OVERVIEW CITPA PROJECTS - EU REGULATORY AFFAIRS -BRUSSELS, JULY 2012

PRODUCT SAFETY Projects

Project 1 PIJITF-Packaging Inks Joint Industry Task Force

INTEREST

It involves representatives from packaging inks manufacturers, packaging manufacturers (light metal packaging, Plastics, Paper and Board) and food and drink manufacturers. The Task Force provides expertise involving the supply chain on assessing and managing the risks associated with the contamination of food contact surfaces by packaging inks and other components. Food Drink Europe is providing the secretarial support.

-Paper and Board subgroup on Mineral oils under the umbrella of the PIJITF (Packaging Inks Joint Industry Task Force), the recent agreement achieved with the food industry association (Food Drink Europe) –(See project 2 below)

CRITICAL POINTS

Each sector worked to understand where potential problems may arise. Agreement on openness about substances.

Sectors continue to study potential risks. Liaison with FACET

Printing Inks in food packaging. Swiss Ordinance on Materials and Articles in contact with Food

German "printing inks ordinance" 2nd draft. BLL position (German food association) available in English.

ORGANISATION INVOLVED: FEFCO CITPA/CEPI STEPS TO FOLLOW:

Liaison with FACET project

The Food Contact Strategy Group: CITPA & CEPI is preparing a Questions & Answers document on the Swiss Ordinance on Packaging Inks based on the document prepared by EuPIA.

PROCEDURE: Voluntary Industry Initiative. DG SANCO Food Contact Materials Working group

TIMING:

PIJITF delegation met The Federal Office of Public Health (FOPH) of Switzerland to discuss about the Swiss Ordinance on Materials and Articles in contact with Food.

Project 2 Food Drink Europe subgroup on paper and board under the umbrella of the Packaging Ink Joint Industry Task Force (PIJITF)

INTEREST

Reach a joint EU-wide industry approach on the mineral oils issue in recycled paper and board for food contact applications. TF also agreed to set up two dedicated working groups to deal with this issue: one on toxicology and one on analytical methods.

Starting point: recent studies and publications on mineral oils (K. Grob, etc.), focusing especially on the different statements and methodologies included in those studies, which might be

CRITICAL POINTS

No feedback from ENPA and FAEP (Now EMMA) - Publishers

EFSA report on Mineral Oils (see below).

ORGANISATION INVOLVED: Food Drink Europe, EuPIA. CEPI, CITPA, FEFCO, FEICA, CONCAWE

STEPS TO FOLLOW

Relevant authorities, especially the German authorities, should be kept informed of the findings and the work undertaken by the working groups.

PROCEDURE: Voluntary initiative

TIMING

Agreement with FDE on how to address the issue at external level.

challenged or supported based on outcomes of the information put together by the working groups.
Food Drink Europe and CITPA are providing the secretarial support.

Project 3 Mineral Oils

Voluntary initiative from the paper value chain to create the High Level Working Group on Mineral Oil Liaison with Food Drink Europe subgroup on paper and board

INTEREST

Mineral oils: Migration into food Materials in contact with food including paper and recovered paper have to comply with the general requirements on food contact materials set out in Regulation (EC) No 1935/2004
July 21st 2011: Hearing on the draft German Ordinance with stakeholders German Parliament discussing different approaches to solve the issue Common approach: support the recycling of paper.

Possible approaches: Ban the use of printing inks containing mineral oil Join voluntary initiatives such as the Clean Paper Initiative

Swiss retail group COOP has successfully experimented printing 500.000 copies of their newspaper(totalling 1.7 million print run) without mineral oil-containing printing inks- EUROCOMMERCE has been informed but there have been no reactions to the trial.

CRITICAL POINTS

Food packaged in recycled cardboard could be contaminated by harmful mineral oils migrating from the packaging.

EFSA report

The report mentions that there is no validated method for the determination of mineral oils in food so far.

Consequently, in the recommendation at the end of the report, the provision of reference materials, the development of methods and their validation in interlaboratory tests are suggested.

Potential sources of mineral oils are:

- mineral oil based packaging printing inks
- mineral oil based newspaper inks which get into the paper recycling loop
- mineral oil based processing and auxiliary materials
- miscellaneous sources (ubiquitous mineral oil components)

ORGANISATION INVOLVED: FEFCO/CITPA/CEPI

National Associations and the industry representatives have been asked to contact their national authorities on food contact to prepare them to the possible notification of the German Ordinance Food Drink Europe

Council of Europe work on updating food contact material resolutions. It has not yet been decided if the amendment to the P&B Resolution will be made.

STEPS TO FOLLOW

CITPA & CEPI will share documents from CONCAWE and from Prof. von Wright (Geno-toxocity testing) to BfR and EFSA.

EC DG SANCO is informed on a regular basis

CITPA has liaise with **DG ENVI** to explore the possibility to use the approach of legislation on Extended Producer Responsibility towards publishers

PROCEDURE

CEPI & CITPA Voluntary self-commitments Q & A on MO document distributed Clean paper recycling initiative launched in Germany TIMING

Next High Level working group meeting on MO scheduled in September 2012

FEFCO Summary state-of-art on MO available

German draft ordinance on Mineral oils - Notification procedure:

Germany has to notify the Commission its technical regulation related to products and and, following notification, the notifying Member State, Germany, has to await the end of a period of three months (so called "standstill period") before adopting its notified draft. During this period other Member States and the Commission examine the notified draft and may react. The Commission and the notifying Member State engage in a dialogue aiming through a preventive control - at eliminating any obstacles to the functioning of the Internal Market, before they even appear.

