confederation of paper industries

REVIEW 2020/21

PROVEN RESILIENCE

The voice and face of the UK's Paper-based Industries

The Confederation of Paper Industries (CPI) is the leading organisation working on behalf of the UK's Paper-based Industries.

CPI's membership includes the overwhelming majority of the supply chain for paper, comprising paper and board manufacturers and converters, corrugated packaging producers, makers of soft tissue papers, and collectors and processors of paper for recycling.

CPI represents an industry with an aggregate annual turnover of £12 billion, 62,000 employees and which supports a further 100,000 jobs in the wider economy. Members range in size from large multi-national organisations with multiple sites in the UK, to single site SMEs.

CPI unites the UK's Paper-based Industries with the purpose of promoting paper's intrinsic value as a renewable and sustainable fibre-based material, enhancing its competitiveness through seeking appropriate legislation and regulation for the industry and in spreading best practice.

CPI is working to promote:

- a positive image for paper
- secure energy supplies at competitive prices
- resource efficiency within a coherent waste strategy
- the benefits of packaging
- a sustainable UK Paper Industry
- manufacturing as a vital part of a balanced economy
- a competitive, level playing field for the UK's Paper-based Industries

cpi confederation of paper industries

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Optimism, Visibility, Community and Sustainability

CPI has four core values. We must be optimistic about the future of the Paper-based Industries in the UK. The Paper-based Industries in the UK have much to be proud about. They have cut carbon emissions from fuel use by 70% relative to 1990 levels, they innovate in the development of new and exciting packaging and they lead the UK in recovery and recycling.

Our optimism needs to go hand in hand with greater visibility in and engagement with Westminster, Whitehall and Brussels. We need to shout louder, more often and in the right ears if we are to successfully influence UK Industrial Strategy and secure any opportunities arising from Brexit.

CPI will also help its members develop roots in their local communities. Our industry is often one of the larger employers in a town, and our "licence to practice" depends on good relations locally and a positive perception of the benefits our industry brings to the community.

The fourth value is that of sustainability. CPI must retain attention on the fact that paper is a uniquely renewable and recyclable material and that these qualities make it the sustainable choice for a wide range of applications, today and long into the future.

Paper - the sustainable, renewable choice

PRESIDENT'S FOREWORD

Welcome to the CPI Annual Review 2020/21. Back in May 2020, when I was elected CPI President, the global COVID-19 pandemic had already changed our perceptions of normal life, and tragically, many thousands of people had died. Since then, for countries, industries and individuals, there has been a process of adjustment to our new circumstances and a hope that a combination of vaccination and public health measures can make 2021 a more optimistic year. The pandemic is by no means over, and its effects will be evident for many years to come.

For the UK, the challenges of this global health crisis have emerged at the same time as the end of the Brexit Transition Period on 31st December 2020, the increasing pressure on industry and the economy from net-zero, and other sustainability issues. Unprecedented has been an overused word in the last few years, but 2020 and now the early months of 2021 represent a challenge to the UK, the like of which has not been felt for a century or more.

In these circumstances, CPI has worked constantly to support members and the wider industry. Very early on, the confederation showed great agility in pivoting from its planned strategy for 2020 towards a focus on providing direct support to members during the pandemic, engaging with Government on the various support measures and restrictions over the year, and securing the financial position of CPI so that members could rely on its support in future. I am pleased to be able to report that all these objectives were achieved.

The CPI Board recognises that the effects of the pandemic have not been equally felt among the membership. The Board agreed a 5% discount on prompt payment of the 2021 membership subscriptions and we continue to work with all sectors of the industry to promote their resilience to the current challenges.

On Brexit, CPI held two webinars in late 2020 which supported the industry through the challenges of the end of the Transitional Period. I am pleased that the UK and EU were able to reach an agreement as this avoided the worst possible outcome of trading on WTO terms. However, the increase in export and customs procedures is a significant adjustment for all international traders and the management of that change will be a major ongoing priority for the industry.

Aside from COVID and Brexit, CPI must also look to the longer-term development of the industry.

CPI already prioritises competitive energy costs within a decarbonisation strategy. The COP-26 meeting now scheduled for November 2021 in Glasgow will place a focus on the climate ambition of the UK and that of many other countries. We must make sure that the UK does not make the historic error of decarbonising by de-industrialising. Our drive remains for a growing UK Paper-based Industry that takes responsibility for its emissions, rather than offshoring carbon challenges on to others.

Both in the UK and EU, work is focused on the policy that underpins materials in use. The EU Single Use Plastics Directive is rapidly evolving into a single use products policy that prioritises reuse over all other materials management. Here in the UK, Defra will be returning to its consultations on the UK recycling market, and especially those concerning extended producer responsibility, deposit return schemes and domestic collection methodologies. Taken together, these represent a real change in the policy landscape, and CPI is at the forefront of ensuring that the sustainability benefits of fibre-based products are properly understood by policy makers.

I am therefore pleased that CPI has already started the development work for a certification service for the recyclability of new packaging products. I look forward to seeing this develop as an essential part of CPI's offering to support its members in improving the quality of the materials streams that they buy and recycle into new products.

There are many people to thank for their support in the delivery of CPI's objectives. I am particularly indebted to my fellow CPI Board and Council members, and the members of CPI's sectoral Councils and committees for their support and contribution over the year. CPI simply could not function without the engagement and contribution of such a wide spectrum of its knowledgeable and committed members to its work. On behalf of all CPI members, I would also like to thank Andrew Large, our Director General, and the team of CPI staff for their work throughout this most challenging of years. CPI is fortunate to have such a dedicated team of experts at its disposal, and throughout this report you will read the significant achievements that this group has made over the year.

Kevin Bussey

DIRECTOR GENERAL'S OVERVIEW

Today's global agenda is dominated by the COVID pandemic, and in the UK at least, the continuing fall out from Brexit. This Annual Review similarly sees these two issues run through everything we report, like the lettering in a stick of rock. While I will report on our work on both issues, I also want to showcase the rest of the work of CPI. Our support of the industry on issues such as decarbonisation, regulation, recycling, and promotion of corrugated continues to grow. Indeed, this year it has been ever more vital that CPI should engage with stakeholders from across the policy spectrum to build the case for the UK's Paper-based Industries.

COVID-19 Pandemic

In the year since I last wrote, the COVID tragedy has continued almost unabated. Over 120,000 people have now died in the UK, and while the vaccines offer hope for an end to social restrictions, the economic, community and health implications of the pandemic will be with us for many years to come.

For our industry, the impacts of the pandemic have been varied. The focus on hygiene and changing consumption patterns have affected demand for tissue, packaging and graphic paper products in different ways.

The coronavirus pandemic has also shone a spotlight on the importance of our industry for the UK. When borders close and lengthy supply chains become stretched, the UK's indigenous manufacturing capacity is shown in its true importance, and the ability of our industry to react to sudden changes in demand becomes crucial to the wellbeing of society.

Over the pandemic period, the UK's Paper-based Industries have been at the cornerstone of society. We have provided hygiene products for the NHS and at home, we have packaged the country's online purchases, and ensured that they arrived safely, and to do these things and a myriad of others, we have managed our workforce safely and ensured continuity of supply. As an industry we can be proud of our response to this unprecedented challenge and proud of how we have contributed to the continuation of UK life.

Brexit

At the same time as the pandemic, on 31st December 2020, the UK was also faced with the end of the Brexit Transition Period and the start of a new trading relationship with the EU.

CPI was pleased that the UK and EU were able to reach a Trade Agreement before the end of the Transition Period. Despite some posturing from both sides, it was clear that an agreement needed to be reached, and the disruption of a sudden lurch to trading on WTO terms avoided at all costs.

It is early days for the new Agreement, and it is evident that there is some disruption to trade. CPI members have been confronted with issues as diverse as rules of origin, document requirements for goods entering Northern Ireland, and haulage disruption. It is not yet clear how much of this is due to bugs in the changeover of systems and how much is a long-term feature of the new relationship. The impact of the change in trading relationships has clearly had a differential impact across sectors, with the UK's Paper-based Industries being only somewhat affected in comparison with the business threatening issues seen by customer industries such as food and drink.

In the run up to the end of the Transition Period, CPI worked with policy specialists from BEIS, HMRC, and the membership to deliver two webinars that focused on the key practical changes between EU membership and the free trade agreement. These webinars focused on the UK Border Operating Model for UK imports, meeting EU requirements for exports and key regulatory changes. Over 200 member representatives attended the two events and gave positive feedback to CPI on how useful they had been in building expertise in the new arrangements.

Looking forwards, the relationship between the UK and EU will continue to evolve. The UK/EU Agreement has established some 19 joint committees to develop policy expertise in areas as diverse as financial services, fish, and transport. There is also a civil society committee where organisations like CPI will be able to engage with the process. The recent arguments over vaccine supply have revealed a certain rawness on both sides of the Channel and it will take some time for the new relationship to bed in, COVID restrictions notwithstanding.

And it will be important that the relationship does reach a stable, friendly point. The UK and EU have a land border, and such geographic proximity means they will always be significant trading partners. It will damage growth and employment prospects in the UK (and in the EU too) if the relationship becomes fractious and a zero-sum game of one-upmanship. CPI looks forward to working with both the UK and EU, and the representatives of the global paper-based industries, to make the case for the freest possible future cooperation and trading relationship.

Challenges

As we reflect on the events of 2020, the pandemic has highlighted the longer term, global challenges that we face and in particular the interrelationship between the health of society and the health of the planet. We are now in the Anthropocene epoch, and human beings are the dominant force on Earth's climate and ecosystems. There is an opportunity, as we seek economic recovery following the pandemic, to move towards an agenda in which economic growth and environmental sustainability are not in opposition.

In the past, environmental concerns have tended to move up the agenda in times of economic growth and prosperity, only to retreat in times of economic crisis when policy makers are focused on jobs and livelihoods in the short term. In future, this pendulum of policy must be replaced with long term clear goals. Already, the Climate Change Act, by writing the UK's carbon targets into legislation, has fixed the goalposts on Net-Zero by 2050, which gives both Government and business the opportunity to plan and invest for the long term.

However, this opportunity opens the societal question of how it will be implemented. There are those who would advocate for legislation to outlaw activities that emit carbon and see a more autocratic approach as the only way that society as a whole will ever reach the agreed goals. Conversely there are those who believe that only the market can deliver the innovation required for Net-Zero and that Government should limit its activities to setting a level playing field of incentives.

There needs to be a middle way. Radical decarbonisation will not be achieved without the consent of the people unless Western Governments are prepared to adopt increasingly authoritarian methods. Such consent will not be forthcoming unless individuals and businesses can see that they will have jobs, incomes, and prosperity before, during and after the process. Politicians knowing what needs to be done is one thing. Them knowing how to get elected again afterwards is another.

This then is the challenge. How can the UK align the interests and incentives of Government, business, and the voter behind the long-term mission of placing the economy on a sustainable footing? The Climate Change Act is a step in the right direction in terms of laying out the end goal, but what is needed is a wider concept of what a sustainable UK economy looks like, and then a collaborative process of policy incentives, innovation, and committed investment to deliver against the goal. There are encouraging signs that BEIS, Ofgem and the Committee on Climate Change are open to such a new approach. CPI will continue to push them to adopt this collaborative policy making agenda.

CPI Activity

As I noted in my introduction, throughout 2020 CPI has been active in supporting the interests of members across the full range of their activities. The remainder of this report gives much more detail on our various activities, but I would like to focus on four areas.

- The first is energy costs, where CPI leadership has been key to securing the Climate Change Agreement process and agreeing challenging but achievable targets for industry.
- The second is the Beyond the Box Programme, which continues to promote the benefits of corrugated packaging to consumers.
- The third key development is the launch of Papercycle, and the development of a certification service for the recyclability of paper packaging products.
- Finally, the PABIAC Health and Safety Programme continues to drive improvements in the quality of our workplaces, and CPI is focused on building the industry response to the remaining leadership challenges in this area.

These four areas are just a snapshot of the substantial work in which the CPI Team has been engaged this past year. I strongly encourage you all to read the detail of CPI's activities, and to contact us if there are any other issues you would wish us to pursue.

No association is stronger than the commitment and engagement of its members. Our ability to understand and respond to the industry's needs is completely dependent on the engagement we have with the CPI membership at large. This year more than ever, I would like to thank all the CPI members for their support of the confederation's work and engagement with us in committees, in webinars, and by email. This association's strength is fundamentally founded on your commitment to improve this industry.

I would particularly like to thank the CPI President, Kevin Bussey (Smurfit Kappa), Vice-President, Brian Lister (SAICA), Honorary Treasurer, Angus MacSween (Arjowiggins) and the Past President, Patrick Willink (James Cropper) for their advice and support over the past year. Together with CPI Chief Operating Officer Neil Fishburne, this is a strong management team for CPI, and I am very grateful for their support.

Finally, I would again like to thank the CPI executive team. CPI is fortunate that it can rely on a group of experienced and dedicated staff who deserve an enormous amount of credit for the work that they have done in 2020, under such trying circumstances, and the achievements they have made, many of which are recorded in this Annual Review.

