

EU Recyclers' Manifesto: Removing barriers to paper circularity

Enabling the success story



RECYCLING EUROPE'S **4 RECOMMENDATIONS** FOR A **CIRCULAR** AND COMPETITIVE PAPER SECTOR

Paper recycling is one of Europe's greatest circular economy achievements. For decades, it has **quietly delivered** what the Green Deal now aims to scale up: resource savings, lower energy use, reduced CO2 emissions, and sustainable value chains rooted in Europe.

Every tonne of recovered paper keeps raw materials in the loop, supports thousands of jobs, and reduces the EU's reliance on virgin resources. It is a proven, cost-effective climate solution.

Yet this **success story is under threat**. Regulatory fragmentation, market imbalances, and rising operational risks are placing mounting pressure on recyclers. Without clear and coherent EU action, Europe risks losing ground - not only on its circularity goals but also on its industrial competitiveness.

Recycling Europe calls on EU policymakers to act decisively, with simple but strategic moves: recognise recovered paper as a resource, design products for circularity, remove barriers inside the Single Market, keep trade channels open, and address battery fire risks head-on.

In this manifesto, Recycling Europe explores how the following four measures could safeguard the success story of paper recycling.

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KEY PROPOSALS INCLUDE:



Recognising recovered paper as a resource



Reducing EU administrative burdens, strengthening the internal market



Securing access to global markets for recovered paper



Addressing the fire risk from lithium batteries

Recycling Europe's Paper Branch (Recycling Europe Paper), which comprises of national recycling federations active in the collection, sorting, reuse and recycling of used textiles, can play a key role in increasing circularity in the textiles sector. As reuse and recycling operators, Recycling Europe Textiles' members actively contribute to the EU's decarbonisation efforts.



1

DESIGN TRULY CIRCULAR PAPER PRODUCTS

Europe's Packaging and Packaging Waste Regulation (PPWR) holds the key to improving recyclability at the product level

For PPWR to succeed, it must be implemented ambitiously and realistically. Designing paper products for **recyclability should be the norm, not the exception**. Standardised design criteria, clear recyclability testing for multilayer packaging, and practical design-for-recycling guidelines will help ensure that what is placed on the market can actually be recycled at scale.



- Prioritising **standardisation of paper products** for recyclability.
- Effective **implementation of eco-modulation of EPR fees** based on recyclability.
- Mandatory **recyclability testing** of multilayer packaging, coupled with continuous design improvements (for example, by adapting design for recycling criteria).

Recyclability assessments must look beyond theory, meaning beyond product design. **A package is not 'recyclable' if it cannot be sorted, treated, and reprocessed in real-life industrial facilities.** Assessments must therefore consider the existing collection, sorting, and treatment infrastructure and the actual industrial utilisation, as well as the ability of recyclers to process the material based on the composition of the packaging, its functionality and its suitability for recycling. **Functionality and composition matter just as much as design.**

The transition must be fair, and recyclers alone cannot bear the financial burden of adapting collection, sorting and treatment systems to new requirements. Instead, constructive cooperation across the paper value chain is essential, from producers to recyclers, ensuring that all stakeholders comply with the same PPWR obligations.

At the same time, **the EU must help pull demand, not just push supply**, to enhance competitiveness across the European paper value chain, including recyclers and users. To achieve this:



- The Circular Economy Act must **stimulate demand** for recovered paper in the EU.
- Green Public Procurement (**GPP**) rules should **require minimum levels of recycled content** in paper products.
- **Financial incentives** should reward the use of recovered paper.



2

REDUCE EU ADMINISTRATIVE BURDENS, STRENGTHENING THE INTERNAL MARKET

*The promise of a truly circular economy cannot be met
with fragmented rules*

Today, paper recyclers face a **patchwork of national and regional end-of-waste criteria**, inconsistent interpretations of waste shipment rules, and diverging procedures for brokers and intra-EU trade barriers. This **legal uncertainty** increases costs and slows down investments. To address this, the EU should:



- Adopt **harmonised end-of-waste criteria for recovered paper** based on the EN643 standard, as is already the case for metals, glass, and copper scrap.



- As an interim measure, materials recognised as non-waste under national/regional EoW criteria should be **mutually recognised across the EU** for shipment purposes.



