



Introduction and Position

The European Moulded Pulp Producers Association – EMPPA – represents the interests of companies from the moulded fibre value chain by promoting a level-playing field for circular packaging products made of moulded pulp that was sourced from agricultural secondary feedstock and recycled paper and cardboard.

EMPPA fully supports the European Commission’s goal to create a circular economy by promoting the development and use of bio-based, food-safe and fully recyclable packaging materials, efficient collection systems and a close collaboration between participants in the value chain.

The amount of Packaging and packaging waste has been rising steadily in recent years, faster than the gross national income, which leads to soaring greenhouse gas emissions, the overexploitation of natural resources, biodiversity loss and pollution.

Especially the processing of secondary raw materials from agricultural waste instead of primary wood fibre into moulded pulp plays a key role in containing these negative impacts, reducing waste and pollution from single-use plastic and microplastic. Combining moulded pulp packaging products with barrier coatings made from natural biomaterials make them fully recyclable, compostable and sometime food safe, and hence a fully sustainable alternative to single-use plastic formats. From this perspective, a 75% recovery target for packaging made from paper and cardboard until 2026 and 85% until 2031 are totally realistic.

Policy Recommendations


EMPPA believes that by further developing and scaling up modern fibre moulding technology across different applications and industries, the moulded pulp industry can be a key contributor to the ambitious goals set out in the Paris Climate Agreement and the European Green Deal as the EU’s growth strategy.

To achieve these goals, EMPPA calls on the European Commission to

1. Produce effective policy incentives that promote sustainable packaging products made from recycled paper and pulp, agricultural secondary feedstock, and natural biomaterials;
2. Facilitate the integration of these materials into existing paper and bio-waste collection and recycling streams;
3. Harmonise and simplify rules for Food-Contact-Materials (FCM) across the EU, including fibre, paper and barrier materials, to ensure that recycled FCM are as safe as virgin materials;
4. Set clear rules for data requirements and the information transfer throughout the supply chain, including a declaration of compliance for all FCM; and
5. Extend the EU Ecolabel scheme to fibre-based molded pulp packaging products to certify environmental excellence, based on a full Lifecycle Assessment.

Rationale

The Europe moulded fibre packaging market is forecast to account for 2.5 bn EUR in 2023 and further accelerate at 5.7% annual growth to attain a valuation of 4.4 billion EUR by 2033.



The key factor for driving this market forward is a rising demand for eco-friendly and sustainable packaging solutions from various end use industries such as food and beverages, healthcare, cosmetics, and electronics. The second key driver will be voluntary waste-reduction commitments by industry and the implementation of new regulations both at the EU and Member State level.

The EMPPA sees the opportunity to advance on the EU's waste reduction and consumer protection goals by redesigning, remanufacturing and thus replacing certain packaging and consumer products made of single-use plastics by sustainable moulded pulp packaging products made from agricultural secondary resources and recycled paper and cardboard. This would also be an important contribution to minimize the littering problem.

At a consumer level, this material can be treated as bio-waste and either be composted domestically or converted by a professional waste management organisation into high-quality recycled pulp. The quality of the secondary feedstock is ensured through the integrity of a closed-loop collection system. By minimising the risk of contamination by harmful substances, the original feedstock can be recycled and reused multiple times, thereby maximising its value creation.

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