Nevertheless, the situation in Germany seems to be quiet and there is no date scheduled for the publication of the second draft of the ordinance on MO

UK Food Safety Agency (FSA)

After the publication of the EFSA report on June 6th, the British Food Standards Agency (FSA) maintains its position and will not make any recommendation to consumers to change their consumer behavior.

Press release on the self commitment published
The communication kit, the external position and the
Q&A document has been updated aaccordingly with
the EFSA report published on June 6th.

Project 4 FACET- Flavours, Additives and Contact Materials Exposure Task

INTEREST

TTH Research Framework Program.
Four-year project involving €6M EU funding, will deliver a freely-available risk management tool for the EC and industry. Migration modeling of paper and board The input required from the paper and board sector is nearly complete. The target of the project is to link up the different types of packaging with the Euromonitor database in order to develop an automatic system while entering a type of foodstuff packed in different types of materials

CRITICAL POINTS

3 main areas:

- food flavorings;
- food additives;
- food packaging materials.

Usage and sustainability of the project to be determined.

ORGANISATION INVOLVED: CITPA/CEPI

Food Contact Strategy Group

STEPS TO FOLLOW:

How the modelling system will be used and who will have access.

PROCEDURE

Voluntary Industry Initiative.

The user would receive a scenario of the different exposures that this food might have to different substances

TIMING

Project started 01.09.08.

Project to be concluded by August 2012

Project 5 PIM Plastics Implementation Measure

INTEREST

Consolidation of the plastics legislation. It is a specific measure in accordance with the provisions of the framework regulation on materials and items that come into contact with food, specifically Reg.1935/2004/EC, art. 5 (Specific measures for groups of materials and items)

CRITICAL POINTS

Adapt the Industry Guideline for paper and board in food contact applications to consider the new PIM and how this regulation regulate multi materialmultilayer

The IG has been updated accordingly to the PIM requirements

ORGANISATION INVOLVED: FEFCO, CEPI, CITPA STEPS TO FOLLOW

Paper & Board are not in the general scope of the PIM. The draft list of substances to be included in the next amendment to (EU) No 10/2011 is being prepared

PROCEDURE

DG SANCO:

Working Group on food contact materials

TIMING

Came into force on February 4, 2011. As of May 1, 2011, the PIM will replace the Plastics Directive (2002/72/EC) and its amendments, as well as various directives on compliance (migration) testing.

New version of the Union Guidelines on Regulation (EU) n°10/2011 (Under revision)

Project 6 Working Document on active and intelligent materials and articles intended to come into contact with food

INTEREST

Key features: obligation of risk assessment of all active packaging materials; single market to be created for the use of active and intelligent packaging; labelling rules; industry required to issue declarations of compliance.

Open consultation in order to submit comments to the draft guidance on active and intelligent materials and articles.

The consultation period ended on 3 November.

CRITICAL POINTS

Packaging would only be allowed on the market if: - it complies with requirements under this text and under Regulation 1935/2004, as well as national legislation; - it is suitable and effective for the intended purpose of use; and the active and intelligent components are included in a Community list.

ORGANISATION INVOLVED: FEFCO & CITPA STEPS TO FOLLOW

Follow up through the CITPA Product Safety Working Group and Food Contact Strategy Group (CEPI & CITPA)

PROCEDURE

Working document for a draft regulation.

TIMING

Regulation published in the Official Journal of the EU 30/05/09. In force since on 18/06/09.

Project 7 Phthalates

INTEREST

FEFCO self- commitment to phase out DiBP content in paper and board applications. The target for the DIBP migration limit value was 1.0 mg/kg for paper and board. This value has been reduced by BfR in Germany to 0.3 mg/kg in 2011. There is no European DIBP limit value for paper and board. (The mentioned target value of 0.3 mg/kg was for plastic).

CRITICAL POINTS

Included in the candidate list as a substance of very high concern (VHC) toxic for reproduction category 2 under the REACH regulation.

Four substances bis(2-ethylexyl)phtalathe (DEHP), benzyl butyl phthalate (BBP), dibutyl phthalate (DBP) and disobutylphthalate (DIBP) will be banned in the EU from 21 February 2015, except for uses where there are no alternatives, and where manufacturers have applied and been granted authorisation.

ORGANISATION INVOLVED: FEFCO, CITPA, CEPI Follow up through the CITPA Product Safety Working Group and Food Contact Strategy Group (CEPI & CITPA)

STEPS TO FOLLOW: FEFCO voluntary agreement. Good results for the voluntary agreement of the industry; FEFCO will continue the monitoring

PROCEDURE

Member State Action & Industry Initiative.

TIMING

Manufacturers have until 21 August 2013 to apply for authorization for specific, time-limited exemptions for the four substances.

Project 8 Industry Guideline for the compliance of Paper & Board Materials and Articles for Food Contact

INTEREST

- -Customers require compliance statements
- -Protect paper and board acceptance as a food contact material
- -Give the industry companies a standard to compare their internal production process with European Framework Regulation
- -No Paper & Board specific measure yet -Opportunity to influence Commission if decide to start drafting a specific measure FoodDrink Europe guideline on the use recycled fibres approach based on risk

assessment, in line with the Industry

CRITICAL POINTS

Substances "potentially dangerous " found in recycled paper

Points subject to amendment:

Mineral oils

Revision of BfR XXXVI

Multilayer materials, refer also to Reg. 10/2011 PIM

Reference to new CEPI GMP Editorials, phrasing and similar

ORGANISATION INVOLVED: CEPI & CITPA

& ETS (European Tissue Symposium)

STEPS TO FOLLOW:

Monitoring the implementation

Moving document- first amendments are expected. Revision on-going and the new version will be used to promote further its use within the paper and board companies.

