



## Key Policy Issues CITPA – February 2020

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
<b>Environment</b>			
<b>EU Green Deal</b>			
EU Green Deal ( <b>new</b> )	Published in December 2019 as an overarching EU political ambition and policy package. See link: <a href="https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en">https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en</a>  See more information in a CITPA presentation.	Active	CITPA, CEPI, ACE
New Circular Economy Action Plan ( <b>new</b> )	Expected to be published on 10 March 2020. See more information in a CITPA presentation.		
<b>Circular Economy Package (CEP) 2015</b>			
Circular Economy Package (CEP)	This was the first packaging, published in December 2015 and proposing 54 actions. All of them were completed: <ul style="list-style-type: none"> <li>• Revised EU Directive on Packaging Waste (adopted, see below)</li> <li>• Revised EU Directive on Waste (adopted, see below)</li> <li>• Revised EU Directive on Landfilling (adopted, see below)</li> <li>• EU Plastic Strategy (adopted, see below)</li> <li>• Single use plastic directive (adopted, see below)</li> <li>• Interface between product, chemical and waste legislation (ongoing, see below)</li> <li>• EU Bio-economy strategy (adopted, see below)</li> </ul>	Implementa- tion ongoing	CITPA, CEPI, ACE
Directive 2018/852 on packaging & packaging waste (amending Directive 94/62/EC)	<ul style="list-style-type: none"> <li>• In force since 4 July 2018.</li> <li>• Bio-based materials and packaging made of recycled materials – recognised as offering benefits.</li> <li>• 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</li> <li>• 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</li> </ul>	Implementa- tion ongoing	CITPA, CEPI, ACE



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	<ul style="list-style-type: none"> <li>• Packaging waste targets               <ul style="list-style-type: none"> <li>○ All packaging – 65% by 2025 and 70% by 2030</li> <li>○ Paper &amp; board– 75% by 2025 and 85 % by 2030</li> <li>○ Plastic– 50% by 2025 and 55% by 2030</li> <li>○ Derogations are allowed under certain conditions</li> </ul> </li> <li>• Calculation of the targets               <ul style="list-style-type: none"> <li>○ Point of measurement is the gate of the “recycling operations”</li> <li>○ Derogation is allowed (at end of sorting station), under conditions</li> </ul> </li> <li>• Commission Implementing decision 2019/665 establishing the formats for reporting – new rules on calculation:               <ul style="list-style-type: none"> <li>○ Predominant material – rules remain for reporting under the old targets in the PPWD (if countries want to correct old data)</li> <li>○ New targets – separate reporting per material if exceeding 5% of the total mass</li> <li>○ Reusable packaging – new reporting includes paper &amp; cardboard</li> </ul> </li> <li>• Mandatory Extended Producers Responsibility (EPR) for all packaging by 31 December 2024</li> <li>• Next steps               <ul style="list-style-type: none"> <li>○ 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”</li> <li>○ By 2024 the Commission will decide whether to set quantitative targets on re-use of packaging</li> </ul> </li> <li>• <b>New:</b> Review of the Directive started, and proposal is expected 2020-2021 on the essential requirements, prevention and re-use measures and other aspects.</li> </ul>		
Directive 2018/851 on waste (amending Directive 2008/98/EC)	<ul style="list-style-type: none"> <li>• In force since 4 July 2018</li> <li>• Bio-based recycle products – recognised as an opportunity to substitute fuel-based feedstock</li> </ul>	Implementation ongoing	CITPA, CEPI, ACE

