

The Hague, 23 March 2022

FINAT Feedback to Eunomia stakeholder questionnaire – PPWD revision and recyclability requirements

[FINAT](#) is the European association for the self-adhesive label industry. We welcome the opportunity to provide feedback on the Stakeholder questionnaire on recyclability requirements as part of the revision of the Packaging and Packaging Waste Directive.

In particular, we would like to provide feedback on the proposal of a **negative list of packaging features**.

Question: Do you agree with the need for a negative list of packaging features to be published? Why?

We **strongly oppose** the creation of a negative list of packaging features, as it would create confusion and it is in many cases based on weak/flawed points and broad generalizations (*vide infra*) that result in incorrect conclusions about various types of packaging. As a result, the measure will be counterproductive, with the potential to hinder the development of recycling-friendly innovations or adaptations of recycling processes that enable technically and commercially viable recycling routes.

Our view is that clear **Design for Recycling (DfR) guidelines** that are material-, technology- or application-specific, as currently available or being developed by different sectors, can be much more efficient at ensuring a high recyclability of packaging materials.

Question: Are there any specific packaging features you would add/remove from the example list provided?

To illustrate our above mentioned rationale, the following proposed criteria would be particularly problematic:

Plastic

- *Plastic or glass packaging with sleeves covering >50% of the surface*: it is not an issue to have > 50% coverage of the container with decorations, as the material of the container can still be properly recognized using modern sorting technology. The advent of digital watermarking solutions (e.g., HolyGrail2.0) and further advances in sorting technologies will render this into a non-issue. Besides this, full body decoration using sleeves can be helpful at removing colour inhomogeneities arising when using containers made from recycled plastic, thus further enabling the circular economy.
- *Plastic packaging with additives changing the material density >1 g/cm³*: we recognize that in order for PET containers to be recycled, the finished labels or sleeves should have a density lower than 1.0 g/cm³ so that they can be separated from the PET flakes. In the case of HDPE/PP containers, labels/sleeves from e.g. PET, PETG, PLA, PS and paper with densities higher than 1.0 g/cm³ can be separated from the HDPE/PP in the sink-float process. This is one example of a generalization without careful consideration of details that can have unforeseen consequences. DfR guidelines can be more efficient at addressing this point.
- *Non-water soluble / water-releasable adhesives at <600C (sic)*: We understand that the “600C” was a typo and that 60°C was meant. Non-water soluble / water-releasable adhesives on labels are

already approved by Plastics Recyclers Europe (PRE) and RecyClass as being recyclable together with coloured HDPE and PP containers; this is therefore an irrelevant criteria to focus on. Furthermore, 60°C is also not necessarily the most relevant temperature to put focus on, as the value depends on the technology involved at both the packaging manufacturer and the recycler.

Paper

- *Silicone/wax coatings*: Siliconized papers can be recycled commercially with currently available technology (see e.g. [CELAB white papers](#)). There are multiple programs specifically targeting the collection of siliconized release liner from self-adhesive labels to be recycled into high-value products. The self-adhesive label industry is working on a global project to further develop the recycling of these materials ([CELAB](#)).
- *Insoluble adhesives + hotmelt adhesives with softening >450 (sic)*: We understand that the “450” was a typo and that 45°C was meant. All pressure-sensitive adhesives are insoluble in water and all hot-melt adhesives have a softening point greater than 45°C. Nevertheless, they can be fully recyclable with the paper-based packaging to which they are adhered. Industry-established test methods to assess the removability of adhesives are listed in some national guidelines, e.g. German’s Minimum standard pursuant to section 21 VerpackG. The removability of the adhesive is not only influenced by the nature of the adhesive itself, but also by the application conditions (e.g., thickness). These adhesives are used throughout critical, essential products and supply chains, and many are also approved for uses in food contact materials in the EU. Again, a broad generalization is not needed and instead DfR guidelines will be sufficient.

Glass

- *Full surface sleeves and permanently attached labels with ultra adhesive glues*: as in the above comment for plastic, there is no issue in the recognition of the material of the container with high coverage sleeves or labels with the advent of digital watermarking solutions and modern sorting technologies. Furthermore, abrasion systems used in glass recycling are able to efficiently remove sleeves and labels from glass containers, which can be easily separated and do not contaminate the obtained cullet. The term “ultra adhesive glues” does not have a specific meaning in the adhesive or labelling industry and would therefore create confusion. Once again, a “negative” list over-generalizes and instead DfR guidelines should suffice.

FINAT represents almost **600 member companies** established in more than 50 countries, covering the complete value chain of self-adhesive label industry. The label printing industry alone **directly employs around 100.000 people** in the EU, with a **yearly revenue in the order of €14B**. FINAT is committed to increasing the sustainability of the value chain and to applying circular economy principles in packaging.

Self-adhesive labels, also known as pressure-sensitive labels, play a critical economic and social role in packaging. These labels enable communication of information about packaging and its contents, provide resource-efficient functionality that eliminates package complexity and waste (a label can serve multiple purposes), and enable entire supply chains by allowing tracking, tracing and security. Industries such as medical, pharmaceutical, food and beverage, logistics, and others, as well as consumers, rely on self-adhesive labels for a well-functioning supply chain and economy.