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Forest Strategy and packaging policy are synergetic

The paper-based packaging value chain proposes to make better use of the synergies between the EU revised forest strategy and the ongoing policy work on packaging. Without coherent approaches to packaging, circular economy, climate policy and forest strategy, the policy will not be able to achieve an optimal outcome.

Paper- and board-based products have in the preparation of the legislative proposal for the Single Use Plastics Directive ((EU) 2019/904) specifically been assessed by the European Commission services and found to be a sustainable alternative to single-use plastic products; made with sustainably sourced fibres and with the highest recycling rate of all packaging materials paper-based packaging is a truly circular product.

The industry has set a target to reach 90% recycling rate for paper and board packaging by 2030, setting the bar beyond legally binding targets, focusing in particular to advancing circularity of less circular segments of the industry such as away-from-home and on-the-go packaging and food service materials.

Whilst active in innovation for new products and materials, the sector is already with existing products able to substitute 4.5MT of plastic packaging without any loss of functionality¹. This would also lead to a significant saving of fossil emissions of 85% compared to emissions of the current plastic packaging.

Paper and board packaging is also essential for the resilience and functioning of internal market; without packaging, the internal market and EU export markets would not be able to function.

It also provides much needed safe and hygienic packaging and supplies for essential industries and has been playing its part in the current Covid19 crisis. Wood-based packing value chain helps Europe reduce its dependency on fossil-based resources, achieve climate-neutrality and sustain healthy ecosystems.

Food contact materials need to meet both equally important food safety and environmental requirements. The specific food safety requirements need to be recognised in the upcoming EU Forest Strategy.

Based on these justifications, we propose the following amendments to the draft EU Forest Strategy, see overleaf.

¹ Material Economics study 2019

ANNEX: Proposed amendments

Introduction, page 2

Given the increasing and sometimes competing demands on forests, we must also ensure that wood is optimally utilised in line with the cascading principle² ~~so that the majority of it is used for long-lived materials and~~ **which generates** products that are of highest value for a climate neutral and circular economy **in a functioning market, while subsidies hindering the cascading use of wood should be avoided**, ~~while minimising its use for short-lived products and energy production.~~

Chapter 3, page 10

That is why it is crucial that, when building a sustainable and climate-neutral economy, we ensure an optimal use of wood in line with the cascading principle. This means that ~~whilst more wood the majority of it should be used for making long-lived~~ **Wood wood biomass** use for ~~short-lived~~ **diverse bioeconomy** products and energy production ~~should be minimised and rely namely~~ **can be enhanced, in particular, through industrial symbiosis and other circular economy practices valorising** ~~on~~ secondary woody biomass such as sawmill by-products, residues, recycled materials.

Chapter 3.1, page 11

The focus therefore has to be on **an increase of** ~~a drastic shift from short-lived to long-lived~~ **durable** uses of wood, such as buildings and furniture, including through better reusing and recycling wood products from construction and demolition sites. **As managing forests for high value products necessitates practices generating small-calibre wood through thinning operations, the carbon benefits of all products made from wood-based materials must be valued.** This is also in line with the new EU Circular Economy Action Plan, which has committed to reducing **carbon and environmental footprints, over-packaging and packaging waste, promoting reusable and recyclable packaging** and **considering** ~~further restrictions~~ **on the use of some packaging materials for certain applications** ~~single-use products. Such short-lived products are made, among others, also of wood-based materials.~~ **In particular, paper- and board-based products have in the preparation of the legislative proposal for the Directive (EU) 2019/904³ on single-use plastic products specifically been assessed for their potential to serve as a sustainable alternative to single-use plastic products; paper and board packaging is also essential for the resilience and functioning of internal market. It also provides much needed safe and hygienic packaging and supplies for essential industries and has been playing its part in the current Covid19 crisis. Wood-based packing value chain helps Europe reduce its dependency on fossil-based resources, achieve climate-neutrality and sustain healthy ecosystems.**

² AMEND the Footnote 4, page 2:

Cascade principle was already enshrined in the EU Forest Strategy 2014-2020. ~~Under the cascade principle, wood is used in the following order of priorities: 1) wood-based products, 2) extending their service life, 3) re-use, 4) recycling, 5) bio-energy and 6) disposal.~~ **The European Commission has published “Guidance on cascading use of biomass with selected good practice examples on woody biomass” in 2018**

³ADD a Footnote, page 11:

SWD(2018) 254 final, Part 3/3, pp. 29-31.