PROCEDURE

Voluntary Industry Initiative.

Large acceptance within the paper and board companies.

Briefing sessions for Member States have been completed.

Presentation at the European Commission - Food Contact Materials Working Group 8th November 2010 Presentation at the European Parliament May 3rd 2011. Explanatory video will be found in our CITPA website TIMING – Revision will be ready in September 2012

Project 9 BORAX

INTEREST

Guideline

Used as a starch in our applications The WG will inform the European Commission about:

The "typical" starch formulations in the corrugated industry

The content of borax needed to go beyond the limit of 0,1%

There was not a risk exposure for consumers because formulations are prepared in restricted areas and only handled by experts.

The European Court of Justice (ECJ) has backed the European Commission's classification of nickel and borate as dangerous substances, rejecting appeals from the Nickel Institute and Etimine SA in

CRITICAL POINTS

Included on the Candidate List of Substances of Very High Concern (SVHC) under REACH Regulation.

If any of the substances on the SVHC candidate list is present in articles in concentrations above 0.1% (such as in paper and corrugated board) a notification must be sent to ECHA. The maximum concentration in corrugated board will be less but companies are carrying out further verification of the maximum levels possible.

Companies may have **legal obligations** resulting from the inclusion of substances in the Candidate List. These obligations

ORGANISATION INVOLVED: FEFCO ad hoc Working Group.

STEPS TO FOLLOW:

EBA has invited FEFCO, as a downstream user, to complete the questionnaires they have prepared based on descriptive information and how borates are contained in corrugated boxes, to reflect the different exposure scenarios.

PROCEDURE

REACH Regulation

European Chemicals Agency (ECHA).

TIMING

Reclassified in the CMR-2 category since December 2010

Inclusion in the candidate list of Substances of Very High Concern (SVHC)

The Court found that there was "no factor	refer not only to the listed substances on their own or in mixtures but also to their presence in articles.	EU or EEA suppliers of articles which contain substances on the Candidate List in a concentration above 0.1% (w/w) have to provide sufficient information to allow safe use of the article to their customers or upon request, to a consumer within 45 days of the receipt of the request.
identification including situations such as accidents when a substance is spilled or a child eats washing powder containing borate.		Alternatives Lubrizol offering Borax free systems: Freebor

ENVIRONMENT Projects

Project 1 - The role of packaging to prevent food waste

INTEREST

Food packaging in the context of sustainable consumption and production and resource efficiency
European Parliament initiative report (Motion for a Resolution) on how to avoid food wastage. The Parliamentary Resolution is non-binding and does not oblige the Commission to act, however it will be taken into account in future policy development.

CRITICAL POINTS

Reduce food packaging waste by EU policymakers, food industries and consumers

Include a strategy for dealing with food waste in national waste plans under the EU waste framework directive.

Originally packaging was not mentioned in the first draft.

ORGANISATION INVOLVED: CITPA STEPS TO FOLLOW:

European Parliament initiative report on how to avoid food wastage:

Acting to include the mention of the important role that packaging can play in preventing food waste in the final version.

PROCEDURE

Motion for a Resolution voted in favour at the EP plenary session last January.

TIMING

EP initiative report approved. It considers that "the optimisation and efficient use of food packaging can play an important role in preventing food waste by reducing a product's overall environmental impact".

Project 2 Waste Framework Directive

INTEREST

WFD (2008/98/EC)

Two mains points for our sector:

- The Directive accepts a flexible approach on the hierarchy and confirms that the hierarchy should be applied as a priority order rather than a general rule;
- The Commission will be in charge of issuing guidelines, put into place to assist Member States in the creation of their national waste prevention programmes.

CRITICAL POINTS

CITPA is continuing to monitor the transposition of the WFD by Member States.

Include a strategy for dealing with food waste in national waste plans under the EU waste framework directive

The Commission is expected to carry out a review of framework rules governing EU waste legislation in 2014

ORGANISATION INVOLVED: FEFCO & CITPA STEPS TO FOLLOW:

The Directive had been approved.

Guidance paper on Waste Prevention for Member States

PROCEDURE

Co-decision

TIMING

The Directive has been published in the Official Journal of the EU on 22.11.08 and entered into force on 12.12.08. Implementation of the Waste Framework Directive December 2010

<u>Implementation</u>

Member State experts approved the questionnaire that would be used by the Member States for national reports on the implementation of EU rules on waste.

The Member States are required by Waste Framework Directive 2008/98/EC on waste (WFD), to prepare a report on the implementation of the Directive every 3 years. The draft Decision would set out the questionnaire to be used for national reports for the period 2012-2014 as required by Article 37 of the Directive.

Project 3 End-of- Waste Criteria for Recovered paper

INTEREST

WFD (2008/98/EC) introduces a new procedure for defining end-of-waste (EoW) criteria for recovered paper that have to be fulfilled in order to cease to be waste. Conditions under which waste can be considered to be a non-waste material that can be freely traded following a recovery or recycling process.

