

# EU VISION PAPER

Our industry priorities  
for the EU term 2024 – 2029



**STEEL FOR  
PACKAGING**  
EUROPE

# Foreword

The European Steel for packaging industry strongly supports the renewed circular economy ambition by the EU, and the announcement of the **new Circular Economy Act** in the Political Guidelines for the 2024-2029 term.

Steel for packaging is a strategic asset for several supply chains, ensuring the long-term preservation of various goods, including food for human consumption. It is also the leading circular packaging material, with a current recycling rate of 82%. Even before the EU Green Deal, packaging steel produced in Europe had already embarked on a circular transition thanks to its ability to be permanently recycled and robust recycling infrastructure. In addition, with our advanced decarbonisation plans, we are committed to support the EU's climate policy.

The future policy framework for circular economy needs to support materials achieving high recycling rates as well as high quality recycling. It needs to support resource-based frameworks to achieve a truly circular economy and reduce dependency on imports.

In the global geopolitical context and with increasing pressure on our industry from competing markets, future sustainability will depend on having a level playing field between the products made in the EU, the UK and those imported into the EU.

“Steel for Packaging Europe will continue to support the sustainability and circular economy agenda in the EU and globally.”

We hope to see policy oriented towards ensuring continued investments to support circular and CO<sub>2</sub> reduced steel by providing incentives for multiple and high-quality recycling, in a closed material loop.

We are committed to advancing the sustainability and circular economy agenda in the EU and globally. We hope to see a fit-for purpose EU legislative environment that is fully resource-based and promotes longevity, while preserving the key role of the EU Single Market.

We aim to create partnerships with the new EU institutions to reach the combined objective of EU competitiveness and greater sustainability.



# Priorities

Our legislative priorities under the future Circular Economy Act, Waste Framework Directive and Packaging and Packaging Waste Regulation (PPWR) are:

**Phasing out landfill & introducing increased landfill taxes**

**Enforcing and increasing ambition on separate collection of packaging waste**

**Developing legislation to support high quality recycling, through:**

- ▶ Extending the waste hierarchy by introducing a new **'Recycling hierarchy'**, acknowledging the difference between multiple and limited recycling
- ▶ Ensuring a level playing field by introducing umbrella **Design for Recycling standards for all materials in the PPWR that promote highly recyclable packaging**
- ▶ Establishing **transparent, proportional and non-discriminatory EPR-fees**, that cover the net-costs of collecting, sorting and recycling of the packaging material they are paid for, to avoid cross-subsidizing.

Our priorities are built into three distinct pillars:

# 1

## Resource-based frameworks

Using recycled steel saves CO<sub>2</sub> emissions and energy. Looking beyond merely waste legislation, using less materials needs to be properly incentivised.

A greater focus on the efficient material recycling processes that allow materials to be continuously recycled into new products contributes to maintaining the material's value and utility without loss in quality.

# 2

## Implementation of the existing packaging and waste legislation

EU institutions should leverage the Single Market and focus on effective implementation of the PPWR to support both the sustainability objectives and the practical needs of the packaging industry.

# 3

## Food security

There is a global need to save food and to manage waste.

## Pillar 1

### Resource-based frameworks

# Focus on permanent materials

Continued focus on material reduction by European packaging steel manufacturers has led to a sustained increase in material efficiency. 75% of the steel produced to date is still in use.

#### Our recommendations to the EU institutions

- ▶ Strengthen circularity with a holistic view on recycling, including in the new approach to the EU Circular Economy act and the European Clean Industrial Plan.
- ▶ Recognise the value of permanent materials like steel in the EU Circular Economy Act.

75%

of the steel produced to-date is still in use.



## Pillar 1 Resource-based frameworks

# Secondary raw materials market

Steel for packaging can contribute to secondary raw material supply, by being collected and processed correctly at its end of life, to serve as the raw material for endless new manufacturing loops. Having an established and well-spread local recycling infrastructure, steel does not require long transportation distances.

### Our recommendations to the EU institutions

- ▶ Promote increased separate collection at national levels by revising the Framework Directive as a first step to keep steel for packaging in the closed material loop.
- ▶ Include increased EU-coordinated landfill taxes over time and review the Landfill Directive as necessary steps in order to accelerate the phase-out of landfilling recyclable waste.

## Pillar 1

### Resource-based frameworks

# Ensure high quality recycling



There is a need to shift from waste to resource-focused legislation. This means that the recycled materials can be used to substitute primary raw materials within a closed material loop while representing equivalent quality with respect to the original material based on their preserved technical characteristics.

Steel packaging enables high-quality recycling, thanks to its inherent properties. Furthermore, easy separation, just by using a magnet, means cost-effective sorting of steel from other waste. Steel is already recycled “at-scale”, thanks to a European recycling network of around 200 steel plants, that are also recycling plants, producing new high-quality steel products using recycled steel.

