New EU-wide recycling targets, adopted last year, will have a significant influence on the way people recycle things like beverage cans. EURACTIV looks at how difficult it will be to meet the new targets.
Tough new EU recycling rules could be game-changer for packaging
EU official: ‘Actual recycling could be lower’ with new methodology
Making sense of the EU’s Circular Economy Package from the metal packaging value chain
In the coming years, EU citizens are set to see a change in the way they recycle waste at their homes and businesses – and in the way that recycling is measured.

One of the most visible changes will be in the requirements for packaging, one of the biggest generators of waste. In May last year, a new EU packaging waste directive was adopted which will set much more ambitious recycling targets and requirements to make the products more easily recyclable than they are today.

The new metrics will not only look at recycling. They will take the product’s whole lifecycle into account – from production to use to recycling and back again – in line with the circular economy principles.

Each year, the average European generates two and half times their own weight in packaging waste. Of the 86.7 million tonnes of packaging waste generated in 2016, 41% was made up of paper and cardboard. Plastic and glass made up 16% each, while metal made up only 5%.

Although it makes up a small proportion of packaging waste, metals make up a big proportion of waste recycled. 74% of the rigid aluminium packaged used in soda cans, for example, is recycled, compared to 42% of all plastic packaging. But though its recycling rate is similar to that of paper, it is far less used.

The reason recycling rates are so high is that metal packaging is made up of just one material, so it is more easily separated from other waste with magnet separators. Rigid metal packaging can also be endlessly recycled since its materials don’t change their inherent properties when recycled into new products.

**WHY NOT MORE METAL?**

With the new requirements now coming into national legislation, the makers of packaging are bracing for the impact. Last week, the industry association Metal Packaging Europe held an event in Brussels with a central message: metal has key recyclability benefits, and should be used more in...
packing in order to meet the new EU targets.

“I had a metal lunchbox when I was a kid, and then one day I had one made of plastic – why?” asked Kim Christiansen, an environmental consultant from Denmark. “Maybe we should rethink those things where we used metal before plastic was invented.”

Representatives from those industries which use plastic packaging reported a satisfaction with their recycling situation. “Metal is a no-brainer for us,” said Gloria Gabellini, senior manager for EU government affairs at Pepsi. “With our goal of 100% recyclability, we need metal packaging. Compared to other materials, there’s a certain maturity among consumer awareness, that metal is recyclable and they need to properly dispose of it.”

Though it has innate benefits, green activists noted that there are still practices preventing metal packaging from being more sustainable. “Cans can be stacked effectively, which is a big advantage, but they are often overwrapped,” said Jean-Pierre Schweitzer, from the European Environmental Bureau (EEB). “So we’re using metal packaging, but also putting it in plastic packaging. Overwrap for pallet stabilisation may be more than 2.1 million tonnes per year in the EU,” he said.

**NEW METHODOLOGY**

Makers of beverage cans have been successful at touting metal’s performance over the past years. However, no one is quite sure how all these packaging materials are going to stack up under the new rubrics to be used in the packaging directive to go into effect by next year.

Maja Desgrées du Loû, policy officer for packaging waste at the European Commission, noted that actual recycling rates could be lower than previously thought under the new measurement rules.

“This will be a paradigm shift, it aligns waste management legislation with the circular economy principles,” she said at the event organised by Metal Packaging Europe. “The directive talks about high-quality recycling, and harmonising the methodologies for calculation of the recycling. This will change the results that have been reported so far.”

And according to the Commission, the new calculation method could push down the official recycling rates reported by member states. “Now, the only thing that can be counted is what enters recycling operation, no longer all the waste that comes out of a sorting facility,” Desgrées du Loû said. This means “only waste that is sorted and ready to be recycled” can be accounted for, she explained.

In the past, reducing the weight of packaging was considered packaging waste prevention. But this often led to non-recyclable products going into incineration facilities with no material recovery. Under the new rules, the focus will not be limited to renewables or resource efficiency, but looking to ensure that the resources and materials are maintained in the economy for as long as possible.

**COMPETING PACKAGING**

Much of this is dependent on a lifecycle assessment (LCA) which is still being developed. It has proven tricky and controversial thus far. The Commission is working with a consultancy on using LCA to develop rules for Extended Producer Responsibility, which will have to be followed by 2024. Such rules will place EU-wide requirements on product manufacturers to make sure their packaging is recycled. A stakeholders meeting will be held on 11-12 March in Brussels to further develop these requirements.

