

Joint Ferrous and Non-Ferrous Metals Position Paper (clarifications)



Calculation methodology and reporting for metals in view of reaching recycling targets: additional clarifications

30 January 2019. Europe's ferrous and non-ferrous metals industries fully support the European Commission's ongoing work to develop implementing acts on the rules for calculating recycling rates for municipal and packaging waste, and on the reporting framework for Member States. In this paper we provide additional clarifications following the meeting held on 22.01.2019 at DG Environment.

1. Calculation point (CP) at final recycling

We would like to reiterate our support for the Commission's approach to put the CP at final recycling as this means real recycling whereby waste materials are actually reprocessed into products, materials or substances. Draft Commission Implementation Decision establishing rules for the calculation, verification and reporting of data...in accordance with Articles 11(2) and (3) of the Waste Frame Directive 2008/98/EC..., Annex III: "Calculation Point - Metals: Sorted metal that does not undergo further processing before entering a metal smelter or furnace". The metals sector asks for a comparable calculation point for all materials to ensure a level-playing field.

- ***Our recommendation: For all metals, the calculation point should be set at the entry to the metals' smelter or furnace, after completion of all preliminary sorting operations. The calculation point should be comparable for all materials to ensure a level-playing field.***

2. Reporting of packaging composed of more than one material

Further to the meeting of 22.01.2019, we understand that the Commission's intention is to no longer apply the predominant material principle for reporting composite packaging¹, by which composite packaging is reported under the predominant material by weight.

¹ Old definition and reporting of composite packaging: EU Decision 2005/270/EC, Article 2 (a): "composite packaging" means packaging made of different materials which cannot be separated by hand, none exceeding a given percentage by weight. Article 3 (3): Composite packaging shall be reported under the predominant material by weight".

Under its new definition (PPWD 2018/852/EC, art. 1, (2), (c), 2b.)), a composite packaging is “a packaging made of two or more layers of different materials which cannot be separated by hand and form a single integral unit, consisting of an inner receptacle and an outer enclosure, that it is filled, stored, transported and emptied as such”. Packaging made of metal does not fall under this definition. Metals are part of a large group of packaging made of more than one material such as steel beverage cans with an aluminium lid², aluminium pet food packaging with a polymeric coating or steel aerosols with plastic components.

2.1. Separation by hand

Even if not explicitly mentioned in the WFD (2018/851/EC), nor the PPWD (2018/852/EC), we recommend that packaging composed of more than one material and that can be separated by hand, shall be reported under their respective packaging material (e.g. steel closure on a glass jar, aluminium closure on a glass bottle). This practice has been successfully implemented across Europe and should therefore be continued.

However, we would also like to address the Commission’s attention to the importance of awareness raising campaigns towards consumers to incentivise them to separate packaging materials by hand in light of increased recycling. Many consumers do not know that closures, caps and crown corks made of metal can be easily separated in view of recycling.

- ***Our recommendation: For all metal packaging composed of more than one material, the reporting obligation for the packaging materials that can be separated by hand, should be under its respective packaging material***

2.2. Threshold

We support the Commission’s ambition to shift from a linear to a circular economy and the need to report per material contained in the packaging. However, we also do support, the idea of setting a **pragmatic threshold of at least 10% under which no separate reporting per material is required**. We therefore recommend that packaging composed of more than one material, that cannot be separated by hand, is reported under the packaging material with the highest weight taking into account the threshold.

Coatings and lacquers in metal packaging are essential to ensure compliance with food contact legislation. However, their size, weight and structure strongly vary depending on the content of the metal container e.g. acid content of a tomato, preserving the colour and quality of fruit or specific properties for fizzy drinks. Even if the lacquers and coatings have an important role for the packed product, they only represent a marginal part of the weight of the metal packaging. A separate reporting of coatings and lacquers would therefore be extremely complex and nearly impossible, nor would it bring substantial environmental benefits.

² aluminium is not a recycling inhibitor for steel recycling and aluminium is used by the steel sector for different reasons/applications: oxygen removal in certain steel grades, as alloying element in certain steel grades (TRIP steels) and as coating; but it is not possible to know where it will go because within the closed material loop – steel into steel – recycling we have many open loops with steel grades transformed into others and the other-way-round”. The same applies to aluminium (packaging) recycling.

With thinner and lighter metal packaging now on the market these coatings can sometimes represent 10% or more of the total weight of the packaging. For these lighter aluminium packaging, a pragmatic approach should be found.

Also, metal aerosols are packaging composed of more than one material. Plastic valves and actuators are essential parts of aerosols even if low in weight and not separable by hand. Also, for this type of packaging materials we recommend reporting threshold of at least 10%.

- ***Our recommendation: For all metal packaging composed of more than one material, at least 10% % threshold should be foreseen under which no separate reporting per material is required, implying reporting under the packaging material with the highest weight. For other lighter metal packaging a pragmatic approach should be found.***

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