#### Our recommendations to the EU institutions

- ▶ Introduce an ambitious high quality recycling definition in the new Circular Economy Act
- ▶ Adapt the existing waste hierarchy by introducing the concept of a ‘recycling hierarchy’ next to prevention and reuse or recycled content to promote multiple recycling.
- ▶ Establishing transparent, proportional and nondiscriminatory EPR-fees, that cover the net-costs of collecting, sorting and recycling of the packaging material they are paid for, to avoid cross-subsidizing.



**Pillar 2**

Implementation of the existing packaging and waste legislation

# Design for recycling

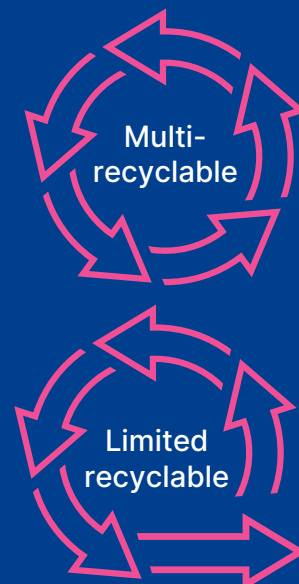
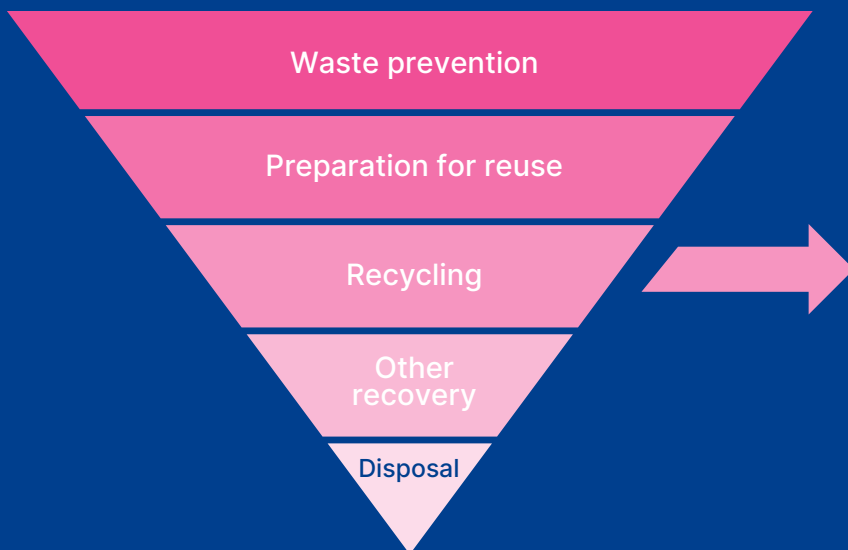
Circular design calls for a closed material loop, where resources are repurposed and do not go to waste.

**Our recommendations to the EU institutions**

- ▶ In the PPWR implementation, ensure a level playing field by introducing umbrella Design for Recycling standards while also recognising the individual contributions of packaging materials for a circular economy, such as efficiency in recycling.
- ▶ Involve relevant standardisation bodies in the formulation of such standards.



**Waste hierarchy**



**Pillar 3**  
Food security

# Less food waste, more food security

There is a global need to save food and to manage food waste. As the EU looks into ways to achieve food sovereignty, policies will require a more coherent framework, achieving a better balance between material reduction and the need for self-sufficiency of food. Steel packaging's unique preservation qualities play an important part in preventing food waste at every stage in the supply chain.

## Our recommendations to the EU institutions

- ▶ In the new "EU Vision for the Agriculture and Food", fully acknowledge the critical role of packaging materials such as steel for maintaining food security and preventing food waste.





# STEEL FOR PACKAGING EUROPE

Established in 1986, we represent the five major European producers of steel for packaging operating 11 dedicated manufacturing sites



TATA STEEL



82%

the most recycled packaging material in Europe with 82% recycled in 2022



unique magnetic properties make steel **easy and economical** to separate from any waste stream



all primary steel plants across Europe use **steel scrap** as a cooling agent for new steel



100% of recycled steel is used in a closed material loop

## Recycling close to home

Over 90% of the European population lives within 200 km of a steel recycling plant, which makes recycling practical, sustainable and local.

### STEEL PLANT NETWORK

- Steel plant = Recycling plant
- Area within 200 km of a steel recycling plant
- Area further than 200 km from a steel recycling plant



The EU steel industry employs

**300K** people directly,

**2M** induced/indirectly.



You can reach us at:  
[www.steelforpackagingeurope.eu](http://www.steelforpackagingeurope.eu)