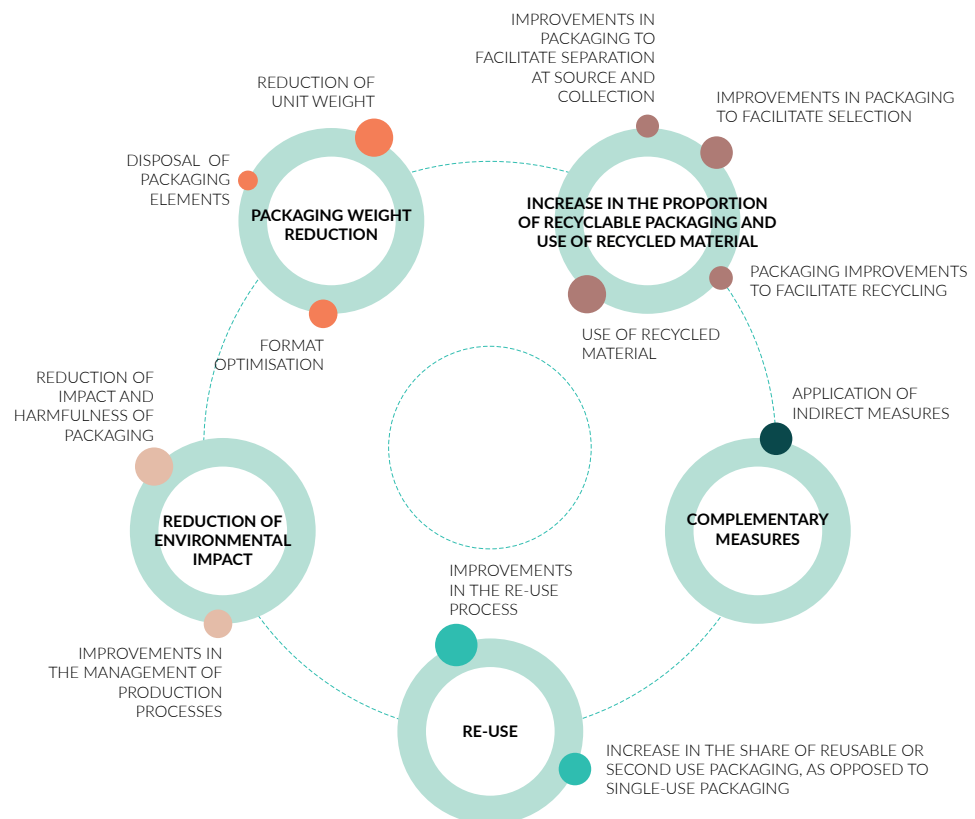
3.1 What kind of prevention measures can producers implement?

The Plan drawn up by a PRO such as Procircular should allow all participating companies to find the necessary standardisation in their data collection models so that they can see how the possible improvements they make to their packaging fit in.

This way of expressing information will fulfil the need to be able to classify and group these prevention actions in such a way that overall conclusions and trends can be drawn about the work of producers.

In this way, a series of broad lines of action have been defined, which in turn are broken down into prevention measures, illustrated by examples of actions related to these measures.

The broad lines of action are shown at the centre of the following diagrams and revolve around possible measures that can be implemented in relation to these broad prevention concepts:





Reduction of packaging weight.

Reducing the weight of packaging is an important aspect in the search for sustainable solutions in the packaging industry. Through eco-design strategies, the application of innovative technologies and the elimination of elements that can be dispensed with, the aim is to **optimise the structure of packaging** regardless of its function (as a primary, secondary or tertiary packaging). The aim will be to reduce their weight without compromising their functionality and integrity.

Reduction of weight per unit.

Improvements in packaging processes can be implemented to reduce the weight of packaging, such as designing more efficient and accurate machinery, allowing less material to be used without compromising the quality of the packaging. For example, optimising the design of moulds for the manufacture of plastic packaging, allowing the amount of material used in each unit to be reduced without sacrificing strength or durability. Among others, the following actions could be carried out:

- Apply technological innovations in the packaging system (weight reduction, improved strength, production processes that tolerate lighter packaging, etc.).
- Modifying product characteristics while maintaining product functionality to reduce the amount of packaging required, such as increasing the concentration of a product like a detergent that allows a smaller package size to be used to put the same amount of equivalent doses on the market.
- Optimisation of the packaging design to allow for weight improvements.





Format optimisation.