Criteria are specific for each waste stream The use of end-of waste paper is only for paper recycling (recovered paper)

CRITICAL POINTS

New limits proposed 1,5% of non-paper components that can be separated in a dry sorting process and 0,5% of non-paper components that cannot be separated

Exception: multilayered packaging (e.g. beverage cartons, frozen food packaging) which are counted as non-paper components although the non-paper components of the original packaging cannot be separated in the dry sorting step.

ORGANISATION INVOLVED: CEPI & CITPA STEPS TO FOLLOW:

Joint Research Centre (JRC) responsible for helping the EC in the development of the TAC

PROCEDURE

Comitology in the Technical Adaptation Committee (TAC) under the Waste Framework Directive followed by scrutiny from European Parliament and Council

TIMING

Vote on a draft measure establishing criteria determining when paper ceases to be waste at a meeting of the Technical Adaptation Committee for Waste on 9 July 2012.

Project 4 Packaging and Packaging Waste Directive -PPWD (94/62/EC) - Annex I

INTEREST

The Commission introduced the **proposal** to amend Annex I (the list of illustrative examples) related to the definition of packaging.

CITPA has been very active towards the European Commission (EC) and Members States in order to avoid the qualification of release paper for self-adhesive labels (FINAT) and cores & tubes (ECTA) as examples of packaging.

CRITICAL POINTS

Harmonisation of the interpretation of the definition of packaging under the PPWD

Annex I

The text will not change the directive, but adds new items, such as rolls, tubes and cylinders and release papers to the already existing illustrative examples of what is and what is not packaging.

The Commission's new proposal (8 May 2012) for a Council Directive no longer includes "Release paper of self-adhesive labels" from the list of illustrative examples in Annex I to the packaging and packaging waste Directive.

ORGANISATION INVOLVED:

CITPA -FINAT & ECTA

STEPS TO FOLLOW:

Alert the national association members to provide comments to their national authorities in order to influence in the final vote

PROCEDURE

Comitology procedure with scrutiny Committee Article 21

TIMING

At the last meeting of the "Article 21 Committee" in December, Member states have failed to agree on illustrative examples in Annex I of the packaging directive.

The proposal sets an implementation deadline of 30 September 2013.

Project 5 Packaging and Packaging Waste Directive PPWD- (94/62/EC)- CMO reform and operational programs

INTEREST

Equal treatment for any materials when giving the subsidies for the actions related to the environmental management of packaging.

A summary has been distributed.

CRITICAL POINTS

The main risk is that all materials would not be measured in the same way. FEFCO has requested an equal calculation for all MMEE and materials. Possible distortion of market competition between between packaging (RPC and Corrugated Trays) and countries: Some countries do not use subsidies. Some countries use flat rates, differing from kind of packaging, differing from country to country. Some countries only subsidize plastic crates.

ORGANISATION INVOLVED: FEFCO

Spain has withdrawn the subsidies as of 1st January 2012

STEPS TO FOLLOW:

DG AGRI had prepared an analysis by countries together with FEFCO.

PROCEDURE

DG AGRI implementing regulation proposal to stop the subsidies.

Comitology.

TIMING

Next EC Management Committee meetings scheduled on July 11th and September 11th 2012

Project 6 The new Action Plan on Sustainable Production and Consumption

INTEREST

The EU's Sustainable Consumption and Production Strategy, aims to make industry cleaner and encourage the production of eco-friendly products as well as encouraging consumers to buy them in order to protect the environment whilst improving economic competitiveness. It outlines a strategy on sustainable industrial policy (SIP) and consumption and production (SCP) and lists measures to deliver sustainable consumption.

Revitalisation of existing legislation on EMAS, Eco-label, Eco-design and Green Public Procurement.

Monitoring:

EU Retail Forum &

EU SCP Food Roundtable (CIAA)

CRITICAL POINTS

Actions to promote:

- a) resource efficiency;
- b) eco-innovation;
- c) good practice internationally;
- d) International trade in environmentally friendly goods and services.

New consultation on Sustainable Consumption and Production.

This consultation brings into focus key questions which will inform the direction of EU-wide policy over coming years in the following areas:

- Sustainable consumption and production and sustainable industrial policy
- Green public procurement
- Improving the environmental performance of products
- Improving the environmental performance of organisations

This approach shall be used to identify the best environmental performing products, including packaging. **ORGANISATION INVOLVED:** CEPI & CITPA

STEPS TO FOLLOW:

Consultation: CITPA is coordinating and aligning the responses of its member associations through an expert group composed by members of the CITPA ENVI Committee.

PROCEDURE

Co-decision Comitology

TIMING

Action Plan Published on 16.07.08

A stakeholder consultation in preparation of the Commission's review on the EU's sustainable consumption and production strategy closed on 3 April 2012.

The Commission will hold informal discussions with other stakeholders and Member States throughout the first half of 2012. The Commission will then begin drafting the Communication on the review in the second half of 2012. The Commission intends to present the revised Strategy in the fourth quarter of 2012.

Project 6(b) The new Action Plan on Sustainable Production and Consumption ECOLABEL

INTEREST

European Commission - Draft criteria proposal for Copying and Graphic paper and Paper products product group.

Newspapers is excluded from the scope European Commission draft proposal establishing the ecological criteria for the award of the EU Ecolabel for newsprints.

CRITICAL POINTS

The draft decision sets out specific ecological criteria that printed paper must meet in order to be awarded the Ecolabel

Ecolabel for converted paper products – Paper carrier bags, paper stationeries

Paper carrier bags, paper stationeries and envelopes under the umbrella of the

ORGANISATION INVOLVED: CEPI/ CITPA

Working group: Paper Product Coordination Group. EU Eco-labelling Board & the EU Eco-label Regulatory Committee.

