

Paper for Recycling



In 2019, 7.4 million tonnes of used fibre was recovered in the UK for recycling. Domestic reprocessors used 3.1 million tonnes as a vital raw material to make new paper products such as newspapers, packaging and boxes, and tissue papers. 4.3 million tonnes was exported for use by paper mills in other parts of the world. The UK is highly dependent upon export markets to reprocess domestically collected secondary raw materials. Over recent years a significant proportion (over 50%) has been dispatched to China, but it has announced it will cease imports of all solid wastes in 2021.

Because the majority of paper collected for recycling is exported, the structure of the UK paper for recycling market is highly dependent upon ready and dependable export outlets for recovered fibre, and this will only be achieved if consistently high-quality material is produced by recovery systems. Moreover, the competitive position of UK-based paper manufacturers can only be preserved if the quality of raw material being presented to them is of sufficient quality to allow the efficient operation of their machinery.

The Confederation of Paper Industries (CPI) has consistently advocated the need for “High Quality” recycling as required by the EU’s revised Waste Framework Directive, which expresses a clear preference for separate collection over co-mingled collections as the means most likely to achieve the purpose of the Directive. Article 11 of the Waste Framework Directive requires Member States to promote high quality recycling by setting up the separate collection of paper and other packaging waste where technically, environmentally and economically practicable¹. The promotion of co-mingled collection systems by waste management operators has undermined the integrity of material quality, whilst passing control of raw material streams to them. Failure by the Environment Agency (EA) to properly police the Materials Recovery Facility (MRF) Code of Practice (CoP), and Trans-Frontier Shipment (TFS) regulations which were established to ensure

material from co-mingled collections was of sufficient standard, has led to a high level of contamination within the post domestic raw material stream and a number of high profile news stories about contaminated recyclate from UK being dumped in developing countries.

For these reasons CPI sets out its position on paper for recycling as follows:

CPI Position:

CPI advocates that paper for recycling:

- is collected and processed in line with the waste hierarchy as set out in the revised Waste Framework Directive (rWFD)
- is not collected alongside residual waste as this makes it unsuitable for use in the paper industry
- should be collected separately from other recyclable materials, as the means most likely to achieve the purpose of the rWFD
- when collected mixed with other recyclable materials, is only processed through plant with suitable sorting capabilities that have transparent and auditable quality management systems in place and which meet the necessary standards of the recycling sectors
- is processed into paper for recycling following the Confederation of European Paper Industries (CEPI) Guidelines on Responsible Sourcing and Quality Control
- must only be used for energy recovery at the end of its life cycle when it can no longer be recycled into new paper
- if used for energy recovery, does not receive renewable energy subsidies
- meets the requirements of the European Standards for Paper for Recycling: EN643
- is not exported unless meeting the requirements of Trans-Frontier Shipment of Waste Regulations 2007 (TFS) and import legislation of the destination country
- should only be used in the manufacture of new paper products.

¹Waste Framework Directive, or Directive 2008/98/EC

CPI further believes that:

- The Environment Agency should be properly funded and staffed to undertake its duties effectively
- a greater emphasis must be placed on the enforcement of TFS including the publication of details of TFS compliance and non-compliance
- a mechanism should be adopted via WasteDataFlow to account for the weight of contaminants that are disposed of by reprocessors in Local Authority data submissions
- Local Authorities should adopt a culture of openness and transparency around the issue of material destinations by publishing (and regularly updating) on their websites the final destination that paper for recycling and other recyclable materials collected by or on behalf of them, are sent to
- UK Governments should encourage Local Authorities to retain budgets for recycling marketing/education campaigns in order to maximise the quality of input material being processed at recycling, sorting and bulking facilities
- product-related recyclability policies should ensure that paper can be recycled at the end of its use; conflicting policies and legislation preventing paper products from being recycled should be reviewed.

Further Information

For further information on this issue please contact Simon Weston, Director of Raw Materials, on 01793 889605 or email sweston@paper.org.uk.

Confederation of Paper Industries

- The Confederation of Paper Industries (CPI) is the leading trade association representing the UK's Paper-based Industries, comprising paper and board manufacturers and converters, corrugated packaging producers, makers of soft tissue papers, and collectors of paper for recycling.
- CPI represents an industry with an aggregate annual turnover of £12 billion, 62,000 employees, which supports a further 100,000 jobs in the wider economy.
- For facts on the UK's Paper-based Industries please visit: www.paper.org.uk.

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