

**For immediate release**

Contact:  
Anne-Sophie Duchene  
Tel: +32 2 626 9835  
Anne-sophie.duchene@fefco.org

**FEFCO : Waste Hierarchy should place re-use and recycling at par!**

**Brussels, 5 July 2006:** “A five step hierarchy, which blindly favours re-use over recycling, sets the clock back and ignores scientific data” declared Wim Hoebert, FEFCO Secretary General.

The corrugated Board industry is questioning the rationale of the new five step hierarchy that has been inserted into the proposal for revision of the Waste Framework Directive that is currently under discussion in the Environment Committee of the European Parliament. It is implied that reuse is better for the environment. This could lead to reusable packaging becoming the preferred option, whatever the case!

From an environmental point of view the preferable option between reusable and one way (recyclable) packaging should not depend on a universally imposed hierarchy which would not take into account all circumstances and their impact on the environment. For example reusable packaging needs to be transported back and forth to the cleaning centre, empty, over long distances, and these trips mean more diesel consuming trucks on the road; what's more one way packaging requires no washing, therefore no water or detergents. These factors need to be considered on a case-by-case basis, which is exactly the way the EU has looked at it so far, in order to avoid the widespread market discrimination of one of the options.

The aspect of public health and safety should not be underestimated either. It is extremely difficult to guarantee the cleanliness of reusable packaging. The cleaning process must respect a number of variables such as: how long it is supposed to last, what temperature the water should be, etc... in order to eradicate bacteria. Again if a universally accepted hierarchy basically says that reuse is generally better than one way (recyclable) packaging, FEFCO is asking how this approach can leave any room for the integration of the factors and conditions specific to each situation.

FEFCO therefore supports a waste hierarchy that maintains a flexible approach between re-use and recycling, in line with the directives on Packaging and Packaging Waste

(n° 94/62/EC, 2004/12/EC and 2005/20/EC), which do not favour one option over the other, especially as there is no scientific justification for it. So why should Europe need a new approach?

Enc. 10 reasons to maintain a flexible hierarchy that puts Recycling and Re-use at par

**XXX**

Note to the editors

FEFCO (European Federation of Corrugated Board Manufacturers) was established in 1952 and represents the interests of the European Corrugated Board Manufacturers. Headquartered in Brussels, FEFCO has 24 active members, all European national corrugated packaging organisations. The role of the Federation is to investigate economic, financial, technical and marketing issues of interest to the corrugated packaging Industry, to analyse all factors which may influence the industry, and to promote and develop its image.

## 10 reasons to maintain a flexible hierarchy that puts Recycling and Re-use at par

1. The rigid “five step” waste hierarchy that is currently under discussion leads to serious inconsistencies and distortions with regard to establishing overall environmental impacts.
2. Despite the absence of any valid evidence, reusables are perceived to be universally more “environmentally friendly”, because of their repeated use.
3. Attempting to define a rigid priority between the options is however **not justified on scientific grounds**.
4. The recent Pira/Ecolas<sup>i</sup> study, written for the Commission as a contribution to the report on the implementation of the Packaging and Packaging Waste Directive, provides clear evidence that there are no scientific grounds to favour reusable packaging systems over one-way alternatives that are recyclable.
5. An earlier study, funded by the Commission<sup>ii</sup>, on packaging waste management has shown that regional or local conditions to a large extent determine which of the options (reuse, recycling or energy recovery) is preferable for providing a high level of environmental protection.
6. The environmental performance of different types of packaging can therefore only be determined on a case-by-case basis. In such an evaluation, all aspects of the packaging and the required functions of that packaging must be considered.
7. In order to make the best choice, one should take all stages of the product life into consideration to make justified and fair comparisons.
8. Especially with regard to food packaging, public health aspects of reuse versus new and clean one-way packaging should not be overlooked. Reused packaging is difficult to clean and the cleaning process demands large amounts of water, chemicals and energy.
9. In many applications, one-way recyclable packaging has proven to be manifestly superior to reusable packaging from an environmental viewpoint, notably when goods are transported over long distances. The packaging does not need to be sent back empty to the filler for reuse, so it requires less transport, reducing greenhouse gas emissions.
10. The “five step” hierarchy would have a deep impact by mistakenly implying to national regulators and to the market that reuse is always the better option. The overall result is that non-reusable packaging products that are recycled would be discriminated against for unjustifiable reasons and this would lead to market distortions.

## Conclusions

The Commission's Proposal incorporates a broad hierarchy in terms of preferability and FEFCO is therefore of the opinion that Commission, Parliament and Council should support the approach contained in the Commission's Proposal instead of trying to change to a strategy based on a "five step" hierarchy.

This would provide consistency with the approach taken by Commission, Council and Parliament for the Packaging and Packaging Waste Directive (94/62/EC). From before its adoption in 1994 through to its first revision in 2004, there was an unequivocal rejection of all attempts to impose a rigid hierarchy between the management options which would have led to additional barriers to trade and competition distortions.

---

<sup>i</sup> Pira International Ecolas, Study on the Implementation of Directive 94/62/EC on Packaging and Packaging Waste options to Strengthen Prevention and Re-use of Packaging. Final Report, 21<sup>st</sup> February 2005 (03/07884/AL)

<sup>ii</sup> RDC Coopers and Lybrand 1997. Eco-balances for Policy-making in the Domain of Packaging and Packaging Waste. Reference no.: B4-3040/95001058/MAR/E3