



## CITPA comments to EU Roadmap on the New Circular Economy Action Plan

**The International Confederation of Paper and Board Converters in Europe (CITPA) welcomes the roadmap for the new Circular Economy Action Plan** and supports the approach to align it with the new EU Industrial Strategy. It is essential to maintain the competitiveness of the EU industry and to support its growth while protecting the environment and building a new circular economy.

- **The sustainable product policy could be a real driver for circularity**, starting from resource efficiency to the reuse or recycling of waste. In this perspective, the selection of raw materials and their sustainable sourcing are key. The policy should support the bioeconomy, which provides renewable materials with low environmental impact. Design for circularity should be a requirement for all products. For example, the paper & board industry has already issued “Paper-based packaging recyclability guidelines” to support the efforts of the industry and its customers to build circularity in their products from the start of the value chain.
- **Packaging fit for purpose can lead to waste prevention.** Every packaging is created with a purpose to protect, preserve and/or promote a product. The loss or damage of the product has a higher environmental impact compared to the packaging itself, in terms of resources used and emissions created. Overpackaging should be reduced, but underpackaging will have higher negative impact. There is an optimal situation, which all packaging producers are targeting – packaging should be fit for purpose and as such will prevent unnecessary waste and losses.
- **A level-playing field for all materials and packaging** is a pre-requisite for the functioning of the internal market. The EU policy should target to improve the circularity of products lagging in performance and at the same time support further improvement for products that already live the circular economy – like paper packaging.
- **Reuse and recycling both contribute to the circular economy.** The selection of raw materials is crucial for the circularity of products and renewability must play a key role. Additional mandatory requirements for reuse or recycled content in packaging should be applied to sectors where more circularity is needed, and it makes sense to drive investments into such direction. If applied to all packaging, this might compromise the efficiency of the existing recycling loops. In this case, stimulating the separate collection of different material streams, like paper and board, will increase the circularity of the products. With a recycling rate of 84.6% (according to Eurostat) paper and board packaging already contributes significantly to the EU ambition.
- **Farm to Fork strategy will be essential** to ensure the implementation of the UN Sustainable Development goals regarding food waste and loss. In this perspective, packaging plays a key role in protecting the product and ensuring its safe transport and storage to the customer.

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