Andrew Large

ENERGY

It remains critical for the long-term future of Energy Intensive Industries in the UK that they can access competitively priced energy. Ofgem (as the Regulator) and BEIS (as the Government policymaker) have to accept that policy costs and taxation are combining to make UK industrial electricity the most expensive in Western Europe and that this is a major issue for industry. In 2021 CPI will continue to work with other interested sectors and policy makers to better understand this issue and how it can be resolved.

While Brexit and leaving the single market and customs union were expected to be the key issues for 2020 and 2021, the impact of COVID-19 came to dominate the year, with energy markets hugely disrupted by changed consumption and energy use patterns as the virus spread around the world.

As with other sectors, demand and production were seriously affected by COVID-19 as people swapped to working from home, panic buying caused shelves to be stripped, and parts of the economy shut down. As this pattern was replicated globally, reduced industrial energy use had a major, but short-term disruptive effect on wholesale prices. Part of the impact was minimised by long-term supply contracts and the fact that actual energy content is generally a smaller component of energy bills, being overshadowed by distribution and transmission costs plus the cost of government policies. With much of the low-carbon energy supply industry underpinned by guaranteed returns, regulators are now struggling to reconcile recovering their costs with disruptions to demand patterns. The result is a focus on the recovery of these costs and how this is shared between different sectors of the economy.

With COVID-19 disruption being so prevalent, the short-term impact of Brexit on energy markets was masked. The long-term physical linkages between the UK and other countries remained in operation and indeed strengthened with the continued construction of new gas and electricity interconnectors further joining markets together.

UK gas and electricity interconnectors

Source: Geopolitical Intelligence Services AG/gisreportsonline.com

Energy Efficiency

In the longer term, making paper remains intrinsically energy intensive, and energy efficiency has always been a key issue for papermakers. Since 1990, the energy used to make a tonne of paper in the UK has been almost halved, and through the voluntary sector Climate Change Agreement (CCA), mills are committed to deliver yet more savings. Even with this progress, energy use (essentially electricity to drive the machines and heat to dry the paper) remains a major cost for paper mills. Competitively priced and secure supplies are key if the UK is to become a more attractive place to make paper, and the sector is to help deliver a more balanced economy.

The CCA was due to end in 2020 but (with thanks to the Government) has been extended for two years until the end of 2022. This maintains the papermaking sector's ability to benefit from significant energy tax relief and buys time to develop a replacement scheme. Although the CCA is predicated on increasing energy efficiency, the tax relief gained as essential to keep papermaking in the UK and so CPI is open to a replacement scheme being introduced with a different basis provided it delivers similar fiscal benefits. Because of the increasing focus on carbon reduction, it is likely that any replacement scheme will be less about energy efficiency and more about absolute carbon reduction. CPI will continue to be fully involved in helping Government develop its ideas.

Notwithstanding COVID-19 and Brexit, the policy changes required to reduce emissions linked to Climate Change continued to be developed by policy makers, cumulating in the release of some major policy documents at the end of 2020. The implications of these are likely to have a huge impact on the future of energy intensive manufacturing in the UK.

The most important set of policies are linked to the legally binding target that, by 2050, UK domestic emissions will be net-zero. A Government Energy White Paper was published just before Christmas, with the Committee on Climate Change (CCC) releasing details of its 6th Carbon Budget (covering the period 2033-37) the preceding week. With the old target being a reduction of 80% by 2050, the new interim target of minus 68% by 2030 means the expected changes to carbon emitting activities in the UK will now happen much earlier than expected.

Impacting on both documents is the UK's hosting of the UN Climate Change summit (COP 26) in Glasgow during November 2021, a platform for the UK to provide a global lead in efforts to curtail the release of climate change emissions. Within Europe, both the UK and the European Union now have 2050 net-zero targets, the US is re-joining the Paris Agreement under the Biden administration, and China has committed to net-zero by 2060. All these measures will give a huge boost to the forthcoming talks and a major push for individual countries to increase the ambition of their Paris Agreement pledges made five years ago.

Value of compensation payments, discounts and exemptions:

£44.5 million	Renewable Obligation, Feed-in-Tariffs and Contracts for Difference
£23 million	Carbon Price Floor
£14.1 million	Climate Change Levy
£15 million	EU ETS Allowances
£96.6 million	Total savings to the UK Papermaking Industry

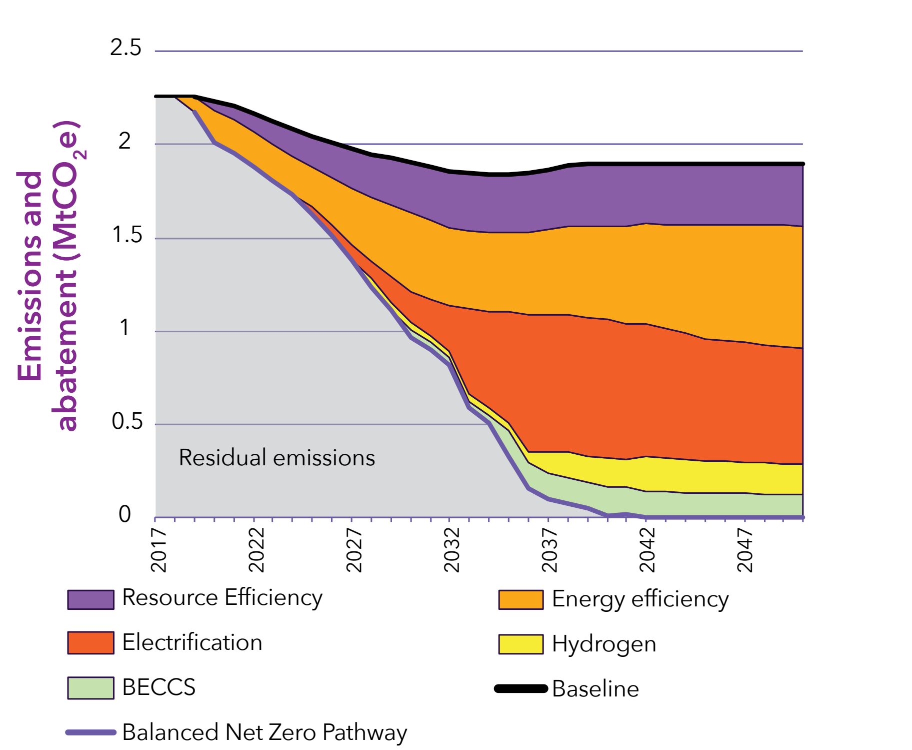
ENERGY

The CCC 6th Carbon Budget is the first issued under the new net-zero national target, and as such is intended to advise government on a phased plan to reach the 2050 target. Notwithstanding that the UK is expected to miss the forthcoming carbon budgets, the document is hugely ambitious, based on an expected fall in the cost of renewably generated electricity, and brings forward a set of new policies that will have a major impact on life in the UK. The scope covers almost all aspects of society requiring huge reductions in the use of fossil fuels. As well as energy use, there are major changes proposed to land use policy, agriculture, diet, and transport.

For papermaking, the biggest impact is that, by 2035 (assuming the proposals are implemented), the use of natural gas will be hugely reduced, with no new investments in gas-fired equipment expected by 2030 (unless powered by bio-gas or in an area where hydrogen is expected to be rolled-out).

The CCC has produced an analysis which charts its concept of a possible path to decarbonisation for UK papermaking highlighting the importance of continuing to deliver energy and resource efficiency, but also showing a structural move away from the use of natural gas (for process heat) and instead using more electricity, hydrogen and also a certain amount carbon capture to decarbonise any remaining natural gas use.

Sources of abatement in the Balanced Net Zero Pathway for the Paper and Pulp sector



Source: CCC analysis, BEIS (2020) Provisional UK greenhouse gas emissions national statistics 2019

There is an acceptance by the CCC that there is a cost and international competition issue for industry with potentially both capital and revenue support being required through the forthcoming energy transition away from fossil fuels. As well as technology challenges with replacing equipment, both the capital and revenue cost of electricity and new technologies will have to be addressed if UK sites are to remain economic. The key alternative low-carbon electricity technology is identified as offshore wind, with costs falling very quickly for new investments. Notwithstanding this welcome fall in costs, there is a huge challenge in delivering affordable power to industry when distribution and transmission costs are added, as well as the costs associated with guaranteed prices given to older low-carbon investments that are still being paid by current consumers.

While BEIS do not have to follow the CCC proposals, in reality the Committee is very influential and its proposals usually signal future policy direction. Indeed, the Energy White Paper takes forward many of the proposals in the carbon budget, with offshore wind and nuclear seen as key technologies.

Emissions Trading Scheme

Emission Trading Schemes (ETS) are the primary policy drivers to reduce emissions from the power sector and heavy industry. Following Brexit and the end of the transition period, UK sites are now regulated under a replacement UK-only ETS, designed along broadly similar principles as the EU scheme. Within these schemes there is some protection from high carbon costs, with sites being given some free allowances each year, with any shortfall purchased from Government auctions or via a secondary market.

Setting an overall emissions cap (delivered through allowances that need to be purchased and traded) sets a price on carbon, with the price dependent on the total demand from both regulated companies and (increasingly) the financial sector viewing carbon as a new investment opportunity – the carbon price can influence investment decisions. A major problem arises if these carbon costs get out of line with costs in other countries where there is a lower, or zero, price attached to carbon. A priority for policy makers must be to keep the cost of carbon in the UK affordable through the energy transition until other competitor countries also move their policy in the same direction to generate a true global carbon price.

Now that the Brexit-related uncertainty is resolved, and assuming the UK is seen as a good location for manufacturing, there is an opportunity for new investments to deliver energy and carbon saving technologies. To help deliver these new projects, Government is offering help, both via Innovate UK (the Transforming Foundation Industries programme) and directly through BEIS (the Industrial Energy Transformation Fund), by offering capital support for new projects. A number of UK paper sector companies have lodged applications for the first funding round and hopefully these will be supported and delivered on-site during 2021.

2.2 million tonnes of CO_2 emitted in 2017

3.2 million tonnes of CO_2 emitted in 2012

6.6 million tonnes of CO_2 emitted in 1990

ENVIRONMENT 2020

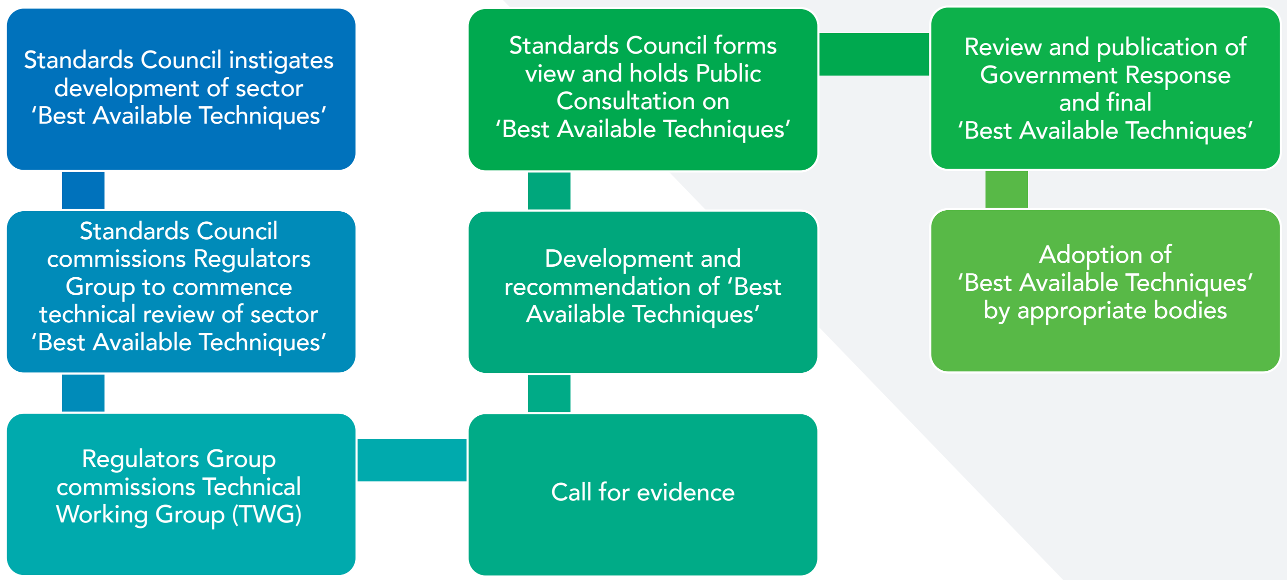
As we start to move on with life beyond Brexit, attention turns to the future direction of all aspects of environmental regulation in the UK. With much of the UK's Paper-based Industries being covered by the requirement to have Environmental Permits for their operations, development of a future permitting regime is a critical priority for our sector. Other key priorities include water, with current developments in regulation of abstraction and management of water resources. Specifically of interest post-Brexit is the development of chemicals regulation in the form of UK REACH. This is of particular relevance to the UK's Paper-based Industries as they are downstream users of chemicals. 2021 will see several consultations as UK regulation is proposed and developed, where the involvement of the paper sector will be important. The COVID-19 pandemic has impacted on many of these consultations which are only now being progressed. All this making for a busy year!

Environmental Permitting / Best Available Techniques

Environmental permits are required by most paper mills in the UK along with a number of sites collecting and sorting paper for recycling. Expected changes to the thresholds will increase the number of such sites requiring permits. Defra has consulted both on the thresholds and on Standard Rules for permits including those for handling paper and cardboard. The outcome of these consultations has been delayed by COVID-19, but it is likely to be released in 2021.

