

EU rules on packaging: NGO perspectives on the urgent need to reduce paper packaging

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INTRODUCTION

This briefing focuses on non-governmental organisations' (NGOs) position on the recent devastating increase in paper packaging. For the wider NGO position on EU packaging rules please see the position paper developed by the [Rethink Plastic alliance](#).

Moves to reduce excessive packaging and single-use items are necessary and overdue. For decades European Union (EU) citizens have had to contend with an overwhelming and increasing amount of packaging and packaging waste. It is timely, therefore, that the EU is currently [revising its rules on packaging and packaging waste](#). It is important that such legislation aims to do away with single-use rather than driving material substitutions like replacing single-use plastic with single-use paper.

In November 2022, the European Commission proposed to replace the [existing Directive](#) with the Packaging and Packaging Waste Regulation (PPWR), which is now being discussed by the Council of the EU and the European Parliament.

There are many positive elements in this proposal such as the inclusion of targets to reduce overall packaging waste and to create reuse and refill systems, but it falls far short of the ambition needed to counter the negative impact that excessive packaging has on the planet. It is alarming that some provisions could actually incentivise an increase in the use of paper packaging.

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This briefing looks at what will need to happen to truly reduce the negative environmental, social and climatic impacts of the paper and packaging industries.

How is packaging defined?

The PPWR definition is complex but basically splits packaging into three types:

1. Sales packaging: Any kind of packaging used for a single item at the point of sale, including drinks cartons, cups and take-away food boxes.
2. Grouped packaging: Packaging for any number of items grouped together, either for selling directly to consumers or as a tool for organising stock.
3. Transport packaging: Bags and delivery boxes to transport products such as packaging for products bought on-line (E-commerce).

BACKGROUND

Paper is increasingly being used for packaging

Few people now print emails, and many newspapers focus on on-line content, but European paper consumption is still increasing, driven by the dramatic rise of disposable packaging. In the EU, half of all paper is now used for packaging,¹ and 'paper and cardboard' was the main packaging waste material from 2009 to 2020 (32.7 million tonnes in 2020). In the eight years from 2012 and 2020, annual paper packaging waste generated per person rose by over 10 kilogrammes (kg).²

European³ paper and board production has also been rising - by 42.1 per cent from 1991 to 2018 - **due to an 82.5 per cent increase in the use of everything from on-line delivery boxes to take-away plates and cups.** The COVID crisis further boosted online purchases, and the recent positive ban on a few single-use plastic products (e.g. straws, cutlery, plates) has had the negative effect of increasing the replacement of plastic with paper and cardboard.

Recycling: the Trojan Horse for increased paper packaging

The industry answer to concern about the increase in paper is to talk about the relatively high paper recycling rate compared to other packaging materials. In reality there is a low rate of single-use paper food packaging recycling (due to contamination by food and mixed materials⁴ that are difficult to recycle). The industry claims that paper in the EU comprises roughly 50% recycled material, although there is no standardised system for measuring this and the real figure is likely to be lower⁵. According to the Confederation of European Paper Industries: "Utilisation rates [of recycled material] in the case,

carton and wrappings/other packaging sub sectors were 93.8%, 34.7% and 52.2%."

Because paper packaging still needs to be strong, it relies on long fibre, virgin pulp. But even if all items could be made from recycled material, there simply isn't the supply to meet the demand. All recycled material is already being used so any increase in packaging demand will be met through increased cutting of forests, and the replacement of forests with plantations.

Regardless of whether paper food packaging is made of recycled or virgin materials, it still uses many possibly dangerous chemicals and paper-based packaging is often mechanically laced with other materials such as plastic and aluminium which complicates its recyclability and reduces the quality of secondary materials.

What is long fibre and why is it important?

Packaging is rarely made without some percentage of virgin fibre. To ensure they are strong enough, paper bags need long fibres, especially at the handle. Although it is technically possible to get long fibres from recycled material, it is rare and expensive.

It can be hard to know what the actual recycled content is of a product. *Virgin corrugated* means it is made 100 per cent with virgin fibre, *recycled corrugated* means that there is some recycled content, but it can still include some virgin fibre, and the *corrugated recycles* symbol simply means a package can be recycled, not that it is made of recycled fibre.

