

Designing, Developing and Delivering the Circular Economy for Consumer Flexible Packaging

The critical role of CEFLEX Designing for a Circular Economy guidelines

Input relevant to the ongoing review of the Packaging
Waste Directive and definition of 'Recyclability'

30 June 2021

The **Circular Economy for Flexible Packaging (CEFLEX)** initiative is a collaboration of over 170 European companies, associations and organisations representing the entire value chain of flexible packaging – from raw material producers, packaging converters, brands, retailers, recyclers, suppliers and beyond. Together, we work to make all flexible packaging in Europe circular by 2025.

The CEFLEX ‘Mission Circular’ vision commits to collection of all flexible packaging with over 80% of the materials entering a recycling process to be returned to the economy and used by sustainable end market to substitute virgin materials.

To deliver the circular economy, it is imperative the **Packaging and Packaging Waste Directive revision recognise the CEFLEX Designing for a Circular Economy guideline applicability for household consumer flexible packaging applications**

Key Messages

- **Recyclable**, light weight, resource efficient flexible packaging is a key enabler of achieving the EU Green Deal objectives of climate neutrality by 2050 and recyclable packaging in a viable and cost-efficient manner by 2030
- Defining recyclability is packaging format specific and needs to be based on agreed design for recycling guidelines. Setting a blanket 95% target material recyclability threshold for all packaging would seriously impact flexible packaging’s ability to deliver the required functionality.
- We call for [CEFLEX Designing for a Circular Economy \(D4ACE\) Guidelines](#) to be legally recognised as the guidelines by which industry and legislation assess ‘recyclability’ for consumer flexible packaging¹ below A4 size.
- The CEFLEX (D4ACE) Guidelines have been developed via multi-stakeholder inputs and are endorsed by a significant percentage of actors across the full consumer flexible packaging value chain including plastic producers, film producers and converters, brand owners and retailers, the collectors, sorters and recyclers and many others.
- For plastic-based consumer flexible packaging¹, CEFLEX D4ACE Guidelines require at least 90% of the functional unit to be the targeted mono-material for it to be deemed recyclable: i.e., fully compatible with mechanical recycling.
- We call for the PPWD legislation to promote, incentivise and facilitate the investments in collection, sorting and recycling (mechanical, physical and chemical) infrastructure that will ensure the recycling of flexible packaging towards the attainment of EU’s plastics packaging recycling targets and the circular economy.
- We ask for Member States to grant sufficient time for innovative packaging and the requisite scale up of new sorting and recycling infrastructure to be 5 rather than 2 years.

* ¹ This specifically refers to plastic-based small consumer flexible packaging which are currently covered by the CEFLEX D4ACE guidelines. We recognise that the 90% full recyclable threshold in D4ACE applies only to PE and PP containing flexible packaging and not to aluminium foil and paper based flexible packaging.

Background

The organisations participating in CEFLEX are committed to accelerating the circularity of consumer flexible packaging and support the sustainable growth strategy outlined in the Green Deal and the decoupling of economic growth from resource use. We support the ambition set out in the EU Circular Economy Action Plan (CEAP) 2 for all packaging to be reusable or recyclable in a viable and cost-effective manner by 2030.

Flexible packaging services a large part of the consumer industry, including around half of all food products in Europe, and is a key medium for brands to speak to consumers and meet legal (consumer information) and food safety requirements. The design and functionality of consumer household flexible packaging allows a large part of the consumer industry to 1) be legally compliant with consumer information requirements, 2) meet food safety legal requirements and 3) prevent food waste. Flexible packaging is already collected, sorted and recycled in an increasing number of EU Member States. The future of this resource efficient packaging form should not be put at risk by a blanket definition of recyclability that a significant proportion of consumer functional flexible packaging cannot realistically meet.

Why D4ACE Guidelines should be the ‘go to’ guidelines for industry and legislation to assess the ‘recyclability’ of consumer flexible packaging below A4 size?

Over the past 4 years CEFLEX stakeholders have collaborated extensively in the development of the [CEFLEX Designing for a Circular Economy \(D4ACE\) guidelines](#). Now published and adopted by the 170+ CEFLEX participating companies, D4ACE guidelines are considered the ‘go to’ industry guidelines for consumer flexible packaging¹ below A4 size.