For the more complex paper mill operations, and potentially others, bespoke permits are required. The existing regulations, whilst written into UK law, stem from the European Industrial Emissions Directive. This directive establishes the Best Available Techniques (BAT) the operators must use and the associated emission levels they must comply with (BAT AELs). These are defined in the BAT Reference Documents (BREFs) for each sector. For existing BREFs, including that for the Pulp & Paper Sector, the UK has had an input. This will not be the case going forward. As such, a key focus for 2021 is the development of a future regime for establishing BAT and associated BAT AELs for each sector. Defra proposals involve a three-tiered governance structure for the development of BAT:

- Standards Council, made up from representatives of UK Government and Devolved Administrations
- Regulators Group with representatives including Environment Agency, NRW and SEPA
- Technical Working Group (set up for each sector as and when BAT are in development) including representatives from Industry, Academia and NGOs.



Proposed process for the development of Best Available Techniques within the UK. Source: HM Government

Of critical importance in the governance of the new regime is that it is a UK wide regime. With environmental regulation being a devolved power, there must be consensus between administrations for both the governance itself, and in the development of any sector BAT documents. The Consultation is a joint consultation but failure to gain consensus could result in, worst case scenario, four different regimes and / or four different BAT documents for any or all sectors. Achieving consensus is, therefore, crucial. Knowledgeable representation on both the Regulators Group and the Technical Working Group will be key.

Once the governance is established the process will move on to the detail of BAT and BATAELs for each sector including how theses would be used as reference for permits. This will present some interesting challenges for the Pulp & Paper Sector in the UK. BAT AELs have previously been derived by looking at the data from operations working to BAT. With a relatively small, but diverse, group of UK mills, submission of accurate data will be crucial and interpretation of that data to establish BAT AELs for each subcategory of mill will be a significant challenge!


HM Government

'Best Available Techniques'– A future regime within the UK

Preventing or minimising impacts on the environment from industry

A joint consultation of the UK Government, the Scottish Government, the Welsh Government and the Department of Agriculture, Environment and Rural Affairs in Northern Ireland.

January 2021

Scottish Government gov.scot

Agriculture, Environment and Rural Affairs

ENVIRONMENT 2020

Abstraction / Management of Water Resources

2021 should finally see the consultation on moving freshwater Abstraction Licences over to Environmental Permits. These could be stand-alone permits but paper mills should have the option to include abstraction in their existing environmental permit, reducing the paperwork! The objective here is to link abstraction to the availability of water with many climate scenarios predicting shortfalls, certainly in some regions - such scenarios being based on the changing climates' impact on rainfall and increasing demand. Water Company led Regional Water Resources Groups have been developing plans to manage water resources within each region and potentially catchment. Involvement of CPI members with these groups has grown over the past year with attention moving to include industrial abstractors. It is important that the way in which paper mills need and use water is understood at regional and catchment level by those looking to manage available resources. Mills require a consistent supply of clean water, but this use is not consumptive. Treated water discharge from paper mills is potentially a water supply for others. With the pressure on water availability varying across the UK, Regional Groups for water resource management are an important way forward.

REACH

In the meantime UK REACH, the domestic regulatory framework for chemicals to replace the EU's REACH regime, came into force on 1st January 2021. Separating the two regimes while retaining some alignment has been hugely complicated, particularly as the EU's own regime has also been reformed. The principal potential issue for the UK's Paper-based Industries is as users of chemicals. Previously, as part of the EU and under EU REACH, the role of site operators was that of Downstream User with the bulk of the obligations for registration under REACH being with the Importer. Going forward, any UK company procuring chemicals directly from EU suppliers will change from Downstream User to Importer with the associated change in requirement to register under UK REACH. However, if a UK company procures chemicals from a UK based supplier then they remain Downstream Users with no change in requirements under UK REACH. Chemicals companies have long warned that the transition to a UK-only system would be very costly with many products needing registration under both systems. Working closely with chemical suppliers is a must to ensure continued supply.

Many challenges lie ahead as we develop environmental regulatory regimes for the UK. Hand in hand though are the opportunities, being involved with the developments and the end result, more UK-focused regulation.

FORESTRY

Papermaking is based on renewable fibres, harvested from well-managed forests, with recycling integral to the paper-cycle. With such high recycling rates, almost three quarters of fibres used in UK papermaking are from recycling, overwhelmingly from paper and card collected for recycling from UK homes and businesses. A certain amount of new, virgin, wood fibre needs to be added to the cycle both to replace damaged fibres lost to the process after repeated recycling cycles, and also for paper lost to the system, say as toilet paper or boxes used for long-term storage.

Sustainable forests

This virgin fibre is largely from wood, either made at UK mills or imported. Two mills (Iggesund in Cumbria and UPM Caledonian in Ayrshire) process UK harvested timber (largely from Scotland and the north of England) to make mechanically produced pulp used in their own papermaking. Other UK mills are using virgin fibre imported as pulp, predominantly conifer pulps from Scandinavia and North America or eucalyptus pulp from plantations in South America. The types of pulp used depends on the characteristics needed in the paper, such as softness or strength.

With the importance of forests being increasingly recognised, income for the sale of sustainably harvested material is an important element of encouraging forest-owners to keep their land as forest rather than cleared for other uses. The amount of forested area in Europe has continued to increase, and the UK is likely to see a large increase in woodland cover as new policies are developed to replace older EU agricultural schemes. New forests are likely to be increasingly multi-purpose, balancing nature conservation with amenity, carbon storage and productive uses, all elements that can be delivered through good quality forest management.

UK Timber Regulation

Companies handling timber and timber derived products (including wood pulp) made or processed within the UK must prove it has been legally harvested – an initiative strongly supported by CPI members, and indeed CPI continues to call for the scope of the Regulation to be widened.

The focus of Timber Regulation is on legality, but most pulp used in the UK goes further than the legal minimum and is also certified to ensure that environmental concerns are properly addressed. Consumers can support this initiative by buying product marked as independently certified, with FSC and PEFC the most widely used schemes.

The Bioeconomy

Growing attention to sustainability and a move away from non-renewable resources has resulted in a much greater focus on sustainable bio-resources (for forestry, where carbon removed from the forest is reabsorbed by new growth) and their scope to support a modern economy in replacing fossil fuel-based materials such as plastics. Paper-based products are a long-established part of this bioeconomy, with their sustainable nature and ability to be recycled making such products an increasingly important tool in reducing the emissions of fossil carbon.

To deliver the maximum benefits from the bioeconomy, we need more trees to be planted, and the Paper Industry is a key supporter of this.

Iggesund Paperboard (Workington) Ltd

HEALTH AND SAFETY

When the Paper and Board Industry Advisory Committee (PABIAC) launched its latest strategy in June 2019, no-one could have predicted what was about to happen in 2020, or the devasting global impact it would have on people's lives.

As we approached the end of 2019, many members had already made a good start towards achieving the first set of strategic objectives. Sites were completing the PABIAC health and safety climate survey tool and gauging people's perception and behaviours towards health and safety within the business. Across the board, the results in general showed the industry in a positive light, and that the significant financial and time investment was starting to pay dividends. Where areas for improvement were identified, they formed part of each site's continuous improvement action plan. Over the duration of the current strategy, PABIAC will continue to evaluate how each site is progressing, which will be evident when the survey is repeated in 2022.

In what was to become a very busy final quarter of 2019 the industry continued to address the other areas within the strategy, which included adopting the industry's first ever machinery procurement policy. From a united position, this was the UK's Paper-based Industries' adoption of an HSE endorsed procurement policy. The aim of the policy was to assist members in the planning and purchasing of new machinery and, at the same time, give some leverage against machine manufacturers / suppliers where equipment did not meet the required level of health and safety standards.

The third and final objective for completion by the end of 2019, was simply to have a system in place for monitoring and managing incidents relating to vehicle movement and storage stability.

All in all, a positive start, and a good base to start working towards the next phase of the strategy.

We began 2020 in the same way that 2019 ended. Phase 2 of the strategy had commenced, and sites were now working towards completing another five objectives around Leadership, Engagement and Collaboration, Work-related Stress, Physical and Mental Health and Wellbeing, and Vehicle, Material Movement and Storage Stability.

Over the years, the industry has become accustomed to challenges including declining markets and past recessions, and throughout these challenges, the focus on health and safety has never waned. So, when the world was faced with a pandemic on a scale beyond anything we have seen in our lifetime, and with an insatiable public demand for paper products, perhaps our biggest challenge has been to continue to provide essential services, while at the same time ensuring that health and safety remains our number one priority.

As the pandemic took hold, and with widespread infection rates increasing, sites across the UK were frantically working their way through a myriad of Government advice to ensure COVID-19 secure operations so that the industry could continue to service the UK with essential paper products.

The industry has always prided itself on the fact that Health and Safety is non-competitive, and that the sharing of information, through CPI, helps to prevent injury and ill health to all those people who work in the industry. Operating a paper mill, corrugated plant or a recycling depot became a health and safety priority, and in the months that followed the industry shared many examples of good practices which gave employees the confidence and reassurance to continue to work. Some of these good practices were used in the Government's 'Working safely through Coronavirus' guidance.

Notwithstanding the physical measures involved in keeping people at work and production lines rolling, for example staggered start and finish times, adjustment of shift patterns to reduce volumes of people gathering, and undertaking regular lateral flow testing etc, one of the biggest challenges has been in ensuring people's mental health and wellbeing has not suffered. For employees who were used to going into work and interacting with colleagues, COVID-19 took this interaction away from them overnight. With many employees now working from home, it was important that they did not feel disconnected, isolated, or abandoned.

No two people are the same, and while for many this new way of working was a relatively easy one to which to adapt, there were also many others who will have struggled.

Pre COVID-19, recognising physical and psychological health issues in the workplace were already key objectives for the industry to begin to address. In July 2019, CPI started to collate data on absenteeism due to work-related health issues. Initial data showed more days were lost due to work-related stress, anxiety, and depression than any other category, a statistic that would continue to rise throughout 2020.

It is too early to suggest that the pandemic and the introduction of Government measures (lockdown, homeworking, social distancing etc), along with general nervousness about the situation were key factors contributing to the increase. Likewise, it is too early to predict whether the impact will be with us for years to come. If it is, the industry has already made great strides in understanding the fundamentals of work-related stress and ill health and recognising the potential contributory factors. In addition, as part of the PABIAC strategy, many companies now have in place clear, concise, and communicated strategic work-related ill health plans, which include confidential counselling for employees affected by mental health problems.

Without question, dealing with a global pandemic has been challenging for people and businesses alike on all fronts. And while it may appear that health and safety has hit a moratorium, especially when it comes to achieving Phase 2 of the PABIAC objectives, there are in fact some positives to take away.

There was an 8% improvement in the industries' injury rate to 446 (per 100,000 employees). Keeping the industry going, and reassuring employees that it was safe to continue to work, required total engagement and cooperation from everyone to implement the necessary workplace adjustments.

Some companies have reported that people have new attitudes and behaviours towards health and safety, different to those from before the pandemic, and an increase in the number of cases of work-related health problems both nationally, and within our own industry, has highlighted the need to do more. This has accelerated the industries' commitment to delivering against objective 2 of the PABIAC strategy.

Sadly, 2.5 million people from across the globe have died from this deadly virus, however, as we enter 2021 with a vaccination programme now in place, there is renewed optimism for the future.

PAPER FOR RECYCLING

Looking back on past contributions to this review we have often expressed the hope that the coming year will be less challenging than the last. As 2020 turned out, it was probably the most challenging year that many in the paper recycling industry can remember. The coronavirus pandemic and the first UK lockdown in mid-March heralded changes to work and social patterns that will leave a mark for many years. Nevertheless, the way the industry responded to these pressures deserves the highest praise. In the early weeks, CPI secured key status for workers in paper mills and converters, and also for those collecting recyclate. As a consequence, the industry was able to play a major role in supporting society, keeping vital supply chains to shops and hospitals open, and supplying essential paper products and services to the public.

The impacts of the pandemic affected parts of the Paper Industry differently. Packaging mills enjoyed a bumper second quarter as retailers re-stocked shelves after panic buying. Tissue manufacturers had a mixed experience as "away from home" sales slumped and recycled office waste became hard to find, but those manufacturing from kraft pulp benefited from shelves being cleared by shoppers preparing for lock down. The newsprint mills were especially challenged, as the long-term decline in newspaper sales seemed to be accelerated by office closures and home working. Throughout, the waste collection infrastructure remained in place and provided vital raw material supplies to the industry.

Nonetheless, the total volume of paper and board collected for recycling during 2020 declined by approximately 11% to 6.64 million tonnes, the lowest volume collected in almost 20 years. This mirrors an 11% reduction in estimated consumption of paper and board to 7.3 million tonnes (down from 8.2 million tonnes in 2019). CPI estimates that UK paper mills consumed just under 3 million tonnes of paper for recycling, an overall decline of 4.8% on 2019. Old Corrugated Cases (OCC) and mixed papers used in the production of containerboard for the corrugated sector grew by 6% and 2% respectively, but use of other grades fell significantly, with consumption of woodfree grades falling nearly 20%. Overall, CPI estimates that in 2020 the total UK production of paper and board declined by 5.8% to a total of 3.63 million tonnes, with only the corrugated case making sector showing growth.

