Position Paper  
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FSC rules on post- and pre-consumer reclaimed material

The FSC Standard for Chain of Custody Certification\(^1\) gives the following definitions:

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**Post-consumer reclaimed material:** Material that is reclaimed from a consumer or commercial product that has been used for its intended purpose by individuals, households or by commercial, industrial and institutional facilities in their role as end-users of the product.

**Pre-consumer reclaimed material:** Material that is reclaimed from a process of secondary manufacture or further downstream industry, in which the material has not been intentionally produced, is unfit for end use and not capable of being re-used on-site in the same manufacturing process that generated it.

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Whereas CEPI

- has clearly supported the new waste directive (2008/98/EC) that provides a priority for the recycling, the new definition of recycling and separate collection and the increasing of recycling target for domestic waste;

- does not see the environmental benefit of dividing recovered paper into two groups, both of which play an essential role in the paper recycling loop;

- regrets, in particular, that materials collected from converters are classified in a way that does not qualify them for the recycling label;

- recalls that in the European situation such a limitation would not be sustainable;

- recalls that mill broke is not accounted for recycling in Europe;

- recalls that not all “post-consumer” waste is sustainable and fit for recycling: CEPI agrees with the Council of Europe resolution\(^2\) on banned sources of recovered paper, in particular any paper sorted from refuse;

- recalls that considerations similar to CEPI's are in the European legislation as the Ecolabel for the printed paper and tissue paper, and in some national environmental regulations.

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\(^1\) FSC-STD-40-004 V2-0 EN

product criteria schemes, notably Der Blaue Engel label for recycled paper\(^3\), the European paper industry is working on the development of the bale identification system to guarantee the traceability of recovered paper (notably the source and the final destination).

**CEPI requests the deletion of these two definitions and recommends the addition of a new definition of recycled paper in the 2011 revision of the FSC Recycling Standard. The definition of recycled paper will be based on the certification of the segregated flow.**

In the absence of a clear indication on the post-consumers’ definition, CEPI offers the following interpretation: “The post-consumers’ reclaimed definition includes the EN 643 grades collected from consumers and other end-users”.

**CEPI confirms that in Europe, use of mill broke in production is not accounted towards any recycling targets and should not qualify for award of any recycling labels or green procurement schemes.**

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**Note to the Editor**

**CEPI aisbl - The Confederation of European Paper Industries**

The Confederation of European Paper Industries (CEPI) is a Brussels-based non-profit making organisation regrouping the European pulp and paper industry and championing this industry’s achievements and the benefits of its products. Its mission is to promote the member’s business sector by taking specific actions notably, by monitoring and analysing activities and initiatives in the areas of industry, environment, energy, forestry, recycling, fiscal policies and competitiveness in general. Through CEPI, the paper industry increases its visibility and acts on emerging issues, making expert and constructive contributions on behalf of the industry.

Its collective expertise provides a unique source of information both for and on the industry; coordinating essential exchanges of experience and knowledge among its members, the ability to provide technical assistance to legislators and to identify independent experts on specific issues.

Through its 18 member countries (16 European Union members plus Norway and Switzerland) CEPI represents some 800 pulp, paper and board producing companies across Europe, ranging from small and medium sized companies to multi-nationals, and 1200 paper mills. Together they represent 27% of world production.

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\(^3\) RAL-UZ5 (Hygiene papers), RAL-UZ14 (Recycled paper), RAL-UZ56 (Recycled cartonboard)