

Brussels, 20 May 2016

Paper Packaging Coordination Group (PPCG)

The paper packaging industry's position and recommendations on the legislative proposals for amending Directive 94/62/EC on packaging and packaging waste (PPWD) and Directive 2008/98/EC on waste (WFD)

Introduction

The Paper Packaging Coordination Group comprises the major European paper and board packaging associations representing the interests of a wide range of packaging products used in transport, retail and consumer packaging. Paper and board packaging is based on a renewable resource (the forest) and is recyclable. We support the concept of a circular economy in which raw materials are sourced from renewable, responsibly-managed resources and recycled after use.

1. Recycling targets for paper and board

Key messages:

- **The proposed targets are ambitious, reflect technical and economic realities and can be achieved.**
- **Packaging recycling targets should be at comparable levels between different consumer packaging materials. High achievement of one packaging material should not compensate for another material's lower achievement.**
- **We welcome the proposal that waste exported outside Europe should count towards the target of the Member State where it has been collected on condition that recycling takes place in equivalent environmental conditions.**

We welcome the proposed targets for paper and board by the Commission. The paper and board packaging industry in Europe has achieved high recycling rates. In 2014, the average paper and board packaging recycling rate was 81.1% (CEPI). The EUROSTAT figure for 2011 was 79.9%. However, there are also significant differences between Member States, with the recycling rate ranging from 59% to 98% (EUROSTAT). Calculation methods for recycling vary between countries, making it difficult to compare existing data from different countries.

2. Recycling rate calculation

Key messages:

- **We support quality recycling.**
- **We support the harmonised method based on “input to final recycling process”.**
- **Calculation formulas should be adapted and clarified with regards to “preparation for re-use and recycling” of “products and components” for packaging**

We believe the “input” to the final recycling process is the correct basis for calculating the recycling rate and will improve the quality of recycling.

Recommendations:

Final recycling process

- Article 1(2f) of the proposal for amending the WFD with a definition of “final recycling process” should read as follows: “final recycling process” means the recycling process which begins when no further mechanical sorting operation is needed and when waste **and waste considered to have ceased to be waste in accordance with Article 6** enter a production process and are effectively reprocessed into products, materials or substances”.
- Article 1(5a) (i) should be consistent with the new definition of final recycling process. Therefore Article 6 (1c) of the WFD should therefore be amended as follows: “the substance or object fulfils the technical requirements for the final recycling process and meets the existing standards and legislation applicable to products.”

Derogation

- The derogation article 11a paragraph 3(a) and (b) of the proposed amendments to the WFD and derogation article 6a paragraph 3 (a) and 3(b) of the proposed amendments to the PPWD should read as follows: “The weight of materials or substances that are not subject to a final recycling process and that are disposed or subject to energy recovery remains below the maximum threshold of impurities acceptable to operators carrying out a final recycling process in order to ensure quality recycling. These thresholds are outlined in Annex VII”. There should be a new annex VII on impurities limits per waste stream, in which the impurities limit for paper (non-paper components and other unwanted materials) should be set at 3% in line with the EN 643.

Packaging is different from the other waste streams, which the European Commission already acknowledges by having a dedicated directive for packaging and packaging waste. Packaging which is re-used in a closed loop is not considered as waste and only becomes waste when it leaves the loop. Mixing waste and non-waste (“products and components”) in one calculation formula will jeopardise the potential a harmonised method could have to deliver robust, comparable and accurate reporting. This, combined with an optional reporting on “products and components” will lead to increasing differences in the Member States’ reporting. It may also trigger cases where targets are met by clever calculations without an effective contribution to the circular economy. The resources needed from the European Commission to control the accurate implementation of the formula would be disproportionate to the potential benefits.

Recommendations:**Calculation method and formula**

- The formula in Annex IV of the PPWD should be clarified to avoid misinterpretations, under claims or over claims and allow for fair treatment of packaging, considering the intrinsic differences among materials.
- For packaging, the proposed Article 6a), paragraph 1c) should be deleted. Member States should not be optionally allowed to include in the calculation “products and components prepared for re-use”.
- For packaging, “R” should be removed from the formula in Annex IV.
- The denominator “P” should be clearly explained by defining “packaging waste generated”, as, for example, “total packaging placed on the market”.

3. Minimum requirements for Extended Producer Responsibility (EPR)**Key messages:**

- **EPR systems should be transparent.**
- **The scope of EPR and roles and responsibilities of each actor involved in packaging waste management should be clearly defined.**
- **A minimum requirement for EPR systems to collect all (packaging) materials should be introduced.**
- **A reference to EPR systems needs to be made in PPWD (94/62/EC) to ensure the protection of the internal market, and in the WFD (2008/98/EC).**

We welcome the Commission’s intention to make EPR systems transparent as well as the inclusion of three important elements in the Commission’s proposal for general requirements for EPR systems: Eco-modulation, optimised cost and secondary raw materials sales revenues. Recyclability is a key criterion in eco-modulation for EPR systems and ensures the value from the sales of secondary raw material. As the additional cost for their collection can be covered by these revenues, the contribution of producers should be lower. Within every material category, criteria for eco-modulation should be carefully designed so they do not inhibit innovation, technical progress, the functioning of the internal market and specific requirements regarding the packed products.

