

POSITION PAPER

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Subject Recycling - Average Loss Rates
title Only counting real recycled tonnages

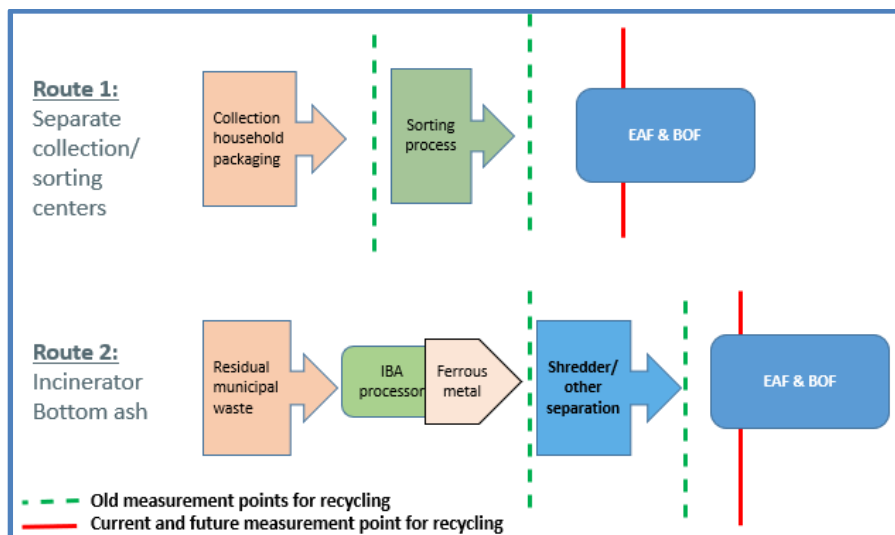
ACCEPTED TONNAGES AT ENTRANCE OF RECYCLING OPERATION AS THE ONLY CALCULATION POINT FOR RECYCLED TONNAGES

In its Delegated Act 2019/1004, the EC laid down the rules for the calculation, verification and reporting of data on recycled municipal waste.

In light of calculating the recycling rate of packaging material, measurement of the recycled tonnages needs to be done at the entrance of the facility where the recycling operation is factual.

For steel packaging waste, only the sorted material entering the recycling facility can be taken into account, being the controlled and accepted loads going into the furnace.

Old and current measurement points for steel packaging



EAF/BOF: steel making in electric arc and blast oxygen furnace

Remarks

- Some Member States already applied the current and future measurement point in the past too.
- In the current and future measurement point, all deliveries are controlled upon reception at the steel recycling facility with deliveries refused in case of non-quality performance. Only the sorted waste accepted at the reception of the steel recycling facility is counted as recycled material.

MEASUREMENT OF RECYCLED TONNAGES CAN OCCUR AT A STAGE PRIOR TO THE CALCULATION POINT ONLY IF SAFEGUARDS ARE MET

When measurement occurs on collected or sorted packaging material undergoing supplementary treatment operations prior to being delivered to the real recycling operation, losses are to be factored in when the tonnages for recycling would not be able to be measured at the calculation point, being the entrance of the recycling operation.

APEAL supports the Commission's decision that the measuring of the recycled packaging waste tonnages need to occur at the entrance of the recycling operation, being the so-called calculation point, and its decision to only grant Member States to derogate from this exceptionally, only when packaging waste tonnages are mixed with other waste flows before reaching the calculation point.

Real losses need to be taken into account, unless it is in practice impossible to do so. Only in the latter case, one can factor in so called average loss rates.

APEAL supports the Commission's decision to only accept the exceptional usage of average loss rates when sorted packaging waste is being processed and mixed with other waste before reaching the calculation point.

When laying down rules for the calculation, verification and reporting of average loss rates for sorted waste, one should:

- avoid that manipulating values is possible and that applying the rules isn't possible in practice and/or not feasible;
- define and render in practice what needs to be used as a basis for the sorted waste on which the average loss rate would be applied (cf. article 3, 3.);
- clarify how to determine the amount of non-targeted materials in the sorted waste (cf. art. 3, 6.);
- outbalance the measurement requirements as to avoid them to be too vague and/or not workable in practice (art. 4)
- state that labels and lacquers that are in integral and non-separable item of a packaging, are part of the targeted material;
- avoid applying formulas that would be too complex and/or for which tonnages only would be able to be calculated with disproportionate effort.

When citing examples of sorted waste, one could add:

- Paper/cardboard packaging
- Plastic film
- Mixed plastics (with a definition for it)
- Instead of "Sorted metal cans", include Sorted steel packaging

About APEAL

APEAL, the Association of European Producers of Steel for Packaging, is a federation of the five major producers of steel for packaging in Europe. Its members - ArcelorMittal, Liberty Liège-Dudelange, Tata Steel, thyssenkrupp Rasselstein and U.S. Steel Košice - employ over 200,000 workers in Europe, 15,000 of whom are employed directly the production of steel for packaging across 11 dedicated manufacturing sites.

About Steel for Packaging

Steel is a unique packaging material, combining exceptional performance capabilities with unrivalled environmental credentials. Strong, formable and long-lasting, steel offers numerous benefits for the safe packaging of a wide variety of products