Imported recovered fibre remains a small fraction of total consumption, but this increased to nearly 160,000 tonnes, reflecting the challenges faced by the tissue sector and poor recovery of higher grades. Exports, however, slumped by 11.2% to 3.84 million tonnes. China has become a minor player in UK recovered fibre markets with exports in 2020 falling to 225,000 tonnes as traders prepared for the closure of this outlet. India has become the UK's leading export outlet followed by Turkey, Vietnam, and Malaysia. Overall the recycling rate for all paper and board fell in 2020 to 67.1%, a 1.3% decline over 2019. However, the Government's paper and board packaging recycling target was comfortably met.

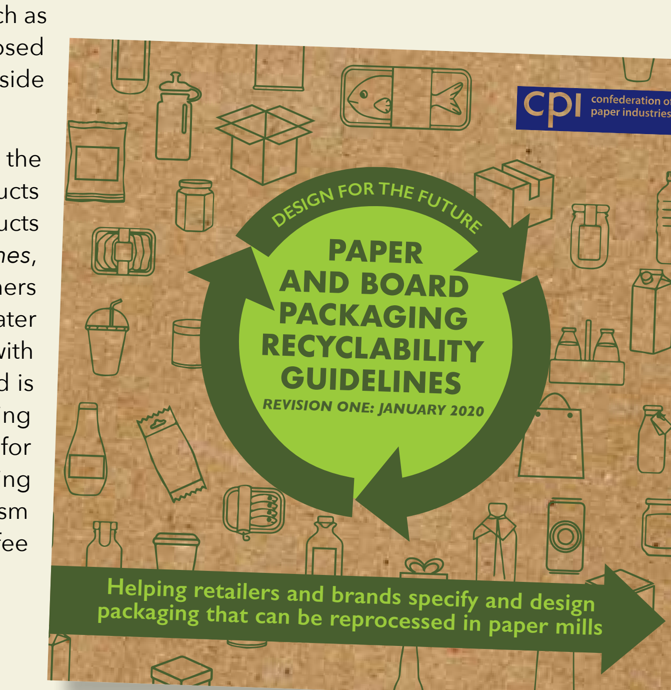
After the initial lockdown, OCC and mixed paper prices slumped from already low levels. Thereafter, an increase in demand from home producers sparked by pressure in the supply chain, and a surge in home deliveries, led to a recovery in prices for these grades. One interesting aspect is the continued spread between OCC and mixed prices, which historically has been £20 but recently has settled at nearer £50. After lockdown, news and pams prices fell by nearly 50% to a record low of around £40 but subsequently recovered, whilst office grades held their prices throughout, supported by demand from tissue mills.

With the closure of Chinese markets to imported recovered fibre and further restrictions on exports to Indonesia, Turkey, and India, a systemic solution must be found to ensure that UK derived recovered fibre is of high quality and in high demand globally. Without it, the UK will not achieve its sustainability and circular economy objectives and will fall short of its carbon reduction and recycling targets. UK stakeholders need to address the quality of recyclate urgently by acting upon four fundamental issues:

1. Design for Recyclability – This is being addressed through the CPI's *Paper and Board Packaging Recyclability Guidelines* and by organisations such as On Pack Recycling Label (OPRL) and WRAP. Ultimately, the introduction of fee modulation should underpin better design behaviours.
2. Improved collection systems that require source separation of materials. It is hoped that Government will demand the necessary minimum infrastructure from collectors in forthcoming proposals for consistent collections.
3. Consumer engagement, with society demanding more from the public and understanding less when the rules are broken.
4. Invested reprocessing technology, with the Paper Industry addressing its processes to improve its contribution to recyclability, demonstrating it is part of a solution, not the problem.

Meanwhile, in other areas CPI was very busy in support of the sector. Defra published its delayed second round of public consultations on the Extended Producer Responsibility (EPR) system and a Deposit Return Scheme (DRS) in late March. The consultation on Consistent Collections was further delayed. The consultation periods have been foreshortened, with responses due at the end of the second quarter of 2021. CPI has been closely involved with several advisory groups, helping to shape future policy. This will see the biggest changes in recycling collection systems in decades and could bring opportunity for the sector to benefit from improved collection systems and better quality if the Government's desire to recover plastic films and flexibles at kerbside requires a separate collection for paper and board. Other fibre-based materials such as beverage cartons and cups could also fill spare capacity left by the proposed DRS that will remove tins, some plastics, and some glass from kerbside collections.

Pressure from politicians and the public to reduce the amount of plastic in the packaging chain is creating significant opportunity for fibre-based products but has also brought the issue of the recyclability of paper and board products to the fore. CPI's *Paper and Board Packaging Recyclability Guidelines*, revised in early 2020, continue to provide valuable direction for designers and specifiers of fibre-based packaging, but there is demand for greater detail and decision from brands and retailers. CPI has worked closely with OPRL to refine the parameters around paper and board recyclability and is developing a certification process that will allow designers and packaging manufacturers to confirm that their packaging format will be accepted for recycling by paper mills. This process will be aligned with similar work being undertaken in Europe, with the objective of providing a support mechanism for forthcoming changes to the EPR system, on-pack labelling and a fee modulation system.



EMPLOYMENT AFFAIRS

Information and expert guidance

Information and guidance is available, via Employment Affairs, to CPI member companies on working arrangements, dispute resolution, annual hours, organisational change, and general HR topics.

Employment Affairs provides advice and guidance on the interpretation and application of the National Agreements in the Corrugated and Papermaking sectors. On behalf of the industry and for the CPI members that conform to the agreements, Employment Affairs leads the annual negotiations between the industry and unions on pay and conditions. In addition, the dispute resolution procedures within the National Agreements continue to provide significant benefit for the conforming sites in securing resolution to impasses.

As well as keeping up to date on general economic data and data on pay settlements, Employment Affairs continues to maintain good working relationships with the unions' national and local representatives. Working in partnership with members and the unions, and within the framework of the National Agreements, Employment Affairs plays an important role in resolving Members' industrial relations issues, so helping to maintain the industry's good industrial relations record.

PACKAGING AFFAIRS

As modern consumers, we all expect access to a broad range of choice, and the ability to select from a wide range of new products that will be available to us on demand. Supply chains make it possible, but this level of choice would not be available to us without effective packaging. All too often criticised, packaging is absolutely essential, not only to make this level of demand possible, but also to allow us to live more sustainably by minimising food and other product waste.

During the coronavirus pandemic, packaging has been recognised for its essential role, and consumers receiving orders at home have become more aware of the vital function packaging plays.

To ensure that packaging meets all necessary regulatory requirements and is suitable for use, we follow a range of legislative issues:

Single Use Plastics (SUP) Directive

The Single Use Plastic (SUP) Directive was established to address marine litter, focussing on a small number of the plastic products most commonly found on beaches. It has been passed quickly and with little resistance, as politicians saw the opportunity to engage with the environmental movement.

The definition of single use plastics includes products made partly from plastic which are not designed for reuse/refill and this includes laminated, coated or lined paper-based products, such as cups, plates and on-the-go food containers.

While the Directive has been completed, at the time of writing, guidance is still being finalised and Member States have been providing feedback on the latest proposals from the Commission. We have been working closely with European Association colleagues to understand the implications of the Directive which sets the scene for plastics in packaging, regardless of the impact of Brexit on the UK position.

Food Contact Guidelines for Paper & Board

Paper packaging that is intended for food contact applications is governed by the "Framework Regulation" (EC 1935/2004) and, while other sectors have material specific legislation, none exists across the EU for paper. In the absence of such specific legislation, the Paper and Board Industry has worked to our voluntary Guidelines to confirm regulatory compliance.

UK law currently brings into force the EU Food Contact Regulations and, until such time as new UK legislation is brought forward, this will remain the case. Thus, the Food Contact Guidelines will remain of fundamental importance to our industry, providing means to demonstrate regulatory compliance. As part of a programme to raise awareness of the Guidelines, CPI has been in discussion with the UK Food Standards Agency (FSA), which has confirmed that it supports the approach.

Other regulatory projects

Mineral Oils in recycled fibre

We have been following concerns on perceived levels of mineral oils in recycled fibre, and in 2018 several pieces of work were published which recognised the many other sources beyond packaging which was considered to be diminishing as a priority. However, during 2020, Germany re-notified its intention to pursue national legislation on certain types, proposing the requirement for a functional barrier if recycled fibre is used.

CPI engaged with the extensive activity across Europe in response and we were also in early contact with the FSA to discuss the matter. There was no opportunity for UK to respond to the Commission as a Member State given Brexit. Instead, we worked with the Food & Drink Federation (FDF) and BPIF Cartons to develop an industry opinion, which has since been formally submitted to the Commission.

Fluorinated chemicals (PFAS)

Fluorinated chemicals have historically been used for grease and moisture resistance in packaging. In an important development, the Danish Government brought forward legislation during 2020 prohibiting the use of paper and board food contact materials in which PFAS have been intentionally used, unless a 'functional barrier' is included.

CPI has surveyed UK member companies and it is clear that they have long since moved away from such chemicals of high concern. The vast majority of UK members do not use PFAS, with the only exceptions being two minority products for which no commercial alternative exists, one of which is medical, and neither of which will enter the recycling stream.

Engaging with BRCGS

The BRCGS Standard for Packaging Materials was originally developed in 2001 to provide a common basis for hygiene certification, providing a framework for all packaging materials with certification recognised by many brand owners and retailers. Many of our Members are accredited to the Standard, developments in which have had a significant impact on the industry.

The Standard has been updated on a number of occasions, a process overseen by its Technical Advisory Committee (TAC). The TAC also considers other technical matters and issues clarification through Position Statements. CPI formerly had a role on the TAC, and we are pleased that CPI has now been accepted back onto the TAC and we are engaged in discussion on a range of developments. We are grateful to the BRCGS administration for the opportunity to bring the views of a significant sector of the packaging to the debate.

PACKAGING AFFAIRS

A Draft Standard for Corrugated Baby Boxes

Corrugated baby boxes have been made in Finland for decades. A gift from the Government to new parents, the box contains various useful items and then acts as a crib for the infant in the early months. The Scottish Government has recently adopted the idea and is now starting to present them to families.

It was proposed in late 2019 that a British Standard should be developed to cover these baby boxes. CPI has been asked to assist in the preparation of the draft text, commenting on the manufacture and testing of the boxes.

National Media Coverage of ‘Cardboard Shortages’

Through the latter months of 2020, and into 2021, the corrugated industry has been facing some exceptional circumstances and earlier this year there was some national media coverage commenting on ‘cardboard shortages’.

CPI had prepared for the eventuality and we have been actively engaged with the media, commenting in regards to general macro-economic trends. We were quoted in national newspapers and briefed the BBC ahead of its TV news coverage.

A range of circumstances came together resulting in an imbalance in supply and demand across the corrugated industry. These circumstances are changing, and steps are in hand to address the imbalance with increased capacity. As the implications of Brexit settle and we come out of lockdown, we can expect the situation to level out.

Working with other UK Trade Associations

CPI works closely with other related Associations, including:

- The Sheet Plant Association, representing independent corrugated cardboard factories. Throughout the pandemic we have exchanged information to keep them informed, enabling us to bring the views of the broader industry to Government. We have been pleased to join their online Conferences.
- The Packaging Federation, which represents packaging converters across all materials. Throughout 2020 they provided a valuable link to the broader food & drink industry and a route into Government to discuss matters relating to the pandemic
- INCPEN, which represents the broader packaging supply chain, including brand owners and retailers. Through them we have been able to engage with government departments regarding the preparation for the consultations on packaging recycling which will follow in 2021 on extended producer responsibility and consistency of collection.
- The Paper Packaging Forum, which brings together a number of associations across the paper packaging sector, to meet, discuss and exchange ideas to understand each other’s areas of activity.

Working across Europe through FEFCO

The European Federation of Corrugated Board Manufacturers (FEFCO) represents the interests of the corrugated cardboard industry across Europe. CPI is pleased to be working closely with FEFCO on a wide range of political, regulatory and communications projects, exchanging best practice with other national Trade Associations. We have attended the National Association Directors’ meetings, the Regulatory Affairs Committee, and the General Assembly.

“Unwrapping the future of sustainable packaging?”

In July 2020, FEFCO co-hosted a high profile online panel discussion which attracted an outstanding number of 2,700 viewers, demonstrating that the sustainability of corrugated cardboard packaging is an issue of great interest. With speakers from the European Commission and the German Federal Ministry for the Environment, the panel touched upon many topics relating to the EU Commission’s Circular Economy Action Plan.

New Officers for FEFCO

During 2020 a new President was announced, Dr Fady Gemayel from Lebanon, who takes the role for a two-year term. Towards the end of the year it was also announced that the Secretary General would retire and her successor, Eleni Despotou, joined FEFCO from February 2021. CPI welcomes Dr Gemayel and Mrs Eleni Despotou to their respective roles and we look forward to continuing the close and constructive working relationship that CPI has enjoyed over past years.

CORRUGATED PROMOTION

www.cardboard.org.uk

The Beyond the Box programme was established in 2018 to inform consumers about the superb environmental benefits of corrugated cardboard packaging. The programme was launched with a Parliamentary Reception and a bust of Winston Churchill which was covered in the national media.

