

Brussels, 13 December 2022

Cepi views on Commission proposal for a Packaging and Packaging Waste Regulation.

The Confederation of European Paper Industries supports the intentions behind the revision of the current Packaging and Packaging Waste Directive and wishes to raise some crucial points related to the Commission's legislative proposal.

Paper-based packaging is made from sustainably sourced renewable and recyclable raw materials, has the highest recycling rate in Europe, namely 82% in 2019¹, 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 forests². Paper fibres from packaging were used 5.5 times on average in 2019³ and in specific product applications, research shows that the fibre itself allows recycling over 25 cycles⁴. The paper and board industry has the advantage of being able to efficiently recycle together different kinds of paper products to produce a multitude of recycled paper products.

1. Re-use and recycling are complementary solutions to achieve circularity. Materials and packaging with high recycling rates should be exempted from mandatory reuse targets;

The paper and board industry recognises that recyclable and reusable options are complementary, and that higher circularity can be achieved by supplementing the successful EU recycling model with reuse systems. As, the performance of reuse systems will have to match that of the paper and board recycling model, targets set in the Commission legislative proposal should concentrate on markets where circularity performance needs to be improved. **Implementing recyclable or reusable packaging solutions should be based on independent science-based proof of their respective environmental benefits.** If adopted, the reuse targets provided in the Commission proposal will disrupt the highly performant recycling system that the paper and board industry has invested in and committed to further improve. The paper and board industry invests 5 billion annually⁵, already operates exceeding the legal targets set by the current PPWD for 2025, and together with the entire value chain, **has voluntary set a 90% recycling target by 2030.**

Horizontal reuse targets for all packaging, would disrupt the competitiveness of the internal market while replacing a significant part of renewable and recyclable paper and board packaging with fossil-based alternatives. This means fossil-based packaging solutions will be promoted without taking into consideration their long-term and systemic environmental impacts. This is also against Waste Framework Directive article 4 (2) which allows to deviate from the waste hierarchy on the basis of proof of environmental benefits. Moreover, hygiene and safety concerns for consumers and producers due to the reuse of packaging in food contact applications should be considered. The EU Circular Economy Action Plan goal for "all packaging to be reusable or recyclable by 2030" should be aligned with the EU's environmental and consumer safety ambitions. We ask that as the European Commission is considering exempting Member States from deposit and return systems where the current system already is performant, **packaging achieving 90% recycling rate without a reuse system should be exempted from the reuse obligation.**

¹ Eurostat (2022). Recycling rate of packaging waste by type of packaging, EU 27. Available here: <https://ec.europa.eu/eurostat/databrowser/bookmark/d73804e4-e7d8-464d-9d5d-c9f1019d3fcf?lang=en>

² as defined by Forest Europe and certified by internationally recognized schemes such as PEFC and FSC

³ Calculation based on 2019 Eurostat recycling rate for paper-based packaging.

⁴ Eckhart, R. (2021). Recyclability of Cartonboard and Carton. Technical University of Graz. Available here : <https://www.procarton.com/wp-content/uploads/2022/01/25-Loops-Study-English-v3.pdf>

⁵ Cepi. European Pulp & Paper Industry Key Statistics 2021.

2. Acknowledge industry initiatives and make sure relevant stakeholders are consulted when drafting the Design for Recycling (DfR) criteria.

We welcome the Commission's intention to establish DfR criteria for packaging materials and to assess their recyclability. The paper and board industry has **developed Paper-Based Packaging Recyclability Guidelines⁶ and Circularity by Design Guidelines⁷ to support the value chain in the design of paper and board packaging that is recyclable. We ask the policy makers to ensure that stakeholders from the industry are consulted in a transparent and systemic manner in the drafting process of DfR guidelines. This should be explicit in the legislation.** This would enable an open cooperation and exchange of expertise to set ambitious and realistic requirements on packaging recyclability.

