



### **Fibre Packaging Europe**

European coalition for renewable, circular and sustainable paper and board packaging.



**EUROPEAN PANEL FEDERATION**  
WOOD-BASED PANELS

Brussels, 08th November 2023

## **Joint Statement on High-Quality Recycling and Recyclability in the Packaging and Packaging Waste Regulation proposal**

Fibre Packaging Europe (FPE), the Federation of Wooden Pallets and Packaging Manufacturers (FEFPEB), the European Confederation of Woodworking Industries (CEI Bois), GROW International, the European Panel Federation (EPF), and the European Furniture Industries Confederation (EFIC) share recommendations regarding the ENVI Committee Report adopted on 24 October on the Packaging and Packaging Waste Regulation (PPWR), specifically relating to the definitions of 'high-quality recycling' and 'recyclability'.

While we fully support the sustainability goals of the PPWR, we believe that the proposed 'one size fits all' approach is not suitable for the unique attributes of wood, pallets and paper-based packaging, as it would impose an unnecessary restriction and fails to account for their significant contributions to the circular economy.

**Our primary concern relates to the new definition of 'high-quality recycling' and 'recyclability' in the ENVI Committee Report.** We urge that these definitions should not enforce a closed-product-loop recycling approach for all packaging materials. Such a mandate would disrupt the wood packaging and paper-based packaging recycling industry, which successfully transforms packaging waste into products that are made from a renewable material, are useful to society and safe for the consumers, including packaging but not necessarily.

**Such requirements would be an unnecessary barrier to paper and wood recycling without bringing any benefits** and it would be better to be avoided. This will **require increased transport of packaging for recycling** within Europe in order to direct packaging to the specific mills for recycling; for example, from the South of Italy to the North of Finland.

As per the ENVI Report, a packaging material is considered to undergo "high-quality recycling" **so that it can be recycled and used in the same way or for a similar application, with minimal loss of quantity, quality, or function. Furthermore, the definition of recyclability provides that packaging is recycled in packaging.** Recyclability and recycling should **not be linked with closed product loop** but **with the quality of recycled materials and their potential to substitute primary raw materials in new products.**

Wood waste from packaging and pallets is mainly recycled into panel boards and considered as high-quality raw material for the panel industry (cascading use of wood<sup>1</sup>). In 2022, 9 million tons of recovered wood were used in Europe to manufacture particleboards, being 43% of the raw material used by this European industry<sup>2</sup>. Mandating a closed loop product recycling approach would restrict

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<sup>1</sup> [European Commission study on the optimised cascading use of wood 2016](#)

<sup>2</sup> [Advocacy Leaflet - European Panel Federation \(europanel.org\)](#)

raw material flow into a perfectly functional panelboard industry that uses a significant amount of recycled raw materials.

Recycled wooden packaging, in the form of wood-based panels used in construction or furniture, plays a significant role in achieving carbon emission reduction targets in this critical sector as well. It also facilitates the replacement of fossil-based products with long-lived circular materials and products that contribute significantly to carbon storage and the circular economy, aligning with the policy objectives of the EU Green Deal to achieve climate neutrality by 2050.

Wood is a renewable and environmentally sustainable material for transport packaging with carbon capture properties and low environmental impact. Wooden packaging and pallets are made from a renewable material which serve as a CO<sup>2</sup>-neutral mobile carbon storage system. They store up to 27 kg of CO<sub>2</sub> per average timber pallet, contributing significantly to carbon capture and climate goals.

Additionally, food contact materials, including wooden light weight packaging (LWP), must adhere to stringent food safety regulations<sup>3</sup>. Thus, implementing closed-loop recycling for materials like wood will also not be feasible due to food safety concerns for food contact material and it will not be possible to be recycled into panelboards (its main application).

**Paper and board fibres being recycled in the paper loop (material loop) is high-quality recycling.** Paper and board fibres can be recycled many times when they remain within the paper loop (not necessarily for the exact same product application); their quality is optimized and the life of the fibre can be further extended.

