

ECMA response to the European Commission's Call for evidence for an Impact Assessment on the proposal for the revision of the EU waste framework

ECMA supports the ambition of the EU Green Deal and welcomes the upcoming revision of the Waste Framework Directive, which offers the opportunity to decrease waste generation and optimize recycling. The paper and board industry has invested heavily over decades to build the infrastructure to ensure our products are collected and recycled – indeed more paper and board packaging is recycled, by volume, than all other packaging types combined. The recycling rate for paper and board packaging was 84.2% in 2018.

With the pending review of the Waste Framework Directive, ECMA recommends:

1. All packaging should be 'fit for purpose' and this should be considered as a waste prevention measure

Well designed, responsibly sourced, efficiently produced, low-carbon folding carton packaging that is appropriately used and effectively recycled provides multiple benefits – it minimises damage to products, extends their useful life, facilitates efficient distribution, gives safe and convenient access to goods, and communicates vital information to the consumer. Packaging which is “fit for purpose” prevents waste and should be introduced as a measure for all packaging. This will ensure that all packaging is designed to fit the product exactly with minimum void space, thus preventing both overpackaging and critically underpackaging and the related unnecessary waste and losses. Packaging needs to meet functionalities and avoid product or food losses.

2. Separate collection facilitates high quality recycling

The main barrier to greater paper and board recycling is the divergence among collection systems for paper and board at source. Separate collection of paper packaging, supported by application of the existing standards for paper grades for recycling (EN643), will contribute to high-quality recycling and increase the use of secondary raw materials. In Europe, paper fibres used in packaging have 6.3 recycling loops per year on average with scientific studies showing these fibres can be recycled and reused more than 25 times with no significant loss in quality or integrity.

3. Recycling and reuse both support waste prevention

The waste hierarchy states a preference for reuse over recycling... but the reality is not so clear. There are now several studies that have demonstrated that recyclable single-use packaging has a lower environmental footprint compared to reusable packaging. ECMA recommends that decisions on the use of reusable packaging are made on a case-by-case basis and by applying a science-based approach following a full lifecycle assessment.

About ECMA:

The European Carton Makers Association brings together folding carton converters, cartonboard mills, national associations and suppliers to the folding carton industry. ECMA represents over 500 carton producers with a current workforce of 60,000 located across nearly all countries in the European Economic Area – this equates to over 80% of the €12.3 bill European folding carton market.