

**FEFCO response to the European Commission's Inception Impact Assessment  
Proposal for a revision of Directive 2008/98/EC on waste – part on food waste  
reduction targets**

The European Federation of Corrugated Board Manufacturers (FEFCO) supports the objective of the present EU initiative in proposing food waste reduction targets as these will reduce the environmental impact of the EU food system and support the ambition of the EU Green Deal. Corrugated cardboard packaging has cooperated with the value chain for many years to provide fit for purpose packaging and prevent food waste.

The main points outlined in this position are the following:

- Fit-for-purpose food packaging helps to prevent food waste.
- Corrugated packaging is based on a renewable source, is recyclable and recycled in reality and is therefore sustainable.
- Food waste reduction targets should be implemented along the entire food supply chain.

FEFCO would like to provide specific feedback on the following elements of the inception impact assessment document.

**1. Point B – Objectives and policy options**

According to the Commission's impact assessment, "*along the food supply chain, food waste contributes 8-10% of total global greenhouse gas emissions*". Additionally, it is estimated that 30% to 59% of Europe's total food waste occurs at the pre-retail stage, and these numbers are likely to be underestimated<sup>1</sup>.

Corrugated packaging provides excellent protection of the product and is also an ideal medium for communication with consumers. These features and the labelling on packaging support the efforts of the Commission to influence "*attitudes and behaviours that lead to food waste and encourage uptake of food waste prevention measures along the food chain, from production through consumption*", as specified in the inception impact assessment.

Regarding the policy options outlined by the Commission in the impact assessment, FEFCO supports the following measures:

- The proposal (Option S1) to establish an EU-wide target covering the whole food supply chain, from farm gate to final consumer. This approach would evenly allocate responsibility of food waste reduction to all actors involved in production, transportation, distribution and retail across the EU.
- The proposal (Option E1) to express the reduction target as a percentage of food waste reduction from the amount of food waste in the baseline year (2020) to target year (2030).
- The proposal (Option T1) to set the same target level for all Member States. Setting divergent targets could lead to unevenly distributed burdens and ultimately prevent the reduction target from being reached. A unified target across Europe not only sends a

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<sup>1</sup> Baker, Gregory A., Leslie C. Gray, Michael J. Harwood, Travis J. Osland, and Jean Baptiste C. Tooley. 'On-Farm Food Loss in Northern and Central California: Results of Field Survey Measurements'. Resources, Conservation and Recycling 149 (1 October 2019): 541–49. <https://doi.org/10.1016/j.resconrec.2019.03.022>

message that reducing food waste should be priority, but it also gives reduction targets the best chance of being achieved.

## 2. Point C – Preliminary Assessment of Expected Impacts

### a. Likely economic impacts

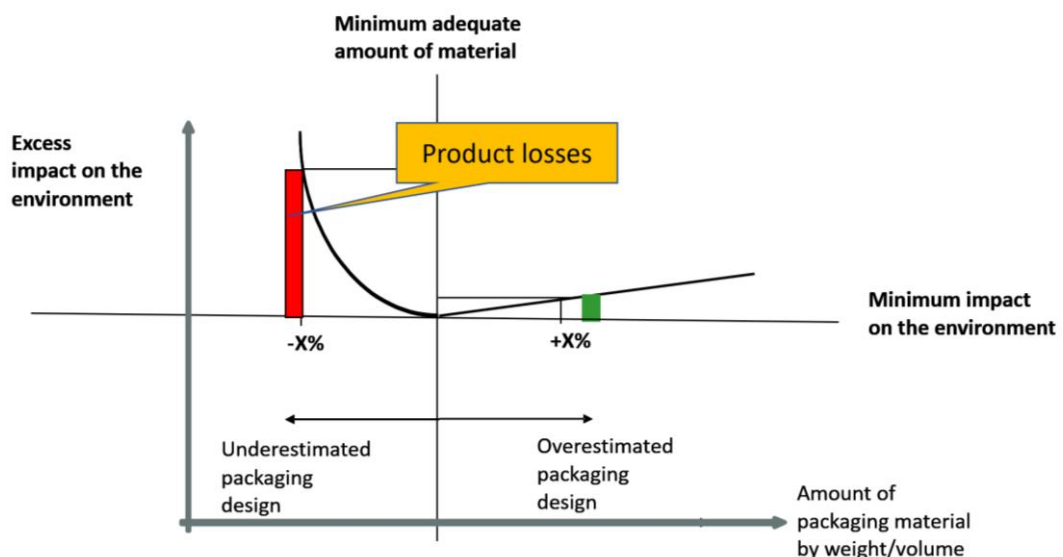
Based on the waste hierarchy outlined in the Waste Framework Directive, the prevention of waste is the ideal solution for achieving an overall reduction. Corrugated cardboard packaging is instrumental in preventing food waste during transport, storage and in retail.

According to a study conducted by the University of Bologna in 2016<sup>2</sup>, corrugated packaging can extend the shelf life of fresh food products by up to three days. The tests conducted not only demonstrated that corrugated preserved the freshness of food, but also kept food safe for longer. The findings clearly demonstrate that corrugated packaging can contribute to the prevention of food waste, thus supporting the waste hierarchy.

### b. Likely environmental impacts

FEFCO disputes the implication in the Commission’s inception impact assessment that an increased amount of packaging to better protect food has inherently negative impacts. Packaging has a vital role to play in the efforts to prevent food waste:

- Packaging is a valuable and indispensable element to protect products from damage during transport and storage, to ensure food safety and to inform about content, including information required by legislation.
- Reduction of packaging may increase food waste. If the reduction of packaging leads to product damage or breakage, the negative effect on the environment and the economy multiplies as shown in the graph below.
- Packaging is vital for preventing food waste and the environmental burden related to it.



<sup>2</sup> Benevelli M. Chiavari C. Grazia L. Lanciotti R. Patrignani F. Serrazanetti D. Siroli L. 'Survival of Spoilage and Pathogenic Microorganisms on Cardboard and Plastic Packaging Materials', *Frontiers in Microbiology* 8, 2017. <https://www.frontiersin.org/article/10.3389/fmicb.2017.02606>.

Corrugated packaging is one of the best recycled paper products with a well-established market for secondary raw materials. Paper and board packaging is a champion in recycling with an 83% recycling rate, compared to 66% average rate of all packaging recycled (incl. glass, metal, plastic, wood), according to Eurostat 2018.

As a packaging made of naturally sourced and renewable materials, corrugated is also one-hundred percent recyclable and has a high collection and recyclability rate overall. Therefore, the use of paper or corrugated packaging to support efforts for food waste reduction should not be seen as inherently negative.

Fit-for-purpose packaging should be considered an ally in the fight against food waste given its capacity to keep food fresh for longer and protect it at transport and retail stages. FEFCO encourages the Commission to take this into account when considering the role packaging plays in food waste prevention.