The same logic applies to waste codes and shipment documentation. **Conflicting classifications of BEU04** ("Composite packaging made mostly of paper with some plastic, not containing residues") have led to legal uncertainties.

Although listed as green-listed waste in Annex IIIB of the EU WSR, disagreements between authorities can result in the shipment being treated as illegal. To prevent this:



- **Harmonised EU criteria for BEU04** are urgently needed to remove ambiguity and ensure uniform classification, enforcement, and legal clarity for intra-EU shipments.

Annex VII submission rules under the EU Waste Shipment Regulation also need a **reality check**. Requiring [1] recyclers to submit shipment documentation two working days before the shipment starts is impractical and unworkable. Multiple actors (recyclers, brokers) may be involved in a shipment, and key details such as the routes are often only known and finalised at loading.



- **Allowing submission at the start of shipment**, when full details are available, would ensure compliance without paralysing logistics.

Finally, broker registration must be clarified at EU level. The registration of brokers across EU Member States is interpreted inconsistently, with some requiring brokers to register in the country of dispatch, while others do not. This lack of harmonisation leads to **fragmented and burdensome procedures for brokers** operating across borders.

To address this, a broker with a registered address in any EU country should be able to use it in Annex VII regardless of shipment origin.



- **Clear and harmonised EU-level guidance** is needed to confirm that single EU registration is sufficient for all green-listed shipments.

[1] Under Article 18(5) of the EU Waste Shipment Regulation 2024/1157 (EU WSR)

SECURE ACCESS TO GLOBAL MARKETS FOR RECOVERED PAPER

Paper recycling does not happen in isolation

International trade is essential to keep material flows balanced and EU recycling businesses economically viable. Imports of recovered paper secure supply, while exports help prevent oversupply. A well-functioning global market for recovered paper should therefore be seen as a **stabilising pillar** of the system, not as a threat.

The EU WSR must support, not restrict, this trade system. Compliant recovered paper exports should not face unnecessary barriers. Instead, the EU should:

- Implement the WSR in an **industry-friendly** way.
- Promote **recognition** of recovered paper **as a key recycled raw material**.
- Work with **OECD** countries that have close trading relationships with the EU and facilities considered equivalent to those within the EU, to establish **mutually agreed audit waivers**.
- For **non-OECD** countries, put in place **efficient authorisation procedures** and proportionate monitoring, enabling them to become authorised destinations.
- **Apply proportionately** the monitoring, audit, and safeguard procedures for OECD and non-OECD countries. Market actors need legal certainty to ensure compliance when implementing measures.

Additionally, the EU must also push for **clearer distinctions under the Basel Convention** and World Customs Organisation (WTO) between waste and recycled/recovered materials that are placed on the market as products.



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José Andrés Martín Cubero
President of Recycling Europe's Paper Branch

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Why exports of recovered paper are vital



Info Box

In Europe, recycling systems are highly efficient. In the CEPI region*, concrete data show the following trends:

Collection of
recovered
paper in
CEPI region

52.1
million tonnes [2024]

52.2
million tonnes [2023]

Utilisation
by European
paper mills
in CEPI
region:

46.2
million tonnes [2024]

44.3
million tonnes [2023]

Structural
surplus:

5.9
million tonnes
(≈11% of total
collected)

2024

Structural
surplus:

7.9
million tonnes
(≈15% of total
collected)

