



MPE Key Policy Principles

The European rigid metal packaging industry, with 85.5% of steel packaging and 73% of aluminium beverage cans recycled in 2020, is perfectly placed to contribute to the circular economy goals of the EU Green Deal and welcomes the introduction of performance grades to assess the recyclability of packaging.

MPE supports the consistent position taken by the European Parliament in the CEAP (par. 39.), which underlines the need to: *"maintain materials at their highest value and to achieve clean, non-toxic and sustainable closed material loops; stresses the need to increase the availability and quality of recyclates, focusing on the ability of a material to retain its inherent properties after recycling, and its ability to replace primary raw materials in future applications"*.



PPWR - Focus Areas

1 Definitions

Current definitions of 'reusable' and 'recyclable' packaging must be unambiguous, with measurable indicators and tools to enable performance monitoring.

'High-quality recycling' should be defined and include the ability of a material to withstand multiple recycling loops without any change to its inherent properties. 'High-quality secondary raw material' should also be defined. To ensure that 'permanent materials' contribute to achieving the objectives of a circular economy, this category should be recognised and defined at the EU level.

2 Recyclability

Criteria to assess recyclability should be clear, harmonised among materials, and enforceable. Recyclable packaging formats should be collected, sorted and recycled at scale into secondary materials with sufficient quality to substitute primary raw materials.

3 Eco-modulation

The eco-modulation of extended producer responsibility (EPR) fees can incentivise the production and use of sustainable packaging. MPE supports the link between recyclability and eco-modulation of fees.

These fees should reflect the ease with which each packaging type can be collected, sorted, and recycled, even after numerous recycling trips. Fees should vary depending on the volume of the packaging, with lower fees applying to smaller sized packaging.

4 Reuse

Measures relating to reusable and highly recyclable one-way packaging should be complementary. In the spirit of fair competition among all packaging materials and formats, the true benefits of reuse should be critically assessed via an impact assessment.

There is currently insufficient data to conclude that the environmental benefit of reusable packaging is greater than that of highly recyclable one-way packaging across all product categories and all markets.

5 Waste Prevention

Before imposing strict packaging waste prevention measures, the role of packaging should be considered. Packaging is designed to protect and preserve a product, convey information, and make it safe for consumers.

Packaging materials that extend shelf life have an important role to play in food waste prevention; only the amount of excessive packaging put on the market should be reduced.

Any reduction targets should take into account the clear differences in increased volumes put on the market per packaging material, as well as the circularity of the material.

6 Deposit Return Schemes (DRS)

Well-functioning DRS will play an essential role in achieving the circular economy ambitions of the EU and are pivotal to reaching our 100% recycling target for aluminium beverage cans by 2030, as set out in the Beverage Recycling Roadmap.

Minimum requirements are essential to ensure harmonised principles in a single market and the interoperability across EU Member States.

7 Labelling

Consumers have an important role to play in supporting the transition to a circular economy. Labelling is crucial in order to help ensure that the most sustainable packaging options are chosen and that the packaging is correctly disposed of at its end-of-life.