Position Paper

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CEPI welcomes Commission intentions for meaningful recycling in Europe and identifies enabling measures for meeting ambitious targets


Summary

- Recycling Targets must be ambitious but realistic to increase collection in an environment where some Member States have already reached high recycling rates. Member States should set their target for paper packaging recycling at a minimum of 80% by 2020.
- Packaging Recycling targets in Europe should not discriminate between the different consumer packaging materials
- The proposed methodology to calculate recycling rates can favour high quality recycling but it should refer to material specific standards or similar quality assurances. For paper, the input method should continue to apply under strict input quality criteria, including for exports
- Incineration restrictions and separate paper collection obligations are needed as complementary measures to ensure recyclable paper diverted from landfills gets actually recycled.
- Final recycling must be clearly defined to ensure targets are meaningful and can be compared between Member States.

Recycling Targets: Minimum targets for Paper Packaging Recycling Rates should be set at 80% by 2020 in all Member States

European Paper Industry is a world champion in recycling, but reaching new targets will be increasingly challenging as several Member States have already reached recycling rates close to the theoretical potential of paper recycling. The average European Paper Recycling rate was 71.7% in 2013 and the sector has set a target of 70% recycling rate by 2015. The recycling rate has increased significantly from levels around 40% in 1990 and 62% in 2005, but has started levelling up since the last five years. As we reach the absolute potentials of paper recycling in some Member States, setting ambitious targets in all Member States is crucial to further stipulate recycling in less than average performing countries. Too ambitious average targets alone will however not be sufficient to reach the objectives set out in the circular economy communication. Further improvement of the paper and board packaging recycling rate will largely depend on progress in less than average performing countries. CEPI therefore proposes that all Member States set their target for paper packaging recycling at a minimum of 80% by 2020. Concrete targets for 2025 and 2030 should be set once the performance based on the proposed methodology and progress towards 2020 targets is assessed, e.g. through the newly proposed early warning system.

Recycling targets in Europe should not discriminate between consumer packaging materials and one material should not compensate for others in a Member State’s calculation of all packaging waste
prepared for re-use and recycled. Recyclability and the recycling performance have increasingly become key aspects in the competition between consumer packaging materials.

**Calculation Methodology:** for paper, the input method should continue to apply under strict input quality criteria

CEPI welcomes the Commission’s intention to set the focus on high quality recycling. The recycling process can only deliver efficiently produced high quality recycled products if the input to this final recycling process fulfills strict quality requirements, too. The Commission proposal rightly distinguishes between final recycling processes with « clean » input material, for which the input method would continue to be applied, and final recycling processes with lesser quality material, for which the output method would have to be applied. CEPI understands the proposed discarded materials as non-target material that is not part of the original product and can be separated in dry sorting.

In the production of recycled paper, the input material for the recycling process is covered by a European Standard (EN 643). This standard sets limits on the share of non-paper components generally not exceeding 1.5%. CEPI is therefore of the opinion that for paper, the input method should continue to apply. However, the Commission proposal leaves too much room for interpretation and should refer to European Standards or similar quality assurances.

Paper for Recycling exported outside the European Union should count towards the recycling rate provided it meets the EN 643 standard and is effectively recycled outside Europe at broadly equivalent environmental conditions as in the EU. This should be demonstrated by a certification scheme as it is being considered by the European Commission and which would include in its scope the reprocessing site in the destination country and ensure traceability through adequate documentation.

Furthermore, it is of great importance that the denominator for the calculation of the recycling rates is identical in all Member States to allow for comparison.

**Complementary measures to reach recycling targets**

To reach high recycling targets based on the proposed new methodology, complementary measures next to the introduction of a landfill ban are however essential:

**Incineration restrictions**

CEPI welcomes the introduction of a landfill ban for recyclable waste. However, CEPI thinks that formulating a landfill ban for recyclable material and high recycling targets is not sufficient to reach the objectives. CEPI therefore thinks it is needed to formulate incineration restrictions for recyclable material from the municipal waste stream. This is to avoid waste is only shifted one step up in the waste hierarchy. In the past, several Member States have set the focus on diversion from landfill. This has partly led to low quality collection systems, which would not be able to deliver the input quality to recycling processes according to the new methodology as suggested by the Commission proposal.
Obligation to collect paper separately from other recyclables and residual waste

To ensure reaching the required quality input for paper recycling processes, paper should be collected separately from other recyclables such as plastics, metal and glass, and from residual waste. The Waste Directive of 2008 has formulated a separate collection target in 2008, however Member States have interpreted this requirement in different ways. CEPI therefore urges the Commission to reinforce the requirement on separate collection for paper. Separate collection is crucial to achieve the landfill restrictions proposed by the commission.

Current recycling definition is too vague

The current definition of recycling is too vague, as it includes next to “reprocessing” also “any other recovery operations”. This leads to a wide range of interpretations, including on the recycling rate, between countries and materials. The only way to ensure material that has been discarded is effectively back in the circular economy is to make sure it is not recognized recycled unless it is reprocessed in a production process into new products, materials or substances that have comparable properties to the corresponding virgin raw materials. The proposed methodology for high quality recycling cannot be reached without a precise recycling definition. Article 3 (17) of directive 2008/98/EC should be amended as follows:

- ‘recycling’ means any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations; ‘final recycling’ means reprocessing in a production process of waste or materials reclaimed from waste into products, materials or substances with similar properties as the equivalent virgin raw material based product, material or substance. It excludes pre-processing.

Next to these measures, CEPI has the following comments on the Commission proposal:

Extended Producer Responsibility: CEPI believes that the proposed provisions of Annex VII paragraph 6.1 and 6.4 place disproportionate financial burden on producers and cover aspects beyond the producers’ control. Putting the burden of «financial contributions to cover the entire cost of waste management...» would act as a disincentive for other actors with roles and responsibilities in the waste collection and sorting chain to focus on cost efficiency. Consequently the competitiveness of European economy would be harmed. CEPI believes that extended producer responsibility should not allow overlapping and duplicating payments: fees should only apply in absence of action when responsibility is delegated to compliance schemes, and fees should be charged on the basis of true cost after the deduction of all fees and revenues related to the waste generated. CEPI also believes Annex VII concerning minimum requirements for EPR should not be amended through the adoption of delegated acts since they are an essential part of the legislation.

Renewability: CEPI is concerned that the Commission published a proposal on the circular economy without mentioning renewability. CEPI believes that the contribution of renewable materials and products to the circular economy should be acknowledged, e.g. by adding renewability to the packaging eco-design options for Member States consideration. CEPI believes that such a non-binding list of ecodesign options is preferred over national packaging design requirements as proposed by the Commission as the latter would undermine the single market by producing barriers to trade.

Definition of Municipal Waste: The definition of municipal waste should not include material from the retail sector. The collection of waste from the retail sector is already well organised. Including the retail sector would divert the focus from the challenge of improving the waste collection from households and small shops.
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