European Paper Packaging Alliance

response to the Eunomia workshops addressing the Essential Requirements revision and waste prevention measures

Summary

The European Paper Packaging Alliance requests that legislative initiatives:

- Recognize that fiber-based packaging provides growth decoupled from resource use.
- Support the demand and supply of high-quality recyclable material in packaging development and innovation.
- Recognize the essential societal, environmental and economic roles that well-designed packaging provides; with a focus on the importance packaging has in preventing food waste and improving wellbeing within the context of a modern society.
- Acknowledge the importance of packaging in delivering essential qualitative and quantitative food information.
- Align with existing legislative frameworks, including the Waste Hierarchy, are evidence-based and fulfill the European Union's Better Regulation Agenda.
- Deliver a consistent approach when assessing single-use and reusable packaging; including explicit definitions of reusable products and the impact of systems required to achieve manufacture, reuse and recyclability.
- Recognize where alternatives to existing packaging solutions do not exist.
- Prioritize options which have minimal administrative burdens and encourage the development of partnerships that deliver systemic and holistic approaches.
- Fully assess and incorporate the demonstrable benefits of wood fiber as a renewable, natural material.

The European Paper Packaging Alliance (EPPA) is a not-for-profit food and foodservice packaging association. EPPA's priority is to provide efficient environmental, low carbon and health-safe products to the European population, with improved recycling solutions.

EPPA supports the efficient use of resources in all its forms and recognizes the major role that packaging, as an essential infrastructure, can play in that common objective.

As per the European Green Deal and Circular Economy Action Plan communications, "**where economic growth is decoupled from resource use,**" EPPA believes fiber-based packaging is a solution providing economic growth and well-being through an infrastructure ensuring:

- The comprehensive and efficient use of renewable forest resources (trees); avoiding waste of those parts of the tree that would otherwise be lost, to generate growth.

- Fiber-based and paper packaging items integrate recycled material into their composition, where food contact regulations permit.

- Fiber-based packaging has indeed high recyclability, as evidenced by the Eurostat (2018) recycling rates of fiber-based packaging at 84% vs. plastics packaging (40%), glass packaging (76%) and metals packaging (81%).

- As a complex renewable chain, fiber-packaging as a whole is decoupled from resource use. Fiber-based packaging is therefore a decoupled economic multiplier, for example to Europe's food chain.

- The EU's sustainably managed forests are responsible for mitigating 13% of European Green House Gas emissions positively contributing to the Green Deal objectives.

- Contrary to deforestation, European forests grew by 44,000 square kilometers (the size of Switzerland) between 2005 and 2015. This is mostly due to economic demand and contributes to the growth of European Natural Capital, and the associated well-being of citizens.
- They make possible a reduction of 90 % and more of plastics and their environmental footprint is substantially lower than the plastic alternatives

- Continued substitution of plastic packaging by fiber-based packaging, will increase the net impact on emission-reduction plans. This is supported by investment in innovation.

EPPA considers the waste hierarchy to be a crucial tool for policymakers[1] and welcomes its continued evidence-based application as set out in Directive (EU) 2018/851 and through Directive (EU) 2018/852. The Legislation is clear that the hierarchy should be used to deliver the best overall environmental outcomes, taking account of human health, economic and social impacts.

The hierarchy was developed to achieve the best environmental outcome, using holistic life cycle thinking. This provides industry with the space to invest and innovate.

The Alliance therefore believes article 4 of the Directive must be fully and rigorously applied in the review of the Essential Requirements and in any strategy aiming to reduce packaging waste. This will help prevent unintended consequences. Such assessments must recognize that:

[1] Directive (EU) 2018/851 Article 4, Waste Framework Directive

- Packaging, which is a societal and business infrastructure, has historically and logically been in-line with GDP growth. As an enabler, packaging will have a differential impact on different sectors of the economy, and on their associated value chains. Assessments should therefore recognize where alternatives to do not exist.

- Overall, product and food waste prevention are the most efficient ways to both improve wider resource efficiency and to reduce the specific environmental impacts of packaging: in this respect, it should be recalled that combined land use and farm-stage emissions account for more than 80% of the footprint of most foods and beverages. Typically, food packaging accounts for 5%. Functionally inadequate food packaging can create food loss.

- Food packaging improves food safety by alleviating bacterial contamination. The risks to human health posed by cross contamination within the food chain are well-known and long-established. Food and food service packaging remains as important today in limiting cross contamination to prevent foodborne illness as it always has.

