

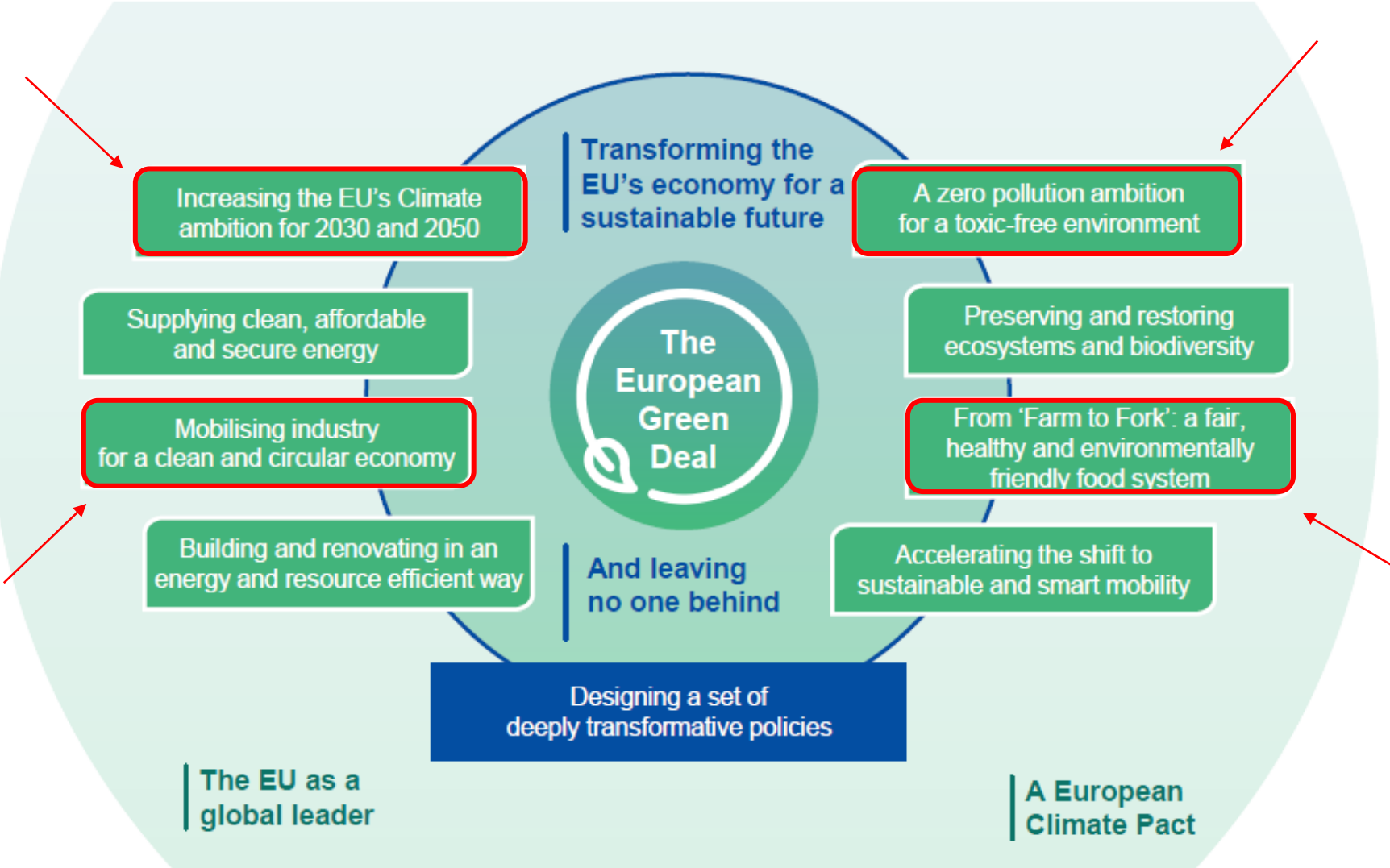
Joint meeting of Environment and Product Safety Committees