The metals industry says they’re confident they will still come on top with these new metrics. Lifecycle assessments completed for metal packaging in the past have shown that the carbon footprint of steel rigid packaging was reduced by 20% between 2006 and 2013. This was due to more green energy being used in the packaging manufacturing process, higher average European metal recycling rates, and lower weight because of fewer raw materials used.

Makers of other packaging materials are also making the argument that they perform well when life cycles are taken into account. Industry association PlasticsEurope is promoting a measurement called Life Cycle Thinking (LCT), which makes use of LCAs in analysing the environmental impacts of their products across the lifespan. They say the unique characteristics of plastics – that they are lightweight, versatile and durable – means savings in energy and water that should give them extra points in any lifecycle assessment.

Meanwhile, the Confederation of European Paper Industries has stressed that the new real recycling rates in the package will play in the favour of paper packaging, since it also has high recycling rates, of around 80%. In the past, authorities have used loopholes to collect paper in co-mingled streams, and with strictly enforced separate paper recycling the industry says recycling rates can be boosted higher.

As the implementation goes forward, and the lifecycle assessment is further developed, the various forms of packaging will continue to claim their virtues. But the full effect of the new measurement system may not be known until 2027, when the results of the first reporting are in and fully analysed. In the meantime, citizens are likely to have new requirements placed on them for recycling in order to get governments to meet the 2025 targets.
When it comes to meeting the EU’s new recycling targets, metals will have a big head start. But EU member states could find it harder to reach future objectives under a new methodology being considered by the European Commission, says Maja Desgrées du Loû.

Maja Desgrées du Loû is policy officer for packaging waste at the European Commission. She spoke to EURACTIV about how metal is going to be evaluated under the recently revised targets.

We know that metal has a higher recycling rate than other types of packaging materials. Does the EU’s circular economy strategy seek to prioritise the use of metal as packaging over other forms?

No, the Circular Economy Action Plan is material neutral. We’ve established a monitoring framework, which was published in early 2018 and represents a framework of indicators to measure the circular economy’s impact.

These indicators can be used by industry when they are deciding their options for material use.

Of course, when we say it’s material neutral, this is not entirely true – because the job is still in progress. We’re working on essential requirements for packaging, and we will be looking at what is good or bad packaging in terms of circular economy, among other things.

The recyclability and the quality of this recyclability is one of the key criteria that we will be looking at, as well as the re-usability. And metal packaging will generally outperform plastic when it comes to these aspects.

That being said, we would like to take the whole life-cycle perspective...
The new methodology, which we are designing, will need to be used for reporting on the new targets, so at the latest in 2025. The first results will therefore become available in mid-2027.

There has been a lot of discussion about how to change consumer behaviour with recycling. Do you think financial incentives are necessary to change consumer behaviour? Are radical behaviour changes needed to meet the new targets?

Well incentives, if you’re serious about them, usually produce an effect. I think it is important to provide sufficient information from local authorities to consumers about how to correctly sort waste. This is quite well done in Belgium, but not yet throughout the EU.

I think with all the information campaigns surrounding the plastic strategy this year and the circular economy in general, consumers are starting to get it. I think what they’re asking for now is that they are provided with clear instructions.

It’s still not clear to consumers how to throw away a paper cup – do you put it in the paper bin or the plastic bin? People are asking me these questions every day, they just don’t know.

Waste collection is of course handled by municipalities and regions. What’s the EU’s role in this area, given that it is a local process?

We are currently running a study on the minimum requirements for separate collection, and we will issue guidelines for that. Ultimately, organisation of the collection systems is a national competence. But we advise member states to use tools such as peer-to-peer tools to connect experts not just from one member state to another, but also from one municipality to another.

Also, when we go for various meetings in member states, such as the meetings on the Environmental Implementation Review and the ‘virtuous tour’ happening now for the countries that are at risk of not meeting the 2020 targets, we are always trying to involve the local authorities as well.
New EU waste legislation adopted last year has redefined what can be considered "recycled" and resets targets for each packaging material. Gordon Shade goes through the expected changes and remaining challenges.

