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Fibre Packaging Europe

Position: A robust, paper-specific scientific validated approach is essential for identifying Substances of Concern under the PPWR

[Fibre Packaging Europe](#) (FPE) supports the objectives of the Packaging and Packaging Waste Regulation (PPWR) for safe, sustainable and recyclable packaging. Identifying Substances of Concern (SoC) can help achieve these objectives, provided conclusions are based on **robust evidence relevant to the specific packaging material, application and recycling process in question.**

ECHA's draft work claims that 464 substances are either added or present in paper packaging materials and/or applications and marks 65 as negatively affecting paper recycling. FPE's review finds that the information provided does neither accurately reflect nor substantiate a negative effect on paper recycling for these entries.

I. The recycling criterion requires demonstrated, paper-specific impact

The PPWR uses the SoC definition in Article 2(27) of Regulation (EU) 2024/1781, the Ecodesign for Sustainable Products Regulation (ESPR). Article 2(27), point (d) states that in addition to SVHC, certain CLP classified substances and Persistent Organic Pollutants, SoC also include substances negatively affecting the reuse and recycling of materials in the product in which they are present. Under ESPR Article 5(14), the assessment of substances that may negatively affect recycling must consider whether, using standard technologies, the substance makes reuse or recycling more complicated, costly, environmentally impactful, or resource- or energy-intensive; impairs the properties, functionality, usefulness or value of the recycled material; or adversely affects its aesthetic or olfactory properties.

A credible application of these criteria should at least require evidence linking to an exact substance, a relevant paper-packaging application, a representative concentration or loading, the intended paper-recycling process and a demonstrated adverse effect. **A generic statement that the substance could be used or present in paper, substance trace detection, substance family-level information or evidence concerning recycling issues with other packaging materials does not establish that link.**

PPWR Article 6 requires material-specific design-for-recycling criteria and recyclability performance grades. The Joint Research Centre (JRC) is developing the supporting technical framework with CEN/CENELEC. Any ECHA findings used in this work should therefore be substantiated for the relevant material and recycling process and should complement, rather than duplicate or override, the material-specific CEN framework.

II. Recycling evidence must be specific in relation to materials, construction and processes

We call for evidence relating to recyclability to be specific to materials and applications. For example, the **EN 18120:2026 series on the design for recycling of plastic packaging**, including **EN 18120-3:2026 on sortability evaluation**, addresses packaging made predominantly of plastic and plastic-specific sorting and recycling processes. Evidence concerning one material, packaging construction or recycling process cannot support unconditional conclusions for other materials or processes where the same substance may occur. That means that where a specific substance use or presence in plastics material can affect recycling, the same cannot be automatically assumed for the recycling of paper. Negative effects must be substantiated by showing that such conclusions are technically applicable also to paper recovery, paper-mill operations or recycled-paper quality.



Moreover, paper recycling is also not a single process. The ongoing CEN/TC 261/SC 4/WG 3 work distinguishes conventional, flotation-deinking and specialised recycling routes. These routes differ in inputs, equipment, process conditions, tolerances, fibre yield and output requirements. **An effect demonstrated for one route cannot be generalised to all paper recycling.**

The same applies to inks, pigments, coatings, adhesives, barriers, laminates, and polymer layers. Their recycling impact depends on the complete packaging construction, physical form, loading, and even design. Construction-level effects should be addressed through the material-specific PPWR Article 6 design-for-recycling framework and relevant CEN methodologies. The SoC exercise should complement this work rather than create parallel, unconditional substance-wide conclusions.

Regulatory coherence should be preserved. Where substances have already been assessed under existing EU regulatory frameworks, including REACH, CLP and relevant product-specific legislation, any conclusions reached in the SoC exercise should clearly distinguish between concerns relating to chemical safety and those relating to recycling performance. Additional designations should be supported by evidence relevant to the specific material, application, and recycling process concerned. This will help avoid duplication of existing regulatory assessments and ensure that the SoC framework complements, rather than overlaps with established legislation.

III. Unsupported entries could create disproportionate downstream effects

ECHA's findings may inform the Commission's work under PPWR Articles 5(2) and 12(7), as well as JRC work supporting Article 6 recyclability criteria and grades. **Unsubstantiated or incorrect conclusions could lead to unnecessary supplier-data, verification, testing and digital-marking requirements, or distort recyclability assessments.** The burden would fall particularly on SMEs and highly recycled fibre value chains, where converters cannot trace the full chemical history of recovered material. This could discourage recycled fibre use without a demonstrated environmental benefit.

IV. FPE's suggested actions

Before the paper-related entries are finalised or used in subsequent PPWR work, we ask ECHA to:

1. **Demonstrate conclusions.** Where evidence does not demonstrate that a substance adversely affects the quality, functionality, safety or value of recycled fibre following representative paper recycling and decontamination processes, the basis for a negative recycling designation should be reconsidered or appropriately qualified.
2. **Qualify findings and prevent premature downstream obligations.** Where an effect is demonstrated only for a particular application, concentration or recycling process, the entry should clearly identify those conditions rather than generalise the conclusion across paper packaging and recycling processes. Unverified findings should not form the basis for broad testing, information-transfer or labelling requirements; any future obligations should be supported by robust evidence and validated methods.
3. **Maintain material and process specificity.** Findings from plastic packaging or one recycling process should not be extrapolated to other materials or recycling processes. Any use of ECHA findings in the JRC technical assessment should preserve these distinctions and align with PPWR Article 6 and the ongoing CEN/TC 261/SC 4/WG 3 work.
4. **Consider the role of recycling processes.** Assessments should reflect the performance of representative industrial paper recycling processes.

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

The presence of a substance in

packaging should not automatically be assumed to result in a negative impact on recycling or recycled fibre quality without evidence demonstrating such an impact following those processes.

5. **Correct identified POP, CLH, and substance-identity errors**, ensuring that SoC grounds are accurately recorded.

FPE supports evidence-based action on SoC. Negative recycling effects should be classified only where demonstrated for a specific paper-packaging application, concentration, construction or recycling process; otherwise, the designation should be removed. This provides a scientifically robust basis for the PPWR and future DfR and recyclability-grading frameworks.

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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