

Key Policy Issues CITPA – June 2019

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
Environment			
Circular Economy Package (CEP)			
Circular Economy Package (CEP)	<p>Published in December 2015 comprising several documents of interest:</p> <ul style="list-style-type: none"> • Revised EU Directive on Packaging Waste (finalised, see below) • Revised EU Directive on Waste (finalised, see below) • Revised EU Directive on Landfilling (finalised, see below) • Closing the Loop: EU Action Plan • EU Plastic Strategy (new, see below) • Single use plastic directive (new, see below) • Interface between product, chemical and waste legislation (new, see below) • EU Bio-economy strategy (new, see below) 	Implementation ongoing	CITPA, CEPI, ACE
Directive 2018/852 on packaging & packaging waste (amending Directive 94/62/EC)	<ul style="list-style-type: none"> • In force since 4 July 2018 • Bio-based materials and packaging made of recycled materials – recognised as offering benefits • New definition on “composite packaging” – made of two or more layers of different materials which cannot be separated by hand and form a single integral unit • Member States mandated to take measures to increase the share of reusable packaging - possibility to set minimum percentage of reusable packaging for each packaging stream • Packaging waste targets <ul style="list-style-type: none"> ○ All packaging – 65% by 2025 and 70% by 2030 ○ Paper & board– 75% by 2025 and 85 % by 2030 ○ Plastic– 50% by 2025 and 55% by 2030 ○ Derogations are allowed under certain conditions • Calculation of the targets <ul style="list-style-type: none"> ○ Point of measurement is the gate of the “recycling operations” ○ Derogation is allowed (at end of sorting station), under conditions 	Directive finalised, implementing acts ongoing	CITPA, CEPI, ACE



Key Policy Issues CITPA – June 2019

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
	<ul style="list-style-type: none"> • NEW: Commission Implementing decision 2019/665 establishing the formats for reporting – new rules on calculation: <ul style="list-style-type: none"> ○ Predominant material – rules remain for reporting under the old targets in the PPWD (if countries want to correct old data) ○ New targets – separate reporting per material if exceeding 5% of the total mass ○ Reusable packaging – new reporting includes paper & cardboard • Mandatory Extended Producers Responsibility (EPR) for all packaging by 31 December 2024 • NEW: Review of the Essential Requirements started <ul style="list-style-type: none"> ○ Study by consultant Eunomia ○ Proposal by Commission expected by 31 December 2020 • Next steps <ul style="list-style-type: none"> ○ Commission will review the illustrative examples of packaging, given in Annex I – in the focus are also “release paper of self-adhesive labels and wrapping papers” ○ By 2024 the Commission will decide whether to set quantitative targets on re-use of packaging 		
Directive 2018/851 on waste (amending Directive 2008/98/EC)	<ul style="list-style-type: none"> • In force since 4 July 2018 • Bio-based recycle products – recognised as an opportunity to substitute fuel-based feedstock • New definition on “material recovery” – including preparing for re-use and recycling • Inspirational target on food waste – 30 % by 2025 and 50% by 2030 • Member States mandated to provide incentives for prevention and reuse • Separate collection for paper is mandatory • European Chemicals Agency shall establish a database with hazardous substances in materials and products by January 2020 <ul style="list-style-type: none"> ○ Suppliers of articles should report to it as of 5 January 2021 for hazardous substances exceeding 0.1% w/w!! 	Directive finalised, implementing acts ongoing	CITPA, CEPI, ACE

