

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

Packaging & Packaging Waste Regulation – Art 22 Annex V 5b bans.

A recent amendment in the Packaging & Packaging Waste Regulation, Article 22, Annex V 5b proposes potential bans for “unneeded layers of cardboard boxes packaging” with healthcare and cosmetics packaging.

All packaging exists for a purpose and whilst the fibre packaging sector supports packaging minimisation, we advocate that all packaging must be ‘fit for purpose’. With packaging typically representing 3 – 3.5% of the carbon footprint of a product, unintended consequences from the proposed bans indicated in Annex V 5b should be fully considered.

- Packaging protects breakable primary product packaging throughout the supply chain from the producer to the retailer to the consumer’s home.
- Healthcare and cosmetics products are not immune from being duplicated by unsafe counterfeit copies – The European Union Intellectual Property Office has reported that counterfeit goods in the marketplace leads to an estimated loss of EUR 7 billion per year for the cosmetic and personal care sector in the EU, equivalent to 10.6% of all sales in the sector. Packaging is recognised as creating an additional barrier to counterfeiting via serialised QR codes, grey mark coding (UV visible inks) and product finger printing.
- Fibre packaging boxes offer an additional layer of consumer safety with regards to tamper evident features for healthcare and cosmetics packaging, the same as pharma packaging, and consumer information on health effects.
- Cosmetics and healthcare items can be sold as gifting kits, with several products combined into 1 set – the outer carton negates the need for the additional packaging that would be required, if sold separately.
- The secondary packaging boxes enable efficient packing. The shape allows you to fit an optimal amount of toothpaste, cream etc in a box or transport unit which saves space.

As demonstrated, the boxes used with healthcare and cosmetics packaging, which are highly recycled, serve a purpose to protect the product and enhance consumer safety hence we would ask these unintended consequences of banning them should be fully considered.

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



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Alliance for Beverage Cartons
and the Environment