Format optimisation focuses on reviewing and adjusting the relationship between the different components of the packaging system to **maximise efficiency and functionality**. The aim is to improve the stacking and transport capacity, which will contribute to a more efficient and sustainable supply chain, the fit of the product to the pack, the arrangement of the elements within the transport system... The following actions illustrate this type of measure:

- Elimination of technical voids in primary packaging, maintaining the dimensions and characteristics of the packaging and increasing the quantity of product contained.
- Increase in the number of containers transported per shipping unit, reducing the number of pallets, films, corners, etc. required per shipment. Optimisation of the palletisation mosaic.
- Adaptation of secondary packaging to primary packaging or vice versa.
- Increasing the capacity of the packs by improving their Kr/Kp ratio. For example, this action could consider packs containing a larger amount of product, designed to suit consumer types with larger family units or promotional lines such as a cereal box with a larger amount of product.
- Improvement in the number and characteristics of secondary packaging used to market primary packaging.





Disposal of packaging elements.

The elimination of packaging elements is focused on several possibilities, firstly, identifying novel and ingenious technical solutions that make it possible to dispense with elements previously used, such as packaging tamper-evident systems that require a simpler mechanism and eliminate parts. This type of measure also includes the re-evaluation of presentations in such a way that they are simplified, focusing on elements that add functionality and value to the packaging system.

The actions associated with this measure include:

- Eliminate packaging and elements by optimising product presentation.
- Use of bulk in the marketing of the product. For example, presentation of food products without packaging, always taking into consideration that bulk sales should be adjusted to products whose conservation, food safety and organoleptic characteristics do not deteriorate with this type of presentation.
- Avoid the use of single-use plastic packaging subject to reduction or restrictions on the use of plastic...



The line of improvement aimed at reducing the environmental impact associated with the manufacturing processes and use of packaging has a broad scope that can include improvements in the decisions on the origin of the raw materials used, the components of the materials or in the technologies and management of the industrial packaging processes.





uction of environmental impact.

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Reducing the impact and harmfulness of packaging.

We highlight the following actions to be implemented:

- Use materials from renewable sources.
- Reducing the harmfulness and quantity of additives, inks, varnishes, coatings in the finishing of the packaging...
- Use packaging with certificates that ensure sustainable management of natural resources.



Improvements in the management of production processes.

To improve the management of production processes, it is important to adopt practices and technologies that **optimise the use of resources** and minimise waste generation. Strategies such as optimising the use of raw materials, improving energy efficiency, reducing water consumption and implementing environmental management systems can be implemented.

An action that would directly affect the amount of materials used in the manufacture of packaging would be the following:

- Minimise wastage in the production process, recover waste. For example, design a sheet size and arrangement of thermoforming elements to reduce waste.





Increased proportion of recyclable packaging and use of recycled material.

These measures focus on increasing the amount of packaging that can be recycled and encouraging the incorporation of recycled materials in its manufacture, thus contributing to reducing waste generation and **promoting a more efficient resource cycle**.

The focus of action is divided into three key points, collection, sorting and recycling, each part of the process benefits differently from the actions, although all of them improve the result we are looking for; a high quality recycled material, ready to be incorporated into new packaging.

Improvements in packaging to facilitate separation at source and collection.

A key player in the value chain in improving source separation is the end-user of the packaging, in whose hands it is to deliver the packaging in the correct waste streams established in waste management.



To enhance this purpose, actions such as the following can be undertaken:

- Facilitate the understanding of the **correct separation of packaging** by materials or flows so that they are delivered in appropriate conditions at source.
- Include instructions on how to separate elements.
- Facilitate the folding of the packaging to reduce the space used in the container and transport.
- Incorporate separability mechanisms adapted to each packaging, design of easily separable components.





Improvements in packaging to facilitate selection.

Implementing improvements in the characteristics of packaging to facilitate sorting is an effective strategy to improve the overall efficiency of the recycling process. This measure focuses on **optimising the identification and sorting** of packaging at sorting plants.

- Facilitate the emptying of the container to avoid product residues at the time of disposal and to improve product utilisation.
- Eliminate carbon black in packaging.
- Prioritise transparent packaging and natural colours over opaque (when natural is transparent) and coloured packaging.
- Adopt a small label size.
- Adopt changes in the geometry of the packaging that facilitate its selection.

Packaging improvement to facilitate recycling.

The recycling process can achieve higher **yields** if improvements in packaging materials and design are applied, leading to higher **quality** of recycled material and efficient use of resources.

Possible actions to facilitate recycling include:

- Opt for mono-material packaging.
- Avoid incompatibilities between materials that prevent their recycling. Eliminate recycling disruptors.
- Replace conventional adhesives with easily removable ones.
- Opt for packaging alternatives that meet recyclability standards.

Use of recycled material.

To **close the cycle** and reintroduce recycled material as well as to further promote the circularity of packaging, it is important to consider the substitution of virgin material by recycled material and we propose the following action:

- Increase the proportion of recycled material in the manufacture of new packaging.





