

"Policy choices that aim at reducing environmental harm should be based on sound scientific evaluation using harmonised methods"

The Single Use Plastics Directive was designed to reduce the Union's plastic use, but there now seems to be a risk that the PPWR proposal takes a U-turn and increases our use of plastic



MEP Miapetra Kumpula-Natri (S&D, Finland)

Reusable, but eventually disposable, plastic packaging is not necessarily a more sustainable alternative to the use of recyclable, fibre-based materials. Policy choices that aim at reducing environmental harm should be based on sound scientific evaluation using harmonised methods, and the regulation of packaging waste should be no exception to this. In my view, the proposed Regulation on Packaging and Packaging Waste puts too much weight on plastic, while overlooking the potential of fibre-based materials.

The creation of reusable plastic packaging, as foreseen in the PPWR proposal, would lead to increased negative environmental impact in the form of CO2 emissions and water use. Although I was expecting the Single Use Plastics Directive to reduce the Union's plastic use, there now seems to be a risk that the PPWR proposal takes a U-turn and in fact increases our use of plastic.

Not even heavy plastic mugs can be recycled forever, and while they can be used for some time, they will end up as waste after 30-80 uses. For the busiest restaurants, this would mean that new plastic mugs would be taken into use almost daily. As opposed to this, I would rather see sustainable and recyclable tableware used in these occasions.

The same reasoning goes for the sector-specific reuse targets that the proposal sets for different types of packaging. For instance, large household appliances come in many different shapes and sizes, and the amount of new reusable packaging that would need to be created in order to comply with the



proposed PPWR would be immense. Cardboard packaging, on the other hand, is already circular: corrugated packaging contains 89% circular content on average. Cardboard packaging also has a high end-of-

life recycling rate and is recycled at scale across the Union. It is for this reason that I support the exclusion of fibre-based cardboard from the reuse targets on the packaging of large household appliances.

The weight that the Commission puts on reusable plastic is also visible in how the proposal bans the packaging of fruits and vegetables in not only plastic, but also paper. This for me is difficult to understand, as for paper packaging, there are efficient recycling systems in place. Plastic packaging of fruits and vegetables should, on the other hand, be forbidden, in order for us to continue reducing plastic waste and production. One commendable aspect of the Commission proposal is, however, the banning of the single use miniature packaging used by hotels for cosmetics, hygiene and toiletry products.

The European Parliament is currently working on the proposal in its ENVI and ITRE committees. Both committees seem to be taking the proposal to a better direction than initially proposed by the Commission, and it will be interesting to follow how the report will continue to evolve. The ultimate objective of the PPWR proposal is to reduce the amount of packaging waste, and we need to ensure that the bans and

targets placed on packaging are based on sound evidence. If not, the regulation might end up contradicting its own core aim by creating even more packaging waste than what currently exists.

The EU's packaging reuse targets could worsen Europe's water scarcity

We cannot have a successful green transition unless policies are informed by solid evidence



Mike Turner
Chair of Fibre Packaging Europe

Europe faces another drought season that experts expect to be critical for water resources. Despite the dangers, policies such as the Packaging and Packaging Waste Regulation proposal currently take little heed of how new sustainability rules could impact water, despite a wealth of available scientific evidence on the topic.

Now under negotiation in the Parliament's ENVI and ITRE Committees, there is an opportunity to adapt the proposed policy, enabling Europe to make better choices based on evidence that takes account of the full lifecycle of a packaging product and its use.

At Fibre Packaging Europe, a coalition of seven trade associations along the value chain, we are acutely aware of the impact of climate change and water scarcity – not least because we

are a forest-based sector and hot, dry summers have caused some of the worst forest fire seasons on record in recent years.

Fibre packaging is sustainable, as it is made from sustainably sourced, renewable, and recyclable raw materials and has a high end-of-life recycling rate. Our value chain is quintessentially European – our products are designed, made and recycled in Europe. Thanks to sustainable forest management, Europe can proudly claim that it currently has more forest resources than it did a century ago. Forests and the forest-based sector absorb around 20% of the EU's total greenhouse gas emissions per year.

When it comes to packaging, we know that both recyclable and reusable options are complementary towards our common goal of achieving a circular economy in the EU. Let's be clear: there are cases where packaging that is used once and then recycled is the better option, and others where reusable packaging makes sense. But all policy decisions, including establishing reuse targets, must be evidence-based to avoid unintended consequences for water and food security, consumers and the environment. This means taking account of things like the length of the transport route, the effectiveness of urban logistics, water consumption, and the number of times the packaging will be reused.

For example, a McKinsey assessment found that as many as 200 rotations would be needed to achieve emission reductions for reusable packaging for food. Other full life cycle evaluations suggest that reuse targets – compelling the use of packaging that is collected, cleaned and reused – will have a negative impact on our scarce water resources.

With so much at stake, we need a proper risk assessment of the implementation of reuse systems vis-à-vis EU water management strategy. And it must be comprehensive, taking account not only of the water used in packaging production but also of water use in washing cycles and the production of the additional energy that will be needed to power reuse systems.

In the PPWR proposal, reusable packaging is considered the solution to reducing the impact of packaging on the environment. However, there is currently no comprehensive scientific evidence to support this assumption. Reusable packaging could require more material use; more logistics, transport and storage space; and more water and detergent for cleaning the packaging. Evidence shows the significant amount of water needed to implement reuse systems at an industrial level is, in most cases, unsustainable.

In the EU, we take pride in policy that is based on facts. Let's not lose focus now.

Fibre Packaging Europe