EU Eco-labelling Board & the EU Eco-label Regulatory Committee

The Commission is expected to adopt a Decision setting out ecological <u>criteria for newsprints</u> in the coming months.

association "Paper by Nature".
Packaging should be out of the scope.
Next meeting scheduled on September.

Member States experts from the EU Ecolabel comitology Committee are expected to take a decision on the application of the Ecolabel Regulation to <u>food and feed products</u> in the third quarter of 2012.

Project 7 RETAIL FORUM

INTEREST

The Retail Forum is a multi-stakeholder platform set up in order to exchange best practices on sustainability in the European retail sector and to identify opportunities and barriers that may further or hinder the achievement of sustainable consumption and production. Participating retailers should join the Environmental Action Programme (REAP).

The final issue paper on packaging optimisation describes trends in packaging, consumption and waste; the scope focuses on the life cycle as packaging being part of a product. The positive role of packaging to protect food and to prevent food waste is emphasized; also it is recommended that retailers to increase the demand for recyclable packaging. The second part of the paper summarises Best Practices from various companies and countries with respect to packaging.

CRITICAL POINTS

Developed and signed a code of conduct for retailers on environment as global commitment.
Retailers' Environmental Action Plan designed to respond to the EU's
Sustainable Consumption and Production

Action Plan and to the changing demands of costumers for information about what retailers are doing to "green" the supply chain.

ORGANISATION INVOLVED: CITPA

FEFCO

STEPS TO FOLLOW:

February 2011

EUROPEN's presentation at the Retail Forum's session on packaging optimisation

Discussions held on two issue papers on packaging optimization and waste minimization.

The Issue paper on waste would focused on Food Waste and Electrical equipment's

Conclusions: the issue paper on packaging optimisation clearly recognises the positive role of packaging in protecting food: « it avoids contamination of food which all together improves competitiveness and enhances the benefits for consumers.» Moreover, the report encourages retailers to demand for more recyclable packaging in order to prevent food waste.

PROCEDURE

Multi-stakeholder platform to exchange best practices on sustainability in the European retail sector The platform it is co-chaired by the European Commission and retailers

TIMING

Initial timeframe of three years

Updated summary note available

Last meeting on waste minimisation December 1st 2011

Project 8 FOOD SCP ROUND TABLE

INTEREST

Guiding Principles are the starting point of the work of the European Food Sustainable Consumption and Production (SCP) Round Table on the voluntary environmental assessment of food and drink products and the voluntary communication of environmental information along the food chain.

The work is divided in 4 working groups. The Food SCP Roundtable is planning to start pilot projects on their methodology by the end of 2011.

FEFCO and ACE have coordinated its input to the WG 3 report of the Food SCP on behalf of the paper and board packaging

In pipeline

New mandate for Task Force on preventing food wastage under Working Group 3: development of a roadmap which could be used to reduce food wastage.

CRITICAL POINTS

The Food SCP Roundtable is planning to start pilot projects on their methodology by the end of 2011. For the WG 3, EUROPEN is leading the packaging constituency at the Food SCP Roundtable.

ORGANISATION INVOLVED: Food Drink Europe/ EUROPEN

STEPS TO FOLLOW:

The RT had adopted a set of guiding principles on "voluntary environmental assessment and communication along the food chain, including consumers". The aim is to promote a coherent way to assess and communicate on a voluntary basis taking a life cycle approach.

PROCEDURE

Voluntary initiative: harmonised framework methodology for the environ-mental assessment specifically of food and drink products

TIMING

The guiding principles for assessing and communicating the environmental impacts of products have been communicated

Project 9 GLOBAL PACKAGING PROJECT: The Consumer Goods Forum

INTEREST

The project gathers all key companies in retail and consumer goods and is developing metrics (based on existing methodology) for packaging.

CRITICAL POINTS

The Consumer Goods Forum has released its report A Global Language for Packaging and Sustainability

ORGANISATION INVOLVED: FEFCO

STEPS TO FOLLOW: The average figures for corrugated board are available to FFFCO Members.

PROCEDURE Voluntary initiative The Consumer Goods Forum

TIMING

Pilot projects using the measurement system are underway

Project 10 FEFCO Carbon Footprint

INTEREST

Development of CO2 footprint based on the common approach from the CEPI Framework, to the common CITPA methodology

CRITICAL POINTS

New standard is expected to be ready during autumn 2012

ORGANISATION INVOLVED: FECO, CEPI & CITPA

STEPS TO FOLLOW:

PROCEDURE Voluntary industry initiative.

TIMING

PAS 2050 Launch

29.10.08.

The RAC had recommended the publication of results.

Project 11 Pilot project on Product Footprint Category Rules (PFCR)

INTEREST

Launched by the European Commission PFCR for paper will provide clear guidance for paper and paper products companies to conduct environmental footprint studies.

CEPI invited to coordinate the pilot project for paper and paper products. All interested organizations, associations,

companies and experts invited consultation paper via the online collaboration platform www.paperpfcr.eu

CRITICAL POINTS

Project's initiative from DG environment where the paper sector were asked to get engaged. The consultation process works very well but, the technical content is less successful.

The results of this consultation will be linked to the forthcoming European harmonized methodology.

ORGANISATION INVOLVED: CEPI, FEFCO, CITPA **STEPS TO FOLLOW:** Paper and board companies within

its associations are providing comments and are very much involved through an external consultant.

