

[REDACTED]

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**From:** [REDACTED]  
**Sent:** vendredi 17 avril 2020 16:59  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Feedback from CITPA on the draft Guidelines SUP Directive  
**Attachments:** SUP-20-017 Joint paper and board value chain letter on SUP Guidance.pdf;  
SUP-20-015 Cross Industry paper on cellulose under the SUPD.pdf

Dear all,

I got a message from our server that the mail was not deliver.  
So, here again.

Apology for any inconvenience and cross-posting.

Have a nice weekend!

Best regards,  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, April 17, 2020 16:36  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Feedback from CITPA on the draft Guidelines SUP Directive

Dear all,

We are writing on behalf of the International Confederation of Paper and Board Converters in Europe (CITPA).

Thank you very much for organizing the workshop and the opportunity to provide comments to the draft Guidelines on SUP Directive (SUPD).

We fully support the position of the paper and board value chain, which comprises of two documents. Please see them enclosed:

- Joint paper and board value chain feedback on the Guidance
- Cross-industry technical paper on cellulose

In addition, we would like to share some specific comments raised by members.

- Part C, Section 1.3.2, Table 1-2

Metal containers are excluded throughout the Guidelines, but, like paper, they often have a poly coating to protect the product. Why would poly-coated metals be excluded, but not poly-coatings for paper that exist for the same purpose?

We would suggest to clarify this contradiction in the Guidelines.

- Part C, Section 1.3.2, Table 1-3

- 1) The images in the category "Plastic food container containing single-sized portion snacks" show a rigid plastic package containing more than a single portion of cashews (therefore, not 'Single-use'); the second image shows a snack container whose expiration date would be greater than 3 days (therefore, not 'Intended for immediate

consumption'). We would suggest removing these images and providing ones that are more representative of the category.

- Part C, Section 1.4.2, Table 1-5

One of the images in this section shows a packet made of paper and plastic film and another of plastic film only. This would seem to fit better under the ISO 21067-1:2016 definition of flexible packaging since the rigidity is provided by the paper fibers or the product itself and not the plastic. We would suggest removing the images and referring to "rigid plastic" as opposed to "rigid material containing plastic".

- Part C, Section 1.3.2., Table 1-2, description of "portion size"

The single -sized portion is being indicated as "consumed by one or two people". This means that the single -size portion is a bigger than single person portion and in the absence of other specific parameters defining the size would become a multi-size portion. This will bring much more confusion to the market than solution.

We recommend to strictly limit the single-size portion as a portion for one person.

Finally, we would like to express our concern that some of the suggested interpretations in the SUPD Guidelines will create a precedent which might have unexpected consequence in future. Once the guidance is approved by the Commission, even though not legally binding, it will provide the official interpretation of the Commission to be used now and in the future legislation. The SUP Directive has an objective to also "promote the transition to a circular economy with innovative and sustainable business models, products and materials" and as such it should support innovations into new sustainable products and encourage existing circular businesses.

We would be happy to discuss this further.

Thank you in advance for considering our feedback.

Best regards,

[Redacted signature]



[Redacted contact information]

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