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Eco-design for sustainable products

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FEFCO welcomes the European Commission's Circular Economy Package, notably its proposal for the "Eco-design for sustainable products regulation" as it aims to accelerate the transition towards environmentally sustainable products while reducing their environmental impact. The design phase is instrumental throughout the value chain, from the use phase until the end of life.

FEFCO embraces the initiative's intention to recognise self-regulation measures as these will allow industry sectors to advance on sustainability goals in a flexible way. Self-regulation measures and delegated acts resulting from this legislation should both be recognised on the market and ensure that the functionality of a product remains a key criterion. The requirements or measures in the delegated acts should be meaningful, achievable and supported by scientific fact-based evidence.

Furthermore, the initiative should avoid comparisons between products as this will influence consumer choices and impact the market, failing to consider the complexity of the debate surrounding material sustainability.

We regret the omittance of renewability as a key eco-design criterion. Considering the Commission's climate neutrality ambitions, renewable materials can play a central role for energy production as well as for products.

We would like to emphasise that the free circulation of products is essential to ensure the functioning of the internal market but, to ensure a level playing field, the rules should apply to both domestic products and imported ones. The Eco-design legislation should prevent regulatory overlap given the ongoing implementation of other initiatives under the Circular Economy Action Plan.

EU policy must support existing sustainable products on the market and enable innovation. Fit-for-purpose corrugated packaging is fit for climate neutrality, resource efficiency and circularity.

Eleni Despotou, Director General of FEFCO, said "The Commission should ensure that 'Better regulation' principles are applied to avoid unnecessary administrative burdens and increased costs without associated environmental benefits."

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Note to the editors

FEFCO (European Federation of Corrugated Board Manufacturers) represents the interests of the European Corrugated Board Manufacturers. Headquartered in Brussels, FEFCO has 17 Association members, all European national corrugated packaging organisations. The role of the Federation is to investigate economic, financial, technical and policy issues of interest to the corrugated packaging Industry, to analyse all factors which may influence the industry, and to promote and develop its reputation.

Europe's corrugated industry in Europe makes about 50 billion square metres of board per year, enough to cover Denmark. It has 373 companies, 646 plants and accounts for around 100,000 jobs. Corrugated cardboard packaging is circular by nature: it is based on a renewable resource; it is recyclable and recycled in reality. The average box weight decreased by 9% between 1996 and 2018 and contains on average 89% recycled material.