

Brussels, 25 September 2020

European Commission

For the attention of:

Mr Frans Timmermans

Executive Vice-President / European Green Deal

Mr Viginijus Sinkevičius

Commissioner / Environment, Oceans & Fisheries

Copy to:

Valdis Dombrovskis

Executive Vice-President /

An Economy that Works for People - Trade

Thierry Breton

Commissioner / Internal Market

Janusz Wojciechowski

Commissioner / Agriculture

Dear Executive Vice-President Timmermans
Dear Commissioner Sinkevičius,

Re: Meeting request with European CEOs to make a pragmatic proposal for implementation of the Single Use Plastics Directive

We are reaching out to you as coalition of six leading European and five national level industry associations representing the European paper & board-based packaging and food service ecosystem (600.000 jobs – €190 billion turnover/year); we take the liberty to write to you regarding the following matter.

Our products are renewable and circular, made and recycled in Europe and increasingly supporting the 2050 target of the EU, committed to improving continuously. We have followed the Single Use Plastics Directive (SUP Directive) with strong interest and fully share its objectives. As a value chain from the very beginning we undertook efforts to align our operations with the spirit of the Directive.

We are committed to measuring our performance in sustainability and as an ecosystem, we have taken action to ensure alignment with SUP Directive moving further with the entire life cycle and including brand-owners, waste management and researchers.

In this context, we are concerned about our products being associated with plastics in the implementation of the SUP Directive as well as about the unintended consequences that could harm the European circular economy, also bringing significant collateral damage to our industry and the wider European food system.

This issue has a very high priority for our business ecosystem. Therefore we would appreciate discussing with you a pragmatic proposal to complement the draft implementation guidelines **to ensure that both the spirit and the objectives of the Directive are met in the most sustainable manner** when it is implementedⁱ.

We suggest a concrete, time-bound and measurable commitment by the value chain as a plastics preventionⁱⁱ measure in exchange to a **threshold strictly limited to Article 4 of the SUP Directive**. What we request would be **temporary** and **progressively diminishing thresholds** of plastics in the polymeric barrier coatings for paper and board covered by Article 4 for the transitional time when **no technical alternative exists on the market**. For instance, the threshold could be reviewed in 2026 in the context of the review of SUP Directive.

As a summary, the whole industry, as part of the proposal and commitment, proposes a programme based on 3 main drivers:

- A threshold system which commits the industry to a progressive diminishing content for plastics in paper and board coatings;
- An industry consortium from the entire value-chain aimed at investing in European innovation (technology and materials, in eco-design and alternative coatings) and at raising consumers awareness and sensibility in waste management;
- A constant support to further stimulate the development and the establishment of collection and recycling systems in Europe.

We believe that the threshold combined with our commitment would help implementing the Directive across the EU by meeting the objectives set by the Directive effectively. A threshold would be a practical tool to clearly guide Member States, thereby avoiding creating any obstacle to the free circulation of goods and supporting a Green Recovery.

We respectfully request a meeting with you at your earliest convenience in order to discuss this proposal with a delegation of CEOs from leading European and global players in the business ecosystem.

Our aim and main focus is to ensure that the Single Use Plastics Directive becomes a tool for the future, supporting innovation and the development of new, sustainable solutions to achieve the goals of the Green Deal—and the Green Recovery.

Thank you for your attention to this crucial matter for our industry.

We remain at your disposal should you require additional information.

Yours sincerely,



Jori Ringman
Director General

CEPI Cartonboard

International Association

Stefan Kauer
Secretary General



Mike Turner
Managing Director



PRO CARTON
PACKAGING FOR
A BETTER WORLD

Tony Hitchin
General Manager

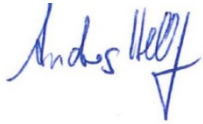


Angelika Christ
Secretary General



Antonio d'Amato
President

PRO-S-PACK
Arbeitsgemeinschaft für
Serviceverpackungen e.V.



