

## FEFCO recommendations for the inter-institutional negotiations on the Packaging & Packaging Waste Regulation

FEFCO shares the legislators' ambition to pioneer circular economy through a Packaging and Packaging Waste Regulation (PPWR) that fulfils its primary aim: *"to reduce the negative environmental impacts of packaging and packaging waste, while improving the functioning of the internal market"*.

To this aim FEFCO would like to draw your attention to **5 key aspects** in the proposal that require further discussion and share our recommendations which are further substantiated below.

- 1. Reuse and recycling should be complementary, reuse targets should be realistic and positive for the environment, society, and economy. (Article 26)**
- 2. Market restrictions should be evaluated to ensure they do not increase environmental impact and food waste. (Article 22, Annex V point 2)**
- 3. Empty space ratio for grouped, transport and e-commerce packaging should be realistic, ensure product safety and promote competitiveness. (Article 21)**
- 4. Prevention targets should be realistic and promote competitiveness. (Article 38)**
- 5. Ensure adequate scope for requirements for substances in packaging. (Article 5)**

- 1. Maintain and optimize the cardboard exemptions as stated by Commission, Parliament and Council in Art. 26.**

Cardboard is the most recycled paper & board packaging in EU with a recycling rate over 90%, recycled in an existing well-functioning system and contains 89%<sup>1</sup> recycled content on average. Renewable materials and highly recyclable packaging must not be replaced by fossil resources and plastic packaging.

On Article 26, **FEFCO recommends realistic and achievable solutions which are further substantiated below.**

- a. Large household appliances – reuse targets (Article 26.1).**

Cardboard packaging can offer fit-for purpose solutions while high reuse targets risk eliminating the most sustainable and recycled logistic packaging from the market. Therefore, **FEFCO supports the European Parliament's position granting a cardboard exemption in the final agreement** and reducing the first re-use target for 2030 to 50%.

Several scientific studies have proved that reuse is not always better for the environment. Additionally, reuse systems require a high level of packaging standardization, increasing the amount of packaging needed to meet the expected product range. This approach undermines product innovation, limits competition, creates logistic chaos and risks increasing excessive packaging.

- b. Retain the cardboard exemptions in the final text as proposed by the Commission and the legislators, for transport packaging / grouped packaging (Article 26.7, 26.10, 26.12, 26.13)**

Unrealistic targets for reusable packaging, regardless of the material, would have a destructive impact on industry and the environment<sup>2</sup>. Each packaging material is adapted to a certain circularity solution, and this must be preserved.

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<sup>1</sup> [LCA Report 2019\\_revised\\_p.37.pdf \(fefco.org\)](#)

- c. **Lower reuse targets for packaging via e-commerce** for the transport and delivery of non-food items (Article 26.8)

Cardboard is one of the predominant options in e-commerce sector and offers fit-for -purpose packaging solutions. Therefore, **FEFCO supports the Parliament’s negotiating position calling for a 10% reuse target for e-commerce packaging**. If recyclable corrugated is replaced for e-commerce, over 700 million plastic boxes<sup>3</sup> will be placed on the EU market in the first year of implementation (2030) to account for the 10% reuse target. To meet the 50% target for 2040, over 3.5 billion new plastic boxes will be needed.

**2. FEFCO supports the Parliament’s position, proposing a complete deletion of the ban for format restrictions in Article 22, Annex V point 2.**

Packaging’s purpose is to protect, preserve, and promote a product. Banning all recyclable single-use packaging for fruits and vegetables (containing less than 1,5kg) in Article 22, Annex V, could undermine this purpose and negatively impact the economy and the environment. Research conducted by the University of Bologna<sup>4</sup> revealed that corrugated cardboard packaging can extend the shelf life of fresh food products by up to three days compared to reusable plastic crates and can significantly reduce contamination from pathogenic and spoilage microorganisms. Lastly, limiting the market to reuse systems would bring increased logistic challenges related to transport, food safety, food waste, and storage.

**3. Support minimisation of empty space ratio applying to all packaging as proposed by the European Parliament.**

Empty space ratio for grouped, transport and e-commerce packaging should be realistic, ensure product safety and promote competitiveness (Article 21)

In order to ensure level playing field across all packaging sectors, FEFCO encourages legislators to **delete empty space ratio exemptions for reusable packaging**. Exempting reusable packaging from this requirement will increase plastic packaging, transport and emissions. This makes the article counterproductive to the objective of the Circular Economy Action Plan, allowing the material with lowest recycling rate to grow in production and increase its negative impact on the environment.

**4. Prevention of packaging waste targets– 5% by 2030: 10% by 2035, 15% by 2040. (Article 38).**

FEFCO welcomes the decision by both EP and Council to set packaging waste targets, however FEFCO supports the European Parliament negotiating position.

**5. Requirements for substances in packaging (Article 5)**

FEFCO acknowledges the decision by both EP and Council to address substances in packaging, however the scope should be limited only to “intentionally added” PFAS and BPA. The cardboard industry does not intentionally use PFAS and BPA. However, traces of these substances could find their way into packaging through the recycling process and other sources.

FEFCO considers effective negotiations are crucial to deliver a balanced and implementable legislation, Therefore, the corrugated cardboard industry is fully committed to working together in ensuring that the EU meets its environmental goals. We sincerely hope our concerns are taken on board and we can all work together to make a resounding success of the PPWR.

Should you require further clarification or more information, we stand ready to discuss these issues further

<sup>2</sup> Estimation based on FEFCO statistics.

<sup>4</sup> [Frontiers | Survival of Spoilage and Pathogenic Microorganisms on Cardboard and Plastic Packaging Materials \(frontiersin.org\)](https://doi.org/10.3389/fmicb.2019.01881)