

Brussels, 2 December 2015

### **The Paper Packaging Industry's view on the Circular Economy Legislative Package**

The Paper Packaging Coordination Group comprises the major European paper and board packaging associations<sup>1</sup> which represent the interests of a wide range of packaging products used in transport, retail and consumer packaging. Paper and board packaging is based on a renewable resource (the forest) and is recyclable. We support the concept of a Circular Economy in which raw materials are sourced from renewable, responsibly managed resources and where possible, recycled after use.

The members of our associations are directly affected by proposals in the Circular Economy legislative package published today, which amend the waste and packaging waste legislation. We will submit our detailed responses to specific proposals when we have had time to study them, but meanwhile we wish to present our joint approach on the major topics which affect us:

#### **1. Recycling targets for paper and board**

- Targets should be ambitious and reflect technical and economic realities
- For materials, a clear focus on recycling should be ensured
- Packaging recycling targets should be proportionate between different consumer packaging materials, fairly taking into account each material's situation, achievements and potential for improvement. High achievement of one packaging material should not compensate for another material's lower achievement.

#### **2. Need to revise the calculation method before setting new targets**

- The method for the calculation of recycling rates should be harmonised, providing clarity and simplification for ease of application
- The "input" method should be the basis of the calculation
- EU requirements for recycling should apply equally to exports of paper for recycling and should be enforced

#### **3. Design of packaging**

- Additional mandatory design requirements at national level for packaging will undermine the objectives of the Packaging and Packaging Waste Directive (PPWD)

#### **4. Composition of municipal waste**

- Retailers should have the freedom to choose the method of collection of their secondary and tertiary packaging waste

#### **5. Minimum requirements for Extended Producer Responsibility**

- The scope of EPR and roles and responsibilities of each actor involved in packaging waste management should be clearly defined

#### **6. Landfill and incineration of waste**

- Recyclables should not be sent to landfill
- Separate collection of materials should be strengthened
- Incineration of recyclables should be restricted

## 7. Ecodesign and product design

- The essential requirements in the PPWD and related CEN standards are sufficient to provide guidance for ecodesign of packaging
- Packaging should serve the functionality and the safety of the product first
- Packaging should not be seen in isolation from the product
- Ecodesign concepts as part of a product's design, should encompass the whole life cycle of the product with its packaging

## 8. Renewability of material resources

- Renewability of material resources is a natural driver for circularity and should be an essential element of a Circular Economy

We particularly welcome the consideration of the role of the bioeconomy in Circular Economy thinking, as we have strongly advocated that sustainable, natural, renewable resources play an essential role in completing the loop of a Circular Economy.

For further information please read the Paper Packaging Coordination Group's position paper on the Circular Economy package: <http://www.cepi.org/positionpaper/PPCGcircularconomy>



<sup>1</sup>Currently the following organisations participate in the Paper Packaging Coordination Group:

**CEPI**, Confederation of European Paper Industries

**CEPI Containerboard**, European industry association of producers of corrugated case materials

**CITPA**, International Confederation of Paper & Board Converters

**ACE**, The Alliance for Beverage Cartons and the Environment

**ECMA**, European Carton Makers Association

**EMBALPACK**, European Association of Makers of Packaging Papers

**EMFA**, European Moulded Fibre Association

**CEPI EUROKRAFT**, European Producers of Sack Kraft Paper and Kraft Paper

**EUROSAC**, European Federation of Multiwall Paper Sack Manufacturers

**FEFCO**, European Federation of Corrugated Board Manufacturers

**PRO CARTON**, European Association of Carton and Cartonboard Manufacturers