



1500 companies



2200 manufacturing plants



365.000 people across Europe



EUR 120 billion annual turnover

Environmental Policy Omnibus - call for evidence

Fibre Packaging Europe policy recommendations

I. Introduction

By streamlining reporting, reducing duplication, promoting digitalisation, and accelerating permitting, the **Environmental Policy Omnibus** will cut unnecessary costs and complexity. This will help companies invest more easily in the green and digital transitions, while ensuring environmental goals are achieved more effectively.

Fibre Packaging Europe (FPE), a **coalition of seven member associations jointly representing 1,500 companies** bringing together Europe's forestry, pulp, paper, board, carton, packaging production, and recycling industries, welcomes the initiative. Since before the release of the Clean Industrial Deal, **FPE has actively been supporting the European Commission with policy recommendations** on the Packaging and Packaging Waste Regulation and the Waste Framework Directive.

Always striving for simplification, harmonisation, and predictability, Fibre Packaging Europe is publishing this paper to **ensure that the Omnibus reduces regulatory burden on industry, while not reopening the Packaging and Packaging Waste Regulation (I)**. The FPE coalition is also sharing **clear recommendations regarding Extended Producer Responsibility (II)**.

II. Legislative procedure & complementarity

Considering **recent attempts by certain stakeholder groups to delay the implementation of the Packaging and Packaging Waste Regulation (PPWR)**, and insofar as the **Omnibus intervenes with a view to simplifying environmental regulations**, FPE is concerned and strongly opposes a reopening of the PPWR through this Omnibus proposal. This would undermine the stability of a legislative framework that has already been adopted after lengthy negotiations and into which many industries have invested significant resources, both in terms of compliance planning and financial commitments. Businesses fear that reopening the text could generate legal uncertainty, discourage further investments, and ultimately penalise those who acted in good faith to align with the new requirements. For many operators, the priority now is ensuring a predictable and consistent regulatory environment, rather than re-launching political debates that could destabilise the progress already made. FPE emphasises the importance of upholding due legal process and respecting the provisions of the adopted text.

In this context, FPE calls for:

- First and foremost, there should be **no reopening of the PPWR**. Reopening the text would risk unravelling this balance, creating uncertainty for businesses that have already started adapting their operations to the agreed rules.
- At the same time, it is acknowledged that some **unclear definitions and provisions of the PPWR can and should be addressed through secondary legislation**. Implementing and delegated acts are the appropriate instruments to provide technical clarifications and ensure consistency of application, without altering the core framework already endorsed by the co-legislators.
- Moreover, any **remaining new measures should be addressed through the Circular Economy Act (CEA) procedure**, ensuring proper consultation and impact assessment before additional requirements are introduced. This approach would guarantee that future adjustments are evidence-based and proportionate, while preserving legal certainty for stakeholders.
- Finally, broader **harmonisation efforts should be pursued through future planned revisions of the existing body of environmental and product-related legislation, rather than reopening the PPWR**. Such a forward-



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looking and structured process would allow alignment across different pieces of EU law, reduce overlaps, and enhance coherence, while avoiding disruption to the regulatory framework that is already in place.

III. Extended Producer Responsibility (EPR)

The system of Extended Producer Responsibility (EPR) schemes is expected to face a reform within the Omnibus Regulation, with a deeper review later expected under the CEA. In both texts, FPE calls for an aligned approach and a horizontal revision of the provisions on EPR schemes.

FPE calls on the following key principles to ensure the successful functioning of EPR:

- **Effective, transparent and better enforceable governance with centralised and industry-based Producer Responsibility Organisation (PRO):** collected fees to be reinvested in waste management operations for the respective waste streams.
- **Guaranteed service for all packaging materials** that pay their due contributions.
- Keeping **EPR schemes for municipal waste separate from EPR solutions for industrial and commercial waste.** Where EPR systems manage both (municipal and commercial&industrial), provide adequate accountability tools (i.e., fee modulation and reporting) to allow more transparency.
- **Application of net cost:** a net cost principle means that the EPR fees should cover the costs of recovery and reporting considering any revenues generated by the value of the secondary raw materials and should by no means exceed the costs of the recovery and reporting of the respective material. FPE mainly advocates for the application of the net cost principle to avoid cross-financing with other materials.
- **Paper and cardboard are much interlinked,** often collected, sorted, and recycled in the same system. The allocation of related **EPRs fees for the two categories should be looked at jointly.**
- **Eco-design:** EPR should serve to increase packaging's recyclability through balanced eco-modulation approaches. Eco-modulation criteria should be harmonised and based on objective criteria such as design for recyclability, recycled material content, renewable materials, compostability of packaging.
- PPWR defines mono-material packaging as packaging with less than 5% of a secondary material (excluding the labels, varnishes, paints, inks, adhesives and lacquers). Hence, according to the PPWR definition, **for mono-material packaging, the imposed fee should be based on the packaging's main material** and not on the presence of minimal quantities of other materials (less than 5%).
- **A one-stop-shop** for registration of producers across Europe should be established.
- **EPR fees that ensure high-quality recycling:** besides supporting efficient collection, sorting, and recycling, the aim of EPR should be to enable material recycling to the highest quality possible. This could mean – for instance – further sorting of collected paper packaging into higher quality materials.
- In line with the PPWR and the WFD, **EPR fees are paid by those who place the packaging on the market for the first time.**

About Fibre Packaging Europe

Fibre Packaging Europe is an informal packaging 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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