

## Feedback to the EU Roadmap on the initiative “Review of the requirements for packaging and other measures to prevent packaging waste”

ECMA supports the Commission’s ambition to contribute to the circular economy through the review of the requirements for packaging and packaging waste. The review should also ensure that the proposed preventive measures will support the functioning of the internal market for packaging and packaged goods while preventing the possible negative impact on the environment.

- **Measures on packaging prevention should be meaningful, achievable,** and support the overall objectives of the EU Green Deal and Circular Economy.
- **EU legislation should be focused on supporting paperboard packaging to become the primary functional pack format.** The material is already circular and through targeted investment and further development, its use could be extended to other market and product applications that are currently reliant on materials that are not renewable or widely recycled
- **Paper & board packaging is the most recycled packaging in Europe with an 85% recycling rate (according to Eurostat).** There is real economic demand for recycled paper as a secondary raw material, allowing the fibres to remain in the economy as a valuable resource and be used for new packaging, but further support for improved waste separation and collection systems is needed. The separated waste stream would provide a new high-grade recycled material with wider applications.
- We support setting a practical and enforceable **definition of “recyclable” packaging.** Such definition **should focus on Design for high quality recycling.** The paper & board sector already incorporates eco-design to ensure that packaging is recyclable and recycled in practice. In addition, we also support an eco-modulated harmonized EPR system to incentivize more easily recycled packaging.
- We support the reduction of “overpackaging” and “underpackaging”. **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 item is designed to fit the product exactly with minimum void space and a specification linked to the product shelf-life, for example, a paper overwrap for short shelf-life products such as fresh fruit and vegetables rather than a non-recyclable film with a life expectancy of many years. This would help prevent overpackaging and underpackaging and the related unnecessary waste and losses.
- **Setting an “overall packaging waste reduction target or waste generation limit”** with the aim of reducing the volume or weight of packaging waste **will be counterproductive to the economy as a whole and have a higher impact on the environment.**
  - An unintended consequence of a weight reduction target will be to favour the use of other non-renewable materials, that are not circular, over paperboard.
  - Well designed, efficiently produced, appropriately used and responsibly recycled packaging 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.

- **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, such as paperboard, should be excluded from such restrictions. Paper-based 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.
- **Future measures on reuse** should consider all environmental, health and economic impacts of reuse systems throughout the life cycle of the product and packaging. Setting reuse targets for “transport packaging” as a format risks including packaging which is already being recycled at a very high rate and thus jeopardizing a well-functioning and circular system.
- **Measures to promote recycled content should target sectors** where the market’s for secondary raw materials are not developed yet. The market for recycled paper is already well-developed – as shown by the high recycling rate. Support for the further development of high-quality fibre separation to produce high-grade recycled fibre materials suitable for food applications would be welcome– measures on recycled content are unnecessary and may have unintended impact disturbing the functioning recycling system.
- **Consumer surveys consistently show consumers prefer fibre packaging** with regards to its **sustainability**, usability and practicality – 81% would choose cartonboard packaging. Support to further develop the functional properties of paperboard to provide an effective barrier for gases, moisture, aromas etc would extend its use to other applications.

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