

# VISION PAPER

## TOWARDS SUSTAINABLE PACKAGING IN THE BAKERY INDUSTRY

Fedima, the Federation of European Manufacturers and Suppliers of Ingredients to the Bakery, Confectionery, and Patisserie Industries, remains steadfast in its commitment to fostering a sustainable and innovative bakery industry.

Fedima members operate halfway along the supply chain, from “cradle” to “gate”. They are at the crossroads between production and consumption of bread and patisserie, and thus well placed to work towards a more sustainable bakery industry by supporting balanced legislation, working towards achieving the United Nations' (UN) Sustainable Development Goals and safeguarding consumers' well-being.

In line with the Packaging and Packaging Waste Regulation (PPWR), Fedima is updating its packaging sustainability goals to ensure compliance with new targets while maintaining our long-standing commitment to achieving a circular economy, which requires active collaboration across the supply chain.

This vision paper outlines Fedima's commitments and key recommendations to ensure that circularity aligns seamlessly with innovation, competitiveness, and food safety, supporting the EU's climate neutrality ambitions.

Aligned with the PPWR requirements, the following outlines Fedima's commitments and recommendations:

### **ARTICLE 5: ALIGNMENT WITH FOOD CONTACT MATERIAL REGULATION AND REQUIREMENTS FOR SUBSTANCES IN PACKAGING:**

- ✓ The European Commission is already entitled, under the General Food Law, the Food Contact Material Regulation (Regulation 2022/1616), the Plastics Regulation, and REACH, to take measures addressing substances of concern in packaging materials that primarily affect human health. It is important that any agreement on the PPWR ensures that requirements for compliance with safety substances are conditional on existing food

contact material regulations and regional recycling capacities. This alignment is necessary to avoid regulatory overlaps and confusion while addressing both safety and practical implementation at the regional level.

## **ARTICLE 6: RECYCLABLE PACKAGING**

- ✓ Under the PPWR, all packaging must be recyclable. Packaging shall be considered recyclable in line with the definitions included in the PPWR. To meet these standards, packaging must be designed for recycling, effectively and efficiently collected separately, sorted into defined waste streams without compromising the recyclability of other waste streams, recycled in a way that the resulting secondary raw materials are of sufficient quality to replace primary raw materials, and recycled at scale.
- ✓ From 2030, all packaging must be recyclable according to the EU's Design for Recycling criteria, which will be finalised by 1 January 2028. Only packaging rated as recyclable in grades A, B, or C will be allowed on the EU market. Fedima endorses this five-year transition period, emphasising the importance of granting manufacturers adequate time to conduct essential tests—such as shelf life and quality assessments for food contact materials—between the publication of the guidelines and their enforcement. This transition period should remain applicable even as new packaging and recycling technologies emerge.
- ✓ However, it is necessary to ensure the availability of recyclable and food grade materials during this transition, especially of Post Consumer Recycled plastics which pose a high food safety risk. High-quality recycled content is particularly vital as the shortage of recycled PET, often diverted to non-food applications, poses a challenge to meeting PPWR targets. To address these issues, policymakers should actively support both chemical and mechanical recycling methods. Chemical recycling can serve as a complementary solution, facilitating the shift toward a fully circular secondary raw materials market within the EU.
- ✓ As for recommendations for policymakers on to how to support the transition, Fedima proposes
  - (I) Immediate actions (2024–2025): Priority should be given to scaling up waste management infrastructure and simplify reporting as required by the Implementation Act (due 31 December 2026).

- (II) Short-term actions (2026–2027): Prompt adoption of secondary legislation to set design for recycling criteria.
- (III) Medium-term actions (2028–2030): Prompt adoption of implementing act establishing calculation methodology for recyclability at scale.

## **ARTICLE 11: LABELLING OF PACKAGING**

- ✓ The PPWR introduces harmonised labelling and marking requirements for various packaging formats, with key obligations beginning in 2026.
- ✓ Fedima underscores the need to ensure that any national labels permitted under the PPWR do not create obstacles to the free movement of packaged goods within the EU. An EU-harmonised labelling system is essential to prevent market fragmentation and should be designed to support consumers in correctly sorting their waste. Such a system would not only simplify consumer choices but also form an integral part of waste management systems across all EU Member States, reinforcing their efficiency and consistency.

## **ARTICLES 26 AND 27: RE-USE TARGETS**

- ✓ Fedima supports the transition towards circular packaging but highlights that certain packaging types cannot be replaced with reusable options without risking food safety. In many cases, reusing such packaging could lead to contamination or cross-contamination of allergens. Therefore, while Fedima recognises the value of circularity in packaging, it emphasises that food safety and hygiene standards must remain a top priority.

## **ARTICLE 38: PREVENTION OF PACKAGING WASTE**

- ✓ Member States must meet packaging waste prevention targets of 5% by 2030, 10% by 2035, and 15% by 2040. They are also required to establish systems and infrastructure for separate collection, adopt mandatory national collection targets by January 2029, and ensure “comprehensive collection and sorting infrastructures” to enable high-quality recycling.
- ✓ Fedima acknowledges the obligations placed on Member States and underscores the importance of achieving these targets. To achieve these goals, we call for increased availability of waste collection, sorting, and recycling infrastructure at the local level.

## **ARTICLE 43: RETURN AND COLLECTION SYSTEM**

- ✓ Member States shall ensure the establishment of systems and infrastructures for the return and separate collection of all packaging waste from end users, ensuring that it is properly treated.
- ✓ Fedima underscores the importance of meeting these requirements to improve packaging sustainability and promote efficient waste management practices. To achieve these goals, we call for increased investment in infrastructure for collection and recycling.

## **REFLECTIONS ON PROGRESS AND FUTURE GOALS**

- ✓ Fedima members are tracking their progress toward achieving environmentally sustainable packaging and have set specific targets for the recyclability of their packaging, with some members now having a measurement system in place. The general trend among Fedima members shows an increase in the total weight of reusable/recyclable packaging in the last years, reflecting a growing commitment to sustainable practices.
- ✓ Fedima continues to encourage its members to adopt packaging reduction and reach recyclability targets and remains committed to helping its members enhance their data tracking capabilities.

## **CONCLUSION**

- ✓ Fedima and its members are leading the way in creating a sustainable packaging future for the bakery, confectionery, and patisserie industries. Achieving this vision requires collaboration from all players across the supply chain. With the updated PPWR targets and our ongoing efforts to make packaging more sustainable, Fedima is confident that we can address future packaging challenges while maintaining food safety and quality.