In 2019 we built on this success, commissioning a larger-than-life size cardboard sculpture depicting the ancient Greek figure Atlas to mark Global Recycling Day, which proved popular, with photographs being carried in a range of national papers. We also undertook an extensive social media campaign through Facebook and Instagram, achieving high levels of engagement, and held a radio day in September that year which put us in front of an audience of more than 1.2 million. Potential reach through 2019 exceeded 330 million.

Building on our success in 2020

Early last year our "Grabbing a slice of the Recycling Action" initiative saw us engage with twenty social media influencers, each of whom was given a specially branded pizza box and invited to develop his/her own post recognising the convenience and recyclability of cardboard. With their assistance we achieved a reach of a quarter of a million online.

Also, in the first few months of 2020 we went out to a younger audience, who are eager to learn but which may not be reached by other cardboard messaging, by engaging with leading children's news publication, First News. We developed a half page advertorial that was published in the April issue to its audience of a quarter of a million, and an additional banner advertising on its website to promote traffic to our own Beyond the Box website.

By the Spring, and adapting to the circumstances arising from the pandemic, our "Green in Quarantine" project considered consumers' attitudes to recycling during lockdown, taking our consumer research out to media with a focus on radio. Nine radio interviews were broadcast across 31 radio stations to an audience of 1.9 million.

We have been able to report that British people want to be more sustainable, with significant numbers indicating that recycling has been more important to them during lockdown, or that they plan to prioritize recycling once lockdown is over. A third of adults say they plan to reduce food waste, one in five commits to slashing their plastic usage, and 15% pledge to travel less.

In the Autumn "How Sustainable is your Shop?" delved into UK shopping trolleys to find out what motivates purchases when people are in the supermarket, conducting consumer research and creating a vox pop-style video hosted by food sustainability expert, Louise Symington. The video featured members of the public discussing their own experiences of shopping sustainably. It was well received with editorial coverage including 10 national pieces and a further placement across 150 regional news sites.

We also engaged with PaperBoyo, a creative and prolific online artist best known for his incredible stencil style photography which integrates paper cut outs on iconic landmarks across the world to create amazing artwork that is simple yet stunning. His image, reminding us of the need to respect our landscape, was shared on Instagram with his half a million followers and achieved coverage in The Evening Standard.

Towards the end of the year we conducted a public vote to identify the Beyond the Box "Celebrity Sustainability Hero of the Year", asking consumers to vote on which high profile figure has most influenced them to act more sustainably.

Following a public vote our winner was Sir David Attenborough and we commissioned a specially made cardboard bust and undertook a photoshoot, seeking to secure a high level of media coverage. That drew a very successful year to a close, in which we had a total potential reach of over 360 million people, with a range of projects that also included targeted social media and youth initiatives, radio interviews, and popular consumer videos.

Going Beyond the Box 2021

The programme continues into 2021, with a further four quarterly targeted projects. In the first quarter of this year we will be investigating "Happiness all boxed up", recognising the influence that the lockdown has had on mental health and following attitudes related to happiness, specifically as they relate to sustainability and receiving e-commerce home deliveries.

Additionally, we will be branching out on social media from April this year, building on previous targeted advertising with our own social media pages on Instagram and Facebook.

PUBLIC AFFAIRS

It goes without saying that 2020 was an unprecedented year. Despite the challenges brought about by the pandemic CPI continued its efforts to engage with Political Stakeholders at the highest level, adapting to new ways of communicating through virtual meetings.

Brexit remained a significant area of engagement in 2020. On 31st December 2020, the Transition Period ended, and the UK officially left the EU. The UK reached a trade deal with the European Union on Christmas Eve. Throughout the transition period and beyond CPI has fed back members' questions and concerns to Government, and members have had the opportunity to engage with Government representatives through CPI's Brexit Webinars.

For most of the year COVID-19 response dominated the agenda. During the early stages of the COVID-19 crisis, the UK's Paper-based Industries were identified as a critical industry by the UK Government, as they played a vital role, including supplying materials to the NHS and food packaging. The industry was recognised by Ministers for its contribution to the National Effort. The views and issues of the industry have constantly been fed into Government throughout the pandemic.

As the nation works towards recovery, the industry hopes to play a central part in this, maintaining sustainable jobs here in the UK, and has engaged with Government and Parliamentarians on the topic of Industrial Strategy.

Face to Face Engagement

Throughout the course of 2020 and in the beginning of 2021, we have managed to secure regular meetings with Parliamentarians across the political spectrum, both in Government, in the Shadow Cabinet, and across the back benches. In these meetings CPI advocates for the interests of the UK's Paper-based Industries.

From the early days of the Pandemic CPI had significant engagement with the Department for Business, Energy and Industrial Strategy (BEIS). CPI held bi-weekly meetings with Nadhim Zahawi during the first few months of the pandemic, who was then the Parliamentary Under-Secretary of State in the Department. Since his promotion to vaccine Minister, we have continued to regularly engage with Lord Grimstone, his successor. During 2020 CPI also met with the then Minister of State, the Rt. Hon Kwasi Kwarteng MP, and in March 2021 in his role as Secretary of State in the Department.

These Ministerial discussions are an excellent opportunity to engage with the Department at a political level. During these meetings, the Minister is provided with an update on how the Paper-based Industries are dealing with the COVID-19 crisis and the significant challenges facing the industry including Industrial Strategy, Brexit, and Energy Costs.

In 2020, CPI Director General, Andrew Large had a meeting with the Ofgem Chief Executive, Jonathan Brearley, and Chairman, Martin Cave. The purpose of this meeting was to facilitate a reset in relations between the Energy Intensive Industries and Ofgem. This meeting was very constructive and has led to productive discussions with BEIS.

CPI met with a wide variety of Parliamentarians in 2020 from across the House. We met with Shadow Ministers from Labour: Lucy Powell MP, Shadow Business Minister; Ruth Jones MP, Shadow Minister for the Natural Environment and Air Quality; Wes Streeting MP, Shadow Treasury Minister; Chi Onwurah MP, Shadow BEIS Minister; and Daniel Zeichner MP, Shadow Minister of the Department of Farming and Rural Affairs. We also met with the Scottish National Party's Environmental Spokesman John Mcnally MP, and the Liberal Democrat's Spokesperson for Business and Industrial Strategy, Sarah Olney MP.

CPI met with 2019 intake 'Red Wall' MPs including Mark Jenkinson MP, Alexander Stafford MP, Rob Roberts MP, and Simon Fell MP. Finally, we met with a significant number of member company's constituency MPs including Ruth Edwards MP, Mark Tami MP, Alan Whitehead MP, Guy Opperman MP, Jerome Mayhew MP, and Alex Sobel MP.

Brexit Webinars

In November and December 2020 CPI held two Brexit Webinars. These online events provided an opportunity for representatives of CPI member companies to engage with officials from across Government about Brexit. These successful interactive sessions had hundreds of attendees and gave members the opportunities to ask questions live and provided the most up to date information from Government.

Think Tanks

In 2020 and the early stages of 2021 CPI has been engaging with several Westminster-based think tanks. CPI met with representatives of the Conservative Environment Network. CPI continues to engage with Onwards on its 'Net-Zero' Enquiry, which is considering the impact of the transition to Net-Zero on employment and wider communities.

APPGs

Attending and engaging with All-Party Parliamentary Groups (APPG) continued to be a focus of our public affairs strategy. APPGs are a valuable way of engaging with a large number of MPs at once with an interest in a specific issue. These meetings have also moved online, and CPI's interactions are with groups covering topics including:

- Industrial Strategy
- Manufacturing
- Energy Costs
- Environment
- Energy Studies
- Packaging Manufacturing Industry
- Sustainable Resource.

Collaboration

From 2019-2021 CPI holds the chairmanship of the Energy Intensive Users' Group and is working to revitalise that Group and campaign on affordable energy for large users and a just transition to a net-zero carbon economy.

Within the EU, CPI's continued membership of its European Associations has been confirmed and we will continue to work closely with our European colleagues on the very large number of matters of shared interest. Andrew Large, CPI Director General, is current Chairman of CEPI's ADG (Committee of Association Directors General), bringing together senior representation from all EU Paper Trade Associations.

Globally, CPI is becoming an active member of the International Council of Forest and Paper Associations, and Andrew Large, CPI Director General, was appointed to the UN FAO Advisory Committee on Sustainable Forest Industries in November 2019.

Consultations

CPI continues to engage and consult with members on its responses to Government consultations. During 2020, responses were submitted for the following political consultations:

- BEIS Select Committee's Net-Zero and UN climate summits Inquiry
- BEIS Select Committee sub-enquiry on the UK Industrial Strategy (Barriers to Growth)
- The Business, Energy and Industrial Strategy's Committee's 'My BEIS Inquiry'
- Labour Party Policy Forum
- Onwards call to evidence on 'The Path to Net-Zero'

In the News

CPI contributed to a number of features, comments and letters in trade and national press including BBC News, The Times, The Telegraph, The Guardian, I-News, Wired, Paper Technology, letsrecycle.com, Print Week, and The Grocer.

The issues covered included:

- The COVID-19 Pandemic (Shortage of Cardboard)
- Brexit
- Sustainable Materials
- Recycled Paper and reuse

Speaking Opportunities

CPI also engages publicly with stakeholders at conferences and workshops and during 2020/early 2021 CPI staff spoke at several events:

- Sheet Plant Association Conference, October 2020
- UN Advisory Committee on Sustainable Forest Industries Webinar, November 2020
- Sheet Plant Association Conference, January 2021
- Transforming Foundation Industries Network+ Launch, February 2021

COMMUNICATIONS

A new way of working

Early in 2020, we were considering a slow and planned approach to the introduction of video conferences for a few "difficult to organise" meetings. Little did we know that, just a few months later, we would be hit by lockdowns and travel restrictions that would change the way we work instantly.

With staff and colleagues working remotely and many member companies' employees continuing to work with social distancing measures in place, we were thrown into a new way of communicating in the workplace. Video conferencing using Zoom/Teams, screen sharing, increased use of social media, and the introduction of cloud-based systems have very quickly become the norm for industry, and we all now seem to have become experts in using this technology in the workplace overnight.

There is an argument to say that this technology has perhaps improved attendance at meetings, and improved efficiency and productivity, however no amount of technology can completely replace our need for face-to-face interaction.

While we are sure that these new methods of communication will certainly have their places within our ongoing communications strategies, we are looking forward to when we can visit members in person, hold physical meetings, and hold our events and conferences.

In the meantime, we have continued, alongside our public affairs work, to ensure that we have maintained good and efficient communication to members and to the outside world.

Communication with our Members

CPI has kept, and continues to keep, members informed of not only important industry issues but, since the COVID-19 pandemic began, has provided updates on the latest Government information and what it means for members. With regular dialogue, we are able to consult directly with BEIS officials, and thus able to answer questions and provide clarity on how guidance, testing etc, will affect member companies and their workforce. We introduced a COVID-19 update which collates the information that has been sent to members, so it is all in one convenient place.

CPI continues to consult and support its members through various committees and councils which provide a communications platform, albeit a different one via video calls, to engage and share information. CPI News, our fortnightly newsletter, updates members with the latest news, and the Members area of the CPI website is constantly being updated with meeting papers, statistics, briefing papers etc. Of course, the CPI team continue to brief members regularly through direct emails.

We have also held a series of webinars to support members during Brexit which proved successful and were well attended.

Online

Our website **paper.org.uk** remains our primary communication tool for both members and the outside world. The site is updated regularly with news, new publications, and information for members.

Our education site **paperworks.school** continues to provide free resources to schools and the Beyond the Box website (**cardboard.org.uk**) continues to evolve to be a one stop source of information for consumers on cardboard.

Publications in Print

Of course, our communications portfolio wouldn't be complete without the paper publications we produced throughout 2020 and early 2021.

Reports

Economic Value Report

Given the COVID-19 pandemic, CPI decided to publish a short overview, entitled *'Summary Economic Value Report – 2020'*, which provides a brief overview on the economic status of the UK's Paper-based Industries, highlighting statistics for 2019, looking at the information we had for 2020 at that point, and reflecting on the role we have played in the health crisis.

CPI is set to publish a full third Economic Value Report later in the Spring which will paint a comprehensive picture of the UK's Paper-based Industries today. The detailed report will review the current status of the UK's Paper-based Industries, consider the impact of the pandemic so far, and considering the opportunities for the industry moving forward.

Process Wastes - introductory report

With the availability of Government sponsored funding to support innovation and cross-sector working across UK Energy Intensive Industries, we are seeing increased interest in by-product materials either as a feedstock for use in other industries, or for direct processing for innovative new uses. CPI has therefore produced a report analysing the generation of paper pulps and processing rejects; these largely arising from the physical recycling of paper and card in the UK.

Discussion Papers

CPI issued two new discussion papers, one on *CHP and Electrification*, the other on Decarbonising the UK Paper Industry. Both can be found in the publications section at paper.org.uk.

Fact Sheets

In February 2021, a new Fact Sheet *"Demonstrating Compliance with Food Packaging Law"* was added to the many existing Fact Sheets available on the CPI website.

