

22 March, 2022

FEFCO feedback to Eunomia's stakeholder questionnaire – PPWD revision and recyclability requirements

The European Federation of Corrugated Board Manufacturers (FEFCO) would like to express its concern with the ongoing consultation which has been addressed to only a limited number of stakeholders within an extremely short feedback period.

As a representative of the corrugated cardboard packaging industry at EU level, FEFCO is deeply engaged in the revision of the PPWD. We would appreciate being involved in follow-up consultations and discussions on this matter.

FEFCO's answers to the questionnaire can be found below.

1.0 Definitions

Question: Which overarching definition of recycled at scale is preferred? Why?

We would like to express a preference for either option 1 or 3 (of those presented) as they provide better representation at the EU level. Option 3 could allow Member States to take proportionate responsibility for collection and recycling of packaging placed on their markets. There are still significant differences among Member States which should be considered.

Furthermore, the five-year limit outlined for the recyclability of innovative packaging could subsequently limit or slow innovation in future.

Question: Would you add/remove any of the specific criteria for defining recycled at scale? Why?

Regarding the 'collected at scale' criteria, we believe that separate waste collection should be embedded in the definition, as it is already required by the Waste Framework Directive. The definitions should also consider that there are separately collected waste streams which do not need sorting before recycling, for example, the pre-consumer waste from the corrugated cardboard packaging manufacturing. For paper & board packaging, separate collection is seen as a prerequisite for high-quality recycling and should therefore be mandatory.

We would support the adoption of standards and existing industry guidelines to improve the recyclability of specific packaging materials. The paper & board industry already has an existing standard (EN 643¹) defining the grades of paper for recycling, including tolerance levels.

Regarding the 'reprocessed/recycled at scale' criteria, we suggest that the quantification in the bracket (i.e. "... be at least a % of the packaging type place on the market that is equal to the material specific recycling target ...") be deleted and replaced by a statement emphasising the importance of high-quality recycled material.

Additionally, the reprocessing capacity should be determined at EU-level, not regionally as suggested in the third bullet, to ensure optimal use of the existing infrastructure and safeguard the Single market.

¹ [European List of Standard Grades of Paper and Board for Recycling \(EN 643\) CEPI Guidance](#)

Question: Would you add/remove any of the specific criteria for defining innovative packaging? Why?

We suggest adding ‘active and intelligent packaging’ to the classifications of innovative packaging to reflect ongoing developments in the sector. The sustainability aspect of packaging should also be reflected in the definition of innovative packaging.

In addition, ‘communicating key information to customers’ should be added to the list of the core functions of packaging since this is an indispensable role of packaging.

2.0 Negative list

Question: Do you agree with the need for a negative list of packaging features to be published? Why?

No. We do not support the creation of a negative list overall as it would limit consumer choices and innovation and create market barriers. Specifically concerning the “paper/card” category, the banning of certain fibre-based packaging (considering its high recyclability rate of 84.2%²) could increase the use of less recyclable, fossil-based packaging, resulting in a step away from the EU’s environmental objectives.

The proposed products list could be used to supplement a measure or recommendation for a DfR assessment to determine the recyclability of these products. Any list should be reviewed regularly to ensure that technological or product developments are reflected.

Question: Are there any specific packaging features you would add/remove from the example list provided?

Regarding the specific “paper/card” features on the list:

- Paper-based packaging with plastic windows – most plastic windows can be disintegrated in a standard stock preparation of a paper mill and, in some cases, the plastic window can be separated from the paper.
- Silicone/ wax coating – there are ongoing technological developments to address the recyclability of silicone and wax coated paper.
- Insoluble adhesives – the suggested 450C° is considered too high for a softening point. The typical temperature is approximately 60C° to 80C°, according to the European Association of adhesives and sealants (FEICA).
- Mineral oil colors – an exclusion of mineral oil-based printing inks would require a significant amount of time to achieve as most industrial printing equipment would have to be replaced. The mineral oil content does not technologically hinder recycling as such.
- Two-sided plastic coating/laminates – there are existing examples of such packaging being recycled. Specific cases might require further investigation to ensure that the coating/laminate does not interfere with the disintegration of the paper. This will be determined by the degree of adhesion between the laminate and fibre.

The paper & board industry developed “Paper-based packaging recyclability guidelines”³ to support the industry in its efforts to improve recyclability and recycling in practice. FEFCO has also developed specific “Recyclability guidelines” for corrugated packaging⁴.

² [Statistics | Eurostat \(europa.eu\)](https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&plugin=1)

³ [Recyclability Guidelines.pdf \(fefco.org\)](https://www.fefco.org/Recyclability-Guidelines.pdf)

⁴ [FEFCO-Recyclability-Guidelines Final.pdf](https://www.fefco.org/FEFCO-Recyclability-Guidelines-Final.pdf)

3.0 DfR Assessment Process

Does the two-staged approach ensure that recyclability will be assessed in practice, not just in theory?

The first step of self-assessment is sufficient to ensure that recyclability is effectively addressed, considering there are EU standards, testing methods and industry guidelines in place for specific packaging materials. Therefore, the recyclability assessment from a third-party certifier is unnecessary given the amount of certification schemes already in place to ensure the sustainability of packaging. This second step will also lead to additional administrative burden and financial costs for both industry and authorities.

We agree that certain packaging materials which already have a high recycling rate, like paper & board, would not require a DfR assessment. Corrugated cardboard packaging in particular, as the most recycled paper & board packaging with a high recycled content of 89%⁵ on average, should be exempt from such assessment.

For packaging that is already recycled at high rate and for which there is no change in the packaging production processes, the three-year certification limit will be superfluous.

Will the suggested exemptions reduce the administrative burden associated with the assessment?

Yes, the suggested exemptions will help to reduce administrative burden for some packaging. However, we question the meaning of ‘type of packaging’ in this context as it is unclear if this refer to materials, individual products, product categories, applications, etc. The “type of packaging” should be clearly defined in the legislation.

Do you have any suggestions for improving the implementation of this measure?

As mentioned above, we suggest removing the second step in the DfR approach as a self-assessment of most products will be sufficient to ensure recyclability. However, more complex products will need further evaluation to determine whether they are recyclable.

FEFCO remains available to further discuss this feedback and provide additional information if needed. We believe that stakeholder contributions are critical to ensure ambitious yet realistic legislation.

⁵ [LCA Report 2019 revised_p 37.pdf \(fefco.org\)](#)