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	<ul style="list-style-type: none"> <li>• New definition on “material recovery” – including preparing for re-use and recycling</li> <li>• Inspirational target on food waste – 30 % by 2025 and 50% by 2030</li> <li>• Member States mandated to provide incentives for prevention and reuse</li> <li>• Separate collection for paper is mandatory</li> <li>• <b>New</b>: European Chemicals Agency database for reporting hazardous substances in materials and products is ready.               <ul style="list-style-type: none"> <li>○ Suppliers of articles should report to it as of 5 January 2021 for hazardous substances exceeding 0.1% w/w!!</li> <li>○ Note: converted paper products are articles</li> </ul> </li> <li>• Municipal waste targets on preparing for re-use and recycling:               <ul style="list-style-type: none"> <li>○ 55% by 2025, 60% by 2030 and 65% by 2035</li> <li>○ Derogations are possible under certain conditions</li> </ul> </li> <li>• Calculation of the targets               <ul style="list-style-type: none"> <li>○ Point of measurement is the gate of the “recycling operations”</li> <li>○ Derogation allowed (at end of sorting station), under conditions</li> </ul> </li> <li>• <b>NEW</b>: EU guidance on Extended Producers Responsibility (EPR) and modulated fees – publication expected in April 2020</li> </ul>		
Directive 2018/850 on the landfill of waste (amending Directive 1999/31/EC)	<ul style="list-style-type: none"> <li>• In force since 4 July 2018</li> <li>• Separately collected waste for recycling is not allowed in landfills. As of 2030 all waste suitable for recycling or other recovery shall not be landfilled.</li> <li>• By 2035, Member States shall ensure that maximum 10% of the municipal waste is landfilled. Derogations exist.</li> </ul>	Implementation ongoing	CITPA, CEPI, ACE
EU Plastic Strategy	<ul style="list-style-type: none"> <li>• Published by the Commission in January 2018</li> <li>• Main issue: silo approach adopted, but measures will impact all packaging</li> <li>• <b>New</b>: Circular Plastic Alliance fully supported by Commission               <ul style="list-style-type: none"> <li>○ Declaration signed by over 100 companies/ organisations</li> <li>○ Company commitments on the target of 10 million tons of recycled plastic</li> </ul> </li> </ul>	Adopted, follow up actions	CITPA, CEPI, ACE



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Single Use Plastic Directive	<ul style="list-style-type: none"> <li>• Directive 2019/904 published on 12 June 2019, in force from 3 July 2019</li> <li>• Member States deadline for transposition is 3 July 2021</li> <li>• Different requirements for single use plastic products (See CITPA paper on SUP):               <ul style="list-style-type: none"> <li>○ Ban on single use products from 3 July 2021</li> <li>○ Consumption reduction by 2026 vs 2021</li> <li>○ Extended Producers Responsibility – to cover cost for clean up litter</li> </ul> </li> <li>• Main issues               <ul style="list-style-type: none"> <li>• Some paper products containing plastic are in scope</li> <li>• The review in 2027 will extend the scope to other single use products</li> <li>○ Note: most paper packaging is one way = single use</li> <li>○ “Lex specialis” - risk for divergent requirements in Member States</li> </ul> </li> <li>• Next steps: Group of consultants lead by RAMBOL working on the guidance documents and studies (new)               <ul style="list-style-type: none"> <li>○ EU Guidance on single use plastic products by 3 July 2020 – CITPA interview with the consultant took place (new)</li> <li>○ Commission will initiate a harmonised standard (design) for caps and lids by 3 October 2019</li> <li>○ Commission will review the directive in 2027</li> <li>○ EU methodology for calculation of reduction targets by 3 July 2021</li> <li>○ EU harmonised marking requirements by 3 July 2020</li> <li>○ EU guidance on the cost to clean up litter by 2023</li> </ul> </li> </ul>	Implementation ongoing	CITPA, CEPI, ACE
Interface products, chemical and waste legislation	<ul style="list-style-type: none"> <li>• Communication by the Commission in January 2018</li> <li>• Study on supply chain information: results expected in 2019 – no results published yet (new)</li> <li>• <b>New:</b> This is now part of the new EU Green Deal and the Chemicals Strategy for Sustainability expected in the summer 2020</li> </ul>	Ongoing	CITPA, CEPI
Environmental Footprint			