- Packaging has a very important extended role in delivering product information, including product authenticity, regulatory compliance, the quantitative and qualitative composition of food, nutritional and allergen advice, appropriate usage, use-by dates, cooking instructions, producer/processor details, branding, and country of origin.

- A holistic systems approach is required **to assess the overall impact of reusable packaging**, especially in the case of paper-board packaging, addressing the production, use and disposal phases of a complex lifecycle:

    - Reusable packaging will typically require more resources, and more non-renewable resources like oil for plastic, metal for iron, sand for glass, clay for ceramic, than equivalent single-use renewable paper packaging.
    - Reusable food packaging requires appropriate logistics and sanitation systems to allow safe and hygienic reuse. Effective sanitation requires machines, energy, water and detergents; and effective drying requires further energy. In particular reusable items require a heavy absorption of energy and potable water (and water systems even in Europe are increasingly stressed, water scarcity & droughts are already a challenge). They also involve a substantial pollution of tributary rivers as a consequence of the big amount of washing detergents. Off-site systems require transportation and facilities to operate. None of this is necessary with the single-use option.
    - Reusable packaging, placing food in previously used containers increases packaging risks and may reduce the amount of information available to consumers.
    - Reusable systems require higher stock levels to ensure uninterrupted rotations; including accounting for damage, deterioration and theft, resulting in increased consumption of non-renewable resources.

- The demonstrated in-use lifespan of reusable options must be fully assessed, using real-life, in-use, data; taking into account damage, deterioration and theft.
- End of Life scenarios for reusable packaging are often, in reality, more limited, especially where reusable food packaging is very difficult or commercially impossible to recycle in recognized waste streams (e.g. ceramic, tempered glass and most of thick plastics).
- As a result, EPPA asks that reusables should be clearly defined and quantified by product category, with specifications to meet in terms of:
  - Number of reuses,
  - Recyclability,
  - And, in professional uses, proven return and operability systems without which the reusing functionality cannot exist.

- Opposite to this approach, a narrow focus at end-of-life would weaken the overall environmental performance of packaging:
  - If packaging is optimised at the design phase (Eco-Design tool) with waste prevention in mind, it will drive the reduction in the quantity of waste generated.
  - The recycling of more resource efficient and optimised packaging will save carbon emissions.

When addressing **European sustainable**, environmental, economic and societal impacts of packaging, it should be remembered that:

- Paper and fiber-based packaging is a natural and renewable material. EPPA members are committed to sourcing it from sustainably managed forests mostly located in Europe that play an important role in mitigating climate change by absorbing carbon from the atmosphere through reforestation.
- In the EU alone, sustainably managed forests deliver an overall climate mitigation impact equal to 13% of European greenhouse gas emissions through sequestration, storage and the substitution of non-renewable, fossil-based materials produced outside of Europe, mostly in Asia and China.
- Wood fiber originates from full-grown trees as well as from young trees thinned out to allow the forests to grow. In sustainable forestry, all material is used for their most appropriate purposes.
- Increased demand for timber and wood fiber from sustainably managed forests means more trees are planted. Today, the general rule is that, in sustainably managed forests, for each felled tree, three new trees are planted.
- European forests generate income for more than 16 million private forest owners, and forest activities have a turnover of almost € 500 billion, employing approximately 3.5 million people. In Europe, forests cover around 35% of the land area (190 million ha), making Europe one of the most forest-rich regions in the world. Forests today are over 30% larger than in the 1950s.
- Virgin wood fibers have specific qualities for appearance and processability which make them suitable for use food packaging with direct food contact. After use, virgin fibers return to the paper cycle as fresh cellulose, where it enhances the quality of recycled material. Wood fiber can be recycled up to seven times before it loses its strength.

- Recycled fibers are sourced from manufacturing or from post-consumer recycled materials. Depending on the source, such materials can be used in molded fiber applications such as fiber plates, egg cartons and trays as well as cup carriers and wine bottle protectors.

The Alliance believes that all new regulations should fully align with the European Union's Better Regulation Agenda[2]. This requires that all actions are based on evidence and understanding of the real impacts of reusable systems, as is required of current single-use systems; and that regulatory burdens on businesses, citizens or public administrations are kept to a minimum. Further to that recyclability and recycling of the packaging are to be taken into account. Recyclability has a crucial impact on each life-cycle phase: manufacturing process, use, post-use collection and sorting. Options should also encourage the development of partnerships that deliver systemic and holistic approaches

EPPA welcomes the opportunity to engage with policymakers on the review of the Essential Requirements for Packaging and on the development of holistic actions designed to reduce unnecessary packaging waste.

(End)

[2] Commission communication – Better Regulation: taking stock and sustaining our commitment, 2019