Key Policy Issues CITPA – June 2019

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
	<ul style="list-style-type: none"> ○ Note: converted paper products are articles ● Municipal waste targets on preparing for re-use and recycling: <ul style="list-style-type: none"> ○ 55% by 2025, 60% by 2030 and 65% by 2035 ○ Derogations are possible under certain conditions ● Calculation of the targets <ul style="list-style-type: none"> ○ Point of measurement is the gate of the “recycling operations” ○ Derogation allowed (at end of sorting station), under conditions ● NEW: Extended Producers Responsibility (EPR) and modulated fees <ul style="list-style-type: none"> ○ Study by Eunomia started ○ Guidelines expected before 31 December 2019 		
Directive 2018/850 on the landfill of waste (amending Directive 1999/31/EC)	<ul style="list-style-type: none"> ● In force since 4 July 2018 ● Separately collected waste for preparing for re-use and recycling is not allowed in landfills ● As of 2030 all waste suitable for recycling or other recovery shall not be landfilled ● By 2035, Member States shall ensure that maximum 10% of the municipal waste is landfilled <ul style="list-style-type: none"> ○ Derogations are possible under certain conditions 	Directive finalised	CITPA, CEPI, ACE
EU Plastic Strategy	<ul style="list-style-type: none"> ● Published by the Commission in January 2018 ● Supported by Council and Parliament ● Main issue: silo approach adopted, but measures will impact all packaging ● New: Commitments (pledges) by 70 companies sent to Commission <ul style="list-style-type: none"> ○ Target of 10 million tons of plastic being recycled by 2025 are reachable ○ Challenge is using the recycled plastic in new products ○ Commission set up Circular Plastic Alliance to support exchange of good practices 	Finalised, follow up actions	CITPA, CEPI, ACE

Key Policy Issues CITPA – June 2019

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
Single Use Plastic Directive (NEW)	<ul style="list-style-type: none"> • Directive 2019/904 published on 12 June 2019, in force from 3 July 2019 • Member States deadline for transposition is 3 July 2021 • Different requirements for single use plastic products (See CITPA paper on SUP): <ul style="list-style-type: none"> ○ Ban on single use products from 3 July 2021 ○ Consumption reduction by 2026 vs 2021 ○ Extended Producers Responsibility – to cover cost for clean up litter • Main issues <ul style="list-style-type: none"> ○ Some paper products containing plastic are in scope ○ The review in 2027 will extend the scope to other single use products ○ Note: most paper packaging is one way = single use ○ “Lex specialis” - risk for divergent requirements in Member States • Next steps: <ul style="list-style-type: none"> ○ EU Guidance on single use plastic products by 3 July 2020 ○ Commission will initiate a harmonised standard (design) for caps and lids by 3 October 2019 ○ Commission will review the directive in 2027 ○ EU methodology for calculation of reduction targets by 3 July 2021 ○ EU harmonised marking requirements by 3 July 2020 ○ EU guidance on the cost to clean up litter by 2023 	Finalised, implementing acts ongoing	
Interface product, chemical and waste legislation	<ul style="list-style-type: none"> • Communication by the Commission in January 2018 • Study on supply chain information: results expected in 2019 	Ongoing	CITPA, CEPI
Environmental Footprint			
Product Environmental Footprint (PEF)	<ul style="list-style-type: none"> • Includes all relevant environmental impacts (wider than carbon footprint) • Two methodologies exist: <ul style="list-style-type: none"> ○ Product Environmental Footprint (PEF) for individual products ○ Organisation Environmental Footprint (OEF) for companies • “Intermediate paper” - final PEF submitted to Commission in 2018 • PEF transition phase 2019-2021: industry involvement via clusters 	EU initiative Ongoing	CEPI CITPA



Key Policy Issues CITPA – June 2019

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
ISO and CEN Standards			
ISO/TC207 Environment	The work of the ISO/TC 207/SC3, ISO/TC207/SC5, ISO/TC 207/SC7 is not actively followed by CITPA at the moment. Members are encouraged to seek information through the national bodies.		
CEN TC 411 Bio-based products	The work of CEN TC 411 is not actively followed by CITPA at the moment. Members are encouraged to seek information through the national bodies.		
CEN TC 261 Packaging and Environment	The work of CEN TC 261 and ISO TC122 is followed by CEPI Eurokraft via the national mirror group.		
Bio-economy			
EU Bio-economy Strategy	<ul style="list-style-type: none"> • Published 11 October 2018 – the target is to create a Sustainable European bio-economy through different initiatives <ul style="list-style-type: none"> ○ Horizon 2021-2027: will propose 10 billion euro for R&D in “food, agriculture and bio-economy” ○ New “Circular Bio-economy” funding program will be established, offering 100 million to upscale innovation ○ Deployment of bio-based innovations ○ Market based incentives for bio-based products ○ Support to local bio-economy 	Finalised, implementation going	CITPA, CEPI
Recyclability Guideline			
Recyclability Guideline (New)	<ul style="list-style-type: none"> • Paper and board industry initiative • Cooperation in the value chain – CEPI, CITPA, ACE, CCB • First draft available, CITPA commented strongly, most comments resolved • Consultation with EPRC in summer 2019 • Final version expected in autumn 2019 • Target group: retailers, brand owners, designers of packaging 	Ongoing	CITPA, CEPI
Microplastic			



