



Paper & board converters feedback on the Sustainable Products Initiative

The paper & board converters welcome the Sustainable Products Initiative of the European Commission aiming to establish sustainability principles and leading the way to a cleaner and more competitive Europe. The sustainable products policy could be a real driver for circularity starting from resource efficiency to the products' end-of-life.

The signatories support the move to more sustainable products in the sense of economic, social, and environmental sustainability. We believe clear sustainability principles should be defined that allow for distinction of the products on the market and inform on environmentally friendly customer choice.

Overarching sustainability principles

- **Resource efficiency and sustainable sourcing matters**

Sustainability starts with the use of primary materials, which must be sustainable by themselves and sustainably sourced. We believe that the sustainability principles should be based around definitions from international sources like *"the idea that goods and services should be produced in ways that do not use resources that cannot be replaced and that do not damage the environment"* (Cambridge dictionary).

A prime example is paper and board, including paper packaging, which uses both virgin paper coming from sustainably managed forests and recycled paper. The forests are a renewable source, and their sustainable management allows for their healthy growth and development. By using renewable materials, the paper packaging offers a sustainable solution to the market. The Sustainable Products policy should incentivize the use of sustainably sourced renewable materials that contribute to climate neutrality, preserve biodiversity and have a positive social impact.

- **End-of-life choice for products matters**

We fully support the approach to consider the entire life cycle of products for defining their circularity and sustainability. The selection of raw materials plays a key role in the end of life fate of the product. Paper products are made from a renewable material and are mostly biodegradable and compostable, allowing for their decomposition and return to nature.

The recycling of sustainable products ensures that valuable resources remain in the economy for as long as possible and enables further circularity of the material. Paper packaging is the most recycled packaging in Europe with 84.6% recycling rate in 2018. Circularity starts with the design of the product, which is often influenced by market demands and customer preferences. We believe that design for circularity should be a requirement for all products. The paper & board industry has already issued *"Paper-based packaging recyclability guidelines"* to support the efforts of the industry and its customers to build circularity in the product from the start of the value chain.



Measures on production process and recycled content

A level-playing field should be safeguarded when measures are defined to ensure that they could apply to both European-made and imported products. Such level playing field for all materials and products is a pre-requisite for the functioning of the internal market.

The paper & board value chain has invested immensely over the decades in collection systems and recycling facilities leading to the excellent performance of today. There is an economy-driven and well-functioning market for secondary raw materials. Effective processes for paper recycling and utilization of recycled paper for new packaging have existed for decades, ensuring a high degree of circularity and sustainability of paper packaging on the market. This approach ensures that recycled materials are used where needed. Additional mandatory requirements for recycled content in products (e.g. packaging) should be applied for materials where more circularity is needed, and it makes sense to drive further greener investments in that direction. A “one-size-fits-all” approach should be avoided, as it risks compromising the efficiency of the existing recycling loops in well-developed sectors, like paper. To stimulate these sectors, more focus should be paid to the separate collection of materials for recycling, allowing cleaner material streams to reach the final stage of recycling and boosting circularity.

We call on the Commission to ensure consistency and coherence of any new piece of legislation with the existing requirements for products (e.g. packaging). New requirements should be aligned to prevent unnecessary administrative and financial burden and avoid possible conflicting targets, they should be realistic and achievable by the whole industry, including small and medium enterprises. We believe that the sustainability principles should distinguish between materials coming from finite and from renewable resources, allowing consideration of the characteristics and needs of the different sectors. This will allow the paper & board converting industry to pursue further circularity and sustainability while supporting the Commission’s Green Deal ambition and contribute to a cleaner and more competitive Europe.

Brussels, 15 November 2020.