PROCEDURE European Commission Proposal

TIMING

Stakeholders meeting with DG ENVI during the paper week 14-15 November 2011

Stakeholder meeting on the draft guides will take place on the 29-30 of November in Brussels.

Project 12 Resource Efficiency Roadmap

INTEREST

The European Commission roadmap towards a sustainable economy by 2050 Objective: achieve the decoupling of growth from resource use built on existing instruments from waste legislation, green public procurement, eco-design and research programs.

CRITICAL POINTS

To be use as a lead indicator resource – productivity but specific targets and indicators are not ready yet

The Roadmap goes on to provide resource-specific improvements that the Commission considers need to be made by 2020, including: (1) Properly valuing and accounting for natural capital and ecosystems; (2) Halting the loss of biodiversity, and restoring natural ecosystems; (3) Improving efficiency in the use of minerals and metals: (4)

ORGANISATION INVOLVED: FEFCO & CITPA

STEPS TO FOLLOW: The Council will continue discussions on the roadmap with view of adopting conclusions.

PROCEDURE

European Commission Proposal

TIMING

Roadmap published in September 2011

European Parliament Resolution sets out the European Parliament's position with regard to the strategic

Ensuring water supply and water quality; (5) Improving air quality; (6) Reducing negative impacts on land use and protecting soils; and (7) Protecting Marine resources.

EP Resolution calls for: (1) creating a strong agenda with the public and private sector; (2) improving the use of secondary materials in Europe; (3) making efficiency and sustainability a top priority; (4) emphasising natural capital and environmental sustainability to measure wealth and economic growth; and (5) extending the scope of the Ecodesign Directive; (6) measures to enforce a progressive landfill ban by 2014 to be extended by introducing an incineration ban on recyclable waste by 2020; (7) create task forces to develop European Resource Efficiency Action Plans in the areas of food and drink, housing, and mobility

aspects of resource efficiency in reply to the Commission's Resource Efficiency Roadmap. The Report calls on the Commission to set a more ambitious agenda for future growth to strengthen Europe's position in the world.

UPDATE

Report carried out on behalf of the Commission by BIO Intelligence Services: Analysed a number of indicators for resource flows such as materials, energy, water and land use and evaluated them to establish whether or not they were suitable for target setting at EU level.

The result was a proposal for a basket of indicators for resource use at EU level in 2020 and 2050.

Project 13 Review of the EU Forestry Strategy

INTEREST

The current challenges that the EU forests and forestry are facing, in particular increase in the demand for forest biomass due to renewable energy policy, as well as climate change both as regards its impacts on forests and the expectations on forests' contribution to mitigation.

The forestry strategy will also address the question of coordination between forest related policies on EU and Member States level, and the need for voluntary co-operation on forest-related policies at EU level.

Ad hoc Working Group on "Enhancing the competitiveness of the EU wood-

CRITICAL POINTS

The priorities so far identified are the following:

- Bioeconomy (including contribution of forests and forestry to the bioeconomy as well as economic aspects of forestry)
- Contribution from the forest sector to Bioenergy
- Climate change mitigation and adaptation (including sequestration, storage, substitution and adaptation)
- Forest protection against biotic and a biotic threats.
- Ecosystem services, including biodiversity (including biodiversity, soil and water, desertification, human health, recreation)

ORGANISATION INVOLVED:

2011 was the International year of the forest.
FEFCO co-organiser of the event called "The Forest sector's contribution to the European Bio-Economy" at the European Parliament

Organisations involved: FEFCO, CEPI, CITPA, Copa-Cogeca, ACE,Nordic forestry, CEPF, ELO, CEI-BOIS, Eustafor, USSE

The event included an exhibition which featured the cycle from wood/ trees to final products and a workshop

STEPS TO FOLLOW: CEPI is taking the lead

PROCEDURE

EU does not have a specific competence in forest

processing industries and related value chains"

Under the Advisory Committee on Community policy regarding forestry and forestry-related industries to provide sectoral input to the Commission on challenges, issues and factors having an impact on business competitiveness and growth. The purpose is to identify and define sector specific problem and provide remedial actions at EU, Member State and industry levels.

- Social aspects
- Innovation and research
- International pillar (including Pan-European, global)
- Coordination, cooperation and communication
- Forest information and monitoring
- Balance (sustainability)
 This initiative will also address the possible options and instruments

management or forestry, although several policies where the EU has a specific competence have an impact on forests and forestry (energy, environment, climate change). The strategy is used as an instrument of coordination between the EU actions and the forest policies of Member States.

TIMING

Expected adoption 2013

Project 14 Communication on Innovating for Sustainable Growth: A bio-economy for Europe

INTEREST

The Bio-economy Action Plan (Strategy), published on 13 February 2012, aims to create a more innovative, knowledge-based, resource efficient and competitive society stressing the correlation between food security and the sustainable use of renewable resources. At the same time the strategy aims to contribute to environmental protection by reducing greenhouse gas emissions.

