



Key Policy Issues CITPA – July 2020

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
Environment			
EU Green Deal			
EU Green Deal	Published in December 2019 as an overarching EU political ambition and policy package. See link: https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en See more information in a CITPA presentation.	Published	CITPA, CEPI, ACE
EU Climate Law (new)	Proposal published on 4 March 2020: <ul style="list-style-type: none"> Proposing a binding objective on climate neutrality by 2050 Clarification on “climate neutrality” – it does not mean zero emissions; it means offsetting the carbon emission by removals from natural or other sinks See link for more information: https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1588581905912&uri=CELEX:52020PC0080	Published	CITPA, CEPI, ACE
EU Industrial Strategy (new)	Published on 10 March 2020: Focus is on <ul style="list-style-type: none"> Green transition – via the European Green Deal Digital transition – that support industry and SMEs and allow decarbonization of the economy Competitiveness on the global stage – by setting global standard See link for more information: https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1593086905382&uri=CELEX%3A52020DC0102	Published	CITPA, CEPI
EU SME Strategy (new)	Published on 10 March 2020. It is coupled with the EU Industrial Strategy and aims to support SME by cutting red tape in legislation, better access to finance and encouraging innovation. See link for more information: https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1593507563224&uri=CELEX%3A52020DC0103	Published	CITPA, CEPI

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Single Market (new)	Communication on better implementation of the Single Market. See link: https://ec.europa.eu/info/sites/info/files/communication-enforcement-implementation-single-market-rules_en_0.pdf	Published	CITPA, CEPI
Farm to Fork Strategy (new)	<p>Published on 20 May 2020 with the aim to have more healthy and sustainable EU food system. The focus is on pesticides, impact on biodiversity and climate, antimicrobial resistance, organic farming, food labelling and food waste. See link: https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1590404602495&uri=CELEX%3A52020DC0381</p> <p>The action plan has a specific provision for the review of the EU food contact regulation by Q4/2022.</p>	Published, action plan ongoing	CITPA, CEPI, ACE
New Circular Economy Action Plan 2020 (new) (CEAP)	<p>Published on 11 March 2020. It sets the basis for number of initiatives:</p> <ul style="list-style-type: none"> • Sustainable product policy (legislative, expected 2021) • Regulating green claims (legislative, expected 2021) • Review of packaging waste legislation (legislative, expected 2021) • Measure on substances of concern (expected 2021) • Methodology for separate collection of waste (expected 2022) • Packaging is considered a “key value chain” <p>See more information in a CITPA presentation or follow the link: https://ec.europa.eu/environment/circular-economy/</p> <ul style="list-style-type: none"> • New: EP is preparing a resolution on the CEAP, vote by ENVI expected by end 2020, plenary vote in January 2021. CITPA in cooperation with the value chain is advocating on the key issues. A joint position is available. 	Published, action plan ongoing	CITPA, CEPI, ACE

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Circular Economy Package (CEP) 2015			
Circular Economy Package (CEP)	<p>This was the first package, published in December 2015 and proposing 54 actions. All of them were completed:</p> <ul style="list-style-type: none"> • Revised EU Directive on Packaging Waste (adopted, see below) • Revised EU Directive on Waste (adopted, see below) • Revised EU Directive on Landfilling (adopted, see below) • EU Plastic Strategy (adopted, see below) • Single use plastic directive (adopted, see below) • Interface between product, chemical and waste legislation (ongoing, see below) • EU Bio-economy strategy (adopted, 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. • Update: Member States deadline for transposition is 4 July 2020 (not finalised by all countries) • 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 	Implementation ongoing	CITPA, CEPI, ACE



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	<ul style="list-style-type: none"> • 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 • 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 • Update: Review of the Directive started, and proposal is expected 2021 on the essential requirements, prevention and re-use measures and other aspects. CITPA together with the value chain is advocating on the key issues. A joint feedback to the EU roadmap consultation is available. 		
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 • New: European Chemicals Agency database for reporting hazardous substances in materials and products is ready. 	Implementation ongoing	CITPA, CEPI, ACE

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	<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!! ○ 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 ● Update: EU guidance on Extended Producers Responsibility (EPR) and modulated fees – publication expected in September 2020. CITPA in cooperating with the value chain is advocating on the key issues. A joint position is available. 		
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 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. Derogations exist. 	Implementation ongoing	CITPA, CEPI, ACE
EU Plastic Strategy	<ul style="list-style-type: none"> ● Published by the Commission in January 2018 ● Main issue: silo approach adopted, but measures will impact all packaging ● Circular Plastic Alliance fully supported by Commission <ul style="list-style-type: none"> ○ Declaration signed by over 100 companies/ organisations ○ Company commitments on the target of 10 million tons of recycled plastic 	Adopted, follow up actions	CITPA, CEPI, ACE
Single Use Plastic Directive	<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 	Implementation ongoing	CITPA, CEPI, ACE