The paper and board industry is actively taking measures in developing products that contribute to waste prevention by placing on the market packaging that is fit for purpose, and at the same time making sure that it is lightweight and with minimum void spaces. It is crucial to **safeguard the primary function of packaging, which is to preserve the product it contains, maintain high standard of food hygiene and minimise food waste, and provide product information to consumers as required by legislation.** The functional properties expected from the packaging to deliver its purpose require it to be in some cases coated, laminated or treated in other ways to meet the different barriers or functional requirements. Nevertheless, **when necessary to combine paper and board with other materials, the paper industry is committed to always apply this combination in a way that does not hamper recycling.** In practice, paper-based packaging with such barriers or functional requirements (i.e. paper products with adhesives or coated with plastic) can still be recycled in some cases at low amounts in standard recycling mills if separation takes place at the paper recycling process, or in specialised recycling mills in EN 643 identified flows. Collecting and sorting paper as a separate waste stream is an essential prerequisite supporting this process.

3. Ensure Member States implement separate collection to enable high quality recycling at scale.

For the paper and board industry, the biggest barrier in further increasing recycling rates and product recyclability, and uptake of secondary raw materials is the lack of harmonised application of separate collection. As the Commission aims to ensure that all packaging placed on the internal market are recycled at scale by 2035, it is deemed necessary **that Member States invest on the necessary infrastructure, implementing separate collection of municipal waste without derogations.**

For paper and board separate collection does not only mean separate from the residual waste, but also from other recyclables such as plastic, metal or glass. **Separate collection of paper ensures that fibres are not lost and return back in the paper loop, it enhances the quality of fibres** by avoiding soiling at source and in the sorting line, **ensures that materials end up in the appropriate recycling operation⁸ and this increases the valorisation of secondary raw materials** which in turn can support more efficient EPR schemes, or market-based solutions e.g. industrial and commercial packaging. Cepi has developed a guidance on how to implement separate collection of paper and board⁹ and the Cepi vision on paper collection and sorting in Europe.¹⁰ While the Cepi guidance does not challenge existing well-functioning systems, it is deemed necessary that an increased harmonisation of separate collection of paper and board should be implemented as a baseline measure before considering any other additional targets, measures, obligations to boost the circularity and recyclability of paper-based packaging¹¹.

⁶ Cepi, CITPA, ACE, FEFCO (2019). Paper-Based Packaging Recyclability Guidelines. Available here: https://www.cepi.org/wp-content/uploads/2020/10/Cepi_recyclability-guidelines.pdf

⁷ 4evergreen. Circularity by Design Guidelines for Fibre-based packaging. Available here: <https://4evergreenforum.eu/4evergreen-releases-expert-based-guidelines-for-how-to-produce-packaging-designed-for-recycling/>

⁸ in the case of paper packaging with non-paper constituents in specialised recycling mills

⁹ Cepi. Guidance on how to Implement Separate Collection (2020). Available here: https://www.cepi.org/wp-content/uploads/2020/10/19-2905_Industry-position-paper-on-separate-collection_A4_20190903.pdf

¹⁰ Cepi. Cepi vision on paper collection and sorting in Europe (2020). Available here : <https://www.cepi.org/wp-content/uploads/2022/01/Cepi-vision-on-paper-collection-and-sorting.pdf>

¹¹ 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.

Cepi is the European association representing the paper industry. We offer a wide range of renewable and recyclable wood-based fibre solutions to EU citizens: from packaging to textile, hygiene and tissue products, printing and graphic papers as well as speciality papers, but also bio-chemicals for food and pharmaceuticals, bio-composites and bioenergy. We are a responsible industry: 85% of our raw materials are sourced from within the European Union and 78% of the wood comes from certified forests, 92% of the water we use is returned in good condition to the environment. We are the world champion in recycling at the rate of 71.4%. At the forefront of the decarbonisation and industrial transformation of our economy, we embrace digitalisation and bring 21 billion value addition to the European economy and €4.5 billion investments annually. Through its 18 national associations, Cepi gathers 495 companies operating 895 mills across Europe and directly employing more than 179,000 people.