1 Coelho et al (2020), Sustainability of reusable packaging – current situation & trends– Resources, Conservation & Recycle, Vol 6, quoted in COMMISSION STAFF WORKING DOCUMENT IMPACT ASSESSMENT REPORT Accompanying the document Proposal for a Regulation of the European Parliament and the Council on packaging and packaging waste, amending Regulation (EU) 2019/1020, and repealing Directive 94/62/EC

2 Eurostat figures report that in 2012 paper packaging waste production was 62.78kg/capita, while in 2020 the figure was 73.11kg/capita. This overall figure masks considerable variation across different EU countries. See https://ec.europa.eu/eurostat/databrowser/view/ENV_WASPAC_custom_5155352/default/table?lang=en

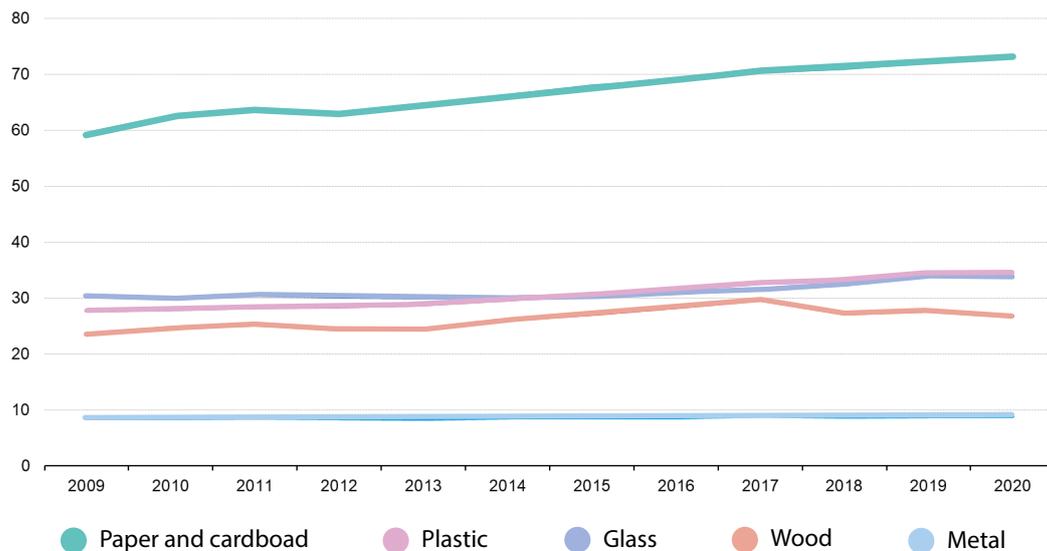
3 CEPI countries (<https://www.cepi.org/about-cepi/members/>)

4 Beverage cartons (as multi-material), coffee cups, waxed paper bags, metalized boxes, plastic coated packaging and even biodegradable containers (commonly wrongly disposed, source: EU Commission Impact assessment, https://environment.ec.europa.eu/document/download/942a1d05-62ce-4778-af6e-7a1be2932c88_en?filename=Impact%20assessment%20accompanying%20the%20proposal%20-%20part%202.pdf)

5 Please note the disclaimer that the European paper industry make on p.22 of their 2021 annual statistics report, <https://www.cepi.org/wp-content/uploads/2022/07/Key-Statistics-2021-Final.pdf>

Packaging waste generated by packaging material, EU 2009-2020 (kg per capita)

Source: Eurostat (online data code: env_waspac)



Impact on forests and forest peoples

Internationally the paper and paperboard sector consumes around 40 per cent of industrially harvested wood. Most EU paper consumed in the EU is produced from European forests and around 30 per cent of EU woody biomass goes to pulp and paper production. But the European forests being used to support this industry are under huge pressure as for decades many EU countries have practised intensive forestry, meaning healthy biodiverse forests are replaced with monoculture plantations.⁶ Three quarters of European forests are clearcut, and most are defined as being in a bad state. Only two per cent of the EU's primary forests remain, but even that small percentage is not necessarily protected.

Intensive forest management not only destroys biodiversity and ecosystems, it also reduces the EU's ability to reach global climate goals. Paper production uses huge amounts of energy and freshwater,⁷ and across the EU, forests are absorbing 15 per cent less carbon dioxide than in 2005. In fact, almost all

EU countries' forests are decreasing the amount of carbon dioxide they absorb, including heavily forested countries such as Sweden, and some even emit more carbon dioxide than they absorb, such as Finland⁸ and Estonia.