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	<ul style="list-style-type: none"> ○ 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 • Group of consultants lead by RAMBOL is working on the guidance documents and studies <ul style="list-style-type: none"> ○ EU Guidance on single use plastic products planned for 3 July 2020 is now being delayed to September 2020. New issues were identified and extensive advocacy by the paper and board value chain is still ongoing. A joint position paper and technical paper on cellulose is available (update) ○ 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 is delayed (update) ○ EU guidance on the cost to clean up litter by 2023 		
Interface products, 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 – no results published yet • Update: This is now part of the new EU Green Deal and the Chemicals Strategy for Sustainability planned for the summer 2020 and delayed to the autumn 2020. CITPA together with other actors in the packaging value chain sent feedback to the public consultation. The main issues are “one substance one assessment” proposal and the approach towards substances of concern. • New: EP is preparing a resolution on the Chemical Strategy – voted by ENVI committee in June 2020, plenary expected in July 2020. 	Ongoing	CITPA, CEPI

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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 • New: Cefi issued a PEF tool for members to help them calculate their environmental footprint according to the Intermediate paper PEF category rules 	EU initiative Ongoing	CEPI CITPA
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 bioeconomy 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 	Implementation ongoing	CITPA, CEPI



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Recyclability Guideline			
Recyclability Guideline	<ul style="list-style-type: none"> Paper & board industry initiative – published in November 2019 Cooperation in the value chain - CEPI, CITPA, ACE, CCB Target group: retailers, brand owners, designers of packaging 	Published	CITPA, CEPI
Microplastic			
Microplastics	<ul style="list-style-type: none"> ECHA proposal for restrictions in 2019 Inks and adhesives are impacted directly, paper packaging – indirect impact This is now part of the EU Green Deal and the new Circular Economy Action Plan 	Ongoing	CITPA, CEPI
Product Safety			
Food contact legislation			
Framework Regulation 1935/2004	<ul style="list-style-type: none"> Review of the regulation on food contact materials and articles - started in 2018 and delayed until Q4/2022 (update) <ul style="list-style-type: none"> Study by consultant Ecorys is now published (update) CITPA took part in two interviews – as part of the paper & board industry and as part of the Packaging Joint Industry Task Force. A staff working document by the Commission is expected beginning of 2021 (update) 	Ongoing	CITPA, CEPI
Printing Inks	<ul style="list-style-type: none"> Germany notified EU via TRIS in July 2016 with the first draft ordinance. Commission stopped the Ordinance in 2016 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 New: A new draft of the German Inks Ordinance was communicated to stakeholder in April 2020. National associations are active. The packaging ink value chain (PIJITF) sent a letter to the upcoming German Presidency asking their support to stop the national measure. It is yet unclear if Germany must notify the Commission again and what is the timeline. 	Ongoing	CITPA, CEPI

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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. • 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 • 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 • New: EC report on “Information flows on substances of concern in products from supply chain to waste operators”, published May 2020, see link: https://op.europa.eu/en/publication-detail/-/publication/59d9b462-a9f6-11ea-bb7a-01aa75ed71a1/language-en <ul style="list-style-type: none"> ○ Annex VIII is a case study on paper & board 	On-going	CITPA CEPI
Council of Europe	<ul style="list-style-type: none"> • 2019: The Council of Europe updated two documents: <ul style="list-style-type: none"> ○ Guiding principles for food contact materials and articles ○ Technical Guide on paper and board materials and articles for food contact • Both documents were for public consultation from 5/2/2020 to 16/3/2020 – several CITPA members submitted comments (update) 	On-going	CITPA CEPI
Perfluoroalkyl chemicals (PFAS) (new)	<ul style="list-style-type: none"> • PFAS will be included in the action plan of the Chemicals strategy for Sustainability • In May 2020, five Member States launched a call for evidence to support an analysis of restriction options on per- and polyfluoroalkyl substances (PFAS). The goal is to introduce restrictions on manufacturing, placing on the market and use of PFAS within the EU. 	Ongoing	CEFIC, PIJITF



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Food Contact Coordination Group (comprised of representatives from all sectors of the paper packaging industry, including CITPA)			
Food Contact Guidelines	<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"> ○ Extended scope – cover tissue and converted paper products ○ Broad communication and promotion ongoing ○ Translations – available in Spanish and Italian, more languages expected later in 2020 (update) ○ New: A corrigendum is under preparation with few amendments regarding DoC and limits following the BfR update • CEN Workshop Agreement – project initiated by CEPI <ul style="list-style-type: none"> ○ CWA 17433:2019 "Mapping of Future needs of standardisation in the paper and board sector for food contact applications" published July 2019 	Published	CITPA CEPI