The strategy is based upon 3 broad strategic actions:

- (1) Higher investment in research, innovation and skills by EU, national and private investors and strengthening the coherence between public investment and research programmes;
- (2) Better coordination of policy and greater stakeholder involvement; and
- (3) Development of bio-based markets and better communication with the public

CRITICAL POINTS

CEPI has expressed its expectation that the communication leads to a comprehensive policy approach, ensuring enough biomass is available to develop the bio-based economy through provisions in the EU Energy policy and the reform of the Common Agricultural Policy

ORGANISATION INVOLVED: FEFCO, CITPA & CEPI **STEPS TO FOLLOW:** Preparatory phase in Parliament: Rapporteur to be nominated

PROCEDURE

TIMING

FEFCO press release to welcome the recognition that packaging has a significant role to play in ensuring food safety, enhancing shelf-life, preserving taste, protecting goods, providing information to consumers and providing convenient portion sizes

UPDATE

The Commission is expected to present a mid-term review of the "Bio-economy" Action Plan in 2014. The expected Report would review the progress of the implementation of the strategy and possibly include recommendations to improve implementation.

to promote a healthy and sustainable	
lifestyle.	

Project 15 Communication on Raw Materials

INTEREST

New strategy on raw materials and commodity markets

3-pillar-based approach to improve access to raw materials for Europe. These pillars are: 1) Fair and sustainable supply of raw materials from international markets; 2) Fostering sustainable supply within the EU; 3) Boosting resource efficiency and promote recycling

CRITICAL POINTS

One of the threats in the Parliament legislative proposal is the mandatory requirement for recycled contents as an eco-design requirement.

ORGANISATION INVOLVED: CEPI/ CITPA
STEPS TO FOLLOW: Monitoring developments
PROCEDURE Co -decision
TIMING

The European Parliament voted in favour of the own initiative Resolution calling for an effective raw materials strategy in the EU on 13 September 2011.

Project 16 European Declaration on Paper Recycling 2011-2015

INTEREST

Set out measures to optimise the management of paper throughout the value chain from paper and board manufacturing, converting and printing through to the collection, sorting, transportation and recycling of used paper and board products back into the paper loop

CRITICAL POINTS

No agreement with the magazines and publishers' associations – ENPA and EMMA (FAEP)

These associations decided to step back as signatory members since their claim to include a text in the declaration itself found no agreement

ORGANISATION INVOLVED:

Parties of the declaration:

CEPI, CITPA, ERPA, ETS, FEPE, INGEDE, INTERGRAF Supporters: EADP, EuPIA, FEICA, FINAT, RadTech Europe STEPS TO FOLLOW:

Reach new target of a 70% recycling rate by 2015 **PROCEDURE** Industry voluntary initiative **TIMING** By 2015

UPDATE

Paper is the most recycled packaging material in the EU with a recycling rate of 78% based on 2010 CEPI figures

Project 17 CEN standards

INTEREST CEN/TC261

Revision of the packaging standards five years after their adoption in 2004.

CEN/TC4 -CEN bio-based products standard mandate has been broadened to include all 'traditional' paper and paper-based products. There is a concern that the currently proposed approach may not play to the strengths of forest products

Revision of the European list of standard grades of recovered paper and board EN 643

The revision of the European List of Standard Grades of Recovered Paper and Board suitable for recycling (EN 643) includes an update of the general description of the standard grades and sets tolerance limits for non-paper components and total unwanted materials.

Final approval by CEN TC/127 expected in May.

CRITICAL POINTS

The Secretariat for CEN/TC261 has issued the results of the enquiry. Most national standards bodies favour confirming the standards unchanged ORGANISATION INVOLVED: CITPA & FEFCO
STEPS TO FOLLOW: Monitors and coordinate views

PROCEDURE Consultation

TIMING

Project 18 ISO standards

INTEREST CRITICAL POINTS ORGANISATION INVOLVED: CITPA/FEFCO ISO Standard 14021: Renewability Get the renewability definition adopted STEPS TO FOLLOW: Usage of the term "renewable" in in ISO, on the basis of the CEN definition. the ISO 14021 'International Standard on Self-declared definition The renewability text in the revision of ISO Environmental Claims' **PROCEDURE** Involving FEFCO National Associations to 14021 has received final approval encourage National Standards bodies to vote yes No consensus to include recycled **TIMING** material Voting begins on 31 March 2011 – and terminates on 31 May 2011 Under ISO a working group (WG 8) had **ORGANISATION INVOLVED: CEPI/ CITPA** Water footprint standard been established under subcommittee 5 STEPS TO FOLLOW:

ISO Carbon footprint Standard	(LCAs) to develop a water footprint standard The development of the ISO water footprint standard, ISO 14046, is advancing quite rapidly. At their meeting in November the ISO Working Group developing the water footprint standard decided to issue the text developed at that meeting as a Committee Draft rather than a further Working Draft. The methodology is good and there is no issue for paper and board. The latest draft of the ISO standard for carbon footprint of products, ISO/DIS 14067 has been published. Most national standards bodies will issue this text for a public enquiry. Although the final closing date for comment is 6th June, shorter timescales will be set by the national standards bodies (BSI has set 23rd April)	Retailers do not seem to have an interest yet in including a label containing water footprint information on a pack as had been the case with carbon footprint, where retailers followed the lead taken by Tesco. TIMING Last meeting held in November in Toronto
Standards for Packaging and the Environment		ORGANISATION INVOLVED: CITPA STEPS TO FOLLOW: The standards were approved unanimously during a 24 May meeting in Seoul and will be published in October

Project 19 Illegal Logging Regulation

INTEREST	CRITICAL POINTS	ORGANISATION INVOLVED: CEPI & CITPA
The EU Regulation to prevent illegal timber	Amongst those obligations, the regulation	STEPS TO FOLLOW: For FEFCO it is important to check if
is in force and lay down obligations of	established due diligence systems	the procedures are being followed by our members'
operators who place timber and timber		suppliers and they fulfil the new requirements
products on the market.		PROCEDURE
		TIMING
The Regulation introduces a ban on the		The legislative procedure completed & entered into
sale of illegally-harvested timber.		force on December 2 nd 2010

GLOSSARY

: The Alliance for Beverage Cartons and the Environment - represents leading beverage carton packaging manufacturers and their main European paperboard suppliers in EU environmental policy developments.

