

ACE IS CONCERNED ABOUT MIS CONCEPTIONS ABOUT WOOD BASED PRODUCTS

ACE calls on the European Commission to recognize the benefits of renewable and recyclable short-lived products, such as packaging, in its upcoming EU Forest Strategy. Low-carbon, circular packaging provides clear benefits, notably in terms of GHG emissions. There is no scientific evidence for discriminating short-lived packaging that is recycled. The substitution of carbon intensive material by low carbon material should be incentivized and intensified.

ACE welcomes the recognition in the upcoming EU Forest Strategy of the role of sustainable forest management and certification to demonstrate sustainable sourcing, avoid illegal logging, mitigate climate change and achieve EU biodiversity ambitions. ACE believes that rather than creating a new certification scheme, the EU Commission would have a key role in supporting small-scale producers to invest in the existing certification schemes and encourage these schemes to further improve.

Packaging is essential to protect consumers' health, allow safe use and transport of goods and avoid food waste. The essential role of packaging has long been recognised, including during the recent pandemic.

Beverage cartons (BCs) are a low-carbon and recyclable packaging solution used to protect and distribute perishable food and beverages, such as milk or juices. Current studies have shown that beverage cartons have the lowest carbon footprint compared to other packaging in their core categories, and they do even perform better than reusable glass bottles¹. Beverage cartons are recyclable and recycled at scale². The beverage carton industry will build on its good performance, notably related to GHG emissions and circularity, to ensure that its **vision of beverage carton as the most sustainable packaging for resilient food supply systems, which is renewable, climate positive and circular**, becomes a reality.³

¹ "Supporting evidence- environmental performance of beverage cartons" – Circular Analytics, December 2020 – www.beveragecarton.eu - [Reusable vs Single-Use Packaging: A Review of Environmental Impacts | ReLoop Platform](#)).

² Eunomia report for the European Commission "Effectiveness of the essential requirements for packaging and packaging waste and proposals for reinforcement" that "beverage cartons are recycled at scale across the EU, however, so based upon this consideration they should be categorised as recyclable packaging".

³ ACE 2030 Roadmap – www.beveragecarton.eu



Sustainable forest management and certification

ACE welcomes the recognition in the upcoming EU Forest strategy of the role of sustainable forest management and certification to demonstrate sustainable sourcing, avoid illegal logging, mitigate climate change and achieve EU biodiversity ambitions. ACE members have long only used board sourced from sustainably managed forests as certified by recognized schemes such as FSC or PEFC.

Robust voluntary forest certification schemes, such as FSC and PEFC, have long-standing expertise in promoting sustainable forest management practices which also encompass biodiversity objectives on the ground and have rigorous procedures in place to ensure that all requirements are applied diligently. The new voluntary EU forest management certification scheme proposed in the upcoming EU Forest Strategy would risk duplicating efforts and associated costs, while creating complexity among market players and confusion among consumers. Forest certification in the EU-27 already entails ca. 78 million ha of the total EU forest.

ACE believes that **rather than creating a new certification scheme, the EU Commission would have a key role in supporting small-scale producers to invest in the existing certification schemes and encourage these schemes to further improve.** ACE is keen to contribute to a multi-stakeholders' process to review and if need be improve existing certification schemes.

We further ask the EU Commission **to cooperate closely with industry and internationally recognised existing sustainable forest management certification schemes when developing any additional criteria** e.g. for "close-to-nature" forestry.

Packaging

ACE is concerned about some common mis-conceptions with regard to so called short-lived products. It is of utmost importance that these misconceptions would not end up to the upcoming EU policies such as the EU forest strategy.

To our understanding, the upcoming EU Forest Strategy will claim that there should be a shift from short-lived products to long-lived uses of wood. **This ignores the reality of paper-based packaging such as beverage cartons that are:**

- **Low carbon** and hence substituting fossil fuel-based packaging which carbon footprint is much higher. Reducing the use of low carbon circular packaging would in fact lead to an increase in the overall GHG emissions.
- **Protecting mainly perishable food.** Food contact materials need to meet both equally important food safety and environmental requirements. The specific food safety requirements need to be recognised in the upcoming EU Forest Strategy.



