

Letter from **XXX National Association XXX** on the Single Use Plastics Directive draft guidance

We are writing to express significant concerns regarding the latest Single Use Plastics Directive draft guidance.

Fibre packaging products are sustainable, being both renewable and circular, whilst increasingly supporting the 2050 target for achieving climate neutrality – as an Association, we support the aspirations of the Single Use Plastics Directive but call for its implementation according to the original scope addressing environmental and health problems caused by plastics...as agreed in the EU Plastics Strategy of 2018.

The new guidance is treating paper and board packaging products, which contain a minimal plastic barrier layer compared to the rest of the packaging, equal to those products made entirely of plastic. This barrier layer is necessary for the functionality of the packaging, for example - to contain liquid – and no non-polymer alternative coatings are available.

The draft guidance explicitly excludes a *de minimis* threshold for polymers – for example, paper cups and fibre food containers already facilitate a plastic reduction of 90%.

We are requesting a temporary and progressively diminishing threshold of plastics, starting at 10-15% of product weight, for a transitional time when no alternative exists on the market – this threshold could be reviewed in 2026 in the wider context of the planned review of the SUP Directive. This threshold will allow the fertile ground of on-going innovation to continue, with the aligned aim of long-term plastic reduction.

The recently circulated draft guidance would significantly affect the European out-of-home foodservice industry worth €335 billion and employing 8 million workers across Member States as well as an estimated loss for Europe's paper industry of €720 million with 6,500 jobs lost.

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