

Position Paper on the review of the Packaging and Packaging Waste Directive

The European Paper Packaging Alliance (EPPA) fully support the objectives of the EU Green Deal and the Circular Economy Action Plan, which aim to move the EU to a circular and climate-neutral economy. We are also committed to the latest target of ensuring that packaging is recyclable or reusable by 2030. As the not-for-profit food and foodservice packaging industry association, EPPA's priority is to contribute to the common ambitions by providing highly recyclable and renewable products with low environmental footprints and which can replace fossil-based products, while ensuring food safety and hygiene. We believe that the upcoming review of the Packaging and Packaging Waste Directive (PPWD) offers an ideal opportunity to advance the EU climate and circular economy objectives. For this effort to succeed, the revision of the Directive must be supported by strong data and scientific evidence.

Data shows that paper-based and other renewable packaging solutions are inherently more sustainable than those derived from non-renewable fossil sources, and can substitute one-sixth of plastic waste ([Pew Charitable Trusts and Systemiq, 2020](#)). Paper-based packaging is highly recyclable and thus a key contributor to the EU's circular economy efforts. The market for paper and board recycling is already well-developed, as shown by the high recycling rate of 84.2% (EU27–2018). Paper-based packaging is made from renewable wood fibres and EPPA members are committed to sourcing it from sustainably-managed forests, ensuring that forests continue to play a key role in mitigating climate change by absorbing carbon from the atmosphere and acting as a carbon sink.

Moreover, paper-based packaging can outperform reusable items in terms of food safety, environmental impact throughout the full life cycle, and recyclability. A [life cycle assessment \(LCA\) study](#) that was independently carried out to ISO standards by Ramboll, and third-party certified by TÜV, concluded that single-use paper-based food packaging can be more sustainable than multiple-use systems throughout its lifecycle. A recent update to the study concluded that multiple-use systems consume 3.4 times as much water and result in 2.8 times more carbon-equivalent emissions over their lifecycle.

EPPA therefore believes it is crucial that the PPWD review does not restrict the use of single-use food paper packaging given its key contribution to a circular and climate-neutral economy. The PPWD should enable further innovation by setting targets, which are aligned with life cycle thinking and deliver the best environmental outcome. In addition to its environmental benefits, single-use paper-based packaging is a critical element to ensure a secure and hygienic European food supply, protect consumers against food-borne illnesses, and ensure the resilience of food supply chains against waste and disruption.

EPPA recommends the following aspects to be taken into account when reviewing the PPWD:

1. Avoid mandatory reuse requirements for paper-based packaging

Any measures promoting packaging reuse must be based on life cycle analysis to assess the real-life environmental impact and the impact on food safety and hygiene, thus avoiding a one-size-fits-all approach. If quick service restaurants were to switch just in-store dining to multiple-use systems across the EU, it would result in the equivalent of adding one million petrol cars to Europe's roads and an additional 750,000 people's equivalent water consumption. Reuse targets should not be implemented where there is evidence that single use alternatives have a better environmental impact, in accordance with the waste hierarchy. In addition, products subject to consumption reduction measures under the Single Use Plastics Directive (cups for beverages and food containers) should be excluded by further mandatory reuse requirements as, within the SUPD, EU co-legislators have already agreed that for many of these products suitable alternatives are not yet readily available. Considering that many Member States have yet to decide how to implement the above-

mentioned consumption reduction measures, we absolutely need to avoid duplication. Furthermore, the EU paper-based packaging value chain would be disproportionately affected by mandatory reuse requirements, which would inevitably discriminate among materials and promote fossil-based alternatives. On the other hand, the lifespan of fibres can be prolonged through recycling: cross-industry alliances like [4evergreen](#) are already working to reach the 90% recycling target for fibre-based packaging by 2030.

2. Avoid mandatory recycled content targets on paper-based packaging

Measures to promote recycled content should be applied for target sectors where the markets for secondary raw materials are underdeveloped and be underpinned by existing market and product realities. Recycled content requirements should be assessed based on a robust impact assessment that accounts for market conditions and existing authorisations, particularly with regard to food contact applications as food safety and hygiene should not be compromised. In addition, the fibre value chain requires fresh fibre inputs to ensure that the fibres retain their properties.

3. Introduce mandatory recyclability requirements for all materials and packaging types to ensure a level playing field

All packaging items should be recyclable, including those that can be reused. Reusable packaging should be held to the same recyclability requirement as other (single-use) packaging. The environmental impact of reusable packaging strongly depends on the actual use phase – e.g. the amount of use cycles the reusable packaging goes through. To enable innovation and market development, definitions of recyclability should be evidence-based and reflect the recyclability of the end-product and not any short-term commercial drivers.

4. Introduce a new essential requirement that all packaging should be “fit for purpose”

Prevent both over-packaging and under-packaging by requiring that all packaging is “fit for purpose”, i.e. designed with the goal to optimally fit the product, following the ISO 18602:2013(E) concept for “optimum pack design”. In addition, both over- and under-packaging should be clearly defined.

5. Enable industry wide take-back systems for single-use paper beverage cups

Using Extended Producer Responsibility to support take-back systems would see operators selling filled disposable paper beverage cups provide for the separate collection of used cups (either generated in-store or consumed off-premises) through dedicated collection points.

6. Avoid unnecessary administrative burdens caused by duplication of existing rules on substances in food contact materials

The PPWD is not the appropriate place for rules on hazardous substances, which are already covered by existing EU legislation such as REACH¹. In addition, the presence of substances in food packaging is already regulated by EU Food Contact Materials legislation², which sets out stringent requirements which are currently being revised.

About EPPA

The European Paper Packaging Alliance (EPPA) is a not-for-profit association representing food and food service packaging companies from across Europe. EPPA's priority is to provide paper-based low carbon and health-safe products with a low environmental impact and improved recycling solutions to the European population. EPPA supports science-based EU policies that foster sustainable and efficient use of resources, and recognises the major role that packaging, as an essential infrastructure, can play in that common objective.

To learn more, please visit www.eppa-eu.org or contact us: mail@eppa-eu.org