22 November 2021

ENVIRONMENT

EU GREEN DEAL & CIRCULAR ECONOMY ACTION PLAN

The European Green Deal





European Climate Law and Fit for 55

- **European Climate Law agreement reached in April 2021**
 - ◆ 55% reduction of greenhouse gas emissions by 2030
 - ◆ Climate neutrality by 2050

- **Fit for 55 package published on 14 July 2021**
 - ◆ Goal of initiatives in package is to help reach European Climate Law targets (55% reduction)
 - ◆ Major initiatives
 - EU Emissions Trading System (EU ETS)
 - Effort Sharing Regulation
 - Regulation on Land Use, Forestry and Agriculture (LULUCF)
 - Renewable Energy Directive
 - Energy Efficiency Directive
 - Energy Taxation Directive
 - Carbon Border Adjustment Mechanism (CBAM)

Regulation on Land Use, Forestry and Agriculture (LULUCF)

- **Sets overall EU target for carbon removals**
- **EU aim to reach climate neutrality in land use, forestry and agriculture sectors by 2035**
- **Complemented by EU Forest Strategy**
- **Relevance for converters**
 - ◆ Identifies the decrease of carbon removals in the land sector due to increasing harvesting rates related to wood demand as a problem
 - ◆ References 'harvested wood products'

Renewable Energy Directive

- **Sets new binding target of 40% for share of energy in EU from renewable sources by 2030 (previously 32%)**
- **Target of 1.1% annual average increase of renewable energy in industry; binding target of 50 % for renewable fuels of non-biological origin**
- **Requirement that labelling of green industrial products indicates the percentage of renewable energy used following a common methodology**
- **Relevance for converters**
 - ◆ Industry-related measures listed above will impact converters
 - ◆ Need to increase renewable energy use
 - ◆ Impact assessment specifically mentions paper and pulp sector as being advanced in renewable

Energy Taxation Directive

- **Revision intends to align taxation of energy products with updated EU energy and climate policies**
- **Definition of ‘energy-intensive business’ – business entity where either the purchases of energy products and electricity amount to at least 3,0 % of the production value or the national energy tax payable amounts to at least 0,5 % of the added value**
- **Relevance for converters:**
 - ◆ Taxation of energy products will impact all industry, including converters

Sustainable Products Policy

- **EU proposal delayed to Q1/2022**
- **Public consultation feedback was open until 9 June 2021**
 - ◆ [CITPA responded to survey](#)
 - ◆ Questionnaire focused on electronics and other repairable products – not specific to paper & board but still impactful
- **Leaked document concerns**
 - ◆ Restricting the presence of substances of concern
 - ◆ Minimum requirements for recycled content & reduce carbon/environmental footprint
 - ◆ Requirements for high quality recycling
 - ◆ Digital information requirements (Digital Product Passport)
 - ◆ Restriction on single-use products

EU Forest Strategy

- **Forest Strategy published alongside Fit for 55 proposals**
- **Some relevance for converters**
 - ◆ Issue with leaked Commission draft cleared up by CEPI
 - ◆ Recognises the role of short-lived wood-based items in substituting fossil-based products – positive outcome from Commission proposal
- **Council conclusions published in November**
 - ◆ “*WELCOMES the emphasis on the promotion of sustainably produced wood-based products, especially long-lived ones, and at the same time RECALLS that resource efficient and sustainable production and use of forest-based products, **including long and short-lived ones**, contribute to climate goals*”



EU WASTE LEGISLATION

Packaging & Packaging Waste Directive review

- **Proposal expected Q2/2022**
- **Eunomia (consultant) report expected November 2021**
- **Eunomia workshops on the PPWD – 6 full-day workshops over two weeks in June 2021**
 - ◆ Some concerning developments for converters
 - ◆ CITPA feedback on the Eunomia workshop
 - ◆ Joint industry letter with Packaging Chain Forum
 - ◆ CITPA participated in a meeting with Mattia Pellegrini, DG ENV and Packaging Chain Forum

Packaging & Packaging Waste Directive review (continued)

