

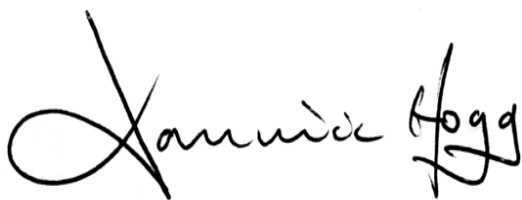
ASSESSMENT OF CREDIBILITY OF RECYCLING 2011 STATISTICS FOR STEEL PACKAGING

In May 2013, Eunomia completed the annual review of APEAL's recycling rates data, covering the EU-27, as well as Switzerland and Norway. Our task was to reveal whether APEAL's 2011 recycling statistics were credible, with particular regard to those countries where their reporting methods may have changed.

We understand that APEAL's objective is to be the reference source for the annual publication of steel packaging recycling rates in Europe. To do this, APEAL seeks to use the most accurate sources of data at its disposal. In principle, all countries should report data to Eurostat regarding the recycling of packaging. However, for a given reporting year, APEAL's statistics are reported earlier than those given to Eurostat. As a result, APEAL has developed a network of contacts for obtaining recycling performance data. This network includes those who are responsible, or upon whom Member States rely, for their reporting to Eurostat.

In general, we find that APEAL has gathered data which is as good as the organisation could be expected to acquire for the majority of Member States. This, therefore, represents a clear 'pass' in terms of what APEAL sets out to do.¹ However, we note that APEAL's process is continuously improving, and we expect the reliability of the data to also improve over time.

Yours sincerely



Dominic Hogg
Director

14th May 2013

¹ None of the above should be taken as endorsement, by Eunomia, of the accuracy of the statistics being reported.