

Feedback to the Eunomia workshop on packaging waste prevention and background paper

The undersigned paper & board converting associations support the Commission's ambition to contribute to a climate neutral circular economy through the review of the Packaging and Packaging Waste Directive. The review should also ensure that the proposed measures still meet the primary objective to prevent the negative impact of packaging on the environment while ensuring the functioning of the internal market for packaging and packaged goods.

Feedback on the problem definition:

- We support the evaluation of the drivers, as the generation of packaging waste is closely linked to the economic growth and population growth coupled with the modern lifestyle, single households, globalization trends and the general move to cities. The impact assessment should evaluate the packaging waste in this new multilinked context. A complete change in lifestyle would require a major shift in social and financial policies to influence the root cause (i.e. the driver) and will not be achieved by a simple packaging waste generation limit.
- The assessment fails to identify the evidence base for the conclusion that "... cardboard boxes are often reused, especially in transportation (tertiary packaging)". Using misleading information as a basis for future policy options is misjudged and will lead to unintended restrictions towards the most recycled packaging in Europe.
- The recycling of paper-based packaging is an important source of fibre for the production of new paper and packaging, allowing the fibres to remain in the loop and be user over and over again.

Feedback and new proposals on waste prevention measures:

- **Measures on packaging prevention should be meaningful**, achievable, and supporting the overall objective of the EU Green Deal and Circular Economy.
- For example, **setting a "packaging waste reduction target or waste generation limit"** with the aim of reducing the volume or weight of packaging waste **could be counterproductive to the economy as a whole and have higher impact on the environment**. Every packaging is created with a purpose to protect, preserve, and promote a product. The loss or damage of the product has a higher environmental impact compared to the savings achieved by reducing the packaging itself, in terms of resources used and emissions created. In the case of food packaging this will create additional food loss and waste.
- **Packaging "fit for purpose" can lead to packaging waste prevention** and should be introduced as a new measure for all packaging. This will ensure that every packaging is designed to fit the product exactly with minimum void space, thus preventing overpackaging and underpackaging and the related unnecessary waste and losses.
- **A level-playing field for all materials and packaging should be maintained** as a pre-requisite for the functioning of the internal market. The EU legislation should target to improve the circularity of packaging lagging in performance and at the same time support further improvements in materials which are already circular – like paper packaging.

- **Banning specific packaging formats**, like single use packaging items is a short-term approach which do not offer a sustainable solution and **should be avoided**.
 - Single use packaging as a format includes packaging made from different materials, which do not pose the same threat to the environment and the oceans and should not be regulated as one single category. Recyclable single use packaging made from renewable materials should be excluded from possible bans.
 - General approach toward single use packaging might have unexpected consequences pushing entire material value chains out of the market. Paper-packaging is in most cases a single use packaging and at the same time it is the mostly recycled packaging material in Europe with 84.6% recycling rate in 2018.
 - Single use packaging has clear hygienic advantages when it comes to food and consumer safety and is essential for the overall sustainability of the food system, as it was also recently proved by the COVID-19 crisis.
 - Possible future bans of packaging formats will create legal uncertainty on the market and limit investments into R&D and innovation of new packaging solutions.
- **Packaging producer is not the decision maker on the packaging used** and the measures should target the one who decides on the packaging and places the packaged products on the market. The packer-filler or brand owner is also the one setting the packaging to product ratio.

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