Position Papers

CPI updated and added new titles to its range of Position Papers, including a *Statement on the Current Position of the Corrugated Cardboard Industry, and Post-Coronavirus Industrial Strategy: A Green Industrial Growth Strategy for the UK.*

Social Media

CPI remains active on social media channels. This is an important way to keep in touch with Members and the public at large, sharing important information in relation to the industry, and sharing our campaigns.

Twitter We have a steady following of almost 2,000 which we will continue to build on. Twitter continues to be CPI's most active social media channel. It is great to engage with issues relating to our public affairs work. We are connected with a significant number of Politicians, Government Departments, and Think Tanks.

Facebook and **LinkedIn** CPI continues to post on both platforms.

Instagram In 2020 we launched an Instagram page to share news from CPI in a more visual way.

Engagement and Support

CPI continues to engage with and support various industry related initiatives including:

- 2050 Decarbonisation Roadmap
- PABIAC Strategy
- Two Sides
- Recycle Now
- Keep Me Posted campaign

Alliances

CPI continues to benefit from, and provide support to, numerous alliances in the UK and Europe.

These include Advisory Committee on Packaging; Association for Decentralised Energy; BPIF Cartons; Combustion Engineering Association; Defra Part A Forum; International Council of Forest and Paper Associations (ICFPA); Emissions Trading Group (ETG); Energy Intensive Users' Group (EIUG); Environment Agency/CPI Liaison Group; Gas Security Group; Make UK; Gold Medal Association; GMB; Health & Safety Executive (HSE); Manufacturers Climate Change Group (MCCG); Manufacturing Trade Remedies Association (MTRA); Ofgem Large User Group; On-Pack Recycling Label Ltd (OPRL); Paper & Board Association (P&BA); Paper Cup Recycling and Recovery Group; Packaging Recycling Group Scotland (PGRS); Paper Packaging Forum; Sheet Plant Association (SPA); The Packaging Federation (PackFed); The Paper Industry Technical Association (PITA); The Industry Council for Research on Packaging and the Environment (INCPEN); The Recycling Association; Timber Expert Panel; Unite the Union; and Waste & Resources Action Programme (WRAP).

In addition, we continue to represent Members at a European level through our work with Confederation of European Paper Industries (CEPI); European Federation of Corrugated Board Manufacturers (FEFCO); European Tissue Symposium (ETS); the International Confederation of Paper and Board Converters in Europe (CITPA); and the Group of European Market Wood Pulp Users (UTIPULP).

We would like to thank all these organisations for their positive engagement on many issues and for their continued support. We look forward to working with them in the future.

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REVIEW OF DATA 2020

As a whole, the UK's Paper-based Industries produced a resilient performance whilst operating in some of the most difficult trading conditions known for decades as the global pandemic periodically closed large parts of the economy at home and abroad. There was considerable variation in the activities of the various sectors, with Packaging and Tissue benefiting from a nation of stay-at-home consumers, whereas Graphics and Specialities experienced a significant decline in demand as the social economy all but disappeared for large periods of 2020. There was less turbulence on raw material markets, with demand for imported woodpulps largely maintained. A few paper mills switched to primary fibre due to the unavailability of suitable grades of secondary raw materials, arisings having declined with the curtailment of business activity. Otherwise recovered paper collection and consumption continued at marginally reduced levels, and exporters of secondary fibre once again found plenty of alternative markets to China for their materials. In the midst of all this, the impact of Brexit on UK indices is hard to evaluate and only the resumption of normal trading conditions during 2021 and 2022 will enable this to be determined.

Apparent Consumption of Paper & Board

2020 witnessed a 10.5% decline in consumption of paper and board materials to 7.32 million tonnes, a loss of almost 860,000 tonnes. Packaging, the UK's largest paper and board sector, experienced a slight decline of 2%, with Corrugated Case Materials growing by just under 1% to 2.5 million tonnes whereas Cartonboards and other paper-based packaging declined by around 6.5%. Consumption of packaging materials in total was 3.71 million tonnes. The Tissue sector, meanwhile, enjoyed good growth stimulated by exceptional domestic demand during the first lockdown, with consumption of Parent Reels growing by 2.6% to just short of 1.1 million tonnes. Most of this increase, however, was for toilet tissue as more specialised applications suffered a decline, for example in the away from home sector affected by the closure of the hospitality industry. The Graphics sector continued its long decline, losing a quarter of its markets, to end the year at 2.29 million tonnes. Newsprint demand in particular suffered heavy losses, consumption declining by almost 30% to a new low of 644,000 tonnes.

With the addition of net inflowing paper and board products (-4.0%) and transit packaging (+1.2%), CPI estimates total arisings in the UK to have amounted to 9.9 million tonnes, an 8% decline compared to 2019. With official estimates of the UK population at just under 67.2 million for 2020, this equates to an average per capita consumption of 147 kg. For the purposes of comparison, average consumption was estimated to be 207 kg per capita at the end of the last decade and 272 kg per capita at the millennium.

Production and Deliveries of Paper & Board

Paper and board production fell by almost 6% to 3.63 million tonnes, the lowest volume produced by the UK industry since 1984. With a significant number of mills forced to reduce or stop production and furlough staff for want of orders during the Spring lockdown, output reached a low point of 278,000 tonnes in June, just as restrictions were beginning to ease. The combined Graphics and Specialities sector produced 971,500 tonnes during the year, a decline of 19.4% or 234,000 tonnes fewer. The Corrugated Case Materials sector, the only sector to grow, increased production by 2.5% to 1.52 million tonnes, whilst all other packaging declined slightly to 392,000 (-1.6%). Output for the Tissue sector, despite increased demand, was affected by ongoing capacity adjustments and produced 2.6% less, at 742,000 tonnes.

Domestic deliveries suffered a slightly smaller decline due to the growth in Corrugated Case Materials, up by 6.7% or almost 90,000 tonnes to 1.41 million tonnes. All other sectors lost sales for various reasons connected with the pandemic, the Graphics and Specialities sector declining most with a fall of over 20% to 585,000 tonnes. In total, domestic deliveries amounted to 2.93 million tonnes, a 3.6% decline compared to 2019. Export sales fell by about 75,000 tonnes (-9.1%) to 750,000, with Graphics and Packaging losing 55,000 and 20,000 tonnes of sales respectively.

Papermaking Raw Materials

Recovered paper usage at UK paper mills fell by 150,000 tonnes during 2020, a decline of almost 5% to 2.96 million tonnes. Good demand for the packaging grades was offset by losses in the higher grades. Mixed Papers increased by 6% to 522,000 tonnes and Old Corrugated Containers by 2% to 1.09 million tonnes; however, both Woodfree and Other grades (which include Newspapers and Magazines) suffered double-digit declines as lack of orders or want of arisings took their toll. For exporters, India and South-east Asia consolidated their positions as the main destinations for papers recovered in the UK in place of China which imported just 225,000 tonnes or 3% of materials collected. Total exports were 3.84 million tonnes, a decline of over 11% with substantial declines for Woodfree and Other grades again. With the inclusion of recovered paper imports, significantly increased albeit at relatively small volumes, domestic recovered paper collections fell by almost 10% to 6.65 million tonnes. This being a slightly higher rate of decline than arisings noted above, the UK's recycling rate fell by just over 1% to 67.1%.

Production of Corrugated Board

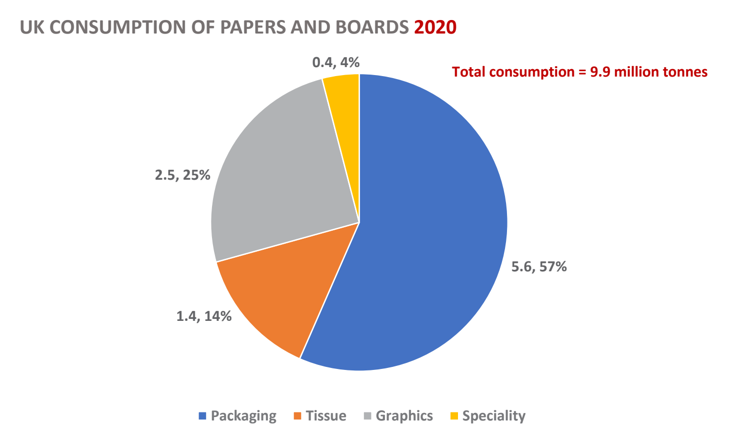
Members reporting their corrugated board production to CPI (newly increased to eight companies) recorded yet another year of growth in output, board production rising by 2.1% to 4.35 million ksm. And whilst some specialist sectors of the industry struggled with the loss of demand from sectors of the economy closed by the pandemic, the boom in demand from consumers shopping online or purchasing food and drink from supermarkets which would normally be consumed elsewhere, more than compensated. Effective weekly production rose to 86,572 ksm, well above 2018 and 2019 levels and at a new low average board weight of 450 gsm. Sheet-feeding by members also put aside last year's decline, increasing by 1.2% to 1.17 million ksm, slightly higher than even 2018's total.

UK PAPER AND BOARD FACTS & FIGURES 2020

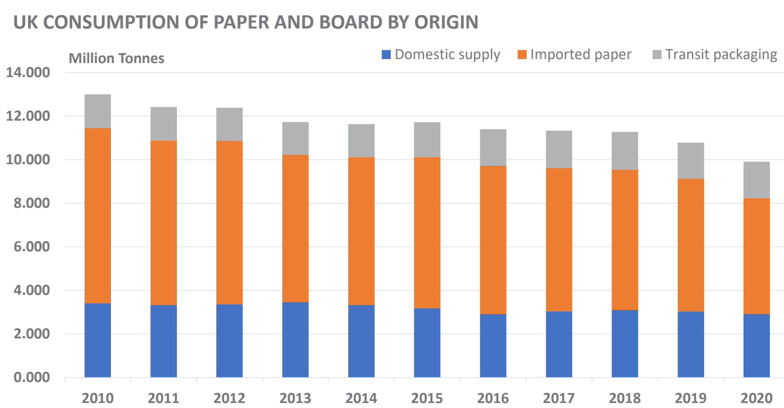
KEY FIGURES OF THE UK'S PAPER-BASED INDUSTRIES

62,000	*62,000 people are employed in the UK manufacturing paper and paper products*	Jobs
1,417	*1,417 UK enterprises are engaged in the manufacture of paper products*	Companies
£12 billion	*UK companies manufacturing paper have a turnover of £12,188 million*	Turnover
£3.4 billion	*UK manufacture of paper has a Gross Value Added of £3,373 million*	GVA

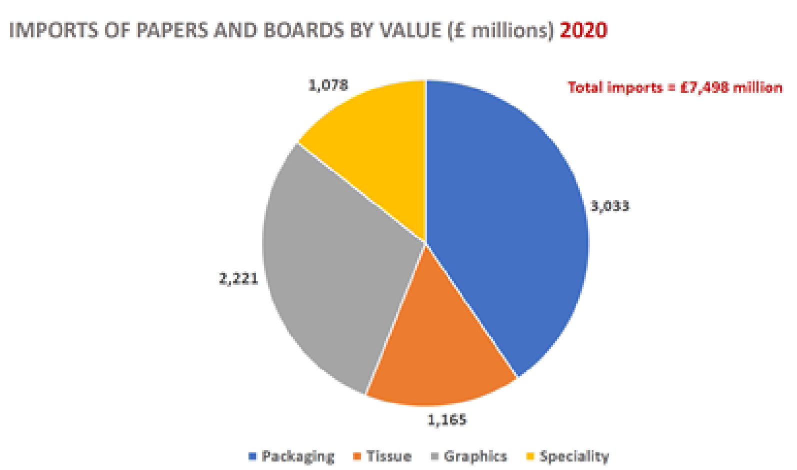
Source: ONS, Annual Business Survey 2020, 2018 data



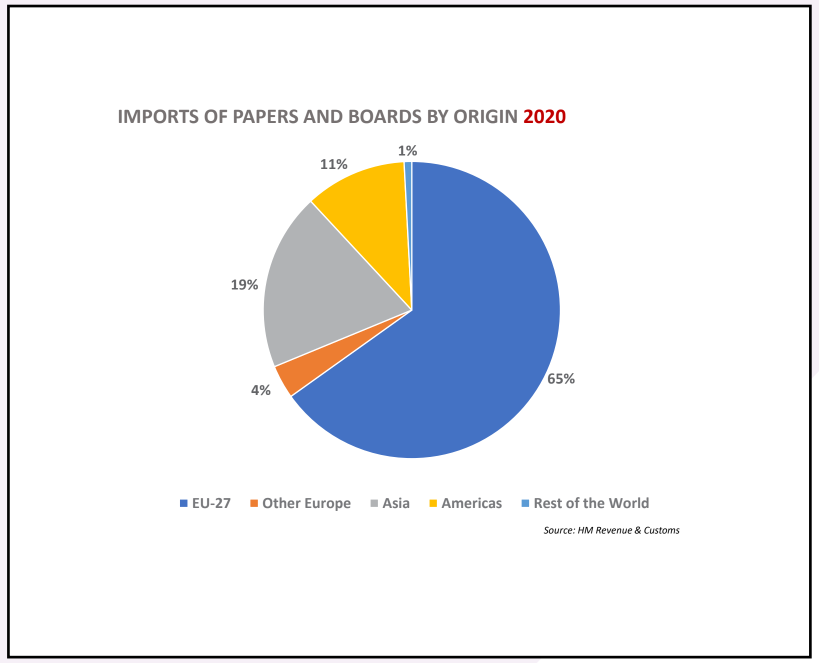
Sources: CPI, HM Revenue & Customs, NPWD

