Position of Fibre Packaging Europe

on the revision of the Packaging and Packaging Waste Directive (PPWD)

Fibre Packaging Europe (FPE) is an informal coalition of seven trade associations representing industries involved in forestry, pulp, paper, board and carton packaging production and recycling from across Europe, coming together **to speak with one voice on the policy issues central to the fibre-packaging value chain in the EU**.

FPE supports the EU's Green Deal ambitions and welcomes the upcoming revision of the Packaging and Packaging Waste Directive (and its transformation into a Regulation) as a crucial opportunity to drive the EU circular economy. FPE has been deeply involved throughout the consultation procedure by carrying out comprehensive studies and providing input to the European Commission's services. With this paper, we wish to address **our key industry concerns and recommendations** regarding the draft proposal for a revision of the PPWD (referred to below as the PPWR proposal), namely:

1) **The Regulation should establish a clear and enforceable definition of recyclability based on transparent and reliable facts, such as the Design for Recycling (DfR) guidelines, and directly link it to collection**

2) **Restrictions on the use of fibre-based packaging items must be avoided, and reuse should only be considered where it is most environmentally beneficial, safer for consumers, technically feasible, and where it makes economic sense**

1) The Regulation should establish a clear and enforceable definition of recyclability based on transparent and reliable facts, such as the Design for Recycling (DfR) guidelines, and directly link it to collection

A future-proof PPWR should mandate that, by 2030, all packaging is low-emission, recyclable or reusable and that raw materials are responsibly sourced. This approach should be underpinned by clear targets, criteria and definitions, thus ensuring a well-functioning EU Internal Market and driving investments in innovative materials and recycling technologies without imposing further restrictions. Therefore, an actionable and forward-looking definition of recyclability applicable to all packaging must be complemented by a material-specific and technology-neutral approach to achieve the PPWR's objectives while safeguarding the health of consumers and reducing food waste. The material-specific definitions complementing the definition of recyclability shall be defined by secondary legislation and linked to collection.

The recyclability of the packaging must be defined for each product and material specificities via Design for Recycling (DfR) guidelines. The DfR guidelines[1] can provide technically sound guidance to ensure recyclability by considering the packaging composition, functionality and suitability for recycling in existing streams and with existing technologies. The DfR guidelines are de facto negative lists. Hence, having a separate list that is not based on the DfR and is banning certain attributes, which do not per se make packaging not recyclable, but at the same time are essential for food safety, is unnecessary. Moreover, it contradicts fundamental Treaty principles, including proportionality, the obligation to avoid assessment errors, the non-discrimination principle, innovation and best environmental performance.

All paper-based packaging (with functional barrier materials or not) is recyclable, and the entire fibre-based value chain is committed to ensuring this remains the case. Adopting DfR guidelines should not be linked to a negative list, as such

[1] Paper-Based Packaging Recyclability Guidelines (Cepi, CITPA, ACE, FEFCO, 2019); Circularity by Design Guideline for Fibre-Based Packaging (4evergreen.eu, 2022)

About Fibre Packaging Europe

Fibre Packaging Europe is an informal coalition of seven trade associations representing industries involved in forestry, pulp, paper, board and carton production and recycling from across Europe. Our joint mission is to provide renewable, circular and sustainable fibre-based packaging solutions to European citizens to achieve the European Green Deal objectives.

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an approach would hamper innovation and discourage investments while banning some packaging from the market without sound scientific evidence. Still, if such a list is maintained, it should be left empty at this stage and be populated through the DfR guidelines (once adopted).

Having mandatory recycled content for fibre-based packaging might not be seen as an appropriate tool in regulating well-functioning markets for secondary raw materials. If, however, the recycled content targets are applied to all packaging containing even little plastic, the targets for contact-sensitive packaging should be set at a realistic level. Mandatory recycled plastic targets should focus on packaging primarily made of plastics (i.e. packaging containing more than 50% plastics). The lack of secondary raw materials could entail serious environmental consequences (e.g., in some cases, the impossibility of creating plastic functional barriers for light-weight, recyclable packaging could lead to a switch to other less optimal packaging solutions which could be heavier, more energy intensive to manufacture, or with worse performances in terms of serving their purpose).

Separate collection is key to further increasing recycling rates because it ensures that fibres are fed back into the paper recycling loop, enhances the quality of fibres by preventing soiling caused by other waste materials, and provides large volumes of high-quality secondary raw materials. This, in turn, increases the valorisation of secondary raw materials, which can then support more efficient EPR schemes. While the fibre-based single-use packaging industry supports mandatory collection targets set as performance targets to secure foreseeable flows and increased recycling, the burden of ensuring that packaging is 'recycled at scale' as of 2035 should not fall on the packaging manufacturers. Such an obligation will penalise the industry, which has no control over the waste collection schemes and waste treatment infrastructure in each EU Member State.