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Product Environmental Footprint (PEF)	<ul style="list-style-type: none"> <li>• Includes all relevant environmental impacts (wider than carbon footprint)</li> <li>• Two methodologies exist:               <ul style="list-style-type: none"> <li>○ Product Environmental Footprint (PEF) for individual products</li> <li>○ Organisation Environmental Footprint (OEF) for companies</li> </ul> </li> <li>• “Intermediate paper” - final PEF submitted to Commission in 2018</li> <li>• PEF transition phase 2019-2021: industry involvement via clusters</li> </ul>	EU initiative Ongoing	CEPI CITPA
<b>ISO and CEN Standards</b>			
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.		
<b>Bio-economy</b>			
EU Bio-economy Strategy	<ul style="list-style-type: none"> <li>• Published 11 October 2018 – the target is to create a Sustainable European bioeconomy through different initiatives:               <ul style="list-style-type: none"> <li>○ Horizon 2021-2027: will propose 10 billion euro for R&amp;D in “food, agriculture and bio-economy”</li> <li>○ New “Circular Bio-economy” funding program will be established, offering 100 million to upscale innovation</li> <li>○ Deployment of bio-based innovations</li> <li>○ Market based incentives for bio-based products</li> <li>○ Support to local bio-economy</li> </ul> </li> </ul>	Implementa- tion ongoing	CITPA, CEPI
<b>Recyclability Guideline</b>			
Recyclability Guideline	<ul style="list-style-type: none"> <li>• Paper &amp; board industry initiative – published in November 2019 (new)</li> </ul>	Published	CITPA, CEPI



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	<ul style="list-style-type: none"> <li>Cooperation in the value chain - CEPI, CITPA, ACE, CCB</li> <li>Target group: retailers, brand owners, designers of packaging</li> </ul>		
<b>Microplastic</b>			
Microplastics	<ul style="list-style-type: none"> <li>ECHA proposal for restrictions in 2019</li> <li>Inks and adhesives are impacted directly, paper packaging – indirect impact</li> <li><b>New</b>: This is now part of the EU Green Deal and the new Circular Economy Action Plan</li> </ul>	Ongoing	CITPA, CEPI
<b>Product Safety</b>			
<b>Food contact legislation</b>			
Framework Regulation 1935/2004	<ul style="list-style-type: none"> <li>Review of the regulation on food contact materials and articles - started in 2018 and results delayed until end 2020 (<b>new</b>)               <ul style="list-style-type: none"> <li>Study by consultant Ecorys</li> <li>CITPA took part in two interviews – as part of the paper &amp; board industry and as part of the Packaging Joint Industry Task Force.</li> </ul> </li> <li>A staff working document by the Commission is expected beginning of 2020</li> </ul>	Ongoing	CITPA, CEPI
Printing Inks	<ul style="list-style-type: none"> <li>Germany notified EU via TRIS in July 2016</li> <li>Commission stopped the Ordinance with the intention to work on a new EU Regulation on printed food contact materials. In 2018 the Commission stopped the work and started a review of the Framework Regulation 1935/2004</li> <li>German Ordinance is still on hold, expectations are that it will be abandoned</li> </ul>	Ongoing	CITPA, CEPI
Mineral Oils	<ul style="list-style-type: none"> <li>January 2017: European Commission published a Recommendation for monitoring of mineral oils in food and materials in contact with food.</li> <li>Deadline for reporting closed end of February 2019               <ul style="list-style-type: none"> <li>Feedback from countries is positive regarding paper packaging – not considered a major source for contamination</li> </ul> </li> <li>March 2019 - JRC published guidelines to support the monitoring on analytics and reporting</li> </ul>	On-going	CITPA CEPI



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	<ul style="list-style-type: none"> <li>• 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</li> <li>• 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</li> </ul>		
Council of Europe (new)	<ul style="list-style-type: none"> <li>• 2019: The Council of Europe updated two documents:               <ul style="list-style-type: none"> <li>○ Guiding principles for food contact materials and articles</li> <li>○ Technical Guide on paper and board materials and articles for food contact</li> </ul> </li> <li>• Both documents are for public consultation from 5/2/2020 to 16/3/2020</li> </ul>	On-going	CITPA CEPI
<b>Food Contact Coordination Group (comprised of representatives from all sectors of the paper packaging industry, including CITPA)</b>			
Food Contact Guidelines	<ul style="list-style-type: none"> <li>• Food Contact Guidelines for the compliance of paper &amp; board materials and articles – published March 2018               <ul style="list-style-type: none"> <li>○ Extended scope – cover tissue and converted paper products</li> <li>○ Broad communication and promotion ongoing (new)</li> <li>○ Translations – available in Spanish, other languages in 2020 (new)</li> </ul> </li> <li>• CEN Workshop Agreement – project initiated by CEPI               <ul style="list-style-type: none"> <li>○ CWA 17433:2019 "Mapping of Future needs of standardisation in the paper and board sector for food contact applications" published July 2019</li> </ul> </li> </ul>	Published	CITPA CEPI