

INTERGRAF and UNI EUROPA GRAPHICAL JOINT STATEMENT

Social Partners emphasise key priorities for Packaging and Packaging Waste Regulation

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The social partners of the packaging printing industry support the ambitious objectives of the review of the Packaging and Packaging Waste Legislation in line with the EU Green Deal. The packaging industry is a large and important sector in Europe that provides products to many other economic operators and the future of its companies, and their workforce needs to be safeguarded. A strong Regulation should support harmonised packaging design and recycling requirements in Europe to secure a well-functioning internal market and to ease the compliance work of economic operators. It should also not ignore the primary purpose and function of packaging, which is to protect products.

Printing is a crucial component of most packaging. Printing will be an important aspect to consider when defining design for recycling criteria for packaging. While it is important to define design for recycling criteria for packaging, it is equally important to address the end-of-life phase of the packaging material and therefore incentivise separate collection, sorting and state-of-the-art deinking and recycling processes.

In view of the final negotiations on the draft packaging and packaging waste Regulation, the social partners of the packaging printing industry would like to highlight its key priorities to achieve an ambitious and workable regulatory framework.

1. Inks, varnishes, coatings

We support the definition of composite packaging as put forward by the European Parliament, i.e. excluding labels, coatings, lining, varnishes, paints, inks, adhesives, lacquers, closures and sealing.

We also support the exclusion of inks, adhesives, paints, varnishes and lacquers from the requirement of minimum recycled content in plastic packaging as adopted by the European Parliament.

2. Reuse and recycling

We support an approach that allows the coexistence of both reuse and recycling schemes. Reuse should not be encouraged per se to the detriment of recycling when it proves to have a better environmental outcome. The introduction of the exemption to reuse targets where the rate of separate collection is above 85%, as introduced by the European Parliament, allows both schemes to coexist.

We support the definition of high-quality recycling as adopted by the European Parliament which is linked to its potential to substitute primary raw materials rather than limit it to a closed-

loop recycling of packaging. Valuable high-quality raw materials can arise from both types of recycling streams.

3. Harmonised rules

We support the Commission's proposal to convert the current Directive into a Regulation. With a view to strengthen the internal market for packaging in Europe, the Regulation should refrain from allowing diverging national measures and labelling rules. In particular, the text should not allow the introduction of national labelling requirements for the purpose of identifying EPR schemes. An EU harmonised labelling scheme should prevail.



Intergraf is the European trade association for the graphic industry, consisting of 22 member federations from 21 countries. Its primary objective is to boost the printing industry's competitiveness by fostering its sustained development, innovative advancement, lasting sustainability, and serving as a social partner for employers in the sector towards the European Union.



UNI Europa Graphical and Packaging represents over 350,000 members of the Publishing, Printing and Packaging Industry in Europe, through over 40 affiliated graphical national trade unions.