

Contribution to the EU public consultation to inform the review of the requirements for packaging and other measures to prevent packaging waste

Who is AREME?

AREME is the association for the recycling of lightweight metal packaging and similar items. We bring together brands which use aluminium packaging for their products, and other stakeholders working to improve recycling of aluminium in Belgium and Luxembourg.

Founded by Bel Group, Nespresso and European Aluminium, later joined by European Aluminium Foil Association and Jacobs Douwe Egberts, AREME aims to improve the collection, sorting and recycling of small aluminium packaging and similar objects. Today, small aluminium packaging and items often end up in the bag for residual waste and is sent to the incinerator. AREME advocates for the extension of PMD sorting instructions to include small aluminium packaging and similar objects so that this fraction can be sorted and sent to adequate recycling centres.

AREME believes that the review of the requirements for packaging and other measures to prevent packaging waste should be carried out in line with the policy objectives of the European Green Deal and the new Circular Economy Action Plan, which lay out the basis for a policy agenda which is driven by **innovation**, pursues **sustainable growth** and encourages **ambitious, economically viable solutions to scale-up circularity and contribute to climate neutrality**.

Role of packaging to fight food waste

Packaging plays an important role in **the protection of food products** and can therefore actively help in **reducing food waste**. Moreover, the environmental footprint of packaging compared to the footprint of the product it protects is often negligible. If the prevention, reuse and recycling of waste all contribute to the achievement of circular economy goals, there is a need to be consistent with the overall goal of reducing negative environmental impacts. Before any new measures are proposed to reduce packaging waste weight or size, specific LCA-based impact assessments should be carried out in order to determine where prevention makes sense from a socio-economic and environmental point of view and where recycling is sometimes preferable.

Moreover, several of the product-specific measures and blanket bans mentioned in the questionnaire do not take into account the **benefits of single serving or individual portions** in reducing risks of food waste and therefore preventing the waste of natural resources. A 'one-size-fits-all' rule such as a ban on single use products will hamper producers working to save natural resources by designing portions that are adequate for the final intended use.

Boosting innovation & better recycling solutions

A lot of packaging and assimilated items are **perfectly recyclable**, such as those made of aluminium. Whether recyclable packaging is actually recycled however often depends on decisions made by local/regional/national authorities as well as organisations responsible for the collection, sorting, and recycling of waste (typically those which execute extended producer responsibility).

EU-level support for voluntary initiatives aiming to achieve more circularity is key.

Our project for example aims to collect, sort, and recycle smaller aluminium packaging and assimilated items not legally defined as packaging but which have similar uses and follow the same technical sorting and recycling process. Indeed, aluminium is indefinitely recyclable without losing any of its physicochemical qualities and **its recycling saves 95% of energy and generates only 5% of GHG compared to its primary production**. Collecting these items through EPR systems when technically, environmentally and economically feasible is therefore an example of improvement from incineration to recycling for a product that is recyclable and is not recycled today due to systemic bottlenecks (equipment not installed in all sorting centres, 'low-hanging fruits' strategy from EPROs, etc.).

A study commissioned in 2019 by European Aluminium found that sorting centres can significantly improve their performance and capture 90% of aluminium packaging with the installation of an additional eddy current separator to capture small aluminium packaging. A technological investment that pays off quickly, according to the study.

On the other hand, the development of recycling solutions such as pyrolysis – a system that allows aluminium recovery, even from thin packaging, is essential and goes hand in hand with efficient collection systems. In both instances, innovation is key.

Stimulating investments in new and more efficient sorting and recycling technologies will allow **to increase the recycling of packaging** and help closing the loop while **stimulating the European waste management sector**.

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