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Cross industry position paper of flexible packaging value chain

PROGRESS IN PACKAGING CIRCULARITY ONLY POSSIBLE WITH FORWARD-LOOKING AND PROGRESSIVE POLICIES

The undersigned organisations representing the flexible packaging value chain in Europe call upon European legislators to provide a progressive and forward-looking definition of packaging recyclability, befitting of a circular economy for all packaging.

As manufacturers of flexible packaging or other stakeholders of the value chain like material suppliers or users of flexible packaging to pack products, we fully endorse the general objective of the Packaging & Packaging Waste Directive (PPWD) to prevent the negative impact of packaging on the environment. We also support the mandate arising from the Circular Economy Action Plan to ensure that all packaging is recyclable or reusable by 2030. We believe the transition towards a circular economy for packaging requires a policy response which fosters progress both in packaging design and waste management infrastructures including collection, sorting and recycling.

Flexible packaging represents at least half of food primary packaging placed on the EU market (in product units) while accounting for only one sixth of packaging material used (in weight). This fact demonstrates the key function of flexible packaging, which is to protect valuable products with the smallest amount of material. The required protection is achieved by selecting the most appropriate materials (mainly plastics but also aluminium and paper), possibly combined in order to benefit from the cumulated materials' properties. In this way, flexible packaging helps save resources, resulting in less material in packaging waste streams by weight.

Such efficient use of materials has made flexible packaging generally more challenging to recycle from an economic point of view, compared to rigid formats. Current infrastructures were established and built when the recycling of small flexible packaging (mainly used for food products) was not yet mandatory because energy recovery was a legitimate and accepted option. Furthermore, until now, EU recycling targets could be relatively easily fulfilled by focussing mainly on rigid formats. Unfortunately, existing infrastructure, a remnant of previous market and policy realities, were not primarily designed to recycle flexible packaging. The revision of the Packaging and Packaging Waste Directive can be the necessary policy lever that addresses this, complementing existing industry and legislative initiatives.

The future recyclability of small flexible packaging will require (1) pursuing the redesign of material structures where possible to comply with existing infrastructure (certain structures already do); and in parallel (2) scaling up the waste management infrastructure mainly in terms of significant additional capacity and the use of new sorting and recycling technologies, such as chemical recycling. A forward-looking definition of recyclability must account for both requirements and not lead to a lock-in at the level of existing waste management technologies. It should incentivise innovation from all players across the flexible packaging value chain.

We acknowledge the achievements of the established design for recycling (DfR) guidelines for rigid (plastic) and large flexible plastic packaging. Those guidelines were mainly developed based on

existing, installed, and proven waste management technologies and capacities and they are not always suitable for small flexible packaging. To address flexible packaging's particular recycling challenges the entire value chain including brand owners and waste management representatives (organised in the project CEFLEX) developed specific "Design for A Circular Economy" (D4ACE) guidelines for flexible packaging. These complement existing DfR guidelines for rigid (plastic) packaging and large flexible packaging.

CEFLEX D4ACE Guidelines, the available guidelines focusing on flexible consumer packaging (below A4 size), represent the largest industry consensus of approach in DfR and if referenced by the PPWD, will help align all actors in gaining the critical mass required to capture higher recycling rates of flexible packaging waste material.

In case legislators opt for a more general qualitative definition of recyclable packaging, it should only include criteria which can objectively be met by all categories of packaging formats and materials. To illustrate this point, we refer to the potential requirement that 95% of the functional unit must be recyclable in a defined material waste stream, a design feature not suitable for small flexible packaging. In most cases, for lightweight flexible packaging solutions, the optimized structural component which defines the recycling stream represents less than 95% in weight because the necessary functional components added (inks, barrier layer, adhesives, protection coating, etc.) inevitably represent more than 5%. This blanket criterion would make most flexible packaging incompatible with the EU definition from the onset, even if it can effectively be (and already is) diverted from waste streams and be recycled into secondary raw materials. These thresholds are therefore not suitable for a general definition of recyclable packaging and should instead be replaced by Design for Recycling (DfR) guidelines/criteria that are relevant for the packaging in question.

Life cycle assessment studies show that, because of its very efficient use of material, flexible packaging is characterised by low overall environmental impacts, especially carbon footprint. Full recyclability will improve those environmental performances even further. Any future legislation should (a) help maintain the resource efficient design and potential for (packaging) waste prevention of (small) flexible packaging and (b) enable it to be increasingly fully recyclable and achieve full circularity – all this in compliance with the widely accepted waste hierarchy.

More generally, to achieve a climate-neutral Europe by 2050, the flexible packaging value chain calls upon legislators in Europe and the Member States to create an appropriate and stable legislative framework which enables investments in packaging design as well as in capacities and advanced technologies for recycling.

Flexible Packaging Europe (FPE) www.flexpack-europe.org

CEFLEX (A Circular Economy for Flexible Packaging) www.ceflex.eu

CAOBISCO (Chocolate, Biscuit and Confectionery of Europe) www.caobisco.eu

ELIPSO (French Plastic Packaging Association) www.elipso.org

European Aluminium Foil Association (EAFA) www.alufoil.org

European Snacks Association (ESA) www.esasnacks.eu

GIFLEX (Italian Flexible Packaging Association) www.giflex.it

NRK Verpakkingen (Dutch Plastic Packaging Association) www.nrkverpakkingen.nl

The European Pet Food Industry (FEDIAF) www.fediaf.org