



Date: 1 June 2020

Re: Briefing on recent European Commission workshops focusing on updates to the 'Packaging & Packaging Waste Directive' and the 'Essential Requirements'

The Packaging & Packaging Waste Directive is the main piece of European legislation which governs packaging and packaging waste in Europe and affects every member of ECMA. This Directive contains Essential Requirements for packaging and all packaging that meets these requirements, is guaranteed free circulation in the European Economic Area.

The Directive was last reviewed in 2015; the European Commission is now engaged in a programme to update and review the effectiveness of the Essential Requirements – last week I joined 2 x calls with Eunomia, who are the Consultants working on behalf of the European Commission.

The purpose of these calls was to outline the intervention logic the Commission will use in updating the Essential Requirements. I have outlined below some of the 'problems' with packaging that have been identified. (Eunomia used the expression 'problems' in these calls and this gives an idea of how they are approaching their work).

1. Per capita European consumption of packaging is increasing despite increased light-weighting (light-weighting of some packaging was noted in the call as increasing the difficulty in recycling)
2. There has been a decline in re-useable packaging
3. Plastic packaging has seen the most growth since 1997, at the expense in particular of glass packaging (Flexible packaging placed on the market has increased 16% in the 2003-2018 period)
4. Overpackaging continues to be an issue, particularly linked to an increase in e-commerce

In a report published last month, they included the following types of packaging as being problematic:

1. "Plastic -coated or metallized cardboard" mentioned under multi-material packaging – considered a problem because of the challenge to separate the plastic/metal from paper and can be recycled in a specialised plant
2. "Paper cured with UV varnish/ varnish that breaks down into small particles" – also considered to be a challenge for the recycling process because it cannot be readily removed by de-inking process and can break into microplastic polluting waste water
3. "Paper with adhesives which plasticise" – also considered a challenge for the recycling operations because of the potential to form "stickies"

The Consultants plan to complete the final paper with their recommendations for amendments to the Packaging & Packaging Waste Directive by March 2021 with the expectation that the Directive will be amended during the last 6 months of 2021. They have outlined the timeline with the different tasks they will conduct prior completing the report next March. Their work will include





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recommendations to over-haul and potentially harmonize Extended Producer Responsibility (EPR) schemes, maximising eco-modulation as a tool for incentivizing easy to recycle packaging and penalise packaging that is defined as being problematic.





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All packaging including folding cartons are in the scope of these Directives, hence I will continue to update you as the work on the updates to the Packaging & Packaging Waste Directive and the Essential Requirements continue, according to the timelines that Eunomia presented, there are industry and public consultations planned for Q3 of 2020 and we will be engaging fully in both.

If you wish to learn more about the various legislative packages that the folding carton and wider packaging sector is facing, please join my complimentary webinar on 29 June at 11.00 CET...contact me if you wish to receive an invitation.

Regards

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Managing Director

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