

Circular Plastics Alliance

PROs commitments to a sustainable value chain for plastics

We, as packaging recovery organisations (PROs), dealing inter alia with plastics and plastic packaging waste management, have joined the Circular Plastics Alliance to promote action on plastic packaging waste prevention, eco-design for recycling, recyclable plastics and use of recycled plastics in new products and packaging in the European Union to close material loops and foster a more circular economy.

Indeed, in the heart of the extended producer responsibility scheme, PROs can play a key role of catalyst, developing appropriate solutions to achieve targets of the Circular Plastics Alliance, in support of and in coordination with national initiatives such as the project of an European plastic packaging pact.

We, with all stakeholders of the plastics value chain, support the ambitious target of 10 million tons of recycled plastics into products in the EU by 2025, extending the life cycle of plastics in the circular economy. We intend to work, in a co-shared responsibility, with the plastics value chain, including all relevant public and private stakeholders across the EU, to reach this objective, whilst ensuring the functionalities of plastic packaging, such as consumer protection, safety and hygiene, are not compromised.

As PROs, we will keep joining our forces, by sharing our common expertise, knowledge and experience with suggesting guiding principles and recommendations for this Circular Plastics Alliance, to tap the full potential of recycled plastics in the circular economy, help bring sustainable growth to the European market for recycled plastics and ensure competitiveness between virgin plastics and recycled plastics

Monitoring

As PROs, we welcome the European Commission's proposal to set up a harmonized EU value chain voluntary system to monitor volumes of recycled plastics used in European products by 1st January 2021. To implement a system that is transparent, trusted and able to ensure data traceability, it is however essential that the European Commission allocates a budget to this project.

As data collection and sharing is a sensitive issue and has to be dealt in compliance with competition law in the EU, we strongly believe that public authorities should coordinate the monitoring process with PROs.

EPR organisations are willing to play a significant role in monitoring, in particular by providing data (where available) on the plastic waste collected (qualitative characteristics, volumes, origin), sent to recycling and which are the geographical destinations of the packaging waste.

Collection and sorting

Regarding collection of plastic packaging, PROs welcome the challenging recycling targets of the Single Use Plastics (SUP) Directive for plastic bottles and are already anