

June 2020

Discussion points on PPWD review, focusing on waste prevention measures beyond the essential requirements for packaging **(follow-up of webinar 26.05.2020 and workshops 28-29.05.2020)**

1. CONTEXT

The broad objective of the PPWD is preventing the negative impact of packaging on the environment and ensuring the functioning of the internal market. Both the European Green Deal (EGD) and the new Circular Economy Action Plan (CEAP) call for actions relating to waste prevention, driving design for re-use and recyclability of packaging, inter alia, by reducing the complexity of packaging.

In light of the assessment of options for reinforcing the Packaging and Packaging Waste Directive's essential requirements (PPWD ER) and other measures to reduce the generation of packaging and packaging waste, Eunomia and DG ENV organized a webinar (26.05.20) and workshops (28-29.05.20) on packaging waste prevention consulting stakeholders.

APEAL, the Association of European Producers of Steel for Packaging, welcomes the opportunity granted to stakeholders to provide written feedback on the background paper (received from Eunomia via email dd 20.5.20) and the workshops on potential packaging waste prevention measures at EU and/or MS level.

When defining and analysing potential packaging waste prevention measures, APEAL believes that one should **also bear in mind, the wider scope of waste prevention in general. Packaging indeed has the great potential to among others safe product (incl. food) losses, ensure food safety, extend the shelf life of products and optimize distribution and storage.** One cannot look at packaging in an isolated way, but one has to look at the couple packaging-product.

Moreover, packaging that can be recycled over and over again without loss of the intrinsic properties of the material, such as steel packaging, allows primary raw materials to be substituted by secondary raw materials, not only just once, but **multiple times, resulting in saving carbon emissions.**

2. FEEDBACK ON THE BACKGROUND PAPER “PACKAGING WASTE PREVENTION” (European Commission, DG Environment, May 2020)

2.1. Problem definition

It is correct to state that overall, packaging waste generation increased almost continuously in the EU (see Eurostat data 1997-2017). However, when looking at the different packaging materials, one can determine that **the non-permanent packaging materials are at the basis of this increase** and thus not the permanent materials, being glass and metals, including steel, whose capability is to be recycled over and over again without loss of the intrinsic properties of the material.

The evolution of the packaging waste generation of the permanent materials, is not only the result of packaging lightweighting actions (e.g. steel can weight reduction), but also of the substitution of permanent materials by other materials. As stated in the background paper, part of these other materials is less easy to collect, to sort and/or to recycle or can't even be recycled at all due to the complexity of the packaging.

Furthermore, it needs to be recognized that whilst packaging waste generation continuously increased (as a result of among others demographic changes), the **packaging waste part going to landfill and incineration decreased to the benefit of recycling**, meaning that more and more of the packaging stays in the circular loop, substituting primary raw materials by secondary ones.

Promoting optimized separate collection, both from household packaging waste streams and industrial commercial ones, **that guarantee a high-quality** input into the recycling operations, will lead to increased recycling rates, enabling to **increase resource efficiency**. Not only, reuse ensures that a material's value is maintained, but also using permanent materials does so.

2.2. Waste prevention measures

APEAL welcomes packaging waste prevention measures that take into account the wider scope of a circular and resource efficient economy, ensuring a net decrease in carbon emissions. One needs to look at design for high-quality recycling, guaranteeing high-quality input in the recycling operations. Furthermore, it is about the couple packaging-product, as packaging indeed has, among other advantageous functionalities, the potential to safe product (incl. food) waste.

APEAL therefore supports:

- Harmonisation of waste prevention strategies across MS;
- Integration of waste management measures (e.g. gradually increased landfill taxes for household waste and PAYT-principle application contribute phasing out landfilling);
- Harmonisation of separate collection scenarios across EU;
- Optimised separate collection requirements, ensuring high-quality input into recycling operations;
- Harmonisation of EPR systems and EPR eco fee modulation across EU;
- Promotion of packaging and packaging material that can be recycled over and over again without loss of intrinsic properties of the material, ensuring high-quality input into recycling operations;
- Promotion of high-quality and multiple recycling;
- Reduction of the complexity of packaging materials;
- Reduction targets should focus on phasing out complex and non-recyclable packaging
- Packaging design that takes into account EoL;
- Better alignment of the essential requirements with the waste hierarchy;
- Increased information sharing of best practice across Member States
- Packaging waste evaluation that not only takes into account weight, but also the recyclability of the packaging

APEAL furthermore believes that recycled content measures aren't suitable for packaging materials for which the scrap demand already exceeds the available scrap as for these materials, such as for steel, there is already a well-established, well-functioning and mature recycling market, guaranteeing the material stays in the circular loop. Even when already achieving a steel for packaging recycling rate of 82.6% across the EU (data 2018), further promoting optimized separate collection is also the way forward for steel packaging.

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