

Fédération européenne des fabricants de carton ondulé
European Federation of Corrugated Board Manufacturers
Brussels, 29 June 2001

Contribution of the corrugated packaging manufacturers to the
REVISION OF THE PACKAGING DIRECTIVE

(Technical Committee for Fruit and Vegetables).

Europäische Föderation der Wellpappefabrikanten

FEFCO/ProBox represents the European corrugated packaging industry, bringing
together 21 national

associations across the continent. It employs 100,000 people and manufactures
over 18 million tonnes of

recyclable corrugated packaging per year. All over the world, corrugated
packaging has proven to be an

indispensable product to protect and transport perishable, breakable or
otherwise valuable goods. In

Europe, corrugated packaging represents over two thirds of the packaging used
for transport.

FEFCO/ProBox supports the environmental objectives of the Packaging Directive.

Nevertheless, there is

no immediate need for revising the Directive with higher targets until all
Member States have fulfilled

the existing requirements. Current data on the Member States' degree of
compliance with the Directive

is neither reliable nor comparable. Against this background, an immediate
revision of the Directive is at

least questionable. However, in view of the Commission's stated intention to
revise the Directive,

FEFCO/ProBox would like to contribute positively to the debate with the
following comments:

Support for recycling

Recycling systems of packaging guarantee the reduction of used packaging
disposal to landfill. This is

because they constitute "closed loops" in which used packaging is collected,
recycled and used again for

the manufacture of new packaging. At the same time, recycling is essential for
the corrugated packaging

industry. Recycled packaging is the principal raw material source of corrugated
board boxes.

The corrugated packaging industry supports the objective of the Commission's
Sixth Environmental

Action Programme that "waste which cannot be prevented should be recovered as
far as possible, with

preference being given to recycling."

The revised Packaging Directive should reflect this objective and encourage the
recycling of packaging.

Article 5 of the current Directive invites Member States to promote reusable
packaging ahead of other

types of packaging, including recyclable. However, in many applications
recyclable packaging has

proven to be manifestly superior to reusable from an environmental viewpoint,
notably when packaged

goods are transported over long distances.

Research based on a study commissioned by the French fruit and vegetables
industry1 demonstrates that

the use of recyclable corrugated packaging, as compared to reusable packaging,
reduces dramatically the

number of lorry trips (carrying empty crates) required for transport and hence
the release of polluting

CO2 emissions into the air. For the transport of tomatoes, apples and nectarines
in France alone, the

study shows that recyclable corrugated packaging would require 165,200 lorry trips less per year.

1 "Comparative Study of Transport Packaging for Fruits and Vegetables" commissioned by INTERFEL (the Union of French Producers of Fruit and Vegetables), ONIFLHOR (National Organisation for Fruit and Vegetables, French Ministry for Agriculture) and CTIFEL

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Environment Commissioner Margot Wallström has highlighted the importance of transport as a key factor to determine environmental impact. The Commission has decided to challenge the German reuse scheme, which aims at protecting the market for reusable drinks packaging, on the grounds that it "does not comply with the Packaging Waste Directive and Community rules on free trade." Commenting on this Decision, the Commissioner stated that the German reuse scheme did not take proper account of the environmental costs of sending containers (in this case of mineral water) over long distances for reuse. The Commission has recently supported that both reuse and recycling systems of packaging should be equally encouraged. Article 8.2 (b) (iii) of Regulation 609/20012 refers to "recyclable and/or reusable packaging" as examples of environmental measures which fruit and vegetables producers may put in place as part of operational programmes eligible for EU financial assistance. FEFCO/ProBox believes that Article 5 should be revised to encourage Member States to adopt measures aimed at promoting packaging recycling. The current wording of Article 5 sends a wrong message to Member States which are urged to adopt measures encouraging reuse to the detriment of often more environmentally friendly recyclable packaging. This may not only discriminate recyclable packaging materials but also create trade barriers within the EU. The traditional preference for reuse is based on the assumption that reuse prevents waste and has therefore a lower environmental impact. This is questionable under the emerging Integrated Product Policy which proposes that products' environmental impact should be assessed by looking at all the stages of their life cycle (i.e. not just waste generation). In many cases, recycling systems reduce environmental impact more effectively than reuse, as recycling requires less transport (reduced CO2 emissions) and no cleaning (saves water and detergents use and reduces effluents). Moreover, recycled packaging is always used for the first time, which guarantees optimum hygiene conditions, essential for food packaging. Reuse may be a good solution in certain cases (e.g. when packaging can be taken back for reuse over short distances) but recycling is often the best option from an environmental point of view. The Directive should encourage Member States to promote recycling and reuse systems of packaging.

In the light of these arguments, FEFCO/ProBox recommends that Article 5 of the Packaging Directive is reformulated as follows:

Article 5: "Member States may encourage recycling and reuse systems of packaging, which can be recycled and reused in an environmentally sound manner, in conformity with the Treaty"

Optimum recovery and recycling in the revised Directive

The corrugated packaging industry has achieved the recovery and recycling objectives set by the 1994

Packaging Directive, making a significant contribution to overall efforts to reduce the amount of used

packaging disposed of in landfills in Europe. Moreover, our high recovery and recycling levels do not

only include used corrugated packaging but also other fibre-based products.

