

Subject:

Written input from MONDI on guidance on identifying and describing the products covered by the SUP Directive

My name is [REDACTED] and I am the Group Product Stewardship Manager at Mondi. Mondi is a leading global packaging and paper group employing around 26,000 people across more than 30 countries, working with thousands of local and global brands using paper where possible, plastic when useful.

On behalf of my colleagues, I would like to share with you some questions and also comments we have in regards to the SUPD in its recent version:

SUPD - comments and questions provided by Mondi

17.04.2020

Wrappers

What is the size and volume indication that might differentiate between being considered under the SUPD or not?

A wrapper around single-use products and multiple-use products does not fall under the SUPD as it is "not a food wrapper"?

Functional paper

Is functional paper considered in any way?

WP1 Guidelines_Part A B D

For part B it would be beneficial to have some real life examples

3.1 Here we have difficulties understanding the interpretation of starch (especially if chemically modified and then applied on)

3.2.2. the definition of "structural component" is unclear to us

Single-use vs. single portion

According to your interpretation it depends on the **number of portions** whether a food packaging is considered single-use or (single portions minimum) that you could undergo the SUPD – is this really in the interest of the SUPD?

Multi-pack vs. single-use servings

How come do multipacks with single-use servings not fall under the SUPD?

Coated and laminated paper products

That coated and also laminated paper products fall under the SUPD as the example for corrugated boxes shows although it is not clear. How can waste collection and recycling not be considered when we want to address a circular economy with the SUPD?

Lid and tray

Are a lid and a tray considered as one product or as two products under the SUPD?

Oxygen barrier

We would recommend acknowledging an oxygen barrier to indicate the exclusion of immediate consumption.

Cellulose

We agree that commercial cellulose grades should be exempt as they are made from the natural polymer cellulose. Only the considering whether the chemical structure of a natural polymer has been modified or not.

Food safety and hygiene management

We are concerned that food safety and hygiene requirements are not considered in the SUPD guidance given the significant

Thank you for giving us this opportunity of sharing our views with you.

Have a good weekend and stay healthy.

Best regards,

[Redacted signature]

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