- **Key points of concern from Eunomia workshops:**
 - ◆ New definition of overpackaging and **removal of marketing from core list of criteria**
 - ◆ **Mandatory MS top down packaging reduction targets – unit weight by material**
 - ◆ **MS level bottom up reuse targets – for primary/secondary/tertiary packaging, proposing 100% in some cases**
 - ◆ Updated essential requirements – all packaging to be reusable or recyclable
 - ◆ Void space limit of 40% for e-commerce/distribution packaging

Packaging & Packaging Waste Directive review (continued)

- **Labelling of packaging**

- ♦ Divergent national packaging labelling and information requirements appearing in Member States (France, Italy, Portugal, Slovenia)
- ♦ [CITPA co-signed paper with Packaging Chain Forum \(link\)](#)
 - Asks for harmonized rules across EU
- ♦ Issue discussed by the Commission at Waste Expert work group in July

Waste Framework Directive review

- **Public consultation planned for Q2/2022**
- **Revision postponed to 2023**



Food waste targets

- **Inception impact assessment as part of review on food waste reduction targets**
 - ◆ *“It should be noted that in some cases the reduction of food waste may have **limited negative impacts** – e.g. better storage may come at the cost of additional electricity use for refrigeration or **better protection of food may be linked with increased amount of packaging**. Any such trade-offs will be analysed in the impact assessment of the proposal.”*
- **FEFCO responded to the consultation**

JRC study on the definition of recycling

- **Aim of project**
 - ◆ Identifying new recycling processes (chemical recycling)
 - ◆ Proposes revised calculations
 - ◆ Suggests definition on high-quality recycling
- **Cepi and ACE active**



Single use plastic directive – guidance

- **EU Guidance on SUP published 31 May 2021**
 - ◆ ‘Bag in box’ still included BUT as “*Flexible plastic beverage container (up to 3 litres) in a carton box separable by hand*”
 - ◆ Many food containers in scope (**see CITPA paper 2 June 2021**)
 - Cardboard food container with plastic for hot/cold food
 - Ice-cream container with plastic lining for direct consumption
 - Packets or wrappers for immediate consumption
 - And morebut exemptions exist



CITPA methodology for carbon footprint calculation

- **Members/customers demand compliance with GHG protocol requirements**
- **CITPA CO2 methodology considered broadly aligned but not officially assessed!**
- **Validation by peer reviewer needed!**
 - ◆ Three offers received
 - ◆ **Suggestion: CITPA commissions the validation**



Update on EPRC

- **EPRC monitoring report 2020**
- **2021 European Declaration on Paper Recycling**
- **EPRC 2021 Paper Recycling Awards**



Update on PPCG and new informal “Fibre Packaging Coalition”

- **New informal coalition – Fibre Packaging Europe**
- **Members: Cepi, FEFCO, ECMA, ProCarton, Swedish Forest Industries, EPPA**
- **Joint advocacy and outreach on common files**
 - ◆ Sustainable Product Policy
 - ◆ Green Claims
 - ◆ PPWD
 - ◆ Initiative to substitute single-use packaging in food services
- **Does CITPA become a member? (25,000 euro fee)**

Tour de table - activities CITPA members

AOB concerning environmental matters

Time for a

COFFEE BREAK – ENJOY!



PRODUCT SAFETY

German ordinances on mineral oil & printing inks

■ Mineral oils

- ◆ WTO notification 15 March 2021
- ◆ CITPA advocacy – joint position with CEPI targeting countries outside the EU
 - Identical responses from Germany to WTO comments
- ◆ Expected that Germany will proceed with Ordinance following the anticipated adoption of the Printing Inks Ordinance

■ Printing inks

- ◆ Expected adoption in November 2021

Ordinance → **Bundesrat for approval**

- Agreement on transitional period: 4 years
- If EU presents a legal text on printing inks: extension of the period

<https://dserver.bundestag.de/brd/2021/0655-21.pdf>

Positive list

- substances that can be used (direct and indirect contact) with SML

Other substances are possible:

