

Fibre Packaging Europe

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



1500 companies



2200 manufacturing plants



710.000 direct & indirect jobs



EUR 110.4 billion annual turnover

Fibre Packaging Europe Environmental Omnibus - Feedback

27 April 2026

[Fibre Packaging Europe](#) (FPE), a coalition comprising seven trade associations spanning the fibre packaging value chain in Europe, welcomes the simplification of administrative burden in environmental legislation introduced in the eighth Environmental Omnibus package. This is a positive first step, recognising the need for streamlined Extended Producer Responsibility (EPR) rules. We especially look forward to further simplifying and harmonising EPR schemes across the EU.

FPE, representing 1,500 companies and 2,200 industrial facilities across Europe, considers current EPR systems to be overly complex and fragmented, resulting in unnecessary administrative burdens and costs for businesses.

The requirement to appoint national authorised representatives contributes to market fragmentation and creates barriers to trade, running counter to the goal of a well-functioning Internal Market that supports industrial competitiveness. FPE therefore welcomes the Commission's proposal, under the Environmental Omnibus, to temporarily suspend the obligation to appoint an Authorised Representative (AR) for packaging waste within the EU. Facing the [opposition](#) to this proposed suspension by several Member States based on the risks of free riding, FPE believes that efficient enforcement and EPR fee collection can be achieved through EU-wide, digital, and interoperable compliance tools.

The system of EPR schemes is facing a targeted reform within the Omnibus Regulation, with a more comprehensive review expected under the Circular Economy Act (CEA). FPE calls for an aligned approach between both initiatives and a horizontal revision of the provisions on EPR schemes:

- **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 the cost principle:** the 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 **EPR fees for the two categories should be looked at jointly.** However, it should be recognized that in some Member States, such as Finland, graphic paper and cardboard packaging are managed as separate waste streams through distinct collection and recycling systems. Any EU level simplification should therefore aim to reduce administrative complexity and fragmentation,

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while preserving the possibility for well-functioning national systems to continue treating these material streams separately, without physical or financial bundling that could compromise cost transparency or recycling performance.

- **Eco-design:** EPR should serve to increase packaging 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.
- The Packaging and Packaging Waste Regulation (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 Waste Framework Directive (WFD), **EPR fees to be paid by those who place the packaging on the market for the first time.**

As a constructive partner, FPE is looking forward to continuing providing aggregated value chain information for this and upcoming initiatives, such as the CEA.

About Fibre Packaging Europe

[Fibre Packaging Europe](#) is an informal coalition of seven trade associations representing industries involved in forestry, pulp, paper, board, carton board and packaging 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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