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 (PPWD) as a crucial opportunity to drive the EU circular economy. Throughout the consultation procedure, FPE has been deeply involved by carrying out comprehensive studies and providing input to the European Commission's services. With this paper, we wish to summarise **our key industry recommendations to achieve an ambitious yet realistic review of the PPWD**.

We call on EU policymakers to ensure that the future overhaul of the PPWD takes into account the following industry recommendations:

1) Single-use fibre-based packaging often has a superior environmental performance - packaging reuse should be mandated only where technically, economically, and environmentally beneficial
2) Establish a definition of recyclability based on Design for Recycling (DfR) guidelines and linked to collection
3) A negative list banning certain packaging types could hinder innovation and result in increased uptake of fossil-based alternatives with higher carbon footprint and lower recycling rates
4) Implement separate and harmonised collection systems across Europe, while setting collection targets for packaging with low collection rates

1) Single-use fibre-based packaging often has a superior environmental performance - packaging reuse should be mandated only where technically, economically, and environmentally beneficial

Reuse presents technical and logistical challenges for the economy and is not, by default, the most beneficial environmental option for packaging. According to the results of an LCA study, the reusable system generated 2.8 times more CO2-equivalent emissions, led to 3.4 times more fossil resource depletion, consumed 3.4 times more freshwater and generated 2.2 times more fine particles compared to the fibre-based single-use system.[1] Reusable packaging systems often have increased environmental and economic impacts due to, for instance, the extra logistics involved, sanitisation and additional costs for food service systems. In addition, transportation distance plays a crucial role in the environmental impact of many sectors, especially when transportation is intercontinental.

Single-use solutions, such as fibre-based packaging sourced from renewable materials and recycled at end-of-life, are often more environmentally friendly than reusable alternatives. Thus, 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 incentivising packaging solutions with the best environmental performance as provided for in Art 4(2) of the WFD.

Moreover, all reusable packaging that is 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 the safety of consumers. A more detailed argumentation, supported by relevant research and examples, can be accessed here.

[1] EPPA, Jan 2021, "Single-Use Vs Multiple-Use: Using Science to Challenge the Misconceptions" Executive Summary of Ramboll LCA study

2) Establish a definition of recyclability based on Design for Recycling (DfR) guidelines and linked to collection

The aim of the PPWD revision is to ensure that all packaging is reusable and/or recyclable by 2030. The recyclability of the packaging must be defined for each packaging material via Design for Recycling (DfR) guidelines. DfR guidelines can provide the technical guidance to ensure recyclability by considering the packaging composition, functionality and suitability for recycling in existing streams and with existing technologies. Paper & Board recyclability guidelines already exist and are used by the industry and the supply chain. [2]

The material specific definitions complementing the definition of recyclability[3] shall be defined by secondary legislation and linked to collection. A proposed definition for fibre-based packaging can be found in FPE's position paper here.

3) A negative list banning certain packaging types could hinder innovation and result in increased uptake of fossil-based alternatives with higher carbon footprint and lower recycling rates

Almost all base paper leaving a paper mill to be formed into packaging is fully recyclable through a standard paper recycling mill. Functional properties expected from the packaging to deliver its purpose require it to be in some cases coated, laminated or treated in other ways in order to meet the different barrier or functional requirements (e.g., for food contact) which can be more challenging for the recycling process. Nevertheless, when necessary to combine paper and board with other materials, the paper industry is committed to always apply this combination in a way that does not hamper recycling while ensuring that the expected role of packaging is fulfilled. The paper and board recycling, manufacturing and converting industry has developed the Paper-Based Packaging Recyclability Guidelines informing on the implications of certain converting steps on the recyclability of used paper-based packaging in the collection, sorting and recycling processes. Thus, for the very vast majority, fibre-based packaging is recyclable even when coated. For example, beverage cartons are recycled at scale.

A negative list including fibre-based composite packaging would also disregard the functionality of the packaging that would be listed and whether their fossil-based substitute would a) provide the same functionality and b) have a higher environmental impact. Substituting fibre packaging by plastic or glass packaging would significantly increase the amount of greenhouse gas emissions emitted for the same functionality and for packaging that would have the same application and purpose.

In addition, the recyclability assessment and the DfR Guidelines *de facto* represent negative lists for packaging recyclability. These Guidelines are technically sound (and not based on beliefs) and can be updated on a regular basis, whereas lists are never up-to-date, hinder sustainable innovation and create an uneven playing field distorting market competition.

4) Implement separate and harmonised collection systems across Europe, while setting collection targets for packaging with low collection rates

Fibre-based packaging is produced mainly from European resources and sold predominantly to European consumers. To sustain resilience against severe global disruptions, there is a need for separate paper collection at the source to ensure good quality paper for recycling, which will be met with demand from the European paper industry. However, without collection and sorting, packaging designed to be recyclable will not have access to the appropriate recycling process. Separate collection of paper 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 ensures large volumes of high-quality secondary raw materials.

A prerequisite for separate and harmonised collection systems across Europe is having a higher collection target for packaging, currently not reaching a 70% collection rate. A higher collection target of 90% for fibre-based packaging would bring secured and foreseeable flows in support of increased recycling, which will result in more predictability of the collected volumes and will lead to an increase in recycling investments.

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[2] Cepi, ACE, FEFCO, Citpa Paper based packaging recyclability guidelines, 4evergreen Design for Circularity Guidelines

[3] For example, the definition proposed by Europen supported by many industry stakeholders.