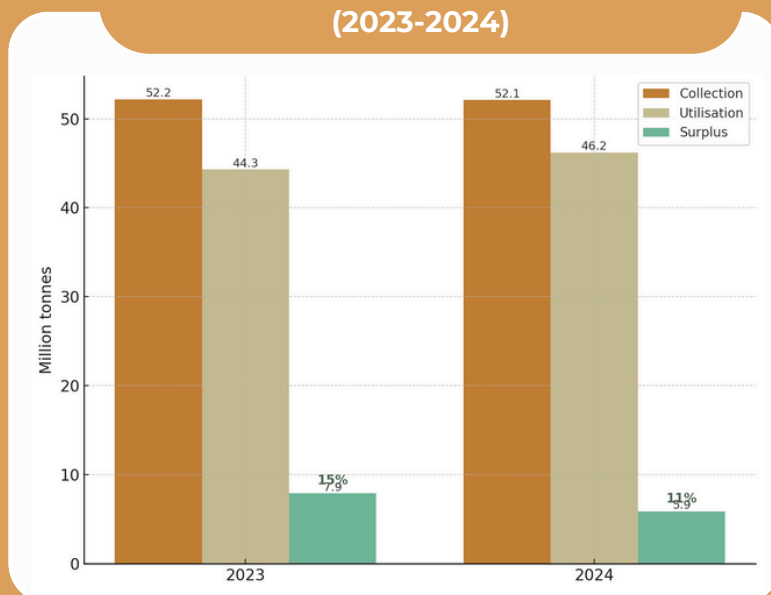
2023

This demonstrates a **structural oversupply of over 11%**, meaning that not all recovered paper can be re-used within Europe, even when mills are operating efficiently. The **recycling rate has steadily increased – from 51.8% in 2000 to 75.1% in 2024** – showing the sector's commitment to circularity.

Without access to international markets, this surplus would remain unused, undermining both recycling efforts and the circular economy. Exports are therefore not optional but essential: they ensure that all collected paper can re-enter the value chain, even when European demand is saturated.

**CEPI region includes Austria, Belgium, Czech Republic, Finland, France, Germany, Greece, Hungary, Italy, The Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, and the United Kingdom. The CEPI region represents ~97% of paper for recycling collection in the EU-27 + Norway, Switzerland, and the UK. Data outside this region are based on estimations.*

Recovered Paper in CEPI Region
(2023-2024)



** Figures are drawn from CEPI's "Key Statistics 2024 European pulp & paper industry" [report](#)*

ADDRESSING THE FIRE RISK FROM LITHIUM BATTERIES IN WASTE MANAGEMENT FACILITIES

One stray battery can set an entire recycling facility on fire

While this is perceived as an exaggeration, it is the daily reality of paper recyclers across Europe. **Small lithium batteries, often embedded in electronics or even greeting cards, mistakenly end up in general waste or paper bins undetected.**

Even well-equipped facilities struggle with high-energy batteries mixed with flammable material, as they create **fires that are nearly impossible to prevent**, inflicting massive damage on infrastructure, posing severe safety risks, leading to huge financial losses, and **making insurance coverage increasingly inaccessible.**

A systemic problem requires a systemic solution and a long-term one. With lithium battery fires in waste management facilities on the rise, the EU must take immediate action. While this issue affects all waste streams, **paper recycling facilities are increasingly impacted and particularly vulnerable from an insurance perspective.** In some EU countries, recyclers risk losing insurance coverage altogether in the near future. The recycling industry already faces twice the loss ratio of other high-risk sectors, such as wood processing. To address these issues, the EU should:



- **Introduce a Deposit Return System (DRS) for portable lithium batteries under the Circular Economy Act.** This should cover lithium batteries embedded in electronics and light means of transport (LMTs), and offer financial incentives for proper disposal, reducing the likelihood of batteries ending up in the wrong bin – and consequently in paper recycling streams.



- **Consider banning non-essential battery-containing paper items** that often trigger thermal incidents in paper streams, such as greeting cards with embedded batteries.



- **Launch an EU-wide educational campaign** to raise awareness about proper waste sorting and the fire risks posed by incorrectly disposed.

Recycling Europe is the voice of Europe's recycling industries, representing **80 members across 24 EU & EFTA countries**, and over **5,500 companies**. We drive a 95 billion EUR contribution to the EU **economy** and support **300,000 green, local jobs**. By turning **waste into valuable resources** and reintroducing materials into value chains, we are at the forefront of circularity and climate neutrality. As a catalyst in Europe's green transition, **Recycling Europe is driving the industrial shift that boosts EU competitiveness, resilience, and strategic autonomy.**



Recycling Europe's Paper Recycling Branch (Recycling Europe Paper) represents the European paper recycling industry towards the EU institutions and engages with European and international stakeholders. Recycling Europe Paper advocates for a global free, fair, and sustainable trade in recovered paper and is a member of the Technical Committee for Pulp, Paper and Board (CEN/TC 172). Established in the early 1990s as WAPAC, it became part of Recycling Europe in 2014.



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