Gordon Shade is CEO of Metal Packaging Europe, a trade association.

In July 2018, European policymakers finally adopted the revised Waste Framework Directive (WFD) and Packaging and Packaging Waste Directive (PPWD) as part of their ambition to establish a circular economy in Europe.

These were last revised in 2008 and 1994 respectively, so a fundamental overhaul was long overdue, especially as the European Commission considers packaging waste and its visibility to European consumers a key part of its Action Plan. It also offered Europe the opportunity to take the leadership role in circular economy thinking, with the obvious business and employment opportunities this could generate.

The legislative process has taken more than 3 years from start to finish, with extensive interaction between policymakers and the different players in the value chain. Member States are now required to implement it by July 2020. The revised legislation generates a fundamental shift in policy, with the focus moving from "make, take, dispose" to the creation of a well-functioning circular economy around the radical reduction in waste.

So, what changes can we expect from the legislation, which challenges remain, and is the legislation sufficient to trigger a change in behaviour?

The new legislation has redefined what can be considered "recycled" and reset the targets for each packaging material, thereby creating much greater consistency across Member States. It also means that incineration of non-recycled materials can no
longer be included when calculating future recycling rates. This encourages Member States and the value chain to place products on the market, which are actually recycled. By redefining the point of measurement, it is quite likely that in the first instance, recycling rates for most materials will decrease, which will indicate the weakness of previous legislation.

The new recycling targets have been established for 2025 and 2030 and these need to be met by all individual Member States. It is clear that more and better recycling is a key outcome of the legislation and our industry is very supportive of this process. Fortunately, rigid metal packaging has at the heart of its design, safety, easy recovery and recycling at the product’s end-of-life. To underline this, we will intensify the use of the ‘Metal Recycles Forever’ logo on our products.

In our sector, the aluminium suppliers are looking closely at their recycling challenges and identifying appropriate actions both in terms of increased quality and quantity. Today, across Europe 3 out of 4 aluminium beverage cans are successfully collected and recycled and, globally, they are the most recycled drinks package. In Europe there are still Member States, which fall short of expectations and the aluminium and steel industries are working with the different stakeholders to improve these positions.

REMAINING CHALLENGES

The CEP is a very significant change in direction for packaging. We would underline that the packaging value chain plus policymakers, both national and European, have a number of key areas to address for the potential of circularity to be fully unlocked. These include:

• **Modulation of EPR fees**

The legislation has made the modulation of EPR fees based on real end-of-life costs mandatory. In 2019, the European Commission will work on guidelines for this. Whether the legislation will be successful, will largely depend on ensuring a clear cost differentiation between products that are easily recyclable, reusable and repairable and products and packaging materials that are difficult to recycle, or not recycled.

CONAI (Consorzio Nazionale Imballaggi), the Italian EPR scheme and largest of its type in Europe, began end-of-life cost allocation a number of years ago and serves as a best-in-class example. Today, it has 6 product categories, which bear significantly different costs per tonne covering collection, sorting and recycling, ranging from €3/tonne for tinplate to €369/tonne for plastics which are not sortable or recyclable with current technologies.

• **Packaging sustainability indicators**

Today, the value chain makes extensive use of Life Cycle Assessments (LCAs) to support the choice of packaging. However, in our view, this instrument is often poorly applied, frequently focusing only on carbon footprints in a limited or incomplete manner even excluding the product content and full end-of-life impact.

We recommend that the value chain come together and develop indicators which measure and encourage a circular approach. Such indicators could be developed by material to better reflect individual characteristics of the different packaging materials.

• **National implementation**

It is crucial that Member States transpose the Circular Economy Package quickly into national law, fully reflecting the change in direction determined by the European institutions. Speed is also important in reporting recycling rates under the new definitions. Can we really wait up to 18 months to discover the effectiveness of legislation?

We don’t believe so and therefore encourage Member States to do their utmost to report quickly and accurately.

• **Is the legislation sufficient?**

It is fair to say that, today, the legislation is a step in the right direction. However, timing is absolutely critical especially as packaging volumes continue to grow. Taking account of this and the pressure from deteriorating environmental trends means policymakers need to facilitate all the necessary means to ensure this legislative package can generate the results expected.

The metal packaging industry remains optimistic and is ready for the challenges ahead... But the clock is ticking.

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