

November 2025

PERMANENT MATERIALS ALLIANCE

Our recommendations for the Circular Economy Act

The Circular Economy Act (CEA) presents a key opportunity to strengthen Europe's leadership in circularity and strategic autonomy. The Permanent Materials Alliance (PMA)—representing the aluminium, glass and steel packaging industries—strongly supports the initiative and calls on the European Commission to shape the CEA around a resource-focused, material-efficient, and industrially resilient circular economy.

A 'permanent material' is a material whose inherent properties do not change, regardless of the number of times it goes through a recycling process. It means that once it is produced for the first time and properly collected, sorted and processed at the end of its life, it becomes the raw material for new and endless production loops.

Recycling of permanent materials already functions effectively across Europe, supporting circularity in practice, not just in theory. However, achieving a truly resource-efficient economy requires improving access to high-quality secondary raw materials and better recognising and rewarding the unique properties of materials that can be recycled indefinitely without loss of quality.

Benefits of 'permanent material'

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

- Recycling rate for aluminium beverage cans (2022 - EU27 + UK + Switzerland + Norway + Iceland): 74.6%
- Collection for recycling rate for glass packaging (2023 - EU27): 80.8%
- Recycling rate for all steel packaging (2023 - EU27 + UK + Switzerland + Norway): 82%

Resources are kept within the economy for longer: When permanent materials are collected and recycled properly, they become the raw material for endless new production cycles, reducing reliance on virgin raw materials.

Boosting circularity supports climate neutrality: Recycled materials help reduce energy consumption and CO₂ emissions from aluminium, glass and steel production.

¹ Final scientific Report on Permanent Materials, Carbotech 2014, [Final_PeM_Report_Carbotech.pdf](#)
[Report on Glass as Permanent Material](#) 2016, Stazione Sperimentale del Vetro

OUR PRIORITIES FOR THE CIRCULAR ECONOMY ACT

1. Establish a Resource-Based Policy Framework

The CEA must shift EU waste policy towards strategic resource use, retaining materials in circulation and prioritising high-quality, closed-loop recycling.

➤ **Define and recognise "permanent materials" in the EU "Waste and Resources" Acquis**

The CEA should formally acknowledge the role of permanent materials as distinct from materials that degrade over recycling cycles. These materials maintain their value across multiple loops and preserve their core properties indefinitely. This recognition will help boost recycling rates, reduce reliance on virgin raw materials, and promote closed recycling loops, while eliminating waste, minimising landfilling and phasing out incineration and the associated resources' loss that comes with it.

Permanent material means a material whose inherent properties do not change during its lifecycles regardless of the number of times it goes through a recycling process.

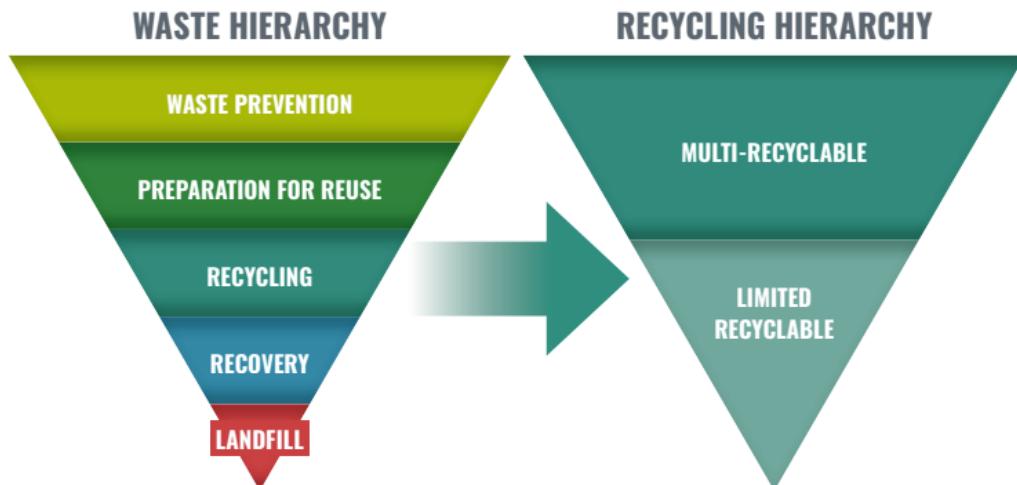
➤ **Introduce an ambitious definition of high-quality recycling**

Introducing this definition in the Waste Framework Directive (as in the Packaging and Packaging Waste Regulation) will further boost the effective and efficient collection and sorting of products; to enable high-quality material recycling within closed material loops.

High-quality recycling means any recycling process which produces recycled materials that are of equivalent quality to the original materials, based on preserved technical characteristics, and that are used as a substitute to primary raw materials for the same or other applications where the quality of the recycled material is retained. The recycled material can be recycled multiple times.

➤ **Revise the Waste hierarchy to reward materials fit for multiple recycling**

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.



➤ **Promote separate collection of packaging waste**

High-quality recycling of packaging materials highly depends on the availability of efficient separate collection and sorting systems for packaging waste.

- Ambitious approach towards reaching 90 % separate collection of packing waste in all EU Member States by 2030.
- Targeted EU funding to install an innovative collection and sorting infrastructure and to invest in high quality recycling facilities especially in countries facing challenges in meeting EU recycling targets.

➤ **Advance material circularity metrics**

Life Cycle Assessments (LCAs), including the Product Environmental Footprint (PEF) currently typically evaluate materials based on a single life cycle, overlooking their ability to be recycled multiple times. Recognising a material's potential to remain in continuous loops would better reflect its true circular value and environmental benefits. This shift is essential to guide policy and material use that truly support a circular economy.

- Improve LCA and PEF methodologies to account for intrinsic material properties and recyclability over multiple recycling cycles.
- Develop the concept of a material circularity indicator to complement current environmental metrics and promote circular flows.

2. Harmonise EPR schemes to reward true circularity

Extended Producer Responsibility (EPR) schemes have been a key driver in achieving the high collection and recycling rates of permanent materials. They must now evolve into strategic tools that actively reward the use of highly recyclable and circular materials. EPR fees and their eco-modulation should better reflect the real-world recyclability, collection efficiency, and closed-loop potential of different materials.

➤ **Amend Article 8a of the WFD and enforce it**

Article 8a already calls for modulated EPR fees based on recyclability. However, it should not only be about the product's capability to be recycled, but about the product being effectively collected, sorted and recycled, not once, but over and over again, thereby substituting virgin material.

General minimum requirements for EPR should foster the harmonisation of EPR governing principles, including EPR fees and their eco-modulation, on the basis of the following:

- Transparent, proportional and non-discriminatory EPR-fees, covering the net-costs of collecting, sorting and recycling of the packaging material it is paid for
- Ring-fencing of EPR revenues to be reinvested in the collection and recycling of the same material stream – no cross-subsidisation across materials
- Eco-modulation of fees to be paid by obliged industry to reflect the recyclability of the packaging and packaging material, taking into account
 - the actual recycling capability of the packaging
 - the potential to be recycled over and over again without any loss of the main intrinsic material properties
 - the recycling rate of each packaging material

The Circular Economy Act must embed permanent materials as strategic, circular enablers that underpin both Europe's sustainability and industrial resilience. Aluminium, glass, and steel are not just packaging materials—they are cornerstones of industrial resilience and circularity. The Permanent Materials Alliance stands ready to support the Commission's efforts through constructive dialogue and evidence-based recommendations.

About the Permanent Materials Alliance (PMA)



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



EU Transparency register
70036906501-10



EU Transparency register
9224280267-20



EU Transparency register
1550133398-72



EU Transparency register
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