**There is a well-established and well-functioning market for secondary raw materials in the paper and board industry.** In 2022, in Europe, 49.1 million tons of Paper for Recycling, our secondary raw material, were used to make new paper and board out of 54.9 million collected. On average 75% of paper and board packaging is sourced from recycled materials.

In conclusion, **considering the distinct characteristics of paper and board, wooden packaging, and pallets, we urge to delete the requirement to recycle packaging in the same application or in new packaging in the definitions of ‘high quality recycling’ and ‘recyclability’ in Article 3.** As a part of the Annex attached below, we are proposing concrete amendments that address our concerns regarding the text of the report.

The signatories of this joint statement call for the EU to regulate a **‘material loop’**, rather than a ‘closed product loop’. Adopting a flexible approach to recycling definitions that allows for the unique qualities of wood packaging is essential to support the circular economy, carbon capture, and the broader sustainability goals. We look forward to engaging in further discussions and collaborative efforts to achieve these aims.

**Signatories of this joint statement:**

- **FEFPEB: European wooden pallets and packaging manufacturers**  
FEFPEB (TR 924074750032-19) is a trade association representing manufacturers, repairers, and traders in the field of wooden packaging and related institutions and organizations. <https://www.fefpeb.eu/>
- **Fibre Packaging Europe**  
Fibre Packaging Europe is an informal coalition of seven trade associations representing industries involved in forestry, pulp, paper, board & carton production and recycling from across Europe. <https://www.fibre-packaging.eu>

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<sup>3</sup> Regulation (EC) No 1935/2004

- **EPF: European Panel Federation**  
EPF represents the European manufacturers of wood-based panels being particleboard, dry process fibreboard (MDF), oriented strand board (OSB), hardboard, softboard and plywood. EPF has members in 30 European countries. [www.europanel.org](http://www.europanel.org)
  
- **CEI Bois: The European Confederation of Woodworking Industries**  
CEI Bois represents 22 European and national organisations from 16 countries and is the body backing the interests of the whole industrial European wood sector: more than 180.000 companies in the EU. <https://www.cei-bois.org/>
  
- **GROW International**  
GROW International is the European organisation of wooden packaging manufacturers, created as a result of the cooperation between wood packaging sector in Spain, France, Germany and Italy. It represents more than 150 companies that manufacture 800 million boxes for fruit and vegetables annually, and 400 million boxes of other types. [www.grow-international.eu](http://www.grow-international.eu)
  
- **EFIC is the European Furniture Industries Confederation**  
EFIC represents over 70% of the total turnover of the European Furniture Industries, a sector employing 1 million people in about 120.000 enterprises across the EU and generating a turnover of over 100 billion Euros. The EFIC membership is composed of 18 national associations, one individual company member and several clusters. <https://www.efic.eu/>

## Annex

<b>Amendment 1</b>	
Proposal for a Regulation	
<b>Article 3 - Paragraph 1 (32a)</b>	
ENVI Report	Suggested Amendment
(32a) 'high quality recycling' means any recovery operation, as defined in Article 3, point (17), of Directive 2008/98/EC, that ensures that the distinct quality of the waste collected is preserved or recovered during that recovery operation, so that it can be subsequently recycled and used in the same way or for a similar application, with minimal loss of quantity, quality or function;	<b>Option 1:</b> (32a) 'high quality recycling' means any recovery operation, as defined in Article 3, point (17), of Directive 2008/98/EC, that ensures that the distinct quality of the waste collected is preserved or recovered during that recovery operation, so that it can be subsequently recycled and used <del>in the same way or for a similar application</del> with minimal loss of quantity and/or quality or function;

<b>Amendment 2</b>	
Proposal for a Regulation	
<b>Article 3 - Paragraph 1, 31 a (new)</b>	
ENVI Report	Suggested Amendment
(31a) 'recyclability' means the assessment of the compatibility of packaging with the management and processing of waste by design, based on separate collection, sorting in separate streams, recycling at scale, and use of recycled materials to replace primary raw materials in new packaging;	(31a) 'recyclability' means the assessment of the compatibility of packaging with the management and processing of waste by design, based on separate collection, sorting in separate streams, recycling at scale, and or use of recycled materials to replace primary raw materials <del>in new packaging</del> ;