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Specific EAA position on the EU Packaging and Packaging Waste Directive (summary)

The five step waste management hierarchy as described in the EU Waste Framework Directive (WFD) with the classification of waste management options in order of their environmental impact has the aim to extract the maximum practical benefits from products and to generate the minimum amount of waste. **For aluminium the most relevant steps are prevention and recycling.**

Prevention: proven track-record but technical limits

Lean production and packaging lightweighting can prevent waste being produced. Aluminium packaging producers and its customers, the beverage can manufacturers and the foil converters have been able to reduce the thickness of cans and of several foil applications step by step. Light weighting and material efficiency has been a constant with the average weight per unit of volume having dropped by more than a third in the last 20 years for beverage cans. Foil thicknesses have been reduced in the range of 28-40%, without jeopardizing the quality of the contents they protect. However, further reductions will be more challenging and could even conflict with the packs ability to be easily recycled.

More ambitious recycling targets

Aluminium is among the highest recycled packaging materials in Europe and we have the ambition to further increase this in the next decade, providing sufficient and innovative collection and sorting systems are put in place.

The latest recycling rate for aluminium beverage can rates stands at 68% (2011, EU 27+EFTA) while it is estimated that more than 55% of all aluminium packaging is being recycled. On top, very thin and laminated foil items are incinerated with energy recovery, resulting into a total aluminium packaging recovery rate of about to 60%.

EAA has together with its partners from BCME (Beverage Can Makers Europe) and EAFA (European Aluminium Foil Association) already put into place many recycling and recovery projects to ensure the metal with its corresponding properties remains permanently available.

EAA supports voluntary commitments for more ambitious recycling targets for rigid metal packaging such as for aluminium beverage cans, as stated by Metal Packaging Europe (MPE).

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Better performance Extended Producer Responsibility schemes
EAA has the following recommendations concerning the performance of the existing packaging collection systems. National recovery schemes should meet at least the following criteria:

- Full coverage of geography, population and packaging materials;
- No cherry picking of packaging materials, for example by focusing only on large volumes and ignoring smaller fractions with high scrap values such as aluminium;
- Manage a professional waste-management operation based on a set of minimum performance criteria related to high quality collection, sorting and recovery;
- Provide transparent and accurate data / numbers;
- Fair allocation of costs between materials, taking also into account their scrap values;
- Address also 'out-of-home' collection by adding dedicated collection activities for packaging items typically consumed 'on the go' or at the workplace (e.g. beverage cans).

Incineration with Energy Recovery to be combined with Bottom Ash Treatment
Regarding the other relevant steps of the waste hierarchy EAA insists on keeping all recovery options open, including **incineration with energy recovery**.
This is due to the fact that when thin and laminated aluminium ends up in an incinerator only part of the aluminium material is oxidized with the possibility to recover the energy and use it for other useful purposes, such as the generation of electricity or heat. The rest of the aluminium, especially the thicker parts remain in the bottom ashes of the incinerator and are – with the help of the latest eddy current sorting technology - available for material recycling.

However, bottom ash recycling is a complementary solution and increased effort should be made to remove metals from the collected waste fraction prior to incineration, through more and better sorting of the waste stream, using innovative separation technologies.

No disposal anymore of recyclable packaging items
When it comes to landfilling, EAA supports the introduction of a **progressive landfill ban** on untreated waste. Metals are too precious to waste and should stay in the material loop for their next end-use application.

EAA (Packaging Group), 8 April 2014