

# Reaffirming our ambition for a Circular Economy

Call for actions in  
the EU 2024-2029



# Introduction

**The European Council's 2024-2029 Strategic Agenda and the Political Guidelines of the President of the European Commission set out the vision to make the EU the first climate neutral continent and strengthen its competitive advantage in a global economy.**

The Permanent Materials Alliance believes that this vision will only be achieved by making a more circular, resource-efficient economy, a top policy priority.

Permanent materials – aluminium, glass and steel – have an important advantage over other packaging materials and already play a critical role in the drive to achieve a more circular economy.

A 'permanent material'<sup>1</sup> is a material whose inherent properties do not change, regardless of the number of times it goes through a recycling process. Following production, this means that permanent materials can be collected, sorted and processed at the end of their life, to become the raw material for new and endless production loops.

We wish to see a different take on the European Industrial agenda, focusing on circularity to realise

the EU's sustainable development commitments and enhance its strategic autonomy.

A circular, closed material loop, which replaces virgin resources with recycled materials, helps reduce CO2 emissions from aluminium, glass and steel production. To achieve the European Council and European Commissions' vision of net-zero emissions, we therefore need an integrated policy approach.

Reducing Europe's dependency on primary resources, achieving material sufficiency, and scaling up collection and sorting infrastructure, will support climate neutrality. Permanent materials will play a critical role in achieving this vision. They need to be anchored as the enabling pillars of an effective Circular Single Market, to end the short-lived, wasteful use of valuable resources.

We invite policymakers and all relevant stakeholders to renew the ambition on a circular and low-carbon economy as a top priority during the new policy cycle 2024-2029.

Our two key policy priorities for the next legislative term 2024-2029:

1. Shift the EU policy from its waste focus to a resource-based focus
2. Implement the EU circular economy legislation effectively

The two pillars below, present a set of requirements which will enable and anchor the transition to a truly circular and sustainable society by supporting the most efficient use of materials, within the packaging sector and throughout its value chain.

**Permanent  
Materials at  
the heart of a  
resource-based  
policy framework**

Considering the Union's need for secondary raw materials and its sustainability commitments, continuing the work to modernise the EU's waste framework is a necessary step to establish a resource-based framework fit for the transition to a low-carbon and Circular Economy.

**Focus on implementation  
and promote Circular  
Economy as a  
guiding principle in  
the Single Market**

Focusing on the swift and efficient implementation of secondary legislation will be a determining factor to secure a well-functioning market for sustainable products. At the same time the concept of a Circular Economy should be integrated into the Single Market.



# **1. Shift the EU policy from its waste focus to a resource-based focus**

**As permanent materials, aluminium, glass and steel are key enablers of a resource-efficient economy because they can be recycled over and over again without losing their key intrinsic properties, thereby maintaining circular material loops. We call upon the EU decision-makers to:**

## **Continue the effort to revise and modernise the EU's waste framework**

This is a necessary step to establish a resource-based framework fit for the transition to a Circular Economy which is well-equipped to meet our Union's sustainability ambitions.



