



15 September 2022

## FLEXIBLE PACKAGING VALUE CHAIN STATEMENT ON RECYCLED PLASTIC CONTENT TARGETS FOR PACKAGING

**The undersigned organisations, representing the flexible packaging value chain in Europe, call upon European legislators to create an environmentally and economically sustainable model for recycled plastic and its use in packaging.**

As manufacturers, material suppliers and users of flexible packaging, we fully endorse the objective of the Packaging & Packaging Waste Directive (PPWD) to increase the share of recycled plastic in packaging.

We are committed to taking the steps necessary to make this a reality by improving packaging design and investing more in R&D. Increasing the share of recycled plastic in packaging is contingent on meeting rigorous quality requirements for many flexible packaging applications and in sufficient quantities.

We welcome the Commission's effort to understand the appropriate levels of recycled plastic content targets and groups it may apply to. We take stock of the fact that lower targets are considered for contact-sensitive applications and that chemical recycling is included in the estimates of output capacity; we also welcome the consideration of only post-consumer content.

However, we recommend a **more cautious approach when setting recycled content targets for packaging which must comply with strict hygiene and safety requirements.** This is hugely dependent on the regulatory authorisation of novel recycling technologies, which in turn influences the tempo of scaling up such processes and the availability of appropriate feedstock.

A too ambitious scenario, in the absence of assurances that there will be sufficient quality recycled plastic available, will discourage investments into flexible packaging circularity, for purely compliance reasons. Instead, a **feasible and progressively evolving target could drive demand and provide a clear signal for manufacturers and users of flexible packaging and recycling industry.**

As a minimum, a revision mechanism closer to the compliance date, should include a set of criteria such as **presence of collecting and recycling infrastructure, availability of sufficient quantity and quality (especially for food grade) and enabling food contact material legislation.**

Given the strong predominance of food-contact applications in the flexible packaging portfolio, meeting any target is linked to the acceptance of chemical recycling output.

Failing to account for these sensitivities can indirectly **impact the future of food supply to the European population, as flexible packaging represents about 50% of packaging units** used for food. We would like to avoid a legislative scenario which incentivises a rushed substitution to packaging with a higher packaging-to-product ratio, resulting in more packaging waste, but also food waste.

We reiterate our commitment to a circular economy and look forward to the legislative proposal on the revised PPWD.

**Flexible Packaging Europe (FPE)** [www.flexpack-europe.org](http://www.flexpack-europe.org)

**CAOBISCO** (Chocolate, Biscuit and Confectionery of Europe) [www.caobisco.eu](http://www.caobisco.eu)

**ELIPSO** (French plastic packaging association) [www.elipso.org](http://www.elipso.org)

**Embalaje Flexible España** (Spanish flexible packaging association) [efe.graphispack.org](http://efe.graphispack.org)

**European Coffee Federation (ECF)** [www.ecf-coffee.org](http://www.ecf-coffee.org)

**European Snacks Association (ESA)** [www.esasnacks.eu](http://www.esasnacks.eu)

**FEDIAF** (The European Pet Food Industry) [www.fediaf.org](http://www.fediaf.org)

**GIFLEX** (Italian flexible packaging association) [www.giflex.it](http://www.giflex.it)

**IK – Industrievereinigung Kunststoffverpackungen** (German plastic packaging association) [www.kunststoffverpackungen.de](http://www.kunststoffverpackungen.de)

**NRK Verpakkingen** (Dutch Plastic Packaging Association) [www.nrkverpakkingen.nl](http://www.nrkverpakkingen.nl)