

## Sustainable Products Initiative

### Fibre-based packaging: a frontrunner among sustainable products

Fibre Packaging Europe welcomes the European Commission's Sustainable Products Initiative (SPI). We acknowledge the importance of ensuring that sustainable products support Europe's transition to a climate neutral, resource efficient and circular economy.

Packaging sourced from renewable wood, generally referred to as fibre-based packaging, actively contributes to the green transition by phasing out fossil-based materials and their associated emissions. This contribution has the potential to be continually increased by further innovation in fibre packaging products. As the Commission defines its SPI legislative framework, it is important to recognise the most sustainable frontrunners and to acknowledge the crucial role of fibre-based packaging in the circular economy.

Fibre Packaging Europe welcomes the establishment of overarching sustainability principles aimed at minimising the negative environmental and social impacts of products and their associated manufacturing processes. These principles must be applicable to varied product categories, and therefore we suggest focusing on measures which:

1. Improve resource efficiency by introducing renewability as a sustainability principle
2. Refrain from applying mandatory recycled content requirements on well-functioning recycling markets
3. Promote responsible sourcing of raw materials
4. Apply product-specific approaches to avoid overlaps and duplicating policy
5. Ensure that fibre-based products can continue to contribute to European resilience
6. Secure a level playing field with imported products

#### 1. Improve resource efficiency by introducing renewability as a sustainability principle

To achieve the headline objectives set under the European Green Deal, systemic transformation is needed. This will affect how we live, what we eat, what we wear, how we stay healthy and how we travel. Material substitution, including the use of renewable wood-based materials instead of fossil-based alternatives, will be imperative in this transformation.<sup>1</sup> The Commission has recognised that the bioeconomy can be a catalyst for systemic change and help to achieve the green transition.<sup>2</sup> New ways of producing and consuming resources while respecting our planetary boundaries should be further explored in the push for more sustainable products.

Recyclable materials from renewable sources, such as fibre-based packaging, should be recognised as building blocks of the new circular economy. Consequently, the Commission should differentiate between fossil-based primary raw materials and renewable raw materials. To achieve climate neutrality by 2050, fossil resources will need to remain in the ground and the emissions from sourcing and manufacturing all products must be reduced. As such, we recommend that renewability be included as a sustainability principle under the Sustainable Products Initiative in order for EU policy to promote the phasing out of fossil-based products by switching to a green renewable economy.

<sup>1</sup> [Sustainable Packaging - The Role of Materials Substitution, Material Economics \(2018\)](#)

<sup>2</sup> [Deploying the bioeconomy in the EU, European Commission \(2021\)](#)

## 2. Refrain from applying mandatory recycled content requirements on well-functioning recycling markets

Preserving the material value of extant products is crucial to achieve increased circularity. In 2020, 56.1 million tonnes of paper and board were collected and recycled in Europe. 49.6 million tonnes of paper for recycling were used to make new paper and board products, and paper packaging has the highest recycling rate among packaging materials, with 82% in the EU.<sup>3</sup> The market for recycled paper and board as a secondary raw material is already well-developed in Europe. For example, corrugated cardboard packaging contains on average 89% recycled content.<sup>4</sup> The existing market demand allows the industry to recycle paper and cardboard and reuse the fibre in industry segments where they are needed.

Fibre-based packaging needs recycled fibres and a continuous flow of fresh fibres into the recycling loop. In this context, we strongly believe that the introduction of an EU-wide mandatory requirement for recycled content in fibre-based packaging would challenge an industry which already leads in recycling, as collected material would be artificially diverted to be used to certain products and regions, leading to secondary material shortages for other products or regions.

An EU-wide mandatory requirement applied on fibre-based packaging would only increase transport-related costs and emissions by shipping waste materials across Europe which otherwise could be fully recycled at their source. Ultimately, mandatory requirements would inevitably constrain the market and reduce consumer choice. Paper and cardboard recycling would be better supported by further developing high-quality separate collection and sorting systems to further increase recycling rates.

## 3. Promote responsible sourcing of raw materials

To be truly sustainable, products need to be sustainably sourced. EU legislation should therefore promote the use of sustainably sourced raw materials in products, including packaging. Fibre-based packaging originates from sustainably managed forests, guided by EU and national forest regulations, as well as market-based certification systems such as the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC). Sustainable forest management is multifunctional and continuously strives to find equilibrium between biodiversity preservation, climate protection and economic output.

Thanks to sustainable forest management, Europe can proudly claim that it currently has more forest resources than it did a century ago, with the forest area in Europe growing by 19.3 million hectares over the last 30 years.<sup>5</sup> Total wood harvesting in the EU accounts for less than the annual growth rate of forests, thereby actively increasing the carbon stock of our forests and helping to preserve biodiversity.

## 4. Apply product-specific approaches to avoid overlaps and duplicating policy

Different products serve different purposes and have different sustainability impacts. It is therefore important to recognise that a one-size-fits-all approach will not be effective in delivering the needed systemic change.

For this reason, further product specific approaches should be addressed by dedicated legislative frameworks, such as the Packaging and Packaging Waste Directive (PPWD) for packaging. Care should be taken to avoid overlaps with duplicative legislation.

By incorporating the SPI in a PPWD revision, we believe legislation can be clear, predictable and as easy to administer as possible. This would also secure long-term predictability, which is needed by industry to meet new requirements, make investments and drive new innovations.

## 5. Ensure that fibre-based products can continue to contribute to European resilience

To minimise future external disruptions, secure global competitiveness and protect our prosperity, the EU must become economically, socially and environmentally resilient. The business community will be an important partner to achieve this.

Fibre-based packaging supports European resilience in several ways. It is sourced mainly from European forests and is recycled within Europe. It is produced across all parts of the continent, creating jobs and tax revenue, and it is sold to a large extent to European consumers.

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<sup>3</sup> [Recycling rate of packaging waste by type of packaging, EU27, Eurostat \(2019\)](#)

<sup>4</sup> [European Database for Corrugated Board Life Cycle Studies, FEFCO \(2018\)](#)

<sup>5</sup> [The State of Europe's Forests, Forest Europe \(2020\)](#)

Packaging plays an essential role in resilient and sustainable food systems, from ensuring consumer health and safety to increasing a product's shelf-life and safety while reducing food losses and waste. Combined with its environmental benefits, these characteristics demonstrate that fibre-based packaging is an important contributor to Europe's economic and social resilience. Policymakers should continue to recognise this contribution through a legislative framework which supports the industry's ability to grow, invest and innovate.

## **6. Secure a level playing field with imported products**

In an open and market-based economy, European products compete with products from the rest of the world. To be effective and secure a level playing field, it is critical that the overarching sustainability principles to be defined under the SPI are applied to both products produced in the EU as well as those imported from third countries.

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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 seven 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.

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