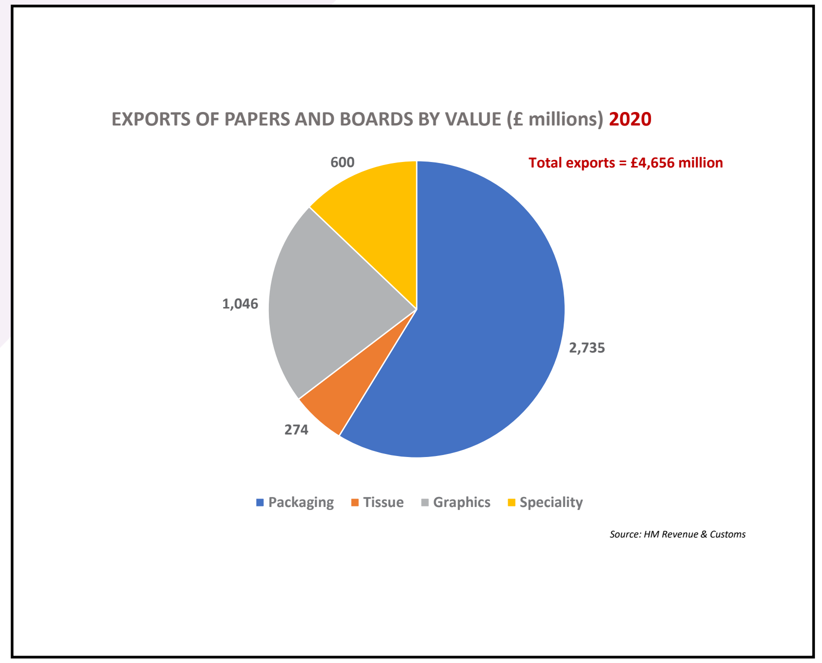


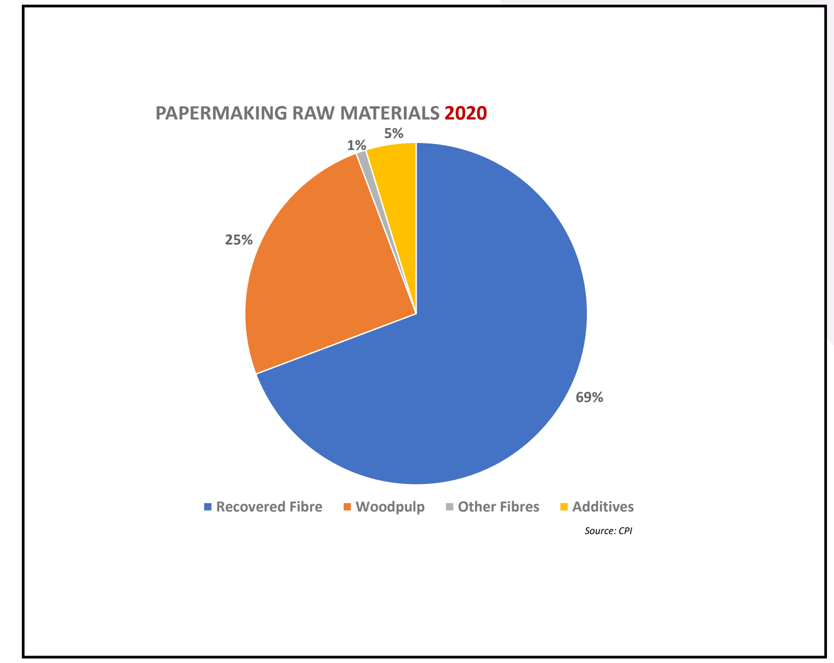
Sources: CPI, HM Revenue & Customs, NPWD

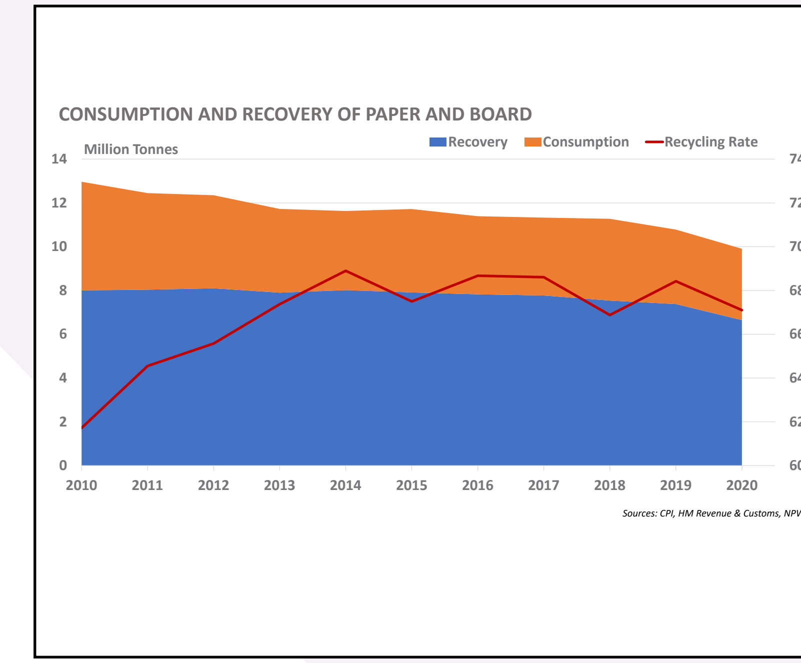


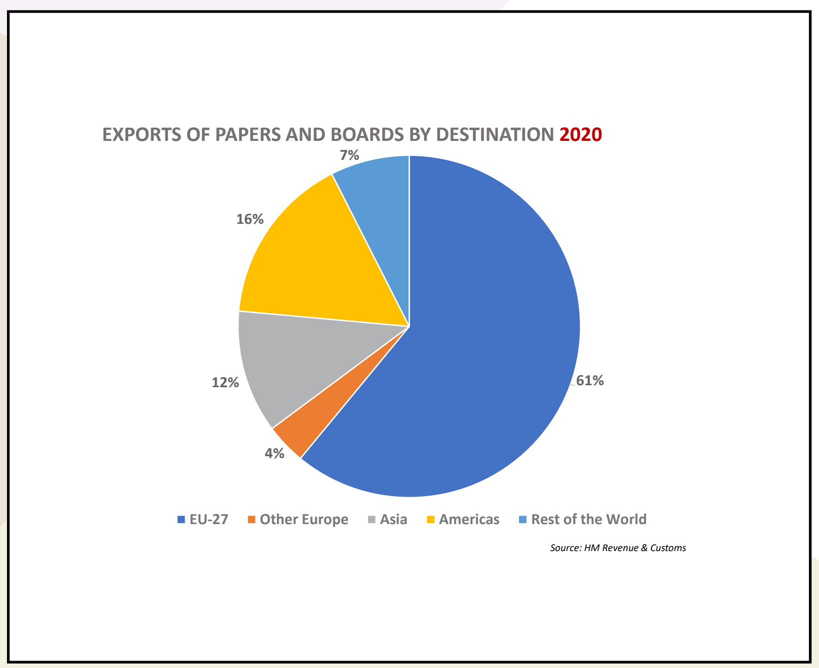
Source: HM Revenue & Customs

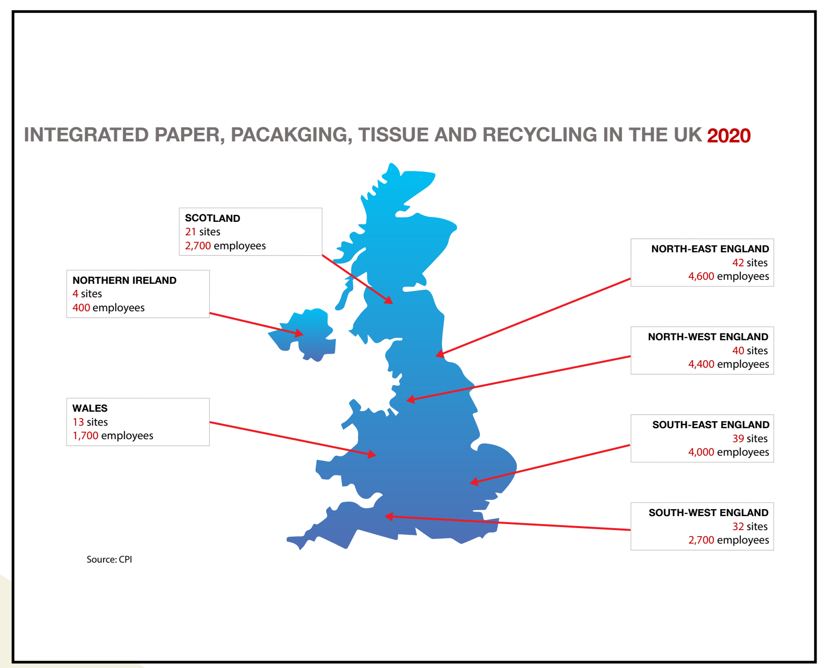

IMPORTS OF PAPERS AND BOARDS BY ORIGIN 2020
1%
11%
19%
4%
65%
EU-27
Other Europe
Asia
Americas
Rest of the World
Source: HM Revenue & Customs

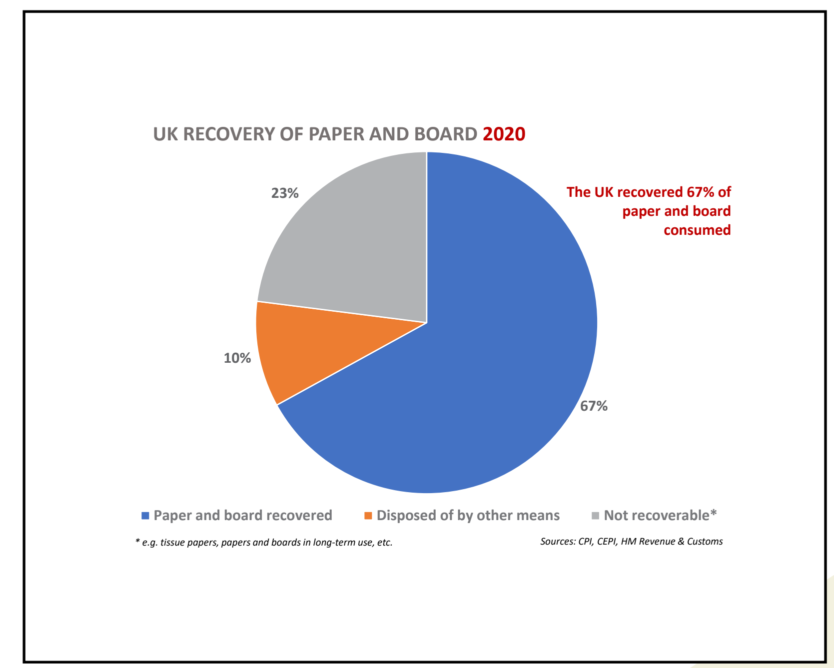

EXPORTS OF PAPERS AND BOARDS BY VALUE (£ millions) 2020
Total exports = £4,656 million
600
1,046
274
2,735
Packaging
Tissue
Graphics
Speciality
Source: HM Revenue & Customs

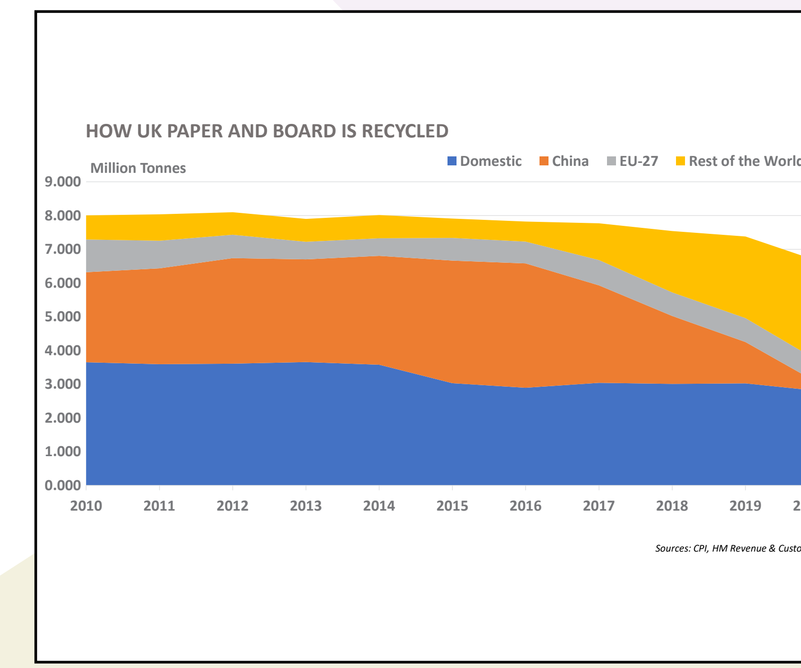

PAPERMAKING RAW MATERIALS 2020
5%
1%
25%
69%
Recovered Fibre
Woodpulp
Other Fibres
Additives
Source: CPI

