

Brussels, 20 September 2022

Summary: Cepi position on the revision of the Packaging and Packaging Waste Directive.

The Confederation of European Paper Industries supports the intentions behind the revision of the current Packaging and Packaging Waste Directive (PPWD) and wishes to raise some crucial points related to the Commission's upcoming proposal. Paper-based packaging is made from sustainably sourced renewable and recyclable raw materials, has the highest recycling rate in Europe, namely 82% in 2019, and is easily recyclable. Paper fibres can be recycled many times when they remain within the paper loop (not necessarily for the same application) while the fibre loop is replenished with virgin fibres, sourced from sustainably managed forests, as defined by Forest Europe and certified by internationally recognized schemes such as PEFC and FSC. Paper fibres from packaging were used 5.5 times on average in 2019 and in specific product applications, and research shows that the fibre itself allows recycling over 25 cycles.

The PPWD revision has the potential to contribute to the EU's climate neutrality by 2050 goal. To achieve this, fossil resources will need to remain in the ground and the emissions from sourcing and manufacturing of all products must be reduced.

Key policy asks

1. Re-use and recycling are complementary solutions to achieve circularity, as recognised in the EU Taxonomy screening criteria. When implementing the waste hierarchy, measures that deliver the best overall environmental outcome should be considered and the principle of life-cycle thinking should be adopted when regulating packaging. Scientific studies demonstrate that prioritising reuse is not always the most sustainable choice.

2. Packaging must be recyclable and fit for purpose. The primary function of packaging should be safeguarded, which is to protect food throughout the logistics chain.

a. We do not support a negative list for fibre-based packaging components. The paper industry is committed to always design packaging in a way that does not hamper recycling. In principle, all paper-based packaging (with technical barriers or not) is recyclable.

b. A horizontal definition of recyclable packaging must be complemented by material-specific definitions. A definition should be focused on the design of packaging, recycling technologies and infrastructure, as well as product and material specificities need to be accounted for.

3. Mandatory recycled content is not an appropriate tool in regulating well-functioning markets of secondary raw materials, such as the one of Paper for Recycling (PfR). The demand and uptake of PfR is already very high in Europe. It should be left to supply and demand to regulate the market and decide in which product groups recycled content is most efficiently used. Furthermore, both fresh and recycled fibres are sustainable and are needed to satisfy customer needs or desired product specifications. Fresh fibres are a prerequisite for the existence of recycled fibres.

4. Renewable and recycled content should be equally considered in reaching circularity targets. Their complementarity is also recognised in the EU Taxonomy screening criteria. Wood fibres from sustainably managed forests can provide alternative solutions to products which are currently made with materials from sources that do not naturally replenish themselves. Fibre-based solutions are a readily available alternative to fossil-based products, that can replace of at least 25% of current fossil-based plastic packaging by 2025.

5. Separate collection is key to further increase recycling rates and uptake of recycled content. Separate collection of paper (separate from the residual waste, but also from other recyclables such as plastic, metal or glass) ensures that fibres are not lost and return back in the paper loop, it enhances the quality of fibres by avoiding soiling, and ensures that materials end up in the appropriate recycling operation. This in turn increases the valorisation of secondary raw materials which can then support more efficient EPR schemes.

Please click [here](#) to read the full version of the Cepi views on the revision of the Packaging and Packaging Waste Directive.