

17 February 2022

## **FEFCO response to the European Commission’s Call for evidence for an Impact Assessment on the proposal for the revision of the EU waste framework**

FEFCO supports the ambition of the EU Green Deal and is ready to contribute to the objective of the present EU initiative to “*decrease waste generation and improve separate waste collection to yield optimal recycling results...*”. The call for evidence aims to tackle the continued increase in total waste generated, due partly to low recycling rates and low quality recyclates. This assessment is valid overall; however, there are significant differences between product types and materials that should be considered – for paper and board, for example, the recycling rate is the highest among materials in the EU at 84.2%<sup>1</sup>.

**Within the review of the waste framework, FEFCO’s recommendations are:**

- **‘Fit for purpose’ packaging should be considered as a waste prevention measure.**
- **Separate collection of packaging should be implemented to achieve high-quality recycling.**
- **Reuse of packaging as a possible waste prevention measure should be considered on a case-by-case basis.**

The review of the Waste Framework Directive should be closely aligned with the ongoing review of the Packaging and Packaging Waste Directive to ensure that a holistic approach is applied across the waste legislation and there is consistency across the requirements.

### **1. ‘Fit for purpose’ packaging prevents waste**

Packaging exists for a reason: to protect and preserve goods throughout the value chain, subsequently preventing waste. Designing innovative packaging solutions that fit products well, protect and present them while preventing waste should therefore be a priority in the shift towards a circular economy. The waste hierarchy outlined in the current Waste Framework Directive shows the prevention of waste as the ideal solution for achieving an overall reduction. The ISO 18602-2013(en) echoes the positive contribution of packaging by saying that the “*role of packaging is prevention of damage to or loss of goods*”<sup>2</sup>.

“Fit for purpose” packaging can reduce the overall environmental impact along the supply chain<sup>3</sup> by preventing product damage and additional waste which could result from over-packaging and under-packaging.

Additionally, research conducted by the University of Bologna revealed that corrugated packaging can extend the shelf life of fresh food products by up to three days compared to reusable plastic crates and can significantly reduce contamination from pathogenic and spoilage microorganisms<sup>4</sup>. By extending the life of products on shelves, corrugated packaging helps prevent food waste.

Notably, the average carbon footprint of a product packed is about 30 times higher than the carbon footprint of the packaging itself; that is to say, packaging generally represents about 3.0-3.5% of the total carbon footprint of final food or beverage products<sup>5</sup>.

<sup>1</sup> [Recycling rate of packaging waste by type of packaging, EU27, Eurostat \(2018\)](#)

<sup>2</sup> [ISO - ISO 18602:2013 - Packaging and the environment — Optimization of the packaging system](#)

<sup>3</sup> [Avoiding food becoming waste in households – The role of packaging in consumers’ practices across different food categories - ScienceDirect](#)

<sup>4</sup> [Siroli L, Patrignani F, Serrazanetti DI, Chiavari C, Benevelli M, Grazia L and Lanciotti R \(2017\) Survival of Spoilage and Pathogenic Microorganisms on Cardboard and Plastic Packaging Materials. Front. Microbiol. 8:2606.](#)

<sup>5</sup> [guideline\\_stopwastesavefood\\_en\\_220520.pdf \(denkstatt.eu\)](#)

## **2. Separate collection is an enabler for high-quality recycling**

FEFCO fully supports the Commission's ambitions to improve separate waste collection systems and introduce requirements for source segregation. The paper and board industry has developed a well-functioning system for recycling of used packaging and utilisation of the recycled paper into new packaging. Scientific studies show that fibres that make up cardboard and cartonboard can be recycled more than 25 times with no significant loss in quality<sup>6</sup> and integrity<sup>7</sup>.

Despite these impressive numbers, recycling rates for paper and board could be further improved by the strict implementation of separate collection and source segregation. Separate collection of paper packaging, supported by the application of the existing standards for paper grades for recycling (EN643)<sup>8</sup>, will contribute to high-quality recycling and increase the use of secondary raw materials.

## **3. Reuse and recycling can both support waste prevention**

We acknowledge the Commission's intention to promote the *"full implementation of the provisions on waste prevention, preparation for reuse and recycling"*.

While the waste hierarchy expresses a preference for reuse over recycling in principle, the reality on the ground often differs. Several studies have shown that recyclable packaging is more beneficial to the environment than reusable solutions. A recent example of this is the European Commission publication<sup>9</sup>, referencing a study by the Polytechnical University of Valencia, that found that the carbon footprint of cardboard boxes outperforms that of reusable plastic boxes when moving tomatoes internationally.

Corrugated packaging is made of sustainably sourced and renewable raw materials and is one of the most recycled paper products with a well-established market for secondary raw materials. On average, a new corrugated packaging contains 89% recycled content. By recycling corrugated, the industry reuses the fibres, thus prolonging the life of its main raw material. Specific targets aiming to increase packaging reuse could potentially disrupt existing well-functioning recycling systems and the availability of materials for recycling.

Recyclable packaging is a valid and highly functional system that helps to prevent product waste, including food waste, and should be seen as such. Packaging should therefore be considered an ally in the fight against waste in the upcoming revision of the Waste Framework Directive.

FEFCO is ready to cooperate with the European Commission to support the review of the EU waste framework. We look forward to being part of forthcoming discussions and actively contributing to evidence collection and the review process.

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<sup>6</sup> Putz, Hans-Joachim / Schabel, Samuel: Der Mythos begrenzter Faserlebenszyklen. Über die Leistungsfähigkeit einer Papierfaser. (The myth of limited fibre life cycles. On the performance capability of paper fibres.) In: Wochenblatt für Papierfabrikation, 6/2018, S. 350-357

<sup>7</sup> Recyclability of fibre based folding boxes ([procarton.com](http://procarton.com))

<sup>8</sup> EN 643 brochure CEPI

<sup>9</sup> Carbon footprint of cardboard boxes outperforms plastic boxes when moving tomatoes internationally ([europa.eu](http://europa.eu))