

FEFCO position on the Packaging & Packaging Waste Regulation proposal

The European Federation of Corrugated Board Manufacturers (FEFCO) acknowledges the Commission's ambition to contribute to a climate neutral, circular economy through the proposal for a Packaging and Packaging Waste Regulation (PPWR). This legislation should ensure that the proposed measures fulfil its primary objective: *"to reduce the negative environmental impacts of packaging and packaging waste, while improving the functioning of the internal market"*.

FEFCO would like to emphasize key aspects in the proposal that require further discussion and recommend realistic and achievable solutions which are further substantiated below.

- 1. Reuse and recycling should be complementary, reuse targets should be realistic and positive for the environment, society, and economy.**
- 2. Waste prevention measures are essential, while market restrictions should be evaluated to ensure they do not increase environmental impact and food waste.**
- 3. Other key issues**
 - a. Mandatory recycled content should be set only for plastic packaging.
 - b. Prevention targets and excessive packaging limits should be realistic and promote competitiveness.

1. Reuse and recycling should be complementary, reuse targets should be realistic and positive for the environment, society, and economy

The reuse targets proposed in the PPWR risk compromising the objective of the Circular Economy Action Plan set for the review of Directive 94/62/EC *"to ensure that packaging on the EU market is reusable or recyclable in an economically viable way by 2030"*.

FEFCO asks that reusability and recyclability are considered complementary measures for achieving circularity in the packaging sector and support existing sustainable systems and materials.

High reuse targets (Article 26) will trigger the substitution of paper & board with plastic packaging, for which recycling is already a challenge. This will create a monopoly for plastic packaging, flooding the market with billions of tons of non-recyclable plastic and increase the EU's dependency on fossil resources. As a result, it will significantly worsen the environmental impact of packaging, failing to fulfil the main objective of the PPWR.

Several scientific studies have proved that reuse is not always better for the environment. Reuse has higher environmental impacts compared to recyclable packaging. A peer-reviewed comparative LCA and several other studies found that:

- Corrugated packaging systems outperformed reusable plastic crates in 10 out of 15 environmental footprint impact categories, including climate change.
- Reusable plastic crates must be reused at least 63 times to surpass corrugated boxes in a climate change impact category, which requires continuous use for 15-20 years.
- Transportation distance plays a crucial role in the environmental impact of many sectors¹.
- The carbon footprint of corrugated cardboard boxes outperforms that of reusable plastic boxes when moving tomatoes internationally².
- Insufficient return rates and rotations, as well as washing installations, also increase the environmental impact of reuse³.

Additionally, reuse systems require a high level of packaging standardization, significantly increasing the amount of packaging needed to meet the expected product range. This approach undermines product innovation, limits competition, creates logistic chaos and risks increasing excessive packaging.

Corrugated cardboard is the most recycled paper & board packaging in EU with a recycling rate over 90%, recycled in an existing well-functioning system and contains 89%⁴ recycled content on average.

¹ A comparative life cycle assessment of single-use fibre drums versus reusable steel drums - Raugei - 2009 - Packaging Technology and Science - Wiley Online Library

² Carbon footprint of cardboard boxes outperforms plastic boxes when moving tomatoes internationally (europa.eu)

³ https://www.fefco.org/sites/default/files/2022/FEFCO_Hotspot_analysis_study.pdf

⁴ LCA Report 2019 revised_p 37.pdf (fefco.org)

2. Waste prevention measures are essential, but market restrictions should be evaluated to ensure that do not increase environmental impact and food waste

Packaging's purpose is to protect, preserve, and promote a product. Banning all recyclable single-use packaging for fruits and vegetables (containing less than 1,5kg) in Article 22, Annex V, could undermine this purpose and negatively impact the economy and the environment. The loss or damage of a packed product has a higher environmental impact compared to the savings achieved by removing the packaging itself, both in terms of resources used and emissions created. In the case of food, for example, packaging generally represents only 3–3.5% of the carbon footprint of a food or beverage product⁵, so any additional food waste caused by a lack of inadequate packaging may result in increased emissions.

Ensuring hygiene and food safety are two essential functions of food packaging which are facilitated by single-use recycled packaging. Research conducted by the University of Bologna⁶ 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. Reusable packaging for fruits and vegetables, on the other hand, can spread contamination, leading to increased food waste.

3. Other key issues

a) *Mandatory recycled content should be set only for plastic packaging*

The Circular Economy Action Plan states that “to increase uptake of recycled plastics and contribute to the more sustainable use of plastics, the Commission will propose mandatory requirements for recycled content and waste reduction measures for key products such as packaging, construction materials and vehicles”.

If the overall aim is to increase the amount of recycled plastic (Article 7), such requirements should be set only for plastic packaging as opposed to ‘the plastic part’ in all packaging. The latter extends the scope of the requirement to all polymers used on any packaging, setting a measure that has not been evaluated by the Impact Assessment. In addition, polymers used for example in inks, adhesives, coatings cannot be produced from “recycled content recovered from post-consumer plastic waste” with the technology that is currently available.

b) *Prevention targets and excessive packaging limits should be realistic and promote competitiveness*

FEFCO supports the Commission's intention to propose waste reduction targets (Article 38) and the empty space ratio for grouped, transport and e-commerce packaging (Article 21). The corrugated industry is already working with customers to minimize void space by providing optimized, fit for purpose packaging.

However, such measures should be meaningful and achievable. The evaluation of the Commission published with the Impact Assessment shows that with a reduction target of 4% all materials will face a significant reduction in packaging production, except plastic. Plastic packaging is expected to grow by 17% for the same period⁷. This makes the article counterproductive to the objective of the Circular Economy Action Plan, allowing the material with lowest recycling rate to grow in production and increase its negative impact on the environment.

Void space is a supply chain issue, as it depends on the product being packed, packaging manufacturers, packaging lines, e-commerce retailers, logistic companies, and consumers. In many applications, a certain amount of void space is needed to ensure the protection of packaged items.

FEFCO is committed to supporting EU policymakers in developing a realistic and ambitious framework for packaging and packaging waste and achieving a climate neutral and circular economy. The PPWR should aim to improve the circularity of packaging lagging in sustainability performance and, at the same time, support further improvements in materials which are already circular – like corrugated cardboard packaging.

⁵ [guideline_stopwastesavefood_en_220520.pdf \(denkstatt.eu\)](#)

⁶ [Frontiers | Survival of Spoilage and Pathogenic Microorganisms on Cardboard and Plastic Packaging Materials \(frontiersin.org\)](#)

⁷ [Commission Impact Assessment](#)