

BRUSSELS, JANUARY 2020

**EC'S ROADMAP FOR THE NEXT ACTION PLAN ON CIRCULAR ECONOMY
(EUROPEAN GREEN DEAL – COM (2019) 640 DECEMBER 2019)**

OPEN FEEDBACK CONSULTATION (DUE JANUARY 2020)

INPUT APEAL

Circular economy – Commission's New Action Plan to increase recycling and reuse of products

With the European Green Deal for the European Union (EU), the Commission resets its commitment to tackle climate and environmental-related challenges. The new action plan aims at increasing recycling and reuse of products in the EU. On 23 December 2019, the European Commission launched an open Feedback consultation (with due date January 2020) asking for comments about the Roadmap for the next Action Plan on Circular Economy. This feedback consultant is the initial part of the process.

- **APEAL, the Association of European Producers of Steel for Packaging, welcomes the Roadmap for the next CEAP (Circular Economy Action Plan),** incl. the Farm to Fork Strategy. In this Strategy, action will be taken on among others food waste and packaging (cf. inter alia the European Parliament Resolution 2016/2223 (INI) in which is stated under article 125: "...stresses the positive contribution of food packaging materials and solutions to the prevention of food loss and food waste along the supply chain, for example packaging that ...preserves the quality and hygiene of food for longer, or that extend shelf life...").
- In APEAL's view, the **EU sustainable products policy should stimulate that packaging is designed** in a way **allowing packaging material to be recycled over and over again** without loss of the intrinsic properties of the material. APEAL is convinced that the EU sustainability products policy has the potential to reduce packaging waste significantly.
- However, **boosting the market of secondary raw materials with mandatory recycled content for packaging, isn't applicable for packaging materials for which the scrap supply is lower than the demand.** For these materials (among others steel), stimulating the collection of the material waste is the way to further reduce the packaging waste.
- The **EU sustainable products policy should also stimulate optimized separate collection of waste streams guaranteeing high-quality input into recycling operations.** Furthermore, the **EU sustainable products policy should allow that LCA's** (cf. Product Environmental Footprint) **factor in more environmental aspects,** among others marine litter and deforestation.
- APEAL would also like to underline that **any adjustment of the legal framework should in any case allow an optimized functioning of the internal market and a guaranteed level-playing field for all packaging and packaging materials.**