Key Policy Issues CITPA – July 2021

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. 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 (update)	Proposal published on 4 March 2020. Update: Agreement reached in April 2021. • 55% reduction of greenhouse gas emissions by 2030. • Aspirational goal for negative emissions after 2050. • European Parliament endorsed the law on 24 June 2021. • European Council adopted the European Climate Law on 28 June 2021. See link:https://data.consilium.europa.eu/doc/document/PE-27-2021-INIT/en/pdf	Published	CITPA, CEPI, ACE
"Fit for 55" package (new)	Package is part of the EU Green Deal and includes number of proposals. The key files relevant for paper packaging are: • Stronger Emissions Trading System (ETS), to include aviation, road transport and building sectors – by 2030 included sections must reduce their greenhouse gas emissions by 61%, compared to 2005 levels. • Carbon border levy on polluting imports (CBAM) – including "polluting goods" (so far paper and board not identified as such). • Update to the Renewable Energy Directive and Energy Efficiency Directive – higher targets for energy efficiency (36% by 2030), new renewable energy target (40% by 2030) and renovations. • Update of the Energy Taxation Directive – to align the minimum tax rates for heating and transport fuels with EU climate and environmental objective. • Update of the Forest Strategy (see section further below). • Update of the Regulation on land use, land use change and forestry (LULUCF) – reflecting on the greenhouse gas emissions and removals by the forest.	Published	CITPA, CEPI, ACE

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
EU Industrial Strategy (update)	Published on 10 March 2020: Focus is on • Green transition – via the European Green Deal • Digital transition –to support industry and SMEs and allow decarbonization of the economy • Competitiveness on the global stage – by setting global standard Update: Update published in May 2021 to reflect effects of COVID-19 pandemic focused on: • Strengthening single market resilience; • Dealing with EU's strategic dependencies; • Accelerating green and digital transitions. See link: https://ec.europa.eu/commission/presscorner/detail/en/ip_21_1884	Published	CITPA, CEPI
EU SME Strategy	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: https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1593507563224&uri=CELEX%3A52020DC0103	Published	CITPA, CEPI
Single Market	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	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 The action plan has a specific provision for the review of the EU food contact regulation by Q4/2022.	Published, action plan ongoing	CITPA, CEPI, ACE

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association

New Circular Economy Action Plan 2020 (CEAP)	Published on 11 March 2020. It sets the basis for number of initiatives:
	• 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"
	See more information in a CITPA presentation or see link:
	https://ec.europa.eu/environment/circular-economy/
	
	• EP resolution on the CEAP, approved on 10 February 2021, asks the Commission to:
	  o establish binding 2030 targets for material use/consumption footprint;
	  o propose product-specific and/or sector-specific binding targets for recycled content;
	  o broaden the scope of the Eco-design directive to include non-energy-related products;
	  o introduce measures against greenwashing and false environmental claims;
	  o champion the EU Ecolabel as a benchmark for environmental sustainability;
	See link: https://www.europarl.europa.eu/doceo/document/A-9-2021-0008_EN.html
		Published, action plan ongoing	CITPA, CEPI, ACE

Sustainable Products Initiative (new)	• New initiative aiming to make products fit for a climate neutral, resource efficient and circular economy, reduce waste and ensure that the performance of frontrunners in sustainability progressively becomes the norm. • It includes a revision of the Eco-design directive widening the scope to non-energy products. • The consultation of the Roadmap took place in autumn 2020 - paper & board converters provided a joint feedback to the Roadmap. • CITPA submitted a response to the public consultation in June 2021. See link: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12567-Sustainable-products-initiative	Ongoing	CITPA, CEPI, ACE

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association

Directive 2018/852 on packaging & packaging waste (amending Directive 94/62/EC) (update)	• In force since 4 July 2018. MS deadline for transposition was 4 July 2020.
	• New labelling requirements in Italy since Sept 2020. See more information on CONAI website. See link:
	http://www.progettarericiclo.com/en/docs/environmental-labeling-packaging
	• 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.
	• Packaging waste targets
	  o All packaging – 65% by 2025 and 70% by 2030
	  o Paper & board– 75% by 2025 and 85 % by 2030
	  o Plastic– 50% by 2025 and 55% by 2030
	• Calculation of the targets
	  o Point of measurement is the gate of the "recycling operations".
	  o Derogation is allowed (at end of sorting station), under conditions.
	• Commission Implementing decision 2019/665 establishing the formats for reporting – new rules on calculation:
	  o Predominant material – rules remain for reporting under the old targets in the PPWD (if countries want to correct old data).
	  o New targets – separate reporting per material if exceeding 5% of the total mass.
	  o Reusable packaging – new reporting includes paper & cardboard.
	• Mandatory Extended Producers Responsibility (EPR) for all packaging by 31 December 2024.
	• 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".
		Implementa-tion ongoing	CITPA, CEPI, ACE

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
	• Review of the Directive started, and proposal is expected end of 2021. CITPA together with the value chain is advocating on the key issues. Update: Eunomia workshops on the revision of the Directive held in June 2021. A brief was communicated to CITPA members. Joint position signed by CITPA is available.		