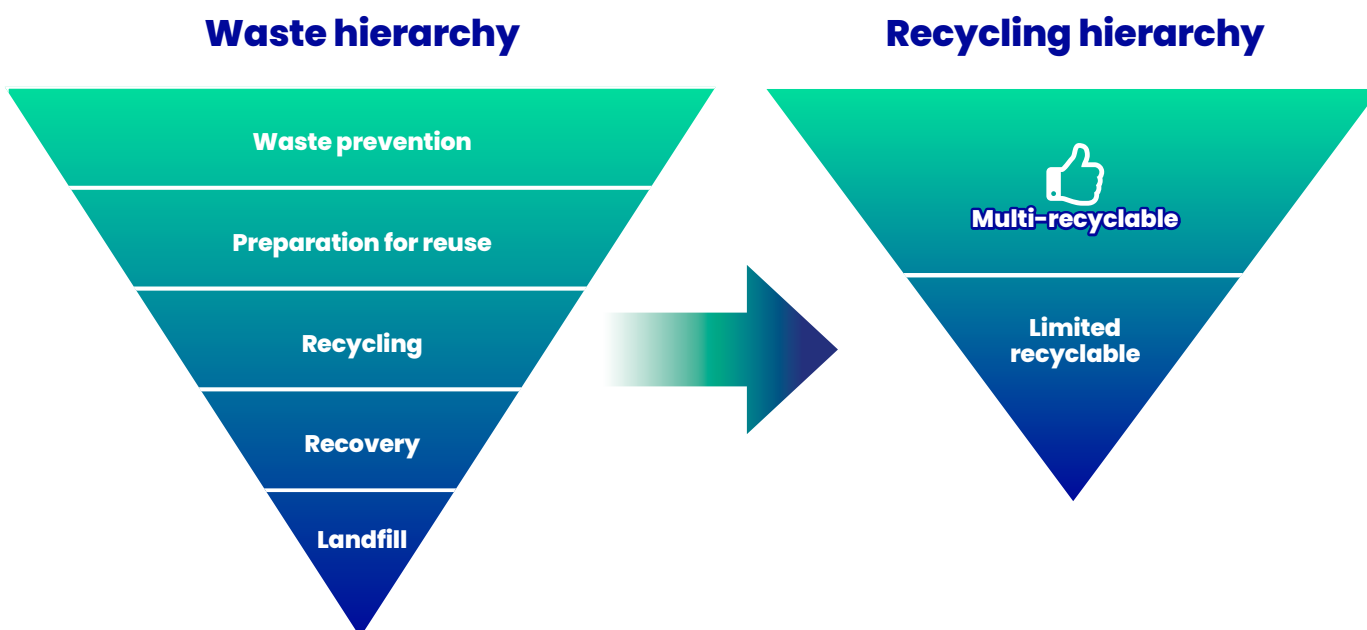
**Call for actions in the next EU term 2024–2029**

**Recognise permanent materials in the EU “Waste and Resources” Acquis**

Packaging that is produced from permanent materials and is properly collected and processed at its end of life, becomes the raw material for new and endless production loops. Recognition of the value of permanent materials will help boost recycling rates, reduce reliance on virgin raw materials, and promote closed recycling loops. It will also help to eliminate waste, minimising landfilling and phasing out incineration and the associated loss of valuable resources. Permanent materials can be recycled again and again and differ substantially from materials which quickly degrade while being recycled and therefore can only be recycled a limited number of times. Permanent materials reduce dependency on primary resources and retain economic value.

**Revise the Waste hierarchy**

The current definition of ‘Recycling’ as it is stated in Art. 3(17) of the Waste Framework Directive (WFD) creates a common high level framework for all materials, but its use in the ‘Waste hierarchy’ (Art. 4 of the WFD) fails to differentiate sufficiently between materials which are circular by nature and fit for multiple recycling without losing their functionalities, and materials that degrade over time and are finally lost. A revised hierarchy should promote circularity and multiple recycling loops. This will help the EU to achieve a fully circular economy.



## Call for actions in the next EU term 2024–2029

### Introduce an ambitious high-quality recycling definition

The recently revised Packaging and Packaging Waste Regulation recognises that: “high-quality recycling implies that the recycled materials, based on their preserved technical characteristics, are of equivalent or higher quality compared to the original material and can be used as a substitute to primary raw materials for packaging or similar applications. The recycled material can be recycled multiple times”. Introducing this definition in the Waste Framework Directive will further boost the effective and efficient collection and sorting of products, to enable high-quality material recycling within closed material loops.

### Support Member States that are at risk of not reaching EU recycling targets

EU countries unable to meet the ambitious new EU recycling targets should be helped by targeted EU funding to implement more effective collection and sorting infrastructure and to invest in high quality recycling facilities.



## Call for actions in the next EU term 2024–2029

### Promote separate collection of packaging waste

High-quality recycling of packaging materials depends on the availability of efficient separate collection and sorting systems for packaging waste. Therefore, we support a timely and ambitious approach towards reaching 90% separate collection of packing waste in all EU Member States.

### Improve Life Cycle Assessment (LCA) methodologies

Consumers and businesses should have access to reliable, comparable, and verifiable information to make informed decisions about the sustainability claims of different packaging formats. Life Cycle Assessment (LCA) methodologies, including the Product Environmental Footprint (PEF) should be further improved to take account of material's potential to remain in multiple loops, instead of focusing on one life cycle.

The ability of materials to be recycled infinitely without losing their inherent properties, which is the case for permanent materials, needs to be reflected in this methodology. We therefore call for the implementation of a material circularity indicator to promote the circularity of material flows, recognising that specific materials have the ability to be recycled multiple times without any loss of quality.

