



The Hague, 30 June 2020
Reference: RA/HvS/EP20-079

Open letter to EU Commissioners and Member States: Practical implementation of the Single Use Plastics Directive

Our modern European food and packaging sectors have long supported the objectives of the Single Use Plastics Directive to reduce plastic leakage into the environment, especially in marine litter. However, the current draft guidance goes much further than plastics – whilst rightly exempting paper, it unfairly targets paper-based packaging, which is clearly part of the solution to deliver the enduring Green Recovery we all want to see.

Paper-based food packaging is an efficient and immediate available substitute for plastic consumption reduction as it cuts the amount of polymers used by up to 90% while offering sustainable, low carbon, circular, renewable and recyclable packaging solutions. It is currently manufactured across Europe using wood fiber from sustainably managed and growing forests, supporting an industry of more 250.000 jobs.

As the guidance project currently stands, it inappropriately redefines much paper-based packaging as plastic and suggests having it replaced with heavier, potentially unrecyclable, reusable plastic items that will end longer in the environment and worsen the environmental impact on plastic leakage and marine litter.

Furthermore, this reusable plastic will mostly be coming from outside the EU, especially Asia and China: the result will be far more imported plastic on the European market. The strategic capacity and capability of the European food packaging industry would be reduced, as its ability to react at times of crisis. This would undeniably impact the resilience of food hygiene and food safety within Europe.

Such a detrimental position will also affect the entire food chain, from the farming to the food service sector; from packaging manufacturers to retailers, with substantial impacts in terms of employment. Citizens' ability to access food and beverages would be affected.

These unintended consequences could easily be solved by setting a maximum threshold for the amount of polymer allowed in products, which could fall as innovations are delivered. It would also simplify administration of this complex Directive, allowing governments to target increasingly scarce resources on recovery. France has already taken the lead and announced it will use this approach for paper cups.



Our sectors support the ambitious goals of the Green Deal and Green Recovery Strategy. We believe that the paper and fiber-based packaging sourced from sustainably managed forests can offer solutions to reach these goals and maintain the variety, accessibility, safety and quality that Europe's citizens deserve from their food and drink choices.

Your faithfully,

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