FEPE position on the proposed inclusion of paper envelopes, pouches and mailers in the 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 opposes the study's proposed inclusion of paper envelopes, pouches and mailers in the Article 29(1) reuse targets. FEPE requests revision of the interpretation presented under "J. Flexible formats" on page 17 and removal of the corresponding paper envelope entry on page 18. Mandatory reuse could undermine the material and space savings and recyclability of lightweight paper mailers designed for one shipment.

1. The classification as "flexible canisters" is insufficiently justified

In FEPE's view, Article 29(1) sets out an exhaustive list of packaging formats. Including an additional format as a flexible variant requires a clear basis in the provision and an explanation of how the format fits a listed category. The study includes e-commerce envelopes, pouches and mailers by treating them as flexible counterparts to canisters. Its reasoning relies on their containment, protection and transport functions and the presence of a closure.

FEPE considers this comparison insufficient. These are general functions shared by many packaging formats. They do not establish that a paper envelope or mailing pouch is a variant of a canister.

The study describes canisters as containers typically intended for liquids, pastes or gases, often with an opening for controlled dispensing. Paper mailing envelopes, pouches and mailers have materially different designs and uses. As the study acknowledges, e-commerce is a distribution channel. Its use alone provides no basis for extending the list.

2. Paper mailing packaging follows an established recycling model

Paper envelopes, pouches and mailers are generally designed to protect products during one shipment with limited material consumption. After delivery, suitable formats can be collected for recycling so that the recovered fibres can be used in new paper products.

Recyclability depends on the complete design, including coatings, adhesives and closures, and on suitable collection and recycling infrastructure.

This single-use and recycling model delivers on several PPWR objectives at once. Lightweight paper mailers protect goods with little material and fit closely around the contents, limiting empty space and waste while allowing fibre recovery. Mandatory reuse could undermine these strengths by requiring heavier, bulkier or harder-to-recycle designs.

3. Mandatory reuse could undermine other PPWR objectives

Requiring paper mailing packaging to withstand repeated handling, opening, closing and transport could necessitate higher paper grammages, additional layers, reinforced seams, stronger closures or protective treatments.

- **Packaging weight minimisation:** thicker paper and reinforcement increase the material required for each packaging unit.
- **Packaging volume and empty-space reduction:** more reinforced or standardised formats may fit products less closely, increasing bulk or requiring additional filling material.
- **Recyclability:** certain coatings, adhesives and mixed-material components used to improve durability may make fibre recovery more difficult.
- **Waste prevention:** heavier packaging may generate more waste if it is discarded before achieving enough reuse cycles.
- **Resource efficiency:** collection, return transport, inspection and reconditioning require resources that must be included in the assessment.

These outcomes are not inevitable for every reusable design, but they must be assessed before extending reuse obligations to paper mailing formats. The relevant comparison is the overall material consumption and environmental impact per successful delivery, based on actual operating conditions.

4. FEPE's demands

FEPE calls on the study team and the European Commission to:

1. **Revise the interpretation on page 17.** Remove the classification of paper envelopes, pouches and mailers as flexible counterparts to canisters.
2. **Remove the paper envelope entry on page 18.**
3. **Clarify the exclusion of paper mailing formats.** Confirm that paper envelopes, pouches and mailers used for e-commerce deliveries fall outside the Article 29(1) reuse targets, rather than treating e-commerce use as a sufficient basis for inclusion.

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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