

## REPLY TO THE CONSULTATION ON THE INCEPTION STUDY ON REVIEW OF THE WASTE SHIPMENT REGULATION

### ACE contribution to the consultation on the inception impact assessment

All the materials used in beverage cartons are recyclable. 49% of all beverage cartons sold in Europe were recycled in 2018. The recycling rate of beverage cartons will continue to increase thanks to the new EU waste legislation's requirement to separately collect all packaging materials and the industry's investments and the industry's newly formed pan-European recycling platform aimed at coordinating and supporting collection and recycling of beverage cartons, EXTR:ACT.

Beverage cartons are recycled in some 20 dedicated recycling mills across Europe. The fibre used to produce beverage cartons is of high quality and hence well demanded by recyclers and has a well-established secondary raw material market.

The first and essential step to recycling is collection. Once used beverage cartons are collected, they are sent to the dedicated recycling mills for recycling. Beverage cartons are in some cases shipped across the EU MS to optimize logistics and efficiency of recycling capacities with the objective of ensuring the highest possible recycling rate. However, the shipment of the used beverage cartons for recycling is sometimes challenged due to different interpretations of Member States.

The BC industry is also actively working on ensuring that the non-fibre materials used in beverage cartons are equally recycled. Different projects will already allow PolyAl (polymer and aluminium) recycling in the second part of 2020. The EXTR:ACT platform is active in supporting this, particularly in scaling up PolyAl recycling across the MS. Again, the recycling facilities for PolyAl will probably need to import some volumes from neighbouring countries in order to reach optimal capacity and security of supply. We assume that the same challenges may arise regarding cross-border movement of these materials for recycling

**To ensure that all valuable packaging waste is recycled it is essential that:**

- **All waste recovered for recycling can be shipped across the EU as green listed waste (hence without notification procedure).**
- **Both the used beverage cartons themselves and the PolyAl components should be classified as green waste.**
- **All Member States respect and implement the classification decided at EU level.**
- is consistent with the above.