CEFLEX companies have already invested to adapt large parts of their flexible packaging portfolio to these guidelines and more work is going on to accelerate this implementation with the ultimate goal of making flexible packaging truly circular. A June 2020 survey of CEFLEX brand owners indicated all are in the process of reviewing their flexible packaging portfolios, replacing multi-material flexible packs with mono-material versions, with commitments to be entirely recyclable, reusable or compostable by 2025. The CEFLEX D4ACE guidelines call for simpler, mono-material packages to be designed and commercialised, whilst maintaining the highly valued functional characteristics in a light weight, resource efficient package.

The application of D4ACE guidelines recyclability requirement of at least 90% of the functional unit of a flexible plastic packaging to be a mono-material which is collected, sorted and recycled is consistent with the objectives of the Essential Requirements revision.

We call for the D4ACE guidelines to be legally recognised as the design guidelines used by the flexible packaging industry and legislation to assess the recyclability of consumer flexible packaging below A4 size.

We also ask that design guidelines deployed in the assessment of recyclability are harmonised across all Member States to ensure the proper functioning of the Single Market.

Flexible packaging is already being recycled in an increasing number of EU countries

With the proper incentives, EPR support and Member State investments in collection, sorting and recycling (mechanical, physical, chemical) infrastructure, flexible packaging that today is not recycled at scale can be properly collected and sorted, building sufficient volumes to become economically attractive for recycling to meet EU recycling targets by 2025.

Specifically, there are encouraging examples of what can be achieved with this approach as shown by the recent commitment of the EPR scheme FostPlus in Belgium to recycle flexible packaging, following the examples set in Germany, Austria and the Netherlands.

This must be accompanied by effective and workable Extended Producer Responsibility (EPR) systems and a clear investment framework by Member States in the necessary sorting and recycling (mechanical, physical, chemical) infrastructure to EU meet recycling targets and CEAP 2 goals.

Only if the efforts come from both directions – the packaging value chain and policy makers - will we achieve a high level of recyclability.

95% Rule

CEFLEX does not support the proposed blanket threshold of 95% of the functional unit of packaging to be recyclable in a possible qualitative definition of recyclability for the Essential Requirements. In the case of flexible packaging, the proposed threshold does not provide sufficient scope for the inclusion of printing inks, food protection barriers and other functional materials needed to protect the packaged good and to communicate to consumers. Due to thinness of the films, weight share of function-enabling components such as non-PE/PP layers, adhesives and coatings is relatively higher than for other packaging types. For plastic-based consumer flexible packaging¹, our proposal for a threshold level for full recyclability be set at 90%, based on our D4ACE Guidelines.

A threshold of 95% would lead to either a compromise on food barriers increasing the risk of food being wasted or result in the use of excess materials for producers to meet a regulatory requirement of 95% mono material and which would go against the principle of waste minimisation. Importantly, such a requirement may incentivise unnecessary material use to meet the percentage target (e.g., by doubling the thickness of the base material one could move from 90 to 95%, which would go against principles of source reduction and efficiency).

Timing for innovative packaging to be recyclable

The proposed timeline of 2 years we believe is not realistic or reflective of the innovation and qualification cycles used by producers to ensure packaging functionality, shelf life and food safety. Neither is two years sufficient time to scale up new sorting and recycling infrastructure. Consequently a 2-year time frame would curtail innovative flexible packaging and hampers investment decisions. We believe a more realistic and practical timeline would be 5 years.

The acceptance of the D4ACE guidelines for the assessment of consumer packaging below A4 and the investment and realisation of the required collection, sorting and recycling infrastructure in the required capacity is critical for a successful, sustainable and circular flexible packaging economy.

We are grateful for this opportunity to present our proposals and we would welcome an occasion for a few CEFLEX members, representative of the value chain to meet with you and to expand on the points presented as well as, show practical examples of flexible packaging commercialised in alignment with the D4ACE guidelines and share our firsthand experiences.

Attached: [CEFLEX Designing for a Circular Economy guidelines](#)