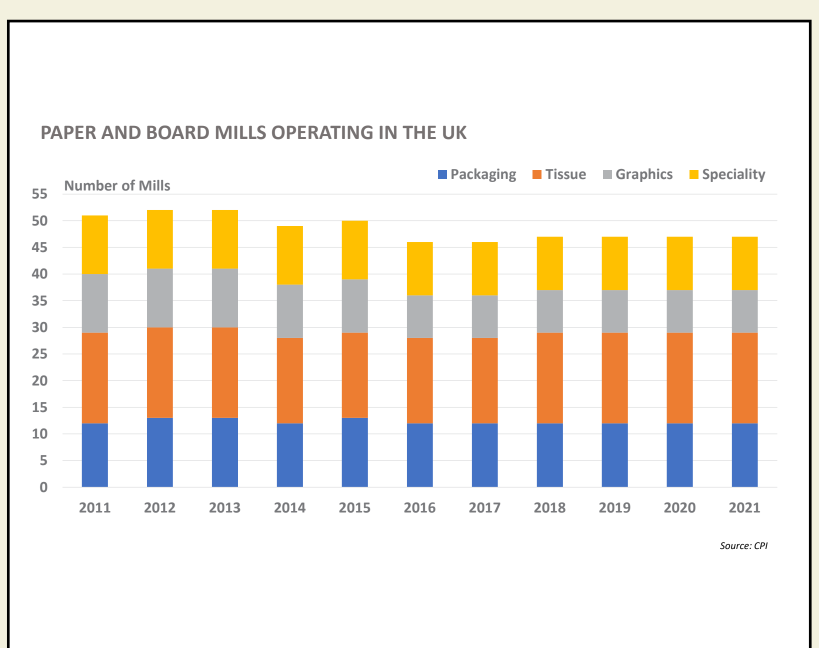

CONSUMPTION AND RECOVERY OF PAPER AND BOARD
Million Tonnes
Recovery
Consumption
Recycling Rate
2010
2011
2012
2013
2014
2015
2016
2017
2018
2019
2020
Sources: CPI, HM Revenue & Customs, NPWD

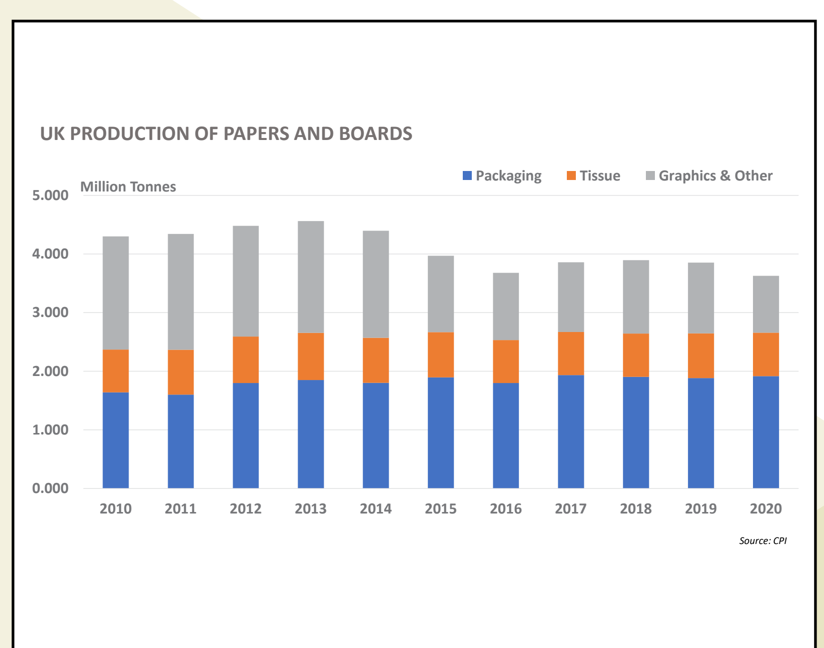

EXPORTS OF PAPERS AND BOARDS BY DESTINATION 2020
7%
16%
12%
4%
61%
EU-27
Other Europe
Asia
Americas
Rest of the World
Source: HM Revenue & Customs

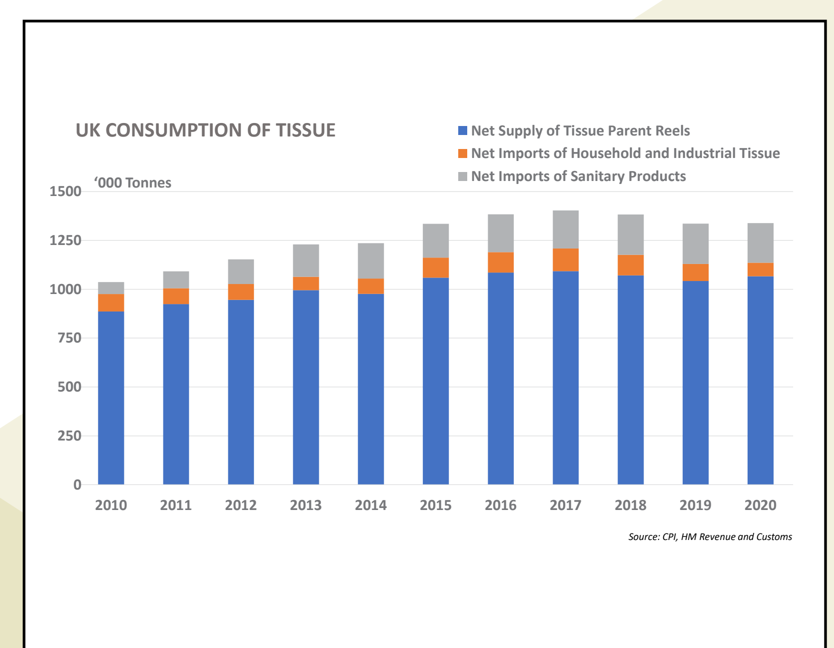

INTEGRATED PAPER, PACAKGING, TISSUE AND RECYCLING IN THE UK 2020
SCOTLAND
21 sites
2,700 employees
NORTHERN IRELAND
4 sites
400 employees
WALES
13 sites
1,700 employees
NORTH-EAST ENGLAND
42 sites
4,600 employees
NORTH-WEST ENGLAND
40 sites
4,400 employees
SOUTH-EAST ENGLAND
39 sites
4,000 employees
SOUTH-WEST ENGLAND
32 sites
2,700 employees
Source: CPI

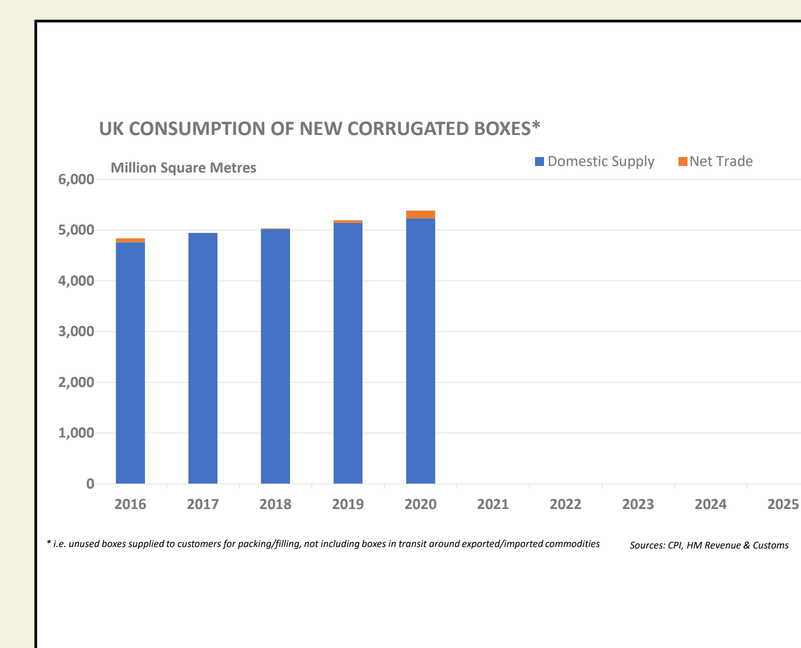

UK RECOVERY OF PAPER AND BOARD 2020
The UK recovered 67% of paper and board consumed
23%
10%
67%
Paper and board recovered
Disposed of by other means
Not recoverable*
* e.g. tissue papers, papers and boards in long-term use, etc.
Sources: CPI, CEPI, HM Revenue & Customs


HOW UK PAPER AND BOARD IS RECYCLED
Million Tonnes
Domestic
China
EU-27
Rest of the World
2010
2011
2012
2013
2014
2015
2016
2017
2018
2019
2020
Sources: CPI, HM Revenue & Customs


PAPER AND BOARD MILLS OPERATING IN THE UK
Number of Mills
Packaging
Tissue
Graphics
Speciality
2011
2012
2013
2014
2015
2016
2017
2018
2019
2020
2021
Source: CPI


UK PRODUCTION OF PAPERS AND BOARDS
Million Tonnes
Packaging
Tissue
Graphics & Other
2010
2011
2012
2013
2014
2015
2016
2017
2018
2019
2020
Source: CPI


UK CONSUMPTION OF TISSUE
'000 Tonnes
Net Supply of Tissue Parent Reels
Net Imports of Household and Industrial Tissue
Net Imports of Sanitary Products
2010
2011
2012
2013
2014
2015
2016
2017
2018
2019
2020
Source: CPI, HM Revenue and Customs


UK CONSUMPTION OF NEW CORRUGATED BOXES*
Million Square Metres
Domestic Supply
Net Trade
2016
2017
2018
2019
2020
2021
2022
2023
2024
2025
* i.e. unused boxes supplied to customers for packing/filling, not including boxes in transit around exported/imported commodities
Sources: CPI, HM Revenue & Customs

CPI TEAM

Andy Barnetson
Director of Packaging Affairs

Andrew Braund
Director of Health and Safety

Neil Fishburne
Chief Operating Officer

Steve Freeman
Director of Energy and Environmental Affairs

Nick Langdon
Statistics Manager

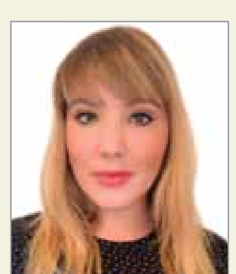
Andrew Large
Director General

David Morgan
Energy Data Manager

Emma Punchard
Director of Member Communications

Debbie Stringer
Director of Environment

Simon Weston
Director of Raw Materials



Holly Whitbread
External Communications Manager

Leonie Williams
Accounts and Office Manager

CPI COUNCIL

Officers

Kevin Bussey	(President)	Smurfit Kappa – Papermaking
Brian Lister	(Vice President)	SAICA Pack UK Ltd
Angus MacSween	(Honorary Treasurer)	Arjowiggins Scotland Ltd
Patrick Willink	(Past President)	James Cropper PLC
Andrew Large	(Director General)	Confederation of Paper Industries

Members

Jenny Bergstrom	Iggesund Paperboard (Workington) Ltd
Andres Calle	Kimberly-Clark Ltd
Niels Flierman	DS Smith Paper Ltd
Alex Kelly	Logson Group
Simon Morris	Palm Paper Ltd
Giuseppe Munari	Sofidel UK Ltd
Chris Murray	DS Smith Packaging
Tom Rice	SAICA Pack UK Ltd
Tony Richards	Essity UK Ltd
Simon Walker	UPM-Kymmene (UK) Ltd

CPI MEMBERS

Full Members*

Ahlstrom Chirnside Ltd
Arjowiggins Scotland Ltd
BillerudKorsnäs Beetham Ltd
Caledonian Packaging Ltd
De Jong Packaging Ltd
Devon Valley Ltd
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DS Smith - Paper
DS Smith - Recycling
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John Roberts Holdings Ltd
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Logson Group
Macfarlane Group
McLaren Packaging Ltd
Northwood Tissue Ltd
Packaging Products Ltd
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Palm Recycling Ltd
Pearce Recycling Company Ltd
Portals Paper Ltd
Preston Board & Packaging Ltd
Recycling UK Ltd
Ribble Packaging Ltd
Roydon Packaging Ltd
SAICA Natur UK Ltd
SAICA Pack UK Ltd
SAICA Paper UK Ltd
Sheard Packaging Ltd
Slater Harrison & Co. Ltd
Smurfit Kappa - Corrugated
Smurfit Kappa - Papermaking
Smurfit Kappa - Recycling
Sofidel UK Ltd
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Sonoco Recycling - UK
Southern Cross Packaging Ltd
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Swanline Print Ltd
Union PaperTech Ltd
UPM-Kymmene (UK) Ltd
Vernacare Ltd
VPK Packaging Ltd
W E Roberts (Corrugated) Ltd
Weedon Group
Weidmann Whiteley Ltd
WEPA UK

**representing approx 200 sites*

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Affiliate Members

Combustion Engineering Association
Paper and Board Association
Paper Industry Technical Association

Paper - the sustainable, renewable choice

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Registered in England and Wales
Registered Office: 1 Rivenhall Road, Swindon, Wiltshire SN5 7BD

- Designed and produced by Bob Child - www.peartreestudios.co.uk
- Printed by Park Lane Press Ltd - www.parklanepress.co.uk