Fibre Packaging Europe
European coalition for renewable, circular and sustainable paper and board packaging.

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Packaging and Packaging Waste Directive revision

Concrete measures to boost packaging recycling across Europe

Fibre Packaging Europe supports the EU's Green Deal ambitions and welcomes the upcoming revision of the Packaging and Packaging Waste Directive (PPWD) as a crucial opportunity to drive the EU circular economy. We are ready to play our part in this transformation and are committed to further increasing the recycling rate of renewable packaging made from wood fibre and recycled paper and board, referred to as fibre-based packaging.

Packaging sourced from renewable wood and recycled paper and board is a sustainable product with unique features. It is easily recyclable, and in fact the most recycled packaging in Europe compared to all other packaging materials, and is consequently already a key contributor to the circular economy. The market for paper and board recycling is already well-developed in Europe, as shown by the high paper and board packaging recycling rate of 82% in the EU.[1] Paper fibres from packaging are used 6.3 times on average in 2018.[2] Several scientific studies show that paper fibres used in paper and board packaging can be recycled 25 times or more while maintaining the quality of the packaging produced.[3] Fibre Packaging Europe is strongly convinced that the paper packaging recycling rate can be further increased through concrete measures including the convergence of collection systems.

The paper and board industry has the capability to recycle a wide variety of used fibre-based items (e.g. packaging, printed products) into a multitude of new products, such as packaging, tissues, and printing and writing papers.

We would therefore like to contribute to the success of the PPWD review. For this effort to succeed, Fibre Packaging Europe recommends that policymakers take the following considerations into account:

> 1. **Safeguard the primary function of packaging**
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> 2. **Ensure a clear, practical, and enforceable definition of recyclability for packaging**
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> 3. **Support measures that drive the convergence of collection systems**
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> 4. **EPR systems should focus on covering costs for the collection, sorting, and treatment of waste**
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> 5. **Mandatory recycled content requirements are only appropriate for product groups for which there is insufficient demand for recycled materials**

1. Safeguard the primary function of packaging

Policymakers must take into account the primary function of packaging, which is to protect goods throughout the logistics chain and on-shelf, preserve the product it contains, maintain high standards of food hygiene and minimise food waste when the product is food, and provide product information to consumers required by legislation (e.g., quality assurance, allergen information and use-by dates). The primary function of packaging should be retained as a key element of the PPWD essential requirements.

2. Ensure a clear, practical, and enforceable definition of recyclability for packaging

An actionable and forward-looking definition of recyclability applicable to all packaging must be complemented by a material-specific and technology-neutral approach. Such a definition should be based on transparent and reliable facts, focused on the design of packaging and foster the co-evolution of innovative packaging, recycling technologies and

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[1] Recycling rate of packaging waste by type of packaging, EU27, Eurostat (2019)
[2] Monitoring report 2020, European Paper Recycling Council
[3] 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; Eckhart, René, Recyclability of Cartonboard and Carton. In: Wochenblatt für Papierfabrikation. 11/2021

infrastructure. Product and material specificities need to be accounted for. For example, packaging that protects perishable food has different design requirements from other packaging, e.g. a milk carton requires a different design from a water bottle.

Therefore, the definition of recyclability for fibre-based packaging should read as follows:

> *"The individual suitability of a paper-based packaging for its factual reprocessing in the post-use phase into new paper and board; factual means that separate collection (where relevant and followed by sorting) into EN 643 grades and final recycling takes place on an industrial scale."*

Fibre Packaging Europe supports the adoption of existing standards and industry guidance documents to improve the recyclability of packaging. In the case of paper and board, the EN 643 (European List of Standard Grades of Paper and Board for Recycling) defines the composition and tolerance levels for non-paper components and unwanted materials. In addition, our industry has developed Paper-Based Packaging Recyclability Guidelines[4] to support the value chain in the design of paper and board packaging that is recyclable.

3. Support measures that drive the convergence of collection systems

The greatest barrier to increasing paper and board recycling rates is the divergence among collection systems for paper and board at source. Paper and board need to be collected separate from residual waste as well as from other recyclables such as plastic, metal or glass.[5] Separate collection of paper ensures that fibres are fed back into the paper recycling loop; enhances the quality of fibres by preventing soiling caused by other waste materials; and increases the economic value of secondary raw materials.

