

# Fibre Packaging Europe

European coalition for renewable, circular and sustainable paper and board packaging.



1500 companies



2200 manufacturing plants



365.000 people across Europe



EUR 120 billion annual turnover

## Position of Fibre Packaging Europe on the proposal for a Packaging and Packaging Waste Regulation (PPWR)

Fibre Packaging Europe (FPE) is an informal coalition of seven trade associations representing industries involved in forestry, pulp, cardboard (paper, board and carton packaging) production and recycling in Europe, coming together **to speak with one voice on the policy issues central to the fibre-packaging value chain in the EU.**

The fibre-based packaging sector acknowledges the European Commission's proposal for a Packaging and Packaging Waste Regulation, and looks forward to supporting an **evidence-based regulatory approach** during the next stages of the legislative process. Both recyclable and reusable items have a role in the transition to a circular economy. Fibre-based recyclable packaging is produced from low-carbon renewable materials sourced from sustainably managed European forests and recycled at end-of-life. Thanks to sustainable forest management, Europe can proudly claim that it currently has more forest resources than it did a century ago, with the forest area in Europe growing by 19.3 million hectares over the last 30 years.<sup>1</sup> In fact, it is estimated that forests and the forest-based sector absorb around 20% of the EU's total greenhouse gas emissions per year, contributing to the EU's climate goals.<sup>2</sup> Moreover, fibre-based packaging has a high recycling rate (81.6%)<sup>3</sup> and is consequently already a key contributor to the circular economy.

### 1) The industry should be involved in the drafting of the Design for Recycling Guidelines (DfR) in a systematic and transparent way through CEN

FPE welcomes the proposed, actionable and forward-looking, definition of recyclability applicable to all packaging. However, the recyclability of the packaging must be assessed while taking into account material specificities via Design for Recycling (DfR) guidelines which provide technically sound guidance for recycling. The DfR should be based on expert judgment and consultation with targeted stakeholders, including recyclers, waste management operators, and technology providers. Thus, policymakers should ensure that stakeholders from the industry are consulted in a transparent and systemic manner in the drafting process of DfR guidelines. The paper and board recycling, manufacturing and converting industry, which has already invested into and developed recyclability guidelines<sup>4</sup>, has the knowledge and the expertise to support the development of DfR guidelines which will ensure recyclability by considering the packaging composition, functionality and suitability for recycling in existing streams and with existing technologies. A process within the independent standardisation body, European Committee for Standardisation (CEN), would allow for open cooperation and exchange of expertise to set ambitious and realistic requirements on packaging recyclability.

### 2) A mandatory 90% collection target for all packaging formats by 2030 is necessary to reach the recycled at scale obligation in 2035, further increase recycling rates and enhance the quality of the secondary raw materials

The industry needs enabling conditions to ensure that packaging is recycled at scale by 2035. The first step to recycling is collection. It would be unjustified to ban packaging, as provided for in Art. 6 (2) (e) of the PPWR, if not recycled at scale in 2035 while the responsibility for collection does not rest with the industry. Such an obligation will penalise the industry,

<sup>1</sup> [The State of Europe's Forests, Forest Europe \(2020\)](#)

<sup>2</sup> [Climate effects of the forest-based sector in the European Union, Peter Holmgren, FutureVistas AB \(2020\)](#)

<sup>3</sup> [Recycling rate of packaging waste by type of packaging, EU27,](#)

<sup>4</sup> [Paper-Based Packaging Recyclability Guidelines \(Cepi, CITPA, ACE, FEFCO, 2019\); Circularity by Design Guideline for Fibre-Based Packaging \(4evergreen.eu, 2022\)](#), [FEFCO-Recyclability-Guidelines Final.pdf](#)

## About Fibre Packaging Europe

Fibre Packaging Europe is an informal coalition of seven trade associations representing industries involved in forestry, pulp, paper, board and carton production and recycling from across Europe. Our joint mission is to provide renewable, circular and sustainable fibre-based packaging solutions to European citizens to achieve the European Green Deal objectives.

For more information, please contact [info.fpe@logos-pa.com](mailto:info.fpe@logos-pa.com)



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Alliance for Beverage Cartons  
and the Environment

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which has no control over the waste collection schemes available in each Member State. Therefore, FPE calls for setting a mandatory 90% collection target for all packaging formats by 2030. EU-wide minimum requirements and a target for separate waste collection at 90% are necessary to further increase recycling and enhance the quality of the secondary raw materials. To achieve this, separate collection must be easy for consumers. From an operational point of view, FPE supports the principle that waste collection should rely on locally fit and efficient methodologies (e.g., kerbside collection rounds from households and businesses, acceptance in waste centres, etc.). In light of the above, used fibre-based packaging could be collected either in a single paper and board packaging stream or in a paper stream including graphic paper. Beverage cartons could be collected in a separate lightweight stream or as part of a deposit refund system (where this would help reach high collection targets).

### 3) Recycling and reuse are complementary to create a circular economy. Policy decisions (including reuse targets) should be evidence-based.