Develop a long-term strategy for the availability of secondary raw materials (e.g. ferrous scrap, non-ferrous scrap and glass cullet). The recycling of permanent materials already works very well. However, to achieve the vision of a fully resource-efficient economy, improved access to secondary raw materials is required. All relevant EU legislation should work in unison to improve the quality of secondary raw materials and additional efforts are needed to refine the available data and to consider, where needed, a better categorisation of the different types and quality of secondary raw materials. We support a better use of end-of-waste criteria to support this objective.



## **2. Implement the EU circular economy legislation effectively and harmonize the EU Single Market**

**A swift implementation of the Packaging and Packaging Waste Regulation (PPWR) and the development of secondary legislation and harmonised standards will be a determining factor in providing visibility and certainty to economic operators and securing a well-functioning market for sustainable products. Secondary legislation should support both environmental objectives and the practical needs of the packaging industry, taking into consideration the following:**

**Establishing transparent, proportional and non-discriminatory Extended Producer Responsibility EPR fees, covering the net-costs of collecting, sorting and recycling the packaging material it is paid for.**

These fees should reflect the ease with which a certain type of packaging can be recycled but should also reflect the likelihood of the packaging of being separately collected, sorted and recycled multiple times with no loss of quality.

### **Design for recycling criteria**

While developing Design for Recycling Delegated acts, the European Commission should take into consideration the Design for Recycling standards developed by the CEN, the European Standardisation Committee. While the specificities of each material must be assessed separately, it is key to ensure a level playing field so that those criteria respect similar and ambitious principles and definitions (e.g. definition of state-of-the-art recycling collection and sorting process). These umbrella standards will ensure that all materials will be assessed on the same basis.





## Call for actions in the next EU term 2024–2029

### Evidence-based policy making

To ensure that policy decisions, especially those related to the upcoming secondary legislation, are both effective and forward-looking, it is crucial that they are based on sound scientific evidence. This approach supports sustainable practices and drives technological innovation. A key example of this is the design for recycling guidelines, which must be backed by robust expertise, multi-stakeholder dialogue and solid evidence on the performance and capabilities of existing recycling systems.

### Circular Single Market

Beyond considering metrics to measure circularity, the principles of circular economy should be integrated into the Single Market. The recent report by Enrico Letta<sup>2</sup> clearly states that a “Circular Single Market is needed, as it will support environmental sustainability while simultaneously driving economic growth by fostering innovative business models and consumer behaviours”. Upholding Single Market principles by cutting red tape and abolishing market barriers that come from divergent national measures is a key driver for circular business models and the deployment of sustainable practices.

**The Permanent Materials Alliance, remains committed to achieving to its long-standing ambition of enhancing Europe’s Strategic Autonomy, contributing to its Climate ambitions and enhancing the Circular Economy. We invite policymakers and all relevant stakeholders to consider these recommendations and look forward to supporting their development.**



<sup>2</sup> Letta Report “Much More Than a Market” (April 2024)

# About the Permanent Materials Alliance (PMA)

As permanent materials, aluminium, glass and steel can be recycled over and over again without losing their key intrinsic properties, thus maintaining circular material loops. Such materials are, and will remain, at the heart of any proven and well-functioning Circular Economy.

**The aluminium, glass and steel sectors are top performers in recycling packaging materials.**



## Aluminium

Recycling rate\* for beverage cans  
(2021 - EU27 + UK + Switzerland +  
Norway + Iceland)



## Glass

Collection rate\*\* for  
glass packaging  
(2022 - EU27)



## Steel

Recycling rate for all steel  
packaging  
(2022 - EU27 + UK +  
Switzerland + Norway)

\*\*The collection rate refers to the percentage of materials gathered for recycling, that still need to be processed to sort materials that can be recycled.

\*The recycling rate refers to the percentage of recovered materials that are reprocessed into products and materials whether for the original or other purposes.



The Permanent Materials Alliance comprises Steel for Packaging Europe, European Aluminium, the European Container Glass Federation (FEVE) and Metal Packaging Europe.



**More information [www.circularchampions.eu](http://www.circularchampions.eu)**



EU Transparency register  
70036906501-10



EU Transparency register  
9224280267-20



EU Transparency register  
1550133398-72



EU Transparency register  
867965517169-77