

APEAL and MPE's recommendations for the inter-institutional negotiations on PACKAGING AND PACKAGING WASTE REGULATION (PPWR)

APEAL, representing the steel for packaging sector, and MPE, representing the rigid metal packaging industry, welcome the direction taken both by the EP and the Council on the PPWR. However, our sectors would like to draw your attention to four main points:

- Art. 6.11 – the **net cost** of collection, sorting and recycling infrastructures of the different packaging types
- Art. 3.1.31a – the definition of '**recyclability**'
- Art. 26 – the listing of some packaging under the category of **transport packaging**
- Art. 2.1 – the exclusion of packaging for the transport of dangerous goods from the scope of the regulation

Therefore, you will find our recommendations for the inter-institutional negotiations on these specific points below:

1. Financing of net cost – Article 6.11 (Row 286)

The Parliament's report makes a reference – in Article 6.11 – to forms of financial contribution for the financing of the 'net cost of collection, sorting and recycling infrastructures' of each type of packaging. The Council's version of the proposal does not contain this reference. APEAL and MPE believe that those contributions should be present in the final text, and they should reflect the recyclability of the different kinds of packaging.

2. Definitions of 'recyclability' – Article 3.1.31a (Row 200a)

APEAL and MPE welcome the decision, by both the EP and the Council, to add a definition of 'recyclability'. However, we support the definition proposed by the Council, as we believe that the secondary raw material coming from the recycling process could be used for several applications other than packaging. An application different from packaging would not mean that they cannot be part of the circular economy.

3. Transport packaging– Article 26.7 (Row 464), 26.12 (Row 480), 26.13 (Row 482)

APEAL and MPE regret that the EP and the Council have decided to keep transport packaging pails, drums, intermediate bulk containers and canisters as examples. However, these packaging are used by businesses and consumers directly at the point of sale. For example, the canisters are used by businesses to sell olive oil; customers will buy the olive oil directly from the canisters, and they will bring the canisters to their households. Thus, canisters represent a clear example of sales packaging, as defined in Article 3.2. Additionally, national legislations and guidelines on this subject – among other countries, in Germany, Belgium, Italy and France – confirm that these packaging belong to the sales packaging category and not to the transport one.

4. Packaging transporting dangerous goods – Article 2.1 (Row 159)

Our sectors support the removal from the scope of the PPWR of those types of packaging used for the transportation of dangerous goods, which are already approached by specific UN requirements, as proposed by the EP amendment adopted in Article 2.1.



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