

Brussels, 21 October 2020

Letter of the paper and board industry on the Single Use Plastics Directive

Honourable Member Dan Nica,

We are reaching out to you as a coalition of six European industry associations representing the European paper & board-based packaging and foodservice ecosystem to express our concerns on the implementation guidance covering the Single Use Plastics Directive and ask for your support.

We agree that the EU Parliament has a role to play, as co-legislator to ensure that the guidance fully conforms to the objectives of the Single Use Plastics Directive. Our raw materials are sourced in Europe; we manufacture in Europe with European technology, and recycle in Europe. This adds true resilience in support of many key business ecosystems in Europe, including those 14 selected by the European Commission considered key to the European green recovery. Implementation should go hand in hand with green recovery hence why we also support the European alliance for a Green Recovery.

Our products are renewable and circular, and increasingly supporting the 2050 target of the EU, committed to improving continuously. We support the objectives of the Single Use Plastics Directive and call for its implementation according to the original scopeⁱ and respecting the starting point of addressing environmental and health problems caused by plastics as agreed in the EU Plastics Strategy of 2018.

In its current version, the guidance is explicitly excluding a *de minimis* threshold. This **would not respect the principle of proportionality nor does it recognise that some polymers have minor or no structural roles, as allowed for in the Directive**. This would be an attempt to reduce Member States' ability to implement the Directive in ways to achieve a rapid and efficient plastic consumption reduction in beverage cups and containers. In the case of single-use cups and containers, this reduction in plastic content is 90% by using paper rather than disposable plastic. With the deadline for application in 2021 approaching, it is important that the guidelines are clear enough to ensure a smooth and effective implementation.

Paper and board articles are a fertile ground of new innovations, able to replace an increasing part of plastics on the market. In fact, 25%ⁱⁱ of plastics use in packaging can already be replaced. However, for certain applications of paper and board products, in particular for barriers to contain liquids, no alternative is available to coatings which contain polymers. These coatings are a very small amount of plastics compared to the rest of the packaging. The guidance is 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.

We therefore suggest a concrete, time-bound and measurable commitment by the value chain as a plastics prevention measure in exchange to a **threshold of 10-15 per cent of plastic content of the total product weight**. 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. We also believe thresholds will prevent some unforeseen results on food waste and public health, such as increased portion size – as multi-portions are excluded from the scope of the Directive. An example is the “carton box with inner plastic bag (3l)” which is designed as a multiple – service



portion of beverage packaging to extend the packaged products' shelf life and reduce food waste. The carton box and plastic bag are two independent elements which after use are collected separately and sent for recycling. This innovative solution leads to 57- 85% reduction of plastic use compared to equivalent plastic packaging.

We urge you to support practical and proportionate guidance, avoiding the current wording which could result in an estimated loss for Europe's paper industry alone of over 720 million euros and 6 500 jobs. Further to the 200,000 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.

We remain at your disposal should you require additional information.

Yours sincerely,

**Jori Ringman, Director General
Confederation of European Paper Industries (Cepi)**

**Angelika Christ, Secretary General
FEFCO and CITPA**

**Hans van Schaik, Managing Director
European Paper Packaging Alliance (EPPA)**

**Mike Turner, Managing Director
European Carton Makers Association (ECMA)**

**Tony Hitchin, General Manager
Pro Carton**

ⁱ Recital 7: To focus efforts where they are most needed, this Directive should cover only those single-use plastic products that are found the most on beaches in the Union [...]. The single-use plastic products covered by measures under this Directive are estimated to represent around 86 % of the single-use plastics found, in counts, on beaches in the Union.

ⁱⁱ <https://materialeconomics.com/publications/sustainable-packaging>