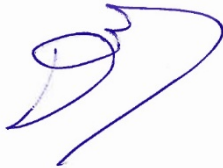
Andreas Helbig
Chairman (Germany)

 **Fachverband
Faltschachtel-Industrie e.V.**



Christian Schiffers
Managing Director (Germany)

 **ALLIANCE
GOBELET
CARTON**



David Schisler
President (France)

 **ASPACK** Asociación Española de
Fabricantes de Envases, Embalajes
y Transformados de Cartón



Pablo Serrano
Secretary General (Spain)

 **ASSOGRAFICI**
Italian Association of Printing
and Paper Converting Industries



Dr Maurizio D'Adda
General Manager (Italy)

Annex: Environmental, economic and social impacts

Environmental impacts can be optimised

Paper and board articles are a fertile ground of new innovations, able to replace a significant and an increasing part of plastics on the market. However, for certain applications of paper and board products in particular for barriers to contain liquids, no alternative is currently available to coatings which contain polymers. These coatings contain a very small amount of plastics compared to the rest of the packaging. The implementation of the Directive risks treating such paper and board products equal to those made entirely of plastics even if the circular economy management systems and environmental impacts of coated paper and board articles compared to articles made entirely of plastic are very different. As an example, a disposable paper cup contains only 0.5 grams of plastic versus about 70 grams of a reusable plastic cup and as the paper cup is collected for recycling, also the plastic content is managed under controlled industrial conditions and can be effectively recovered and recycled closing the loop for both components.

Paper and board packaging is the most recycled packaging in Europe with 85% recycling rate, recycling as much as all other packaging materials combined, according to Eurostat. When the separate collection and sorting systems are effectively in place, the paper industry is able to recycle paper & board products also including those containing small amounts of plastic. As recycling is integrated in the industry, there is also a strong economic demand for secondary raw material allowing the fibres to remain in the EU economy as a valuable and resilient resource used for new packaging, providing a sustainable replacement to fossil-based packaging. Our industry is a living example of the circular economy.

The Directive sets the Member States to achieve an ambitious and sustained reduction in the consumption of products in the scope, without compromising food hygiene, food safety, good hygiene practices, good manufacturing practices, consumer information, or traceability requirements set in the EU law. The voluntary agreement would support Member States' ability to implement the Directive in ways to achieve a rapid and efficient plastic consumption reduction in food service materials, beverage cups and containers. In the case of cups, this reduction in plastic content is 90% by using coated paper rather than plastic.

Moreover, our ecosystem is a leader in moving towards the EU Climate Change goals, supporting the 2050 climate neutrality target. The low-carbon and renewable solutions we offer will have an immediate effect by avoiding fossil emissions and empowering consumers to choose it will have an immediate and a significant climate mitigation effect¹. Responsible sourcing and traceability together with high level of circularity is allowing sustainable management of the resources throughout the entire life-cycle of our products.

Economic and social impacts at stake

We urge you to support practical and proportionate implementation facilitated with a voluntary agreement, ensuring effective meeting of the objectives of the Directive and avoiding an estimated loss for Europe's paper industry alone of over 720 million euros and 6 500 jobs which would materialise if coated paper and board articles are treated the same as plastics.

Further to the 600,000 employees in the paper packaging sector, the restrictions provided in the Directive will significantly affect the out-of-home industry (the European Foodservice sector, which is worth around 335 billion euros and employs over 8 million workers) and its upstream supply chain – the agri-food industry. The global impacts are likely to run into several hundred thousand employees.

Fibre-based packaging is a net exporting sector, generating added value and export income to the European economy. As a sector, we invest twice as much in Europe compared to manufacturing sectors on average. Our raw materials are sourced in Europe, we manufacture in Europe with European technology, and recycle in Europe adding true resilience in support of many key business ecosystems in Europe, including those 14 selected by the European Commission to be key to the European economic recovery after the Covid-19 crisis of 2020.

ⁱ The implementation guidance is expected to enter the Inter-Service Consultation on 29 September.

ⁱⁱ Waste Directive defines it as follows: 'prevention' shall mean the reduction of the *quantity* and of the *harmfulness* for the environment.