



European Paper Packaging Alliance

Comments on the EU Food Supply and Food Security Contingency Plan

The European Paper Packaging Alliance (EPPA) is a not-for-profit food and foodservice packaging association. EPPA's priority is to provide efficient environmental, low carbon and health-safe products to the European population, with improved recycling solutions. EPPA supports the efficient use of resources in all its forms and recognizes the major role that packaging, as an essential infrastructure, can play in that common objective.

EPPA welcomes the opportunity to provide comment on the EU food supply and food security contingency plan to support Europe's food system, especially at times of crisis. We also consider that the development of a European contingency plan is an important component of the European Green Deal since packaging helps address food waste which is one of the key drivers of carbon footprints in food systems.

The essential nature of food packaging

- Food packaging is integral to the product it holds, and much food requires packaging (primary, secondary, or tertiary) to reach the consumer in a safe and hygienic condition. Any failure of the food packaging supply chain will therefore have a substantial impact on modern Europe's food supply chain, from farmer to manufacturer to retailer to end-consumer. Supply chain breakdowns would affect both food retail and foodservice operators.
- Europe's packaging supply chain helped the food system meet the challenges of Covid-19 and was critical in facilitating the availability of safe, hygienic and secure food products across the EU. Member States recognised the packaging industry as an essential industry and it was supported to operate throughout the pandemic. Without sufficient and appropriate packaging available, there would have been significant impacts with food distribution and food availability across Europe.
- Fibre-based foodservice packaging was also crucial in supporting lives and livelihoods during the pandemic, with hospitality relying on such packaging to allow it to supply citizens. The European Environment Agency¹, also confirmed that single-use food packaging "played an important role in preventing the spread of COVID-19."
- Food packaging has an important role to play in limiting food waste, which is a major contributor to Green House Gas emissions. Without sufficient packaging available at times of crisis there would likely be increased food waste, compounding availability issues.²

¹ [COVID-19 and Europe's environment: impacts of a global pandemic — European Environment Agency \(europa.eu\)](https://european-council.europa.eu/media/en/press-room/default.aspx?id=14122)

² https://boku.ac.at/fileadmin/data/H03000/H81000/H81300/upload-files/Forschung/Lebensmittel/Guideline_StopWasteSaveFood_EN_220520.pdf



Recommendations

- EPPA supports the proposed inclusion of food chain organizations and their representatives in the development of these proposals. We also recommend the European Commission include raw material suppliers and food packaging industry representatives in those discussion to ensure expert representation of the full food system.
- EPPA believes the European Food Safety Authority and the European Centre for Disease Prevention and Control must fully participate in the development and implementation of the food contingency plan.

EPPA urges the European Commission to recognize and include the essential role of food packaging in the contingency plan, thereby recognizing how modern European food chains operate.

- As part of the European Commission's Better Regulation Agenda and processes we recommend that all policy proposals are subject to a specific food supply and security impact assessment. This should utilize Life Cycle Thinking, to examine and quantify any potential impacts of proposals on the food packaging supply chain; especially impacts at time of crisis. Such early stress testing would help ensure the long-term resilience of Europe's food system.

(End)