The provisions on general requirements for EPR systems should describe the costs to be covered without using non-exhaustive lists.

Recommendations:

- Article 1(8) 4. (a) first paragraph of the proposal for amending the WFD should read as follows: “Cover the following cost of waste management for the products it puts on the Union market:...”
- The packaging sector should be recognised as a stakeholder in the EPR process so that it can share its expertise in managing the different materials

4. Separate collection, Landfill and Incineration of waste

Key messages:

- **Recyclable packaging waste should not go to landfill. We support the ban on landfilling separately collected waste.**
- **Separate collection of all packaging waste should be strengthened and clarified.**
- **Incineration of recyclables should be restricted.**

The requirement for separate collection of recyclable packaging waste is a precondition to avoid landfilling. The proposal aims in the right direction by linking the provisions on landfill restrictions to the separate collection requirement in the WFD and by introducing a methodology to measure the recycling rate at the input to a final recycling process, and by defining this final recycling process.

Despite the existing capacity for reprocessing paper in Europe, up to 10 million tonnes of all paper, including packaging, are currently being landfilled or incinerated in Europe. This situation has to be addressed, otherwise ambitious recycling targets cannot be achieved.

Paper and board should be collected separately from other recyclables such as plastics, metal, glass – or any combination thereof - and residual waste. Separate collection of all packaging and packaging waste is crucial in order to promote a circular economy and guarantee a high quality of secondary raw materials. The WFD formulated a separate collection target in 2008, but this has been interpreted in different ways by Member States. Beverage cartons (consisting predominantly of board) should be collected in the most optimal way for further recycling, which may differ from country to country.

Recommendations:

- Article 11(1) of the WFD should be amended by changing "for the relevant recycling sectors" to "for the relevant final recycling processes".
- Article 11(11) of the WFD should be amended to clarify that paper shall be collected separately from metal, plastic and glass.

5. Unlock the potential of Renewable, Bio-Based Materials

Key message:

- **EU circular economy policies and measures should promote and encourage the use of bio-based materials as an essential solution to achieve a real circular economy.**

The increased use of packaging made from bio-based materials fosters the establishment of a truly circular economy by taking into account an efficient use of renewable resources (biomass), integrated production and efficient use of bio-based feedstock in integrated bio-refineries. A true circular economy needs to be built on renewable carbon.

This logic should be extended to the legislative proposals under the circular economy package, in particular for sectors where solutions are already available, e.g. packaging. Therefore, the signatories request the recognition and encouragement of the use of materials from renewable sources in the PPWD.

Furthermore, using renewable, bio-based materials decreases Europe's dependence on the import of raw materials and supports green development within the EU, leading to green growth and jobs.

Recommendations:

- Amend the PPWD with the explicit requirement for Member States to encourage the use of bio-based materials for the manufacturing of packaging, where appropriate.
- Introduce a clear definition of what is meant by 'bio-based' to ensure coherent interpretation and a level-playing field for producers. The signatories recommend using existing definitions of the CEN Technical Committee TC 411¹ on bio-based products which define 'bio-based' as "derived from biomass" and 'biomass' as "material of biological origin excluding material embedded in geological formations and/or fossilised".

6. Food waste

Key messages:

- **We support the efforts of the Commission to reduce the generation of food waste.**
- **Cooperation among all stakeholders in the food supply chain and the Commission is needed.**

Packaging prevents food loss and food waste in a sustainable way. UN studies support the fact that a substantial reduction of food losses can be achieved by providing and using the right packaging solution.

Recommendations:

- The methodologies (paragraph 4) developed by the Commission should consider the positive role of packaging in the prevention of food waste.
- The packaging sector should be among the stakeholders consulted on the subject.



Currently, the following organisations participate in the PPCG:

CITPA, International Confederation of Paper & Board Converters
CEPI, Confederation of European Paper Industries
ACE, The Alliance for Beverage Cartons and the Environment
CEPI CONTAINERBOARD, European Producers of corrugated case materials
CEPI EUROKRAFT, European Producers of Sack Kraft Paper and Kraft Paper

¹ CEN European Standard EN 16575:2014 'Bio-based products – Vocabulary' ([here](#))

ECMA, European Carton Makers Association

EMBALPACK, European Association of Makers of Packaging Papers

EMFA, European Moulded Fibre Association

EUROSAC, European Federation of Multiwall Paper Sack Manufacturers

FEFCO, European Federation of Corrugated Board Manufacturers

PRO CARTON, European Association of Carton and Cartonboard Manufacturers