Directive 2018/851 on waste (amending Directive 2008/98/EC) (update)	• 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.
	• MS mandated to provide incentives for prevention and reuse.
	• Separate collection for paper is mandatory.
	• European Chemicals Agency database for reporting hazardous substances in materials and products is ready (SCIP database).
	  o Suppliers of articles should report to it as of 5 January 2021 for hazardous substances exceeding 0.1% w/w!!
	  o Note: converted paper products are articles.
	• Municipal waste targets on preparing for re-use and recycling:
	  o 55% by 2025, 60% by 2030 and 65% by 2035
	• Calculation of the targets
	  o Point of measurement is the gate of the "recycling operations"
	  o Derogation allowed (at end of sorting station), under conditions
	• EU guidance on Extended Producers Responsibility (EPR) and modulated fees – publication still expected. A joint position signed by CITPA is available.
	• Update: Review of Waste Framework Directive is expected in 2023.
		Implementa-tion ongoing	CITPA, CEPI, ACE

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
Directive 2018/850 on the landfill of waste (amending Directive 1999/31/EC)	• 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.	Implementa-tion ongoing	CITPA, CEPI, ACE

EU Plastic Strategy	• 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:
	  o Declaration signed by over 100 companies/ organisations.
	  o Company commitments on the target of 10 million tons of recycled plastic.
		Adopted, follow up actions	CITPA, CEPI, ACE

Single Use Plastic Directive (update)	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):
	  • 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.
	• "Lex specialis" - risk for divergent requirements in Member States.
	• Group of consultants lead by RAMBOLL is working on the guidance documents and studies:
	  • Commission will review the directive in 2027 to extend the scope to other single use products.
	  • EU methodology for calculation of reduction targets planned for July 2021 – still to be published (update).
	  • EU harmonised marking specifications are now available - Commission Implementing Regulation (EU) 2020/2151.
	  • EU guidance on the cost to clean up litter expected by 2023.
	
	Update: EU Guidance on single use plastic published on 31 May 2021. Key points:
		Implementa-tion ongoing	CITPA, CEPI, ACE

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
	- Cellulose and lignin extracted from wood and paper material resulting from wood pulping process exempt. - Paper-based products without plastic lining/coating identified as more sustainable alternatives to SUP products. - Paper & board products with plastic coating or lining included in the scope. See link: https://ec.europa.eu/environment/pdf/plastics/guidelines_single-use_plastics_products.pdf		
Chemical Strategy for Sustainability	- Published 14 October 2020. - A long-term vision for EU chemicals policy focused on innovating safe and sustainable EU chemicals and non-toxic material cycles. - CITPA together with other actors in the packaging value chain sent feedback to the public consultation. The main issues for paper packaging are: "One substance one assessment" - Regulating substances of concern in products - Essential uses - Ban on substances/group of substances – e.g. PFAS, endocrine disruptors - EP resolution adopted 10 July 2020.	Ongoing	CITPA, CEPI
Corporate Sustainability Reporting Directive (New)	Proposed by European Commission on 21 April 2021 to amend the existing reporting requirements of the Non-Financial Reporting Directive, establishing principles for companies to report sustainability information annually. - Proposal suggests reporting from 2024 – will apply only to large companies. - For SMEs – the rules will apply from 1 January 2026. - Changes according to the proposal: - All large companies are included (not only publicly listed ones). - Only publicly listed SMEs in scope – for SMEs there will be special rules (via additional standard criteria) to lessen burden. - Management report should include impact on sustainability matters, including climate change. - Both management report/financial report should be in a single format.	Proposal – negotiations ongoing	CITPA, CEPI

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	• Mandatory audit (assurance) starting as "limited" assurance. See link: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021DC0188&from=EN		
Environmental Footprint			

Product Environmental Footprint (PEF)	• Two methodologies exist:
	    o Product Environmental Footprint (PEF) for individual products
	    o Organisation Environmental Footprint (OEF) for companies
	 • "Intermediate paper" - final PEF submitted to Commission in 2018.
	    o PEFCR for intermediate paper will have a light review in 2021.
	 • PEF transition phase 2019-2021: industry involvement via clusters.
	 • Cepi 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

EU Green Claims	New initiative of the Commission under the Circular Economy Action Plan to regulate green claims. • The expectations are that PEF will become mandatory for substantiating green claims. • CITPA in cooperation with the value chain provided comments on the Roadmap.	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.		

