



## Joint statement on a material-neutral horizontal exemption from reuse targets for highly circular packaging in the PPWR

We, the co-signatories of this joint statement, representing 6 trade associations along the fibre packaging value chain in Europe, in the forestry, pulp, paper, carton production and recycling industries would like to draw your attention to an essential aspect of Article 26 of the Packaging and Packaging Waste Regulation (PPWR) in the context of the interinstitutional negotiations on the file.

In addition to the existing material-specific derogations contained in the position of the co-legislators in Article 26, which should be confirmed and retained in the final PPWR text, **the co-signatories support a horizontal derogation from the reuse targets for packaging reaching 85% recycling rate calculated on the basis of the predominant material.**

**Below we explain why any other formulation would not be material-neutral and would disadvantage certain materials:**

A horizontal exemption for packaging reaching 85% calculated per packaging category de facto means providing an exemption only for packaging that is collected through Deposit return schemes (DRS), as only that is likely to reach a 90% collection rate and high recycling rate.

Indeed, the PPWR proposal imposes a recycling rate reporting system per packaging category (PET and cans are categories on their own). This means that packaging as PET, having a 90% collection target via the Single Use Plastics Directive (SUPD), a mandatory inclusion in the upcoming DRS and the packaging waste reduction target system which is assessed by weight, would have a competitive advantage over packaging such as beverage cartons, which have a low carbon footprint and allow for a longer shelf life. An unintended consequence would be more plastic packaging placed on the EU market since other packaging formats such as beverage cartons will be substituted by plastic packaging.

**This exemption related only to the packaging category would in fact not be material-neutral.**

**If a derogation is to be based on an 85% recycling rate, this should not only apply to individual packaging categories but to the packaging material as well.** Therefore, the reference to Article 50(2)c present in the current text of the European Parliament in Article 26, 13a (row 482b of the four-column document) should be amended. For a truly material-neutral clause, the correct reference should be Article 46, which requires Member States to report their recycling performance by packaging materials to the Commission (recycling rates by Eurostat). This would truly reflect the recycling performance of the different packaging materials, without being impacted by the implementation of different collection systems. **With this amendment the proposed text below offers two options: to reach the target either by material or by category.** The latter option is contained in the wording: “or when the rate of recycling of packaging formats”.

We would suggest the following amendment to the text tabled by the Parliament to ensure a more material-neutral approach allowing packaging formats that achieve a high recycling performance to be exempted:

<p><b>Art. 26, 13 a (new) in the European Parliament approach</b></p>	<p>13a. Economic operators shall be exempted from the obligation to meet targets in this Article, when <b>the rate of recycling</b> of the predominant packaging material as reported by the Member States to the Commission under <b>Article 46 50(2), point (c)</b>, or when <b>the rate of recycling</b> of packaging formats - such as PET bottles or aluminium cans - is above 85 % by weight of such packaging placed on the market on the territory of that Member State in the calendar year 2027 or any calendar year thereafter.</p>
---	--

The co-signatories remain available to exchange with PPWR negotiators on this recommendation.



EUROPEAN  
CARTON MAKERS  
ASSOCIATION

EPPA  
European Paper Packaging Alliance



CEPI EUROKRAFT  
European Producers of Sack Kraft Paper and Kraft Paper



### **Confederation of European Paper Industries (Cepi)**

Cepi is the European association representing the paper industry. It is a non-profit-making organisation.

### **European Carton Makers Associations (ECMA)**

ECMA represents over 500 carton producers with a current workforce of 60,000+ located across nearly all countries in the European Economic Area.

### **The European Paper Packaging Alliance (EPPA)**

EPPA is a not-for-profit association representing food and food service packaging companies from across Europe.

### **Pro Carton**

Pro Carton is the European Association of Carton and Cartonboard manufacturers. It represents members of over 40 mills in 14 countries in Europe accounting for more than 95% of European cartonboard production and the converting industry.

### **CEPI Eurokraft**

CEPI Eurokraft is the European Association for Producers of Sack Kraft Paper for the Paper Sack Industry and Kraft Paper for the Packaging Industry.

### **The Alliance for Beverage Cartons and the Environment**

ACE is a European platform for beverage carton manufacturers and their paperboard suppliers to benchmark and profile beverage cartons as a safe, circular and sustainable packaging solution with low carbon benefits.