4. EPR systems should focus on covering costs for the collection, sorting, and recycling

Extended Producer Responsibility (EPR) systems can support increases in the recyclability of packaging, which will significantly contribute to creating a valuable stream of secondary raw materials.

EPR systems should focus on the main objective: ensuring that the costs of collection, sorting and recycling are covered in case they are not covered by the value of the secondary raw material obtained (net-cost principle). This way, packaging recyclability can be improved, as recyclability is a pre-condition for obtaining a valuable secondary raw material after collection and sorting.

The Recyclability Guidelines[6] for paper-based packaging our industry has developed should also be taken into consideration for EPR systems. It is also important that any assessment of Design for Recycling should include consultations with the recycling value chain. The paper and board recycling, manufacturing and converting industry has produced guidelines to specify and design fibre-based packaging to ensure high-quality recycling.[7]

5. Mandatory recycled content requirements are only appropriate for product groups for which there is insufficient demand for recycled materials

The Circular Economy Action Plan proposes mandatory requirements for recycled content for plastic packaging to boost the demand and uptake of recycled content and develop secondary raw material markets.

Mandatory measures would not be appropriate for paper and board packaging as the demand for recycled wood fibre is already very high in Europe. In 2020 in Europe (EU27, UK, Norway and Switzerland), 49.6 million tonnes of paper for recycling were used to make new paper and board products out of 56.1 million collected.[8] Both fresh and recycled fibres are sustainable and needed to satisfy customer needs or desired product specifications. For example, while corrugated board packaging contains on average 89% recycled content,[9] takeaway food packaging requires 100% fresh fibres for safety reasons. The high recycling rate of paper and board packaging (82%[10]) suggests a high uptake of recycled content as well as high quality of secondary raw materials. A well-functioning recycling loop needs a continuous flow of fresh fibres.

Mandatory recycled content would disrupt the efficient operation of existing recycling systems. There is already a strong market demand for recycled content in paper and board packaging and the value chain remains committed to increase

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[4] Cepi, CITPA, ACE, FEFCO (2019). Paper-Based Packaging Recyclability Guidelines
[5] Harmonisation at EU-level of separate waste collection systems used locally in member states should focus on situations where certain fractions are not yet collected separately from residual waste and/or other recyclables, and avoid disrupting well-functioning systems.
[6] Cepi, CITPA, ACE, FEFCO (2019). Paper-Based Packaging Recyclability Guidelines
[7] Ibid.
[8] European Pulp & Paper Industry Key Statistics, 2020
[9] European Database for Corrugated Board Life Cycle Studies, 2018
[10] Recycling rate of packaging waste by type of packaging, EU27, Eurostat (2019)

recycling rates even further. It should be left to the market to decide in which product groups recycled content is most efficiently used. A mandatory recycled content target would also increase transport related costs and emissions.

Any requirements for recycled content in packaging should be informed by a measurement methodology that is material-specific. Existing recycling targets for packaging waste are material specific, as are the calculation points for the measurement of waste for recycling. The measurement methodology for recycled content should follow the same rationale to ensure consistency with existing legislation,[11] and should be based on a robust impact assessment.

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Fibre Packaging Europe looks forward to working with policymakers to ensure that stakeholder concerns and scientific evidence are taken into consideration before the legislative proposal is released. We remain available to provide additional information, expertise and data, and would appreciate the opportunity to continue the dialogue with policymakers on this crucial topic.

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About Fibre Packaging Europe

Fibre Packaging Europe is an informal coalition of eight trade associations representing industries involved in forestry, pulp, paper, board and carton production and recycling from across Europe. Our joint mission is to provide renewable, circular and sustainable fibre-based packaging solutions to European citizens to achieve the European Green Deal objectives. Together, we represent around 1500 companies and over 2200 manufacturing plants, we employ more than 365.000 people across Europe and our annual turnover is around EUR 120 billion.

For more information, please contact papercoalition@apcoworldwide.com.

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[11] Commission Implementing Decision (EU) 2019/665, Annex II