

Joint paper packaging value chain voting recommendation to adopt ACA 3A on the definition of composite packaging in the Packaging and Packaging Waste Regulation

20 October 2023

In view of the 24 October ENVI vote on the Packaging and Packaging Waste Regulation (PPWR), we would like to share views on the definition of composite packaging **as a group of companies and associations who are active in the production & conversion, filling, and recycling of paper packaging as well as recycled paperboard users.**

Under the existing Packaging and Packaging Waste Directive (PPWD), the **definition of composite packaging has diverged significantly among Member States** and in some instances has become material specific, aligned with evolving state-of-art recycling knowledge.

We call on EU policymakers to **adopt Alternative Compromise Amendment 3A** in order to provide an EU definition that provides legal certainty for investments for the following reasons:

- If there is no threshold included in the PPWR, this introduces **ambiguity** on selecting the right assessment criteria, namely if the packaging is to be assessed as “Paper/cardboard packaging” or “Composite packaging of which the majority is paper/cardboard”. At worst, it may mean that the status quo continues with **different national thresholds** to define composite packaging.
- Plastics are often a mixture of different polymers, yet they would be considered as mono-material and may be perceived as more recyclable. However, paper being made of natural polymers may be considered as composite if it contains any other polymeric coating. Therefore, **it is important to have a threshold to ensure that materials other than plastics are not discriminated because they may use functional barriers that in fact do not preclude recyclability.**
- The use of a functional layer (around **10%**) means the **packaging component performs very well in terms of recyclability like mono-material**. For instance, pulping tests of some formats that use recycled paperboard content with a barrier of around 10% shows **very good recyclability performance**¹. We emphasise that packaging should be recyclable in all cases and **introducing a threshold would not risk any recyclability objectives** because packaging recyclability should be determined by its ease of recyclability rather than the definition of composite packaging. However, the above-mentioned reasons highlight the need to set a threshold for the definition.

Therefore, considering various frameworks in Member States, guidance from different Producer Responsibility Organisations, and available pulping test data, **a 10% threshold would be optimal for the best outcomes** in terms of legal clarity, investment in innovation, design for recycling criteria development and recycled-at-scale assessment. This threshold represents an acceptable common value in light of the most common practices in Europe (e.g. Belgium²: 15%, Sweden³: 15%, Spain⁴: 15%, Italy: 20%, Austria⁵: 20%).

¹ [Paper Container Recyclability - Sonoco \(sonocoeurope.com\)](https://www.sonoco.com/sonocoeurope.com)

² FostPlus, Green Dot rates 2024

³ Paper Packaging: A Recycling Manual from FTI version 4.0

⁴ Ecoembes Guide to Eco-Modulation 2024

⁵ Altstoff Recycling Austria (2022) Verbundverpackungen

Signatories:

Pulp, Paper and Board Manufacturers & Recyclers



Packaging Producers & Converters



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