

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

20 January 2020

**The European Federation of Corrugated Board Manufacturers (FEFCO) welcomes the EU initiative** to increase further the circular economy activities with the New Circular Economy Action Plan and appreciates the opportunity to provide comments.

- **Circular products exist:** Corrugated cardboard packaging is a real example of circularity and sustainability. It is using a renewable resource; its recycling ensures that the waste goes back to the economy as a resource and a well-established market for secondary raw materials already exists. As a paper-based packaging, it contributes significantly to the EU recycling rate of 84.6% for paper & board packaging.
- **EU policies should encourage improvements in all sectors:** The EU policies will address high-impact sectors or materials lagging in performance. While we recognize the need to motivate further such sectors/materials, we believe that the EU policies should also support the efforts of sectors that contribute already to the circular economy and have the ambition to improve their circularity further.
- **The sustainable products policy should drive circularity:** Sustainability starts with sustainable sourcing of raw materials and should encourage the use of renewable materials. Circularity of products starts with the design of the product, which is often influenced by market demands and customer preferences. In order to strengthen this, the paper & board industry has set first steps and developed “Paper-based packaging recyclability guidelines” to support further the circularity of paper & board packaging.
- **The circular economy needs both reuse and recycling:** For many years, the paper & board industry has invested in recycling, leading to an excellent performance today. The recycled materials are being used by the paper & board industry for new products, like packaging. The system works effectively driven by market forces and customer applications. “One fits all” solution to reuse or mandatory recycled content for all packaging could jeopardize the existing recycling system for paper & board and create more problems than solutions. Actions on reuse should focus on products which are not designed for recycling.
- **EU policies should consider the lifecycle of products & packaging:** Packaging is not created for the sake of existing by itself. It serves a purpose, mainly to protect the product and move it safely and efficiently from one point to another. Packaging should always be fit in size and manufacturers should prevent overpackaging. Insufficient or “reduced” packaging could have high negative impact on the environment: the product damage will multiply the waste generated and the resources used for production will also be wasted. The negative environmental impact from damaging a product outweighs the positive impact of reducing its packaging. Packaging should always be fit for purpose!

FEFCO welcomes the approach of the Commission to align the existing policies, adopting the new Circular Economy Action Plan alongside with an ambitious EU Industrial Strategy. It is key to support the competitiveness of the European industry while improving the circularity of materials and products.