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	Proposal published on 4 March 2020: • Proposing a binding objective on climate neutrality by 2050 • Clarification on "climate neutrality" - 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 Update: Trialogue is ongoing • Parliament agreed on a position: target of 60% by 2030 • Council position asks for 55%	Trialogue ongoing	CITPA, CEPI, ACE
EU Industrial Strategy	Published on 10 March 2020: Focus is on • Green transition – via the European Green Deal • Digital transition – that supports 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 • Update: Update of the EU Industrial Strategy is expected in April 2021	Published	CITPA, CEPI

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
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 for more information: 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
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 follow the link: https://ec.europa.eu/environment/circular-economy/ • New: EP resolution on the CEAP, approved on 10 February 2021 and asking the Commission to:	Published, action plan ongoing	CITPA, CEPI, ACE

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
	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 Ecodesign 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 for more information: https://www.europarl.europa.eu/doceo/document/A-9-2021-0008_EN.html		

Directive 2018/852 on packaging & packaging waste (amending Directive 94/62/EC)	• In force since 4 July 2018.
	 • Member States deadline for transposition is 4 July 2020
	    o New: New labelling requirements in Italy since Sept 2020. See more information on CONAI website.
	      http://www.progettarericiclo.com/en/docs/environmental-labeling-packaging
	 • Bio-based materials and packaging made of recycled materials are recognised.
	 • 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
	 • 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
	    o Derogations are allowed under certain conditions
	 • 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:
		Implementa-tion ongoing	CITPA, CEPI, ACE

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

	○ 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
	  ○ 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, 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, as well as a joint feedback on overpackaging and waste reduction.		

Directive 2018/851 on waste (amending Directive 2008/98/EC)	• In force since 4 July 2018
	• Bio-based recyclable 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 functioning since 5 January 2021.
	  ○ Suppliers of articles should report SVHC exceeding 0.1% w/w!!
	  ○ Note: converted paper products are articles
		Implementa-tion ongoing	CITPA, CEPI, ACE

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

	• Municipal waste targets on preparing for re-use and recycling:
	  o 55% by 2025, 60% by 2030 and 65% by 2035
	  o Derogations are possible under certain conditions
	• 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
	• <mark>Update</mark>: EU guidance on Extended Producers Responsibility (EPR) and modulated fees – publication expected at the beginning of 2021. CITPA in cooperation 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)	• 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	• 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	• 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):
	  o Ban on single use products from 3 July 2021
	  o Consumption reduction by 2026 vs 2021
	  o Extended Producers Responsibility – to cover cost for clean up litter
		Implementation ongoing	CITPA, CEPI, ACE

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

	• Main issues
	   • 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
	   ○ EU Guidance on single use plastic products planned for 3 July 2020 is now being delayed to Q1 of 2021. New issues were identified and extensive advocacy by the paper and board value chain was performed. 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 specifications are now available - Commission Implementing Regulation (EU) 2020/2151 (update)
	   ○ EU guidance on the cost to clean up litter expected by 2023		

Chemical Strategy for Sustainability (New)	• Published 14 October 2020.
	• A long-term vision for EU chemicals policy focused on innovating safe and sustainable EU chemicals, safe products 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 and
	   ○ Ban on substances/group of substances – e.g. PFAS, endocrine disruptors
	• EP resolution adopted 10 July 2020.
		Ongoing	CITPA, CEPI

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
<td colspan="4" style="background:orange">**Environmental Footprint**</td>			

Product Environmental Footprint (PEF)	• Includes all relevant environmental impacts (wider than carbon footprint)
	• 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 New: 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: New initiative of the Commission under the Circular Economy Action Plan to regulate green claims, expected in Q1 /2021 • 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
<td colspan="4" style="background:orange">**ISO and CEN Standards**</td>			
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.		
<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:	Implementa-tion ongoing	CITPA, CEPI

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
	○ Horizon 2021-2027: will propose10 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		
EU Forest Strategy	• <mark>New</mark>: Part of the EU Green Deal. New forest strategy expected in 2021 • There is an ongoing public consultation for the forest strategy. CITPA will provide a response. Deadline for responses 19 April 2021. See link for more information: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12674-EU-Forest-Strategy-	Ongoing	CITPA, CEPI
Recyclability Guideline			
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 • <mark>New</mark>: 4evergreen is working on design guidelines and a test method for evaluating recyclability	Published	CITPA, CEPI
Microplastic			
Microplastics	• ECHA proposal for restrictions in 2019 • <mark>New</mark>: Combined final opinion of ECHA RAC and SEC committees submitted to the Commission in February 2021. ○ Draft proposal to amend Annex XVII of REACH (restrictions) expected in May 2021 ○ Adoption expected 2021 - 2022 • 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

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
	Product Safety		
	Food contact legislation		

Framework Regulation 1935/2004	• Review of the regulation on food contact materials and articles - started in 2020 and adoption is expected by Q4/2022 (update)
	  o Study by consultant Ecorys is available
	  o CITPA took part in two interviews – as part of the paper & board industry and as part of the Packaging Joint Industry Task Force.
	• New: A roadmap by the Commission was published in December 2020. CITPA and the value chain sent joint feedback to the Commission
	• New: Public consultation is expected in Q2/2021.
		Ongoing	CITPA, CEPI, ACE

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 announced a review of the Framework Regulation 1935/2004 • A new draft of the German Inks Ordinance was communicated to stakeholders 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
Mineral Oils	• January 2017: European Commission published a Recommendation for monitoring of mineral oils in food and materials in contact with food. • Deadline for reporting was end of February 2019, later extended to end 2021 (update) o Feedback from countries is positive regarding paper packaging – not considered a major source of contamination • March 2019 - JRC published guidelines to support the monitoring on analytics and reporting	Ongoing	CITPA CEPI

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
	• 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 • <mark>New</mark>: August 2020 a new draft of a German Regulation on Mineral Oils was notified to the Commission via TRIS 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. Official position available • Comments were sent by Commission and Spain, detailed opinion by the Netherlands - Stand still ended on 18 February 2021.		
Council of Europe	• 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 • <mark>New</mark>: 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: https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMConten t?documentId=09000016809fe04a	On-going	CITPA CEPI
Perfluoroalkyl chemicals (PFAS)	• <mark>New</mark>: 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.	Ongoing	CEFIC, PIJITF

Policy issue/ Legislative act	Description of the issue/interest/concern	Status	Interested Association
	• 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.		
Food Contact Coordination Group (comprised of representatives from all sectors of the paper packaging industry, including CITPA)			

Food Contact Guidelines	• Food Contact Guidelines for the compliance of paper & board materials and articles – published March 2018
	  o Extended scope – covers tissue and converted paper products
	  o Broad communication and promotion ongoing
	  o Translations – available in Spanish, Italian, German and Polish; more languages expected later in 2021 (update)
	  o New: 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
	  o 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