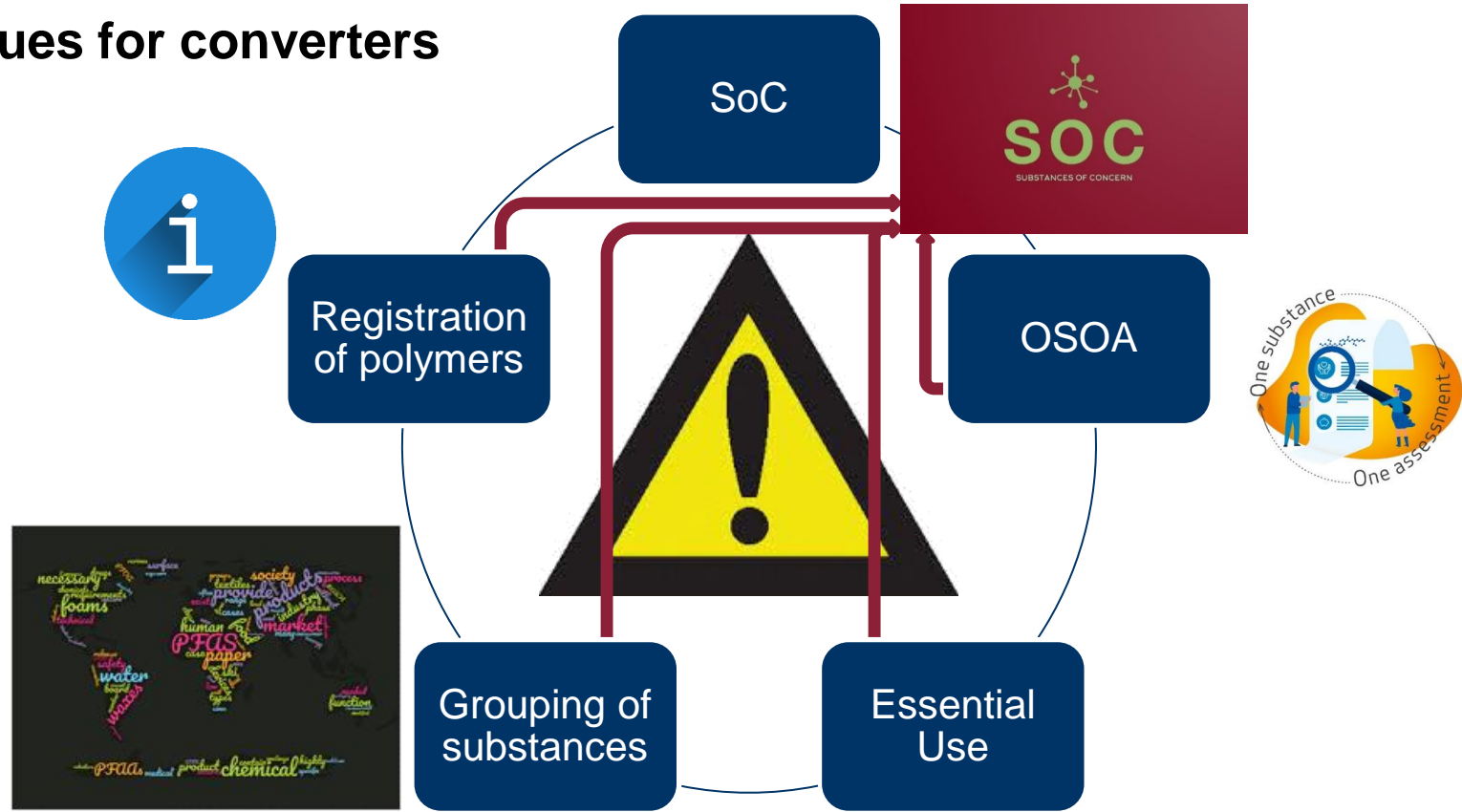
- Indirect contact only
- No CMR
- Migration non-detectable (0,01 mg/kg food)

