

Feedback to the EU Inception Impact Assessment on the initiative “Review of the requirements for packaging and other measures to prevent packaging waste”

The undersigned associations support the Commission’s ambition to contribute to the circular economy through the review of the requirements for packaging and packaging waste. The review should also ensure that the proposed preventive measures will support the functioning of the internal market and free movement of packaging and packaged goods while preventing the possible negative impact on the environment.

- **Measures on packaging prevention should be meaningful, achievable, and supporting the overall objective of the EU Green Deal and Circular Economy.** All new measures need to be exhaustively assessed on their impact on climate change, biodiversity and the functioning of resilient and sustainable food supply chains.
- **A level-playing field for all materials and packaging should be maintained** as a pre-requisite for the functioning of the internal market. The EU legislation should provide objectives and targets to improve the circularity and climate impact of packaging lagging in performance and at the same time support further innovation in sustainable materials which are already circular – like paper packaging.
- **Paper & board packaging is the most recycled packaging in Europe with 85%** of recycling rate in 2018, according to Eurostat. There is a ‘real’ economic demand for recycled paper as a secondary raw material allowing the fibres to remain in the economy as a valuable resource and be used for new packaging.
- We support setting a practical and enforceable **definition of “recyclable” packaging.** Such a definition **should focus on Design for high quality recycling.** In the paper sector, high quality recycling is understood as using paper for recycling for the production of new paper-based products. The paper & board sector already incorporates eco-design to ensure that packaging is recyclable and recycled in practice and at scale. In addition, we support the net-cost principle and general requirements on harmonized EPR systems, including eco-modulation to incentivize more easily recycled packaging.
- We support the reduction of “overpackaging”. **Packaging “fit for purpose” prevents waste** and should be introduced as a new measure for all packaging. This will ensure that every packaging is designed to fit the product exactly with minimum void space, thus preventing overpackaging and underpackaging and the related unnecessary waste and losses. Packaging need to meet functionalities and avoid product or food losses which in some cases require an adapted composition.
- **Setting an “overall packaging waste reduction target or waste generation limit”** with the aim of reducing the volume or weight of packaging waste **is counterproductive to the economy as a whole and has higher impact on the environment.**
 - **The targets to reduce packaging should focus on the stream of residual packaging waste,** i.e. waste that cannot be reused or recycled and is therefore landfilled or incinerated.
 - **Well designed, responsibly sourced, efficiently produced, low-carbon packaging that is appropriately used and effectively recycled provides multiple benefits** – it minimises damage to products, extends their useful life,

facilitates efficient distribution, gives safe and convenient access to goods and communicates vital information to the consumer.

- **Restricting the use of specific packaging formats**, like single use packaging items is a short-sighted approach which do not offer a sustainable solution and **should be avoided**.
 - Single use packaging as a format includes packaging made from different materials, which do not pose the same threat to the environment and the oceans and should not be regulated as one single category. Recyclable, low-carbon single use packaging made from renewable materials should be excluded from such restrictions.
 - Single use packaging including for food contact materials has clear hygienic advantages when it comes to food and consumer safety and is essential for the overall resilience and sustainability of the food system, as it was also recently proved by the COVID-19 crisis.
- **Future measures on reuse** should consider all environmental, health and economic impact of reuse systems throughout the life cycle of the product and packaging. Setting reuse targets for “transport packaging” as a format risks to include packaging which is already being recycled at very high rate and thus jeopardizing a well-functioning and circular system.
- **Measures to promote mandatory recycled content should target sectors** where the markets for secondary raw materials are not developed yet. The market for paper for recycling already well-developed, as shown by the high recycling rate. Measures on mandatory recycled content are unnecessary and may have unintended impact disturbing the functioning recycling system. Moreover, as for all other materials, the recycling loop also needs to be reinforced by fresh fibre flows.
- **Green procurement criteria and targets** could be introduced to support not only the public bodies but all businesses who would like to include sustainability in their packaging procurement strategies.

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