

May 2020



Position Paper: Committee of the Regions' consultation on the Circular Economy Action Plan 2.0

CONTEXT

On 12 March, the European Commission adopted a new Circular Economy Action Plan - one of the main building blocks of the European Green Deal, Europe's new agenda for sustainable growth. With measures along the entire life cycle of products, the new Circular Economy Action Plan (CEAP) aims to make our economy fit for a green future, strengthen our competitiveness while protecting the environment and give new rights to consumers. Building on the work done since 2015, the new CEAP focuses on the design and production for a circular economy, with the aim to ensure that the resources used are kept in the EU economy for as long as possible. The plan and the initiatives therein will be developed with the close involvement of the business and stakeholder community.¹

ALUMINIUM, GLASS, STEEL

The aluminium, glass and steel sectors are top performers in recycling packaging materials. With respective rates of 74,5%, 76% and 80.5%² in 2017, our industries have worked closely with European, national and local authorities, Extended Producer Responsibility Schemes, waste management operators and last but not least, customers, brands and civil society at large to invest in collection systems that underpin the recycling infrastructure.

As permanent materials, aluminium, glass and steel have the potential to be recycled over and over again without loss of the main intrinsic properties and thus maintain circular

¹ https://ec.europa.eu/commission/presscorner/detail/en/ip_20_420

² Recycling rate for respective aluminium beverage cans, glass containers and all steel for packaging segments

material loops. A **'permanent material'** is a material whose inherent properties do not change, regardless of the number of times it goes through a recycling process. It means that once it is produced for the first time, and properly collected and processed at its end of life, it becomes the **raw material for new and endless production loops**. Such materials are and will remain at the heart of any proven and well-functioning Circular Economy.

PROPOSALS for amendments per theme:

0) Targets 2020-2025 and investment in collection and sorting infrastructure:

“Urges the European Commission to continue supporting Member States that are at risk of not reaching EU recycling targets for 2020 and 2025. The circular economy for any packaging involves many stakeholders, from municipalities to producers, to brands and consumers. It is important to get all these stakeholders working together to close the loop. Thus, important efforts under the previous European Commission, including the so-called ‘Virtuous Circle’ missions, should be pursued that bring all these actors together.”³

“Members States having difficulties to meet the new ambitious EU recycling targets should be helped by targeted EU funding to install an innovative collection and sorting infrastructure and to invest in high quality recycling facilities. In the case of metals and glass such investments have an immediate beneficial environmental and economic impact, due to the fact that these ‘permanent’ materials are easy to recycle and have a positive scrap value”.

1) Food waste and shelf-life:

“Welcomes the focus on reducing food waste which goes hand in hand with packaging that can extend shelf-life. Glass, aluminium and steel packaging can play an important role in this fight against food waste”.

2) Separate collection:

“Welcomes the emphasis in the European Commission’s Circular Economy Action Plan 2.0 on separate collection. The way packaging is collected directly impacts the quantity and quality of the collected materials that can be recycled. Separate collection and sorting are therefore the prerequisite to guaranteeing high-quality recycling processes of permanent materials. Well-sorted aluminium and steel scrap and glass cullet has resulted in these already accounting for a major resource in the production of new material.”

“Stresses that any initiative to harmonise collection systems must take account of regional and local circumstances and therefore emphasis on infrastructure harmonisation would be more effective if done at national level to deliver the quantity and quality of scrap materials to reach the targets. As a

³ https://ec.europa.eu/info/events/circular-economy-virtuous-circle-tour_en

first step, for example, a Member State should have at least a consistent colour scheme for the different types of waste they collect through either curbside collection or a bring-system. Sharing of best practice among Member States should be facilitated at European level.”

“Stresses the key role of consumers and therefore reiterates the need for better instructions on how to separate their waste and to put the different types of used packaging in the right bin or bag. Furthermore, reiterates the importance for Member States to continue initiatives to further promote waste sorting so as to avoid that any aluminium/glass/steel packaging ends up in residual waste”.

3) High-quality recycling

“Highlights, that as the 2018 Circular Economy Package stipulates, high-quality recycling creates real market demand for recycled material. Key factors in the drive to increase the total amount of packaging being collected, sorted and recycled is therefore to incentivise the use of modern and efficient sorting equipment and separation technologies combined with a better eco-design of packaging, including the need to re-design packaging solutions based on improved LCA-criteria.”

4) Landfill:

“Welcomes the European Commission’s Circular Economy Action Plan but reiterates that the new Circular Economy Action Plan does not give enough attention to diminish the need for landfilling of recyclable resources from household waste by more sustainable separate collection systems for recyclable materials and products. Urges the European Commission therefore, to eliminate current loopholes in the waste management process and supports a more ambitious approach to keep these valuable materials in the recycling loop”.

5) Green claims:

“Welcomes the European Commission’s initiative for companies to substantiate their environmental claims, however the Product Environmental Footprint (PEF) methods as they currently stand should not be the only acceptable framework for evaluation of these claims. Calls on the European Commission to firstly evaluate the current PEF methodology, since it does not, among other things, take account of the circularity of the material used in the different products being evaluated. The ability of materials to be recycled infinitely without losing their inherent properties, which is the case for permanent materials, needs to be reflected in this methodology.”

6) Promote eco-modulated EPR fees:

“Supports the waste hierarchy but would welcome further recognition for permanent materials such as aluminium, glass and steel, which, when collected, can be recycled infinitely without losing their intrinsic properties. The use of such materials in packaging is the best way to guarantee high-quality recycling and ensure that resources remain in use in the economy, thereby reducing the reliance on virgin raw materials. It will also ensure that all packaging is reusable or recycled by 2030. In this respect, a differentiated step within the recycling category of the waste hierarchy (e.g. one-off and downcycling versus high-quality multiple recycling’) could be considered in the context of eco-modulated EPR fees.”

“Eco-modulated EPR-fees should also reflect the ease with which a certain type of packaging can be recycled; it should reflect the likelihood of the packaging of being separately collected, sorted and actually recycled even after numerous recycling trips. This recyclability criteria should also take into

account the properties of the recycled material and its ability to replace the corresponding virgin material.”

7) Recycled in Europe:

“Strongly supports the Commission’s ambition to make “recycled in the EU” a benchmark for qualitative secondary materials and the related review of EU rules on waste shipment, with the ambition of allowing waste exports only if they make sense from a sustainability perspective. This will stimulate growth in recycling activity in the EU and consequently decrease the EU dependency on third countries for raw materials”.

Contact details

- European Aluminium - Maarten G. Labberton, Director Packaging Group
labberton@european-aluminium.be, +32 494 51 58 58
- FEVE - Adeline Farrelly, Secretary General and Vanessa Chesnot, Product Policy Maker
a.farrelly@feve.org, +32 475 93 17 24;
v.chesnot@feve.org, +32 475 79 12 33
- Metal Packaging Europe - Leonie Knox-Peebles CEO and Milan Pažicky, European Affairs Adviser
leonie.knoxpeebles@metalpackagingeurope.org, +32 2 897 04 90;
milan.pazicky@metalpackagingeurope.org, +32 2 897 04 90
- APEAL - Alexis Van Maercke, Secretary General and Steve Claus, Sustainability & Circular Economy Officer
a.vanmaercke@apeal.be, +32 2 535 72 06;
s.claus@apeal.be, +32 496 54 14 11