Review Framework Regulation 1935/2007

- Ongoing, public consultation delayed to Q1/2022

Chemical Strategy for Sustainability

Major issues for converters



Chemical Strategy for Sustainability (continued)

- **Safe and Sustainable by design**
 - ◆ For substances, materials and **products**
 - ◆ Initiative lead by DG RTD
 - Technical workshop – planned for Q4/2021
 - Specific criteria definition – Q1- Q2/2022
 - [Stakeholder consultation – Q3/2022](#)

Chemical Strategy for Sustainability (continued)

- **New project of Cevi issue group on Chemical Strategy for Sustainability**
 - ♦ Investigation of substances used in paper-making
- **Data collection on substances in converting?**
 - ♦ CITPA
 - ♦ Inks, adhesives

Identification & preparation of weak points in our production process if measures are proposed, substances are used and no substitution is available.

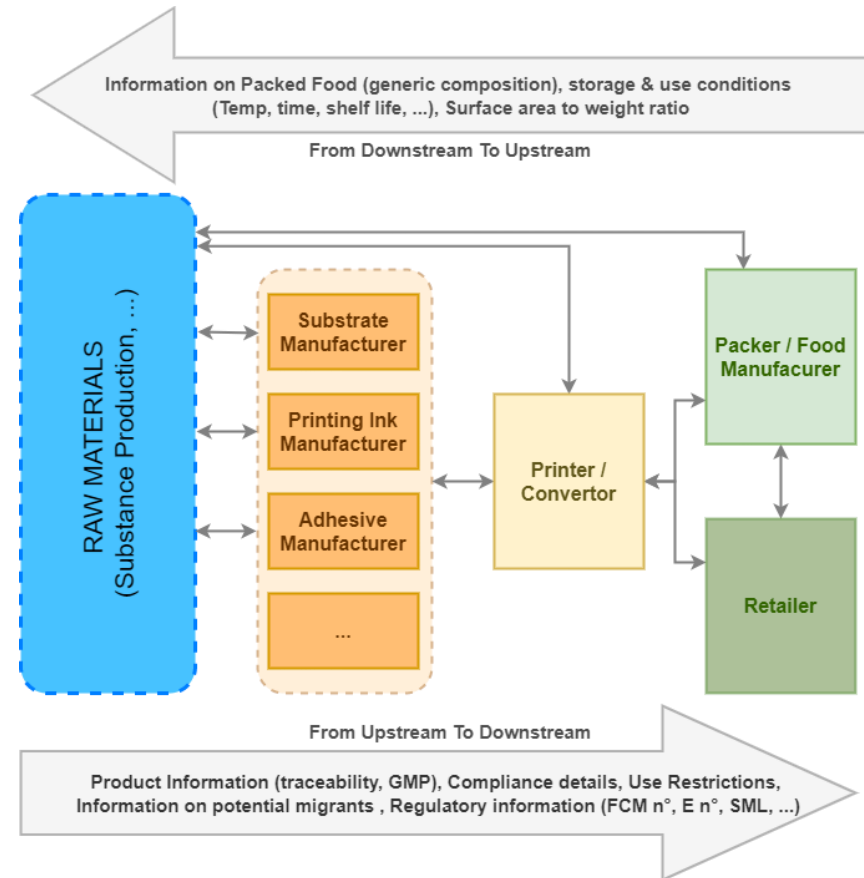
1. Identification of – most commonly used - substances, mixtures and polymers
2. Identification Known Hazards
3. Identification of Substances of Essential Use
4. Substitution possible?