In addition to the harm to nature and our climate, the extractive forestry industry offers fewer and fewer forestry jobs,⁹ and undermines sustainable rural development. Intensive logging offers little to local communities and threatens livelihoods, such as those of Europe's only Indigenous Peoples, the Sámi, who are increasingly unable to practise the reindeer husbandry they have lived from for centuries.¹⁰ The EU imports pulp and paper from Norway, Brazil, Uruguay and the United States of America (USA) (and previously Belarus and Russia) with huge implications for human rights, local water levels, deadly forest fires, the climate and biodiversity. There are also indirect imports of paper from Indonesian forests in packaging for goods imported from Asia.¹¹

6 See Laakkonen, Hujala, and Pykäläinen, 'Defining the Systemic Development of the Finnish Pulp and Paper Industry's Business Network'; Hanna Lundmark, Torbjörn Josefsson, and Lars Östlund, 'The Introduction of Modern Forest Management and Clear-Cutting in Sweden: Ridö State Forest 1832–2014', *European Journal of Forest Research* 136, no. 2 (2017): 269–85, <https://doi.org/10.1007/s10342-017-1027-6>; Hanna Lundmark, Torbjörn Josefsson, and Lars Östlund, 'The History of Clear-Cutting in Northern Sweden – Driving Forces and Myths in Boreal Silviculture', *Forest Ecology and Management* 307 (2013): 112–22, <https://doi.org/10.1016/j.foreco.2013.07.003>.

7 For details, see <https://environmentalpaper.org/why-is-papers-carbon-footprint-so-large/>

8 For Finland, it is for the land use sector as a whole.

9 See Martin Larsson's presentation here https://www.fern.org/fileadmin/uploads/fern/Documents/Presentations/Insights_into_Sweden_Forests_Masterslide.pdf or this publication [A Just Transition - Fern](#)

10 See presentation by Anja Fjellgren Walkeapää at https://www.fern.org/fileadmin/uploads/fern/Documents/Presentations/Insights_into_Sweden_Forests_Masterslide.pdf or [Arctic Limits: How Finland's forest policies threaten the Sámi and the climate - Fern](#)

11 In 2021 China imported more than two thirds of total Indonesian pulp exports (4,712,936 million tonnes, with a value of US\$ 2.6 billion, see: UN Comtrade <https://comtradeplus.un.org/>). In the past decades, deforestation fibre has been systematically found in products manufactured in China (see: https://wwf.panda.org/wwf_news/?207141/Tropical-pulp-still-a-long-way-from-fiction-in-German-childrens-books)



RECOMMENDATIONS FOR THE PACKAGING AND PACKAGING WASTE REGULATION

The Commission proposal aims to set standards across the whole lifecycle of packaging, but most attention is paid to waste disposal and recovery. This is the wrong way around. The Regulation should start by looking at how to reduce packaging in the first place.

We propose focussing on the following two issues:

1. Substantially increase packaging minimisation and packaging waste reduction targets

Where the proposal mentions reduction of packaging, the aims are either vague, or unambitious, or both. The Commission proposes to reduce packaging waste by five per cent by 2030, using 2018 as a baseline. This is far too low, especially considering that volumes have increased by 20 per cent over the last decade.

Recommendation: To avoid driving substitutions between single-use applications made of different materials (from heavier to lighter packaging materials), material-specific sub-targets should be set. In the case of paper, a sub-target for packaging minimisation is

important, since there is a high risk that paper, as a light material, will significantly increase in use as a result of such an amendment.

If the recommendation above on sub-targets is taken on board, then it would be possible to focus on ensuring the sustainability of finite and already over-stretched resources such as woody biomass. Some countries in the global South do not yet have enough paper for educational and cultural needs, so meeting their demand should trump demands from the single-use industry in Europe.

Recommendation: The paper packaging waste reduction target should be based on the best available science about what forests can sustainably supply.

We welcome the decision to set an empty space ratio, but the target is too low and any serious proposal should also consider how to eliminate the multiple other forms of unnecessary and excessive packaging. It is positive, therefore, that the Regulation tackles packaging that is used for advertising instead of protection.

Recommendation: Strengthen the empty space ratio and look at how to eliminate other forms of unnecessary packaging and keep the ban on packaging whose sole purpose is advertising.

The Regulation aims to phase out single-use plastic bags. This is welcome, but it is important that this move does not lead to a switch towards single-use paper bags. Paper bags are harder to use more than once and need long fibres that cannot come from recycling.

Recommendation: Have the long-term aim of phasing out all single-use bags, this includes paper bags.

2. Increase reuse and refill targets

It is positive that the proposal includes targets for moving to reusable packaging, however, the targets are far too low (for example only 20 per cent of beverages and 10 per cent of take-away food should be sold in reusable packaging by 2030). Reusable packaging is on a downward trend and this must be reversed as soon as possible, but too often the focus is on switching from plastic single-use to paper single-use. It will require a policy-supported shift to get to a situation where single-use and instant waste are no longer the default option.

Recommendation: The Regulation should focus on scaling up well-designed reuse systems which can deliver clear environmental benefits, including maximising packaging reuse by creating closed loop systems, in keeping with the waste hierarchy.