Thus, our industry helps

other sectors fulfil their recycling targets under the Directive. The corrugated packaging industry

considers it its obligation to continue working towards optimum recovery and recycling targets as long

as this is beneficial for the environment.

However, any revision of the Directive with higher targets should be supported by evidence of

environmental, economic and social benefits. The targets in the Directive should be optimum and not

maximum. This is supported by the proposed 6th Environmental Action Programme which points out

that "the aim is to recover and recycle wastes to levels that make sense, i.e. to the point where there is

still a net environmental benefit and it is economical and technically feasible".

N° 411/97

2 Commission Regulation (CE) N° 609/2001 of 28 March 2001 laying down detailed rules for the application of Council Regulation (EC)

N° 2200/96 as regards operational programmes, operational funds and Community financial assistance, and repealing Regulation (EC)

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Although preference should be given to recycling, all recovery techniques should be allowed by the

legislation to ensure that the disposal of used packaging is minimised in the most appropriate manner in

each case. The Directive should therefore keep the current structure of recovery and recycling targets.

The Directive should establish common minimum targets for all the different materials to ensure that no

market discrimination exists among the different packaging materials. Targets differentiated on a permaterial

basis cannot be justified from an environmental point of view and are likely to distort

competition.

The new targets should take into account the geographical circumstances and recycling infrastructure in

the different Member States.

Other key requirements for an effective Packaging Directive

Ø The corrugated packaging industry supports the Packaging Directive's objective of prevention.

However, the Directive should not set up legally binding targets, as these may give raise to trade

barriers and be inconsistent with the essential requirements legislation.

Ø We would strongly encourage the Commission to endorse the five packaging standards adopted by

CEN (the European Standardization Committee) to develop the "essential requirements" of Articles 9, 11 and Annex II to the Packaging Directive. The application of the CEN standards would further reduce the environmental impact of packaging and provide industry with legal certainty. In addition, the CEN standards would complete the implementation of the existing Directive. The revision of the Directive does not make sense unless the standards are published in the Official Journal of the European Communities as Harmonised Standards.

Ø The scope of the Directive, should be clarified by appending the guidance document on the packaging definition as agreed by the Article 21 Packaging Committee.

Ø The Member States should continue to choose freely the system for financing return, collection and recovery systems, which they consider optimum for achieving their obligations under the Directive.

Ø The corrugated packaging industry supports the introduction of an EU-harmonised conformity assessment procedure for packaging.

Ø EU legislation should not regard used corrugated packaging as waste. Used corrugated packaging is the principal component used for manufacturing new packaging products and constitutes a valuable raw material. Only things which are lost and irrevocably a burden to society should be regarded as waste.

The contribution of corrugated packaging to environmental protection
The Packaging Directive must encourage the use of packaging which has a low environmental impact, while still fulfilling its main function: to guarantee the protection and safe delivery of products.

By preventing product wastage, packaging can also preserve natural resources and ensure that important products, notably food, are delivered safely to the places where they are required. The study "packaging and the prevention of environmental impact" 3 concludes that product wastes saved by packaging are tenfold the waste it creates. The objective of waste prevention should not be sought at the expense of a greater environmental impact from product wastage.

3 "Packaging and the prevention of environmental impact" by Dr. Anders Söras, Lars Erlöv M. Sc., Cathrine Löfgren M.Sc. Published in Packforst Report No 194, June 2000

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The corrugated packaging industry has managed to de-couple waste generation from economic growth.

The increasingly higher recovery and recycling rates achieved by our industry in recent years have resulted in a significant reduction of the disposal of used corrugated packaging in landfills. Our industry is committed to constantly reducing the total environmental impact of packaging on the environment, while still maintaining the functionality and economy of the product. Corrugated packaging is made from a sustainable raw material and has a low environmental impact over all the stages of its lifecycle. It constitutes a closed loop system in which the used packaging is recycled and used again to manufacture new products:

Ø In manufacture: it optimises the use of disposed materials. Recycled packaging is the first raw material source in the manufacture of corrugated packaging, reducing natural raw material consumption.

Ø In distribution: it reduces polluting emissions from transport. The number of lorries on the road is dramatically reduced by using corrugated packaging as against reusable packaging. Less lorry trips result in less CO2 emissions, less fuel consumption, less noise pollution and less accidents.

Corrugated packaging (both empty and filled) optimises space use for transport and storage and facilitates handling. Less storage space is needed at all points of the logistic chain. Corrugated board boxes are designed to ease the handling and protect the shipped goods, which results in reduced costs.

Ø In use: it guarantees optimum hygiene conditions Corrugated packaging and does not contain any dangerous chemical. Moreover, it does not present any of the health concerns associated with packaging which is reused to deliver food products. It therefore presents no known risks to human health or the environment. Corrugated packaging avoids product wastage and contamination.

Ø On disposal: it relieves pressure on landfills. Corrugated packaging is recyclable and ultimately 100% biodegradable. Recycling of used corrugated packaging is continuously increasing in Europe.

This reduces the amount of packaging being disposed of in landfills or burnt in incinerators.

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