Report from the FCCG

- No meeting

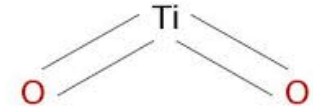
Report from Packaging Ink Joint Industry Taskforce (PIJITF)

- ◆ Next meeting on 25 November 2021
- ◆ Paper on “OSOA – A tailored Risk assessment for FCM” – promotion ongoing
 - Contacts with EHCA, EFSA, DG ENV and DG SANTE to promote position
- ◆ Transparency tool
 - Tool developed by work group for transparency guidance for exchange of information in the supply chain
 - Documents available for adoption

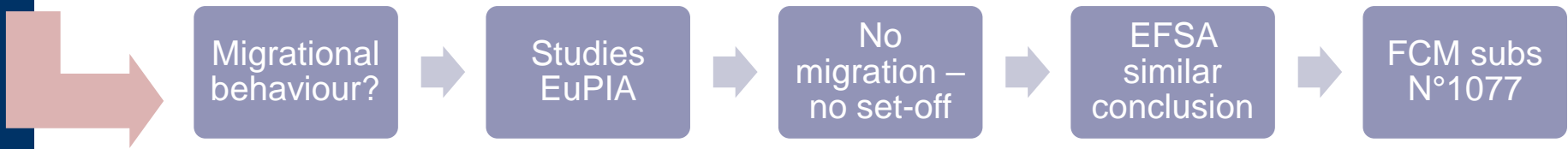
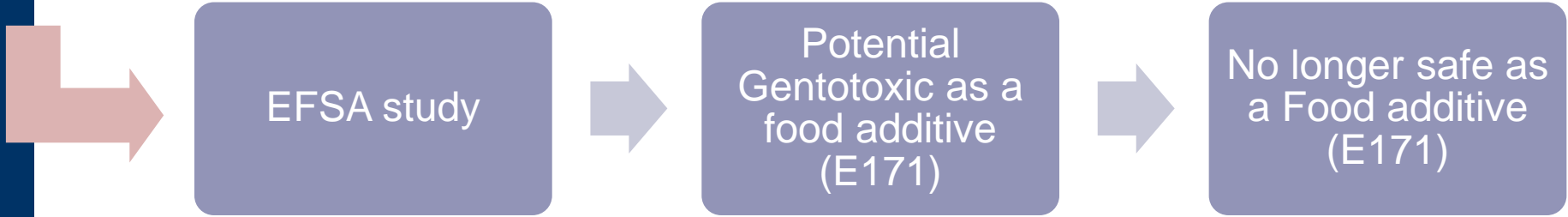
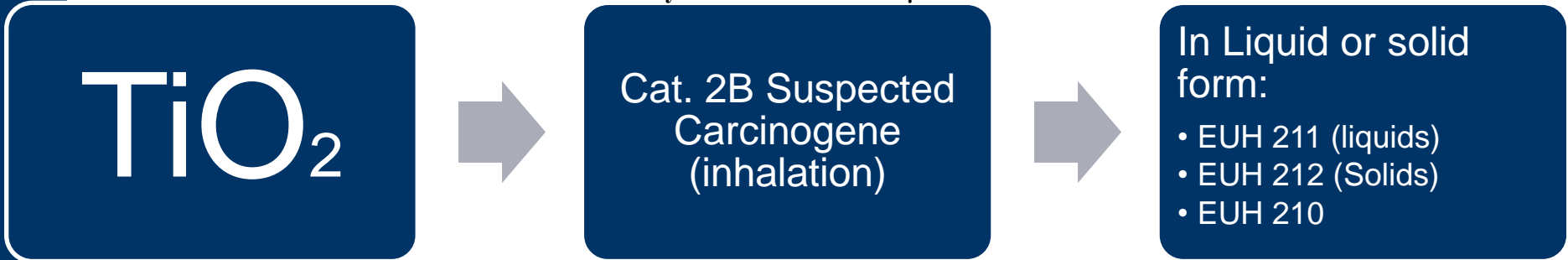


Update on Council of Europe

AOB concerning product safety



(GHS 08-label) packaging of Titanium Dioxide, when in powder form containing 1% or more of particles with an aerodynamic diameter $\leq 10 \mu\text{m}$



<https://efsa.onlinelibrary.wiley.com/doi/pdf/10.2903/j.efsa.2019.5737>

Update on projects

- **Harmonised questionnaire**
- **Substances of interest**

Next meeting: April 2022