Re-use.

Another aspect that can reduce the introduction of packaging materials on the market is the use of reusable packaging, designed with an optimal relationship between resistance and functionality, integrated into carefully studied logistical and production processes.

Increase in the proportion of reusable or second-use packaging as opposed to single-use packaging.

This measure assesses cases where the choice is made to replace packaging systems in which each package experiences a single use towards systems in which each rotation avoids the placing on the market of a new package.

This can be achieved through the following actions:

- Prioritise the use of previously used packaging instead of new packaging. For example, the use of boxes from a supplier that are reused to transport the goods themselves.
- Offer the product in refillable packaging.
- Increase the volume of product marketed in reusable versus single-use packaging.





Improvements to reuse processes.

Once the commercialisation flows of products in reusable packaging have been implemented, one line of work that can be focused on is the improvement of processes. Thus, this measure focuses on identifying and implementing improvements in the characteristics of reusable packaging, as well as in logistics processes, cleaning and refilling of reusable packaging, with the aim of making them more efficient.

The following actions are part of the strategy to optimise reuse processes:

- Improve the technical and design features of packaging to extend its half-life.
- Implement improvements in logistical processes that minimise the amount of yard space needed to market the product.
- Reduce wastage in fleet maintenance operations (cleaning, transport, storage).
- Reconditioning reusable packaging to extend shelf life
- Carry out actions aimed at promoting the valuation of more efficient reuse systems (standardisation, appreciation of the value of less new and reconditioned packaging, etc.).

Complementary measures.

In addition to the measures outlined above, there are a number of complementary actions that can make a significant contribution to the optimisation of packaging management and the promotion of environmental sustainability. These measures range from collaboration on logistical aspects to the implementation of agreements and the promotion of collaboration between different actors in the packaging value chain.

Application of proxy measures.

These measures could include the following actions:

- Establish requirements to which suppliers must conform, establish collaboration agreements that minimise the impact of operations.
- Carrying out communication and awareness-raising projects.
- Promote the implementation of internal and consumer training projects on good packaging management practices.





3.2 What additional tools will be available to companies?

Training.

For some time now, the packaging sector has been increasingly subject to numerous constraints, not only technical but also regulatory at different levels.

For this reason, training is a fundamental part of helping to facilitate the analysis and integration of the applicable requirements. Procircular, through its webinars and participation in dissemination forums, will try to address the topics of greatest interest to companies.



Transversal network for the exchange of knowledge and the search for opportunities.

The creation of working groups will be encouraged to **stimulate co-creation** and a circular vision of prevention (manufacturers, packers, logistics operators, consumers, sectoral associations, etc.).

Spaces will be created in which to share experiences, technical needs... and a vision of how and when to face the challenges that are on the horizon already planned and to come. For example, the preparation of companies for the requirements of the EU Packaging and Packaging Waste Regulation on minimum size, empty spaces, reuse and recyclability.





Company-specific guidance.

The companies included in the Plan developed by Procircular will have access to the general business support service to receive guidance on prevention concepts and the use of the Plan tools.

On the other hand, the availability of ad-hoc services for companies will be promoted, which will be assessed independently according to their scope, for example:

- Diagnosis of the company's packaging system (domestic, commercial and industrial).
- Identification of prevention opportunities with marketing, design and production teams (incorporation of secondary raw materials, recyclability, reuse and preparation for reuse, etc.).
- Cost-benefit analysis of the identified improvements, necessary investments and implementation timeframe.
- Potential savings in the financial contribution to PRO.
- Eco-design training for all departments concerned.
- Implementation plan for the improvements identified, monitoring and follow-up.
- Design of internal procedures for the incorporation of eco-design and recyclability in the development of new products.

3.3 What are the indicators against which their achievements will be assessed?

As indicated above, companies participating in the Plan will report on the prevention measures they implement during the period of the Plan.

On the other hand, by receiving packaging declarations from companies on an annual basis, details of the characteristics of the packaging placed on the market and the products it contains will be available.

These two sources of information provide the necessary basis for observing trends in company performance in relation to both quantitative and qualitative parameters of prevention.

To this end, a series of indicators have been designed for this purpose:

- Make the most efficient use of available information on the packaging placed on the market and on the type of initiatives companies are undertaking to improve it.





- To analyse the most significant trends in the type of measures implemented, their focus on the main lines of work in prevention, the path and the possible stimulation of new initiatives in prevention...
- Respond to the monitoring criteria established by the RDERE in article 18.2.

The monitoring indicators are as follows:

MEASUREMENTS - Royal Decree 1055/2022 of 27 December on packaging and packaging waste.	 INDICATOR PROPOSED
Increasing the ratio of the amount of reusable packaging to the amount of single-use packaging.	Reusable packaging / single-use packaging.
The increase in the ratio of the amount of recyclable packaging to the amount of non-recyclable packaging.	Number of measures taken to improve the recyclability of packaging.
Improving the physical properties and characteristics of packaging, or switching to the use of this type of packaging, enabling it to withstand a greater number of rotations, in case of reuse. Under normally foreseeable conditions of use, or to improve their recyclability.	Evolution of the number of annual rotations of reusable packaging.
The improvement of the physical properties and chemical composition of packaging in order to reduce the harmfulness and hazardousness of the materials contained therein and to minimise the environmental impacts of the waste management operations to which they give rise.	Number of measures taken to reduce the harmfulness of packaging materials and minimise impacts associated with waste management.
The reduction in weight of the material used per unit of packaging, especially single-use packaging, to the limits that allow its viability, without compromising the recyclability of the packaging.	Evolution of the average weight of the container.
The reduction, compared to the previous year, of the total weight of packaging of each material placed on the market, especially single-use packaging, in relation to the products placed on the market by product producers.	Kr (package weight) / Kp (product weight).
The non-use of superfluous packaging and packaging that is larger or heavier than the statistical average of other similar packaging.	Kr (package weight) / Kp (product weight).
The use of packaging with a more favourable ratio between container and content by weight than average, taking into account the individual materials.	Kr (package weight) / Kp (product weight).
The incorporation of secondary raw materials from the recycling of packaging waste in the manufacture of new packaging up to the technically and economically feasible percentages and at the same time allowing the basic requirements on the composition and nature of reusable and recoverable packaging, including recyclable packaging, set out in Annex III to be met.	Number of measures taken to incorporate recycled material in packaging.





3.4

What objectives does the Plan aim to achieve?

Considering the previous chapters which have described in detail possible prevention measures to be put in place, it can be seen that many of them will generate mainly qualitative improvements.

As for the type of quantitative objective that the Plan can set and for which there is more historical reference is the Kr/Kp parameter, which consists of the ratio between the weight of packaging used to contain the weight of the product of the packaging placed on the market by the companies committed to the Plan.

This relationship is not only marked by the decisions made by the companies (such as reducing the unit weight of the packaging, offering presentations with more volume, etc.) but also by the purchasing decisions of the agents involved in this process, which can modify the mix of presentations and materials selected.

This parameter has been improving in recent years and the objective of the Plan is to **stabilise or improve the parameter** based on the 2024 baseline.

On the other hand, in order to make progress in improving packaging and its impact, it is important for companies to evaluate the progress they can make in the different fields of prevention, without limiting themselves to changes in their weight, which in certain sectors is limited by technological issues. In this respect, the objective is that companies adhering to the Plan should **declare at least one prevention measure each year of the Plan's application**.

Finally, with the aim of promoting the circularity of packaging, it is proposed and established that the companies that form part of the Plan **participate in any of the collaboration or training tools** that are made available to the participants in the Plan, or that they **carry out evaluations of the recyclability** of packaging, as indicated in the framework of the European Regulation, as well as the analysis of strategies that maximise the recovery of materials and minimise waste.





3.5

What control mechanisms will be put in place?

The Business Plan for Prevention and Ecodesign developed by the collective system is a tool that **provides**, among other things, **support for organising, grouping and collecting information** from producers, who are ultimately responsible for its implementation and compliance.

Accurate information is key in order to have as clear a picture as possible of the level of implementation of prevention instruments by producers.

The control mechanisms that will be put in place to achieve this accuracy and rigour will focus on several goals:

1.

Ensure that the interpretation of the concepts is correct, so that more and more coherent information is achieved and in the process help to support companies in gaining a better understanding of the tools of prevention.

2.

Facilitate channels for producers to provide evidence of the measures carried out.

3.

Detect alterations in data trends in order to be able to analyse whether they are due to market behaviour or deviations in data quality.

The sources of data that Procircular will rely on, fed by producers, will be the Annual Packaging Declaration and the contribution of prevention measures.

Both channels of communication with the PRO have both quantitative and qualitative data and work will be done on the quality of the information on both aspects, seeking synergy with the rest of the system's control mechanisms and insisting on the goal of achieving maximum efficiency in the processes.





3.6

How will you report on what has happened during the implementation of the Plan?

Throughout the duration of the Plan, Procircular will compile the necessary information to be able to transfer the degree of compliance with the prevention measures included in the Plan at the end of its period of validity by means of a monitoring report.

The monitoring report will be submitted within 3 months of the Plan's completion to the Autonomous Community of Madrid, which will forward it to the other Autonomous Communities.

Procircular will also identify producers who are included in the scope of the Plan.





Procircular

Completing the circle
of circular economy