

POSITION PAPER ON EU GUIDELINES ON SEPARATE COLLECTION

Target audience: External audience, notably European Commission and national government representatives.

Document purpose: The aim of this document is to provide ACE inputs to the drafting of the EU Guidelines on separate collection

WHAT ARE BEVERAGE CARTONS

Beverage cartons are a **low carbon** and **recyclable packaging** material used to protect and distribute milk, juices and other liquid products. They are made, on average, of (by weight):

- 75% paperboard - a renewable material coming from sustainably managed forests
- 21% polymers - mostly polyethylene, to prevent leakage
- 4% aluminum - to protect drinks from light and oxygen

Beverage cartons are recyclable and recycled. Its recycling rate was of 49% across the whole of the EU in 2018.¹ This rate has been constantly increasing since the early 1990s and the beverage cartons industry is continuously investing to recycle all components of beverage cartons.² As they are mainly made from responsibly sourced renewable raw materials, **beverage cartons are a low carbon packaging solution.**

SEPARATE COLLECTION

Separate collection is an essential step in the transition to a circular economy, as it increases the volume and the quality of materials available for recycling. In line with the Waste Framework Directive³, separate collection can also be achieved through the collection of certain types of waste together (e.g. mixed recyclable lightweight packaging), when this allows achieving high quality recycling.⁴ In view of the adoption of the Guidelines on separate collection, ACE:

- **Supports a strict application of the obligation for Member States to separately collect all waste.**⁵ Separate collection is an essential tool to reach the high recycling targets mandated by the EU waste legislation. Member States shall strictly apply the obligation to separately collect used beverage cartons for the following reasons:
 - ✓ Separate collection is **technically feasible** as proven by the existence of well-functioning collection systems across Europe. Thanks to a well performing separate collection system, some Member States reach annual recycling rates of beverage cartons above 70%.

¹ Based on the existing calculation method according to which recycling is accounted to the predominant material; EC Decision 2005/270.

² The beverage cartons industry has established a new platform (EXTR:ACT) to foster recycling of beverage cartons.

³ See Recital 42 of the Waste Framework Directive.

⁴ For instance, countries such as Belgium or Germany have reached municipal waste recycling rates which are above the EU-28 average by collecting certain types of waste together.

⁵ Article 11 (1) of the Waste Framework Directive.



- ✓ Separate collection is **economically practicable**, as its costs are covered by producer fees under Extended Producer Responsibility (EPR) schemes.⁶ This will increasingly be the case thanks to the obligation on EU Member States to ensure that all packaging is covered by EPR schemes as of 2024.⁷
- ✓ Separate collection is **environmentally beneficial**, since recycling of used beverage cartons into new paper products (such as cardboard boxes) keeps materials in the loop, while reducing the need for further use of virgin raw materials.
- **Supports national mandatory collection or recycling targets for used beverage cartons.** By providing the legal certainty that beverage cartons are collected and recycled, mandatory targets provide a strong incentive for further investment and innovation in collection, sorting and recycling technologies. As an example, Belgium and Germany set up ambitious mandatory targets driving up the recycling rate of beverage cartons.

⁶ Article 8a (4) of the Waste Framework Directive mandates that producer fees cover costs of separate collection, transport and treatment of waste.

⁷ Article 7 (2) of the Packaging and Packaging Waste Directive.