



Dutch consultation on Single Use Plastic

The European Carton Makers Association (ECMA) is grateful for the opportunity to provide input to the consultation on the implementation of the Single Use Plastic Directive (Directive (EU) 2019/904) (SUPD) in the Netherlands. ECMA brings together folding carton converters, cartonboard mills and suppliers to the folding carton industry; we are committed to working with policymakers to support these common priorities.

ECMA supports the aim of the SUPD to reduce plastic litter in the environment. We wish to ensure implementation of the SUPD that enables the proper recovery and recycling of single use plastic products and ensures optimal environmental outcomes. Accordingly, ECMA are keen to address two aspects of the proposed implementation in the Netherlands.

Definition of high-quality recycling

ECMA is keen to ensure single use products are recycled back into high quality end uses...indeed we can contribute to the common goal by providing highly recyclable and renewable products with low environmental footprint. ECMA supports incentivising recycling of single use plastic products in the national implementation of the SUPD since this reduces material consumption and reduces waste. It is important that the definition of “recyclable” packaging is clear, practical, and enforceable and this definition should focus on design for high-quality recycling and ensuring that packaging is collected, sorted and recycled into new products.

However, the proposed definition of high-quality recycling is counterproductive...the definition needs to account for differences in recycling processes between materials seeing the scope of the SUPD not only encompasses fully plastic products, but also includes fibre-based packaging with a plastic coating or lining.

The first issue is that recycled fibres cannot be recycled back into food contact materials, as current EU food contact materials legislation does not support this because there are potential challenges with microbiological and chemical contamination.

Secondly, the Paper for Recycling market already functions well. Paper is a circular material and fibre-based packaging is highly recyclable and recycled. It enjoys a high recycling rate of 82.3% (EU27-2019). In the Netherlands, the recycling rate of paper and board packaging is even higher, 91% (2019). There is economic demand for recycled paper as a secondary raw material, allowing the fibres to remain in the economy as a valuable resource and to be used for new products. Whilst the fibre in paper cups can be recycled in excess of 25 times, there is also a need for input of fresh fibres. The highest societal value is provided by taking the fresh fibres into end use applications with the highest safety requirements such as paper cups or containers of perishable food.





Limiting recycling options for fibre-based cups and food containers to closed loop recycling would therefore be counterproductive: it would, in fact, reduce the lifecycle of the fibres, and would not reflect how fibres are recycled in practice.

The proposed timeline and recycling targets are not realistic, considering the challenges with recycled content in food contact materials and the reform of the recycling infrastructure that would be needed to enable closed loop recycling. Therefore, ECMA would recommend that the definition of high-quality recycling is revised to mean recycling Paper for Recycling into new fibre-based products, which can in turn be recycled again, keeping the fibres in the loop. In addition, the proposed recycling targets should be aligned with EU legislation, to ensure aligned implementation. For fibre-based packaging this means 75% recycling rate by 2025 and 80% by 2030, set in the Packaging and Packaging Waste Directive (Directive (EU) 2018/852).

Reusable vs. single use packaging

The proposal for the implementation of the SUPD presents reusable packaging as the best alternative. Reusable packaging may appear to have a lesser environmental impact when compared to single-use packaging. However, when considering the impact across the full life cycle, reusable packaging is not always the best solution from an environmental perspective. Such packaging should not be considered as “standalone” and typically requires transport and washing, before it can be reused.

A recent Life Cycle Analysis (LCA) study conducted by Ramboll, looked at the life cycle impact of fibre-based single use and reusable packaging systems in a Quick Service Restaurant environment in Europe. The study found that the fibre-based single use system had many benefits over multi-use systems and indeed had a lower carbon footprint.

ECMA accordingly recommend the use of LCA analysis, in comparing reusable vs. single use packaging.

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