APEAL : Association of European Producers of Steel for Packaging - is a federation of four multi-national producers of steel for packaging in Europe, founded in 1986, representing some 92% of the total European production of steel for packaging.

CEC : Commission of the European Committees

CEPI: Confederation of European Paper Industry.

CIAA : represents the food and drink industry – the first industrial sector, major employer and exporter in the EU.

CITPA: The International Confederation of Paper and Board Converters in Europe.

CODECISION: The co-decision procedure (Article 251 of the EC Treaty) was introduced by the Treaty of Maastricht. It gives the European Parliament the power to adopt instruments jointly with the Council of the European Union. The procedure comprises one, two or three readings.

CGE : CITPA Environment Committee.

CMO: Common Market Organisation.

Delegated acts

"old Comitology": Article 290 of the TFUE provides: 1. A legislative act may delegate to the Commission the power to adopt non-legislative acts of general application to supplement or amend certain non-essential elements of the legislative act. The objectives, content, scope and duration of the delegation of power shall be explicitly defined in the legislative acts. The essential elements of an area shall be reserved for the legislative act and accordingly shall not be the subject of a delegation of power.

- 2. Legislative acts shall explicitly lay down the conditions to which the delegation is subject; these conditions may be as follows:
- (a) the European Parliament or the Council may decide to revoke the delegation;
- (b) the delegated act may enter into force only if no objection has been expressed by the European Parliament or the Council within a period set by the legislative act.

For the purposes of (a) and (b), the European Parliament shall act by a majority of its component members, and the Council by a qualified majority.

3. The adjective "delegated" shall be inserted in the title of delegated acts.

It is the task of the Commission to implement legislation at Community level. In practice, each legislative instrument specifies the scope of the implementing powers conferred on the Commission by the Council of the European Union. In this context, the Treaty provides for the Commission to be assisted by a committee, in line with the procedure known as "Comitology".

The Committees are forums for discussion, consist of representatives from Member States and are chaired by the Commission. They enable the Commission to establish dialogue with national administrations before adopting implementing measures. The Commission ensures that measures reflect as far as possible the situation in each of the countries concerned.

CROWN Europe: Brand Building packaging- http://www.crowncork.com

: The European Aluminium Association represents the aluminium industry in Europe. It aims to secure sustainable growth of the market for aluminium whilst maintaining and improving the image of the industry.

EC: European Commission.

ECHA : European Chemicals Agency will manage the registration, evaluation, authorisation and restriction processes for chemical substances to ensure consistency across the European Union.

ECO-LABEL

: It is a voluntary scheme designed to encourage businesses to market products and services that are kinder to the environment and for European consumers - including public and private purchasers - to easily identify them. The Flower is the symbol of the European Eco-label.

EMPAC:

represents the metal packaging industry in the countries of the European Union.

EP

: European Parliament

ETS

: European Tissue Symposium

EUROPEN

: The European Organization for Packaging and the Environment--is an industry and trade organization open to any company with an economic interest in packaging and packaged products. It presents the opinion of its members on topics related to packaging and the environment.

Members of EUROPEN are identified as companies which support a united trade and industry organization, dedicated to satisfactorily resolving the environmental challenges facing the packaging chain in an active and co-operative manner without favouring any specific packaging material or system.

DG AGRI

: Directorate General for Agriculture – European Commission.

DG ENTERPRISE: Directorate General Enterprise and Industry – European Commission.

DG SANCO

: Directorate General for Health and Consumer Affairs – European Commission.

EMAS

: The EU Eco-Management and Audit Scheme (EMAS) is a management tool for companies and other organisations to evaluate, report and improve their environmental performance.

EMMA

: European Magazine Media Association, EMMA, representing more than 15.000 publishing houses across Europe, publishing more than 50.000 magazine titles

ENPA

: The European Newspaper Publishers' Association (ENPA) is an international non-profit association, advocating the interests of the European newspaper publishing industry at different European and international organisations and institutions. ENPA represents over 5,200 national, regional and local newspaper titles, published in 26 European countries. More than 150 million newspapers are sold and read by over 300 million Europeans every day, in addition to the millions of unique daily visits to online newspapers websites. Publishing industries as a whole constitute an important economic sector in the EU employing more than 750,000 people in 64,000 companies.

EUROPEN: The European Organisation for Packaging and the Environment.

FEICA : Association of European Adhesives & Sealants Manufacturers.

FEVE : The association of European manufacturers of glass packaging containers and machine-made glass tableware

GROW INTERNATIONAL: The International Confederation of Light Weight Wooden Packaging Industries.

ISO : The International Organization for Standardization

MMEE: Members States.

PIJITF: Packaging Inks Joint Industry Task Force.

PIM : Plastic Implementation Measure.

PSWG: CITPA Product Safety Committee.

RAC: FEFCO Regulatory Affairs Committee.

REX: FEFCO Regulatory Executive Working group.

REACH: is a new European Community Regulation on chemicals and their safe use 1907/2006 EC deals with the Registration, Evaluation,

Authorisation and Restriction of Chemical substances. The new law entered into force on 1 June 2007.

SCP: Sustainable Consumption and Production Action Plan.

WFD: Waste Framework Directive.