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<td colspan="4" style="background:orange">**Bio-economy**</td>			

EU Bio-economy Strategy	• Published 11 October 2018 – the target is to create a Sustainable European bioeconomy though different initiatives:
	  o Horizon 2021-2027: will propose10 billion euro for R&D in "food, agriculture and bio-economy".
	  o New "Circular Bio-economy" funding program will be established, offering 100 million to upscale innovation.
	  o Deployment of bio-based innovations
	  o Market based incentives for bio-based products.
	  o Support to local bio-economy.
		Implementa-tion ongoing	CITPA, CEPI

EU Forest Strategy (update)	• Part of the EU Green Deal.
	• CITPA provided a response to the public consultation for the forest strategy.
	• Update: Proposal adopted 16 July 2021. Key elements include:
	  o Substitution of fossil-based materials with long-lived circular materials and products in line with the cascading principle;
	  o Recognition of the role of short-lived wood-based items in substituting fossil-based products;
	  o Roadmap for planting at least 3 billion additional trees by 2030;
	  o Emphasis on the preservation of the carbon stock and sink function.
	See link: https://ec.europa.eu/info/sites/default/files/communication-new-eu-forest-strategy-2030_with-annex_en.pdf
		Published	CEPI, CITPA

<td colspan="4" style="background:orange">**Recyclability Guideline**</td>			
Recyclability Guideline	• 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. • 4evergreen is working on recyclability guidelines and a test method.	Published	CITPA, CEPI

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
Microplastic			

Microplastics (update)	• Combined final opinion of ECHA, RAC and SEC committees submitted to the Commission in February 2021.
	   o Draft proposal to amend Annex XVII of REACH (restrictions) expected in 2021.
	   o Adoption expected 2021 – 2022.
	• Inks and adhesives are impacted directly, paper packaging – indirect impact.
	• Public consultation planned for Q3 2021.
		Ongoing	CITPA, CEPI

Product Safety			
Food contact legislation			
Framework Regulation 1935/2004	• Review of the regulation on food contact materials and articles - started in 2020 and proposal is expected by Q4/2022. o CITPA took part in two interviews – as part of the paper & board industry and as part of the Packaging Joint Industry Task Force in 2020. • A roadmap by the Commission was published in December 2020 and then joint feedback, signed by CITPA, was sent back to the Commission. • Public consultation expected in Q3/2021.	Ongoing	CITPA, CEPI
Printing Inks	• 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. • A new draft of the German Inks Ordinance was communicated to stakeholder in April 2020. The packaging ink value chain (PIJITF) sent a letter to the 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
Mineral Oils (update)	• January 2017: European Commission published a Recommendation for monitoring of mineral oils in food and materials in contact with food.	On-going	CITPA CEPI

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	• Deadline for reporting end of February 2019, later extended to end 2021.
	   o 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.
	• 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.
	• 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
	   o Annex VIII is a case study on paper & board
	• August 2020 a new draft of a German Regulation on Mineral Oils was notified to the Commission via TRIS. The key elements:
	   o Functional barrier required – some exceptions possible
	   o Limits for MOAH – 0.5 mg/kg in food and 0.15 mg/kg in simulant
	• Paper and board advocacy took place. Joint position signed by CITPA is available.
	• Comments were sent by Commission, Spain, Italy and Netherlands
	• Update: Germany notified WTO in March 2021 with a deadline of 21 May 2021. CITPA and the value chain submitted a joint response and contacted sister associations in non-EU countries for support.		

Council of Europe	• In 2019: The Council of Europe updated two documents:
	   o Guiding principles for food contact materials and articles.
	   o 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.
	• The Council of Europe adopted a resolution on 7 October 2020 on the safety and quality of materials and articles for contact with food. See link:
		On-going	CITPA CEPI

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
	https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016809fe04a		
Perfluoroalkyl chemicals (PFAS)	• PFAS are included in the action plan of the Chemicals strategy for Sustainability – the intention is to ban the whole group for use in consumer products. • 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	CITPA, PIJITF
Endocrine Disruptors (New)	• Commission will make a proposal to amend the CLP regulation introducing new hazard classes for endocrine disruptors. • List of endocrine disruptors published by France – implementation and use of the list is still unclear. TRIS notification of the French decree to the EU.	Ongoing	CITPA, PIJITF
Food Contact Coordination Group (comprised of representatives from all sectors of the paper packaging industry, including CITPA)			

Food Contact Guidelines (industry initiative)	• Food Contact Guidelines for the compliance of paper & board materials and articles – published March 2018.
	  ○ Extended scope – cover tissue and converted paper products.
	  ○ Broad communication and promotion ongoing.
	  ○ Translations – available in Spanish, Italian, German and Polish; more languages expected later in 2021.
	  ○ A corrigendum is available on CEPI and CITPA websites with few amendments regarding DoC and limits following the BfR update.
	• CEN Workshop Agreement – project initiated by CEPI:
	  ○ 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