FEPE position on paper mailing formats and PPWR reuse targets

Comments on the Task 1 Background Document for the stakeholder workshop of 18 November 2026

Study: "Study on reuse and reusable packaging of the new Regulation on Packaging and Packaging Waste (EU) 2025/40 – setup of a methodology to calculate the reuse targets and establishing minimum rotations for reusable packaging", framework contract ENV.B.3/FRA/2023/0012.

FEPE asks the study team to remove lightweight paper envelopes, mailing pouches and mailers from its proposed scope under Article 29(1) of the Packaging and Packaging Waste Regulation (PPWR). Task 1 gives insufficient grounds to classify them as flexible canisters. These formats are designed for a single shipment followed by recycling. Applying a reuse quota to them could undermine the same Regulation's objectives on packaging weight, empty space, waste prevention and recyclability.

1. Article 29(1) requires a clear basis for inclusion

Article 29(1) sets a 40% target from 1 January 2030 for the listed categories of transport packaging and sales packaging used to transport products, including in e-commerce. The target applies in aggregate to covered packaging used by an economic operator and requires reusable packaging within a reuse system. In FEPE's reading, the words "including flexible formats" refer to flexible variants of the listed formats. E-commerce is a distribution channel and does not determine whether a format is covered. [1]

Task 1, section J (pp. 17–18), treats e-commerce envelopes, pouches and mailers as flexible counterparts to canisters because they enclose, protect and transport goods and have a closure. These are ordinary packaging functions. A flat or expandable paper mailer for dispatching goods has a different construction and purpose from the canisters described in the study, which are typically used for liquids, pastes or gases and may allow controlled dispensing. [2]

The study team must identify the specific wording in Article 29(1) that supports inclusion and explain which design features or intended uses make a lightweight paper mailer a variant of a canister. The fact that a mailer closes around goods and protects them in transit is too broad a test. Applied consistently, it would bring a wide range of packaging into scope simply because it performs ordinary packaging functions. The Task 1 paper provides no format-specific justification for extending the target to these products. FEPE therefore asks the study team to remove paper envelopes, pouches and mailers from the proposed scope.

2. Lightweight paper mailers are designed for single use and recycling

Lightweight paper envelopes, pouches and mailers protect goods with little material and fit closely around their contents. This limits packaging weight, empty space and the need for filler. Their intended end-of-life route is paper recycling, where suitable designs allow the fibres to be recovered for new paper products.

Eurostat's 24 November 2026 extract reports that the EU recycled 85.7% of its paper and cardboard packaging waste in 2024 and 87.0% in 2023. The European Paper Recycling Council's Monitoring Report 2025 puts the 2025 recycling rate for all paper and board consumed in Europe at 76.4%, a broader measure. The packaging figures cover paper and cardboard together. [3–4]

3. Mandatory reuse could undermine other PPWR objectives

Designing a mailer for repeated rotations would typically require heavier paper, reinforced seams or more durable closures. Each of those changes can affect how the format performs against the PPWR's other objectives.

Packaging weight. Thicker paper and reinforcements increase the weight of each pack. Those additional materials deliver a benefit only if the pack completes enough trips to offset them.

Empty space. A lightweight mailer can conform to its contents. A stiffer or standardised reusable design may fit less closely, leaving more empty space or requiring filler.

Recyclability. Additional coatings, adhesives or closure components can make fibre recovery harder. A simple paper construction helps preserve the value of the fibres in the existing paper recycling stream.

Waste prevention. If packs are lost, damaged or discarded after too few trips, heavier designs can generate more packaging waste per successful delivery. The assessment must also account for collection, return transport, and any inspection or reconditioning.

A second sealing strip can let the customer send goods back once in the original mailer. That occasional return does not demonstrate suitability for repeated rotations in a reuse system. [1]

Lightweight paper mailers already advance several PPWR objectives together. They protect goods with little material and empty space and are designed to enter an established recycling stream after delivery. FEPE asks that this single-use and recycling model be retained. Any case for mandatory reuse must demonstrate an improvement per successful delivery using observed rotations, return rates and damage or loss rates, while accounting for product protection and end-of-life impacts.

4. The cardboard box exemption reinforces the case for excluding paper mailers

FEPE supports the exemption for cardboard boxes under Article 29(4)(d), which excludes them from the obligations in Article 29(1)–(3). Sturdy corrugated boxes can often withstand repeated handling, protect goods when stacked and be resealed for another shipment. These features can make them better suited to repeated trips than lightweight paper mailers used to deliver the same goods. [1]

A lightweight paper mailer is designed for a single shipment followed by recycling. Its close fit and light construction are advantages for that purpose. Designing it to withstand repeated openings, closures and handling could require heavier paper, reinforced seams or additional components. The study's classification as a flexible canister does not explain why a lighter format with these trade-offs should be subject to a target from which the sturdier box is expressly exempt. The study team should provide a clear legal basis and evidence specific to the format to justify that difference in treatment. FEPE asks the team to remove lightweight paper mailers from the proposed scope. [1–2]

5. Changes requested

- Revise section J on page 17 and remove the paper-envelope entry on page 18, including the proposed classification of paper mailing pouches and mailers as flexible canisters.
- Confirm that the proposed classification gives no basis for bringing lightweight paper envelopes, pouches and mailers used for e-commerce into scope under Article 29(1).
- Invite FEPE to contribute directly before the recommendations are finalised, alongside its input through CITPA. FEPE has represented envelope producers since 1957 and can provide product samples, design specifications and practical evidence on how paper mailers are used and recycled.

Product example: B4 paper e-commerce pocket

A FEPE member's windowless B4 e-commerce pocket (250 × 350 mm) uses 120 g/m² paper and weighs 25.2 kg per 1,000 units. Paper accounts for about 98% of its weight. The balance is adhesive and silicone-coated release paper. Actual fibre recovery depends on the finished design and the collection, sorting and recycling process. FEPE can provide samples for assessment under established fibre-packaging protocols. [5–6]

Sources

[1] Regulation (EU) 2025/40, Articles 11 and 29. View source

[2] Study on reuse and reusable packaging, Task 1 workshop background document, 18 November 2026, framework contract ENV.B.3/FRA/2023/0012, sections I–J, pp. 16–18.

[3] Eurostat, Recycling of packaging waste by type of packaging (cei_wm020), EU-27, paper and cardboard, 2025-and-after target method, extract of 24 November 2026. View source

[4] European Paper Recycling Council, Monitoring Report 2025, pp. 3 and 5. View source

[5] FEPE member technical data, B4 e-commerce pocket, supplied by Udo Karpowitz, November 2026.

[6] 4evergreen, Circularity by Design Guideline, version 4, February 2026. View source

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About FEPE

FEPE, the Federation of European Producers of Envelopes and Light Packaging, represents manufacturers of envelopes and light packaging, alongside suppliers and national industry associations. Based in Brussels, FEPE brings together expertise in paper-based communication and packaging, including mailing envelopes, e-commerce mailers and other light packaging formats.

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