FPE recognises that recyclable and reusable options are complementary towards a common goal of achieving a circular economy in the EU. Policy decisions (including reuse targets) should be founded on an evidence-based evaluation of the life-cycle impact of packaging, and its system, accompanied by the evaluation of the economic and technological implications, and consequences for human health and food security.

Importantly, fibre-based packaging has a critical function in protecting and preserving goods throughout the value chain, extending food lifespan<sup>5</sup>, and preventing product and food waste<sup>6</sup> which contributes to resource efficiency<sup>7</sup>. Crucially, it safeguards consumer safety in logistics and on the shelf. In addition, it provides nutritional information and tells consumers how to store and prepare food safely. Paper-based products, particularly, contribute to expanding the shelf-life period of products often from hours to many days.<sup>8</sup> Furthermore, packaging maintains the quality of sensitive products, such as milk and juices, which provide consumers with essential vitamins and nutrients.

In some sectors (e.g., in food service systems or logistic systems) recyclable fibre packaging has a better environmental performance than reusable options<sup>9</sup>. As an example, according to the results of an in-depth and certified LCA study<sup>10</sup> conducted by Ramboll, the reusable system in quick service restaurants generates 2.8 times more CO<sub>2</sub>-equivalent emissions, leads to 3.4 times more fossil resource depletion, consumes 3.4 times more freshwater and generates 2.2 times more fine particles compared to the fibre-based single-use system, thus, further accelerates climate change. The extra logistics involved in reusable packaging systems and the energy needed for sanitisation could further increase the sector's environmental impact and result in additional costs for food service systems. A peer-reviewed Comparative LCA for the fruits and vegetable sector relieved that cardboard packaging has a better environmental performance than reusable plastic<sup>11</sup>. It also elaborated that reusable packaging has to be reused at least 63 times to have lower CO<sub>2</sub> emissions. Similarly, reuse in e-commerce means complex logistics, increased transport and environmental impact (e.g., more CO<sub>2</sub> emissions, air pollution and increased water use), additional storage space and infrastructure as reusable packaging will need to be collected, returned and reconditioned.<sup>12</sup> Re-use also requires standardisation of packaging, which will inevitably lead to overpackaging, as standard boxes will be used to transport different products of different sizes.

Making the switch to reusable packaging mandatory, when not supported by data, would not only have increased environmental, economic, and health safety impacts but also detrimental effects on parts of the fibre-based packaging industry, harming the competitiveness of the internal market. Moreover, replacing a significant part of renewable and recyclable paper and board packaging will lead to increased use of finite fossil-based resources for the production of non-renewable and non-recyclable fossil-based packaging.

<sup>5</sup> [Packaging's Role in Minimizing Food Loss and Waste Across the Supply Chain is well documented as in the often-cited publication in the International Journal Packaging Technology and Science by Verghese, Lewis, Lockrey and Williams.](#)

<sup>6</sup> [Helén Williams, Annika Lindström, Jakob Trischler, Fredrik Wikström, Zane Rowe, avoiding food becoming waste in households – The role of packaging in consumers' practices across different food categories, Journal of Cleaner Production, Volume 265, 2020](#)

<sup>7</sup> [Packagingdigest.com – How to Balance Food Waste Versus Packaging Waste](#)

<sup>8</sup> [Siroli L, Patrignani F, Serrazanetti DI, Chiavari C, Benevelli M, Grazia L and Lanciotti R \(2017\) Survival of Spoilage and Pathogenic Microorganisms on Cardboard and Plastic Packaging Materials. Front. Microbiol. 8:2606](#)

<sup>9</sup> [Zero Waste Europe, 'Reusable vs Single-use packaging': A review of environmental impacts](#)

<sup>10</sup> [EPPA, Jan 2021, "Single-Use Vs Multiple-Use: Using Science to Challenge the Misconceptions" Executive Summary of Ramboll LCA study](#)

<sup>11</sup> [Comparative Life Cycle Assessment \(LCA\) \(fefco.org\)](#)

<sup>12</sup> [Hot Spot Analysis of E-Commerce Logistic Chain: Single Use Vs Reusable Solutions. Ramboll](#)

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Policy decisions (including reuse targets) should be founded on an evidence-based evaluation of the life-cycle impact of packaging and its system, accompanied by the evaluation of the economic and technological implications, consequences for human health and possible liability implications. Packaging solutions with the best environmental performance, as provided for in Article 4(2) of the Waste Framework Directive (WFD) should be encouraged. Recyclable, sustainably-sourced packaging should be preferred where it has an environmental advantage over reusable alternatives as well as where reuse can pose health, safety, and food security issues.

## About Fibre Packaging Europe

The fibre-based packaging industry is a key contributor to the European Green Deal's aspiration to build a strong, circular and resource-efficient European economy.

Fibre Packaging Europe represents associations whose members' products are sourced, manufactured, used and recycled in Europe using European technology. Collectively, FPE members employ 365k people across 2.2k facilities in Europe, generating around €120bn in annual turnover. Fibre-based packaging products are highly recyclable and come from sustainably managed forests, replacing products based on finite fossil feedstock. Europe's forest sector has a positive climate effect, mitigating 20% of the EU's annual carbon emissions.