Key Policy Issues CITPA – June 2019

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
Microplastics (New)	<ul style="list-style-type: none"> • ECHA proposal for restrictions in 2019 • Public consultation started 20 March 2019 targeting <ul style="list-style-type: none"> ○ Intentionally added microplastics ○ Intentionally released microplastics • Inks and adhesives are impacted directly, paper packaging – indirect impact • CITPA is following closely 	Ongoing	CITPA, CEPI
Product Safety			
Food contact legislation			
Framework Regulation 1935/2004	<ul style="list-style-type: none"> • NEW: Review of the regulation on food contact materials and articles - started in 2018 <ul style="list-style-type: none"> ○ Study by consultant Ecorys ○ Interviews with industry and all other interested stake holders – took part in Q1/2019 ○ CITPA took part in two interviews – as part of the paper & board industry and as part of the Packaging Joint Industry Task Force. ○ Stakeholder conference expected on 9 September 2019 • A staff working document by the Commission is expected beginning of 2020 	Ongoing	CITPA, CEPI
Printing Inks	<ul style="list-style-type: none"> • Germany notified EU via TRIS in July 2016 • Commission stopped the German Ordinance with the intention to work on a new EU Regulation on printed food contact materials • New: Commission stopped the work on the new EU Regulation and started a review of the Framework Regulation 1935/2004 • New: German Ordinance is on hold, expectations are that it will be abandoned 	Ongoing	CITPA, CEPI
Mineral Oils	<ul style="list-style-type: none"> • January 2017: European Commission published a Recommendation for monitoring of mineral oils in food and materials in contact with food. • New: Deadline for reporting closed end of February 2019 <ul style="list-style-type: none"> ○ Feedback from countries is positive regarding paper packaging – not considered a major source for contamination 	On-going	CITPA CEPI



Key Policy Issues CITPA – June 2019

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
	<ul style="list-style-type: none"> • New: March 2019 - JRC published guidelines to support the monitoring on analytics and reporting • Fourth draft of a German Regulation on Mineral Oils is available, focus is on MOAH only (no longer on MOSH). No notification to TRIS yet • Report from the Netherlands (National Institute for Public Health and the Environment) published in June 2018: paper packaging (recycled) has a limited contribution to the mineral oil exposure 		
Council of Europe	<ul style="list-style-type: none"> • April 2015: The Council of Europe prepared a Draft Framework Resolution and Technical Guidelines proposing voluntary measures concerning articles which come into contact with food which are not covered by European or international legislation • 2019: The development is slowly on-going. CITPA members are encouraged to engage through their national members 	On-going	CITPA CEPI
Food Contact Coordination Group (comprised of representatives from all sectors of the paper packaging industry, including CITPA)			
Food Contact Guidelines (New)	<ul style="list-style-type: none"> • Food Contact Guidelines for the compliance of paper & board materials and articles – published March 2018 <ul style="list-style-type: none"> ○ Industry initiative ○ Extended scope – cover tissue and converted paper products ○ Next steps: Broad communication and promotion within industry and to outside stakeholders, including EU and National authorities ongoing • CEN Workshop Agreement – project initiated by CEPI <ul style="list-style-type: none"> ○ Final meeting March 2019 ○ Workshop Agreement expected to be published by CEN soon ○ Next steps: CEN to initiate discussions with the Commission for a harmonised CEN standard. 	Documents finalised, promotion on-going	CITPA CEPI