- **Recyclable and recycled.** The fibers used to produce paper-based products can be recycled at least 5-7 times and up to 20 times, which drastically extends the life cycle of the wood fibers in these applications. Limiting the use of short live products would also lead to a reduction in the availability of recycled fibres for further use. The use of recycled fibers in food contact packaging requires authorization by competent food safety authorities based on scientific evidence. We call on a swift drafting and availability of such guidelines for paper.
- **Produced from pulpwood and by-products from the production of construction products.** The use of by-products is a perfect example of a cascading use of biomass as supported by the Commission itself. Wood is used to produce long-lived products and shorter-lived products which are recycled at the end of their life. Pulpwood is also produced from smaller wood from thinning logwoods, which is performed throughout the forest growth cycle to give space to strongest trees to grow and therefore maximize the amount and quality of logwood. The circularity exists both at sourcing an end-of-life which is a unique asset of paper-based products.
- **Made from fibres coming from sustainably managed forests** and are all certified against globally recognised certification schemes such as FSC and PEFC. This guarantees that forests' biodiversity is maintained notably through measures such as the preservation of areas of high conservation value. The wood used to produce beverage cartons come from boreal forests in the Northern part of Europe where forests are growing faster than harvesting.

ACE members are committed to produce beverage cartons only from renewable and/or recycled content, to significantly increase beverage cartons' recycling rate and to certify all materials used in beverage cartons. **The industry calls for a sound regulatory framework to allow such ambition, such as paper-specific food contact legislation/guidelines and ambitious collection of paper-based packaging for recycling.**

Amendment proposals

We propose the following **amendments to be reflected in the upcoming EU Forest Strategy:**

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The Commission will **assess the most impactful option** ~~also to develop~~ **set** criteria for a harmonised "closer-to-nature" voluntary certification scheme **in cooperation with internationally recognised existing sustainable forest management certification and labelling schemes**, so that the most biodiversity friendly management practices could benefit from ~~an EU~~ quality labels **for sustainable forest management.**



Introduction, page 2

Given the increasing and sometimes competing demands on forests, we must also ensure that wood is optimally utilised in line with the cascading principle² so that the majority of it is used for long-lived materials and **which generates** products that are of highest value for a climate neutral and circular economy **in a functioning market**, while subsidies hindering the cascading use of wood should be avoided, ~~while minimising its use for shortlived products and energy production.~~

Chapter 3, page 10

That is why it is crucial that, when building a sustainable and climate-neutral economy, we ensure an optimal use of wood in line with the cascading principle. This means that **whilst more wood** ~~the majority of it should be used for making long-lived durable~~ **low-carbon** materials and products, wood **biomass** used for ~~shortlived~~ **diverse bioeconomy** products and energy production ~~should be minimised and rely namely~~ **can be enhanced, in particular, through industrial symbiosis and other circular economy practices valorising** ~~on~~ secondary woody biomass such as sawmill by-products, residues, recycled materials.

Chapter 3.1, page 11

The focus therefore has to be **on an increase of** ~~a drastic shift from short-lived to long-lived durable~~ **cascading**-uses of wood **in low carbon products that can substitute carbon intensive ones**, such as buildings and furniture, including through better reusing and recycling wood products from construction and demolition sites. **As managing forests for high value products necessitates practices generating small calibre wood through thinning operations, the carbon benefits of all products made from wood-based materials must be valued.** This is also in line with the new EU Circular Economy Action Plan, which has committed to reducing **carbon and environmental footprints, over-packaging and packaging waste, promoting reusable and recyclable packaging** and **considering** further **restrictions** ~~ing~~ **on the use of some packaging materials for certain applications** ~~single-use products. Such short-lived products are made, among others, also of wood-based materials.~~

About ACE

The Alliance for Beverage Cartons and the Environment (ACE) provides a European platform for beverage carton manufacturers and their paperboard suppliers to benchmark and profile beverage cartons as a safe, circular, and sustainable packaging solution with low carbon benefits.