2) **Restrictions on the use of fibre-based packaging items must be avoided, and reuse should only be considered where it is most environmentally beneficial, safer for consumers, technically feasible, and where it makes economic sense**

Reuse presents technical and logistical challenges for the economy and is not, by default, the most beneficial environmental option for packaging. Substituting fibre packaging with plastic or glass packaging would significantly increase the amount of greenhouse gas emissions emitted for the same functionality and packaging with the same application and purpose. According to the results of an in-depth and certified LCA study conducted by Ramboll[2], the reusable system in quick service restaurants generates 2.8 times more CO2-equivalent emissions, leads to 3.4 times more fossil resource depletion, consumes 3.4 times more freshwater and generates 2.2 times more fine particles compared to the fibre-based single-use system, thus further accelerating climate change. In contrast, fibre-based single-use packaging is produced from low-carbon renewable materials sourced from sustainably managed European forests and recycled at end-of-life. In fact, it is estimated that forests and forest-based products remove a net of 806 million tons of carbon dioxide equivalents annually. This corresponds to 20% of all fossil emissions in the European Union.[3]

Moreover, the extra logistics involved in reusable packaging systems and the energy needed for sanitisation will further increase the sector's environmental impact and result in additional costs for food service systems. Studies of transportation distances have found that single-use packaging has a significantly lower impact compared to reusable alternatives[4]. According to a study, the carbon footprint of cardboard boxes outperforms that of reusable plastic boxes when moving tomatoes internationally.[5] Similar results were demonstrated by an independent peer-reviewed study assessing the B2B transport of fresh produce in the EU.[6] Another study assessing the environmental performance of beverage cartons shows that their high packaging efficiency also leads to a higher transport efficiency, resulting in lower CO2 and other particle emissions due to transporting goods.[7]

Among all, reusable packaging systems present greater cross-contamination risks due to multi-location cleaning, sanitation, storage space and transport.[8] In comparison, fibre-based single-use packaging can ensure that food stays fresh longer than when stored in reusable plastic crates, thus reducing food waste.[9] Crucially, it safeguards consumer safety.

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[2] EPPA, Jan 2021, "Single-Use Vs Multiple-Use: Using Science to Challenge the Misconceptions" Executive Summary of Ramboll LCA study
[3] Climate effects of the forest-based sector in the European Union, Peter Holmgren, FutureVistas AB (2020)
[4] Circular Analytics, Taking a closer look at paper cups for coffee (LCA study), Huhtamaki
[5] Science for Environment Policy, Issue 569, 2021, European Commission DG ENV, edited by SCU, University of the West of England, Bristol
[6] FEFCO, May 2022, 'Overview of FEFCO studies on recycling and reuse of packaging'
[7] Supporting evidence - Environmental performance of beverage cartons, Circular Analytics, 2020, p. 19
[8] Professor David McDowell, June 2020, Report on Hygiene Challenges with reusable packaging, Professor McDowell argued that 'banning or reducing the use of food service disposables in the absence of significant radical changes in good hygiene practice will lead to greater persistence and circulation of foodborne pathogens within the human food chain, and increased risks of human foodborne illness'.
[9] Siroli L, Patrignani F, Serrazanetti DI, Chiavari C, Benevelli M, Grazia L and Lanciotti R (2017) Survival of Spoilage and Pathogenic Microorganisms on Cardboard and Plastic Packaging Materials. Front. Microbiol. 8:2606. Research carried out at the University of Bologna showed that fruit stays fresh for

All reusable packaging placed on the market must be recyclable and effectively recycled at the end of its life without compromising food hygiene and integrity as well as the health and safety of consumers. Since fibre-based packaging has a high recycling rate (82%)[10] and produces high-quality recycled products, it would not prove productive to impose restrictive and unrealistic reuse targets on packaging made of paper and board as this will likely have a negative or very limited environmental impact.

Thus, bans and restrictions on the use of fibre-based packaging items must be avoided. Reuse targets for all packaging, regardless of the material used and of the systemic approach, would not only have increased environmental, economic, and health safety impacts but also detrimental effects on parts of the fibre-based disposable packaging industry, disrupting the competitiveness of the internal market while replacing a significant part of renewable and recyclable paper and board packaging with fossil-based alternatives. This means fossil-based packaging solutions will be promoted without considering their long-term and systemic environmental impacts, e.g., plastic pollution.

Therefore, we believe that policy should be based on a sound scientific evaluation of the life cycle impact of packaging, the packaged product, and its system, accompanied by the evaluation of the economic and technological implications. It should further encourage packaging solutions with the best environmental performance as provided for in Art 4(2) of the Waste Framework Directive (WFD). Moreover, policymakers should fully consider the food-safety risks related to mandated sector reuse targets for packaging in food contact applications.

Paper-based single-use products that can deliver the best overall environmental outcome justified by life cycle thinking should be exempted from reuse targets. A more detailed argumentation, supported by relevant research and examples, can be accessed here.

up to three days longer in corrugated trays compared to reusable plastic crates, in addition to significantly reducing contamination from microorganisms.

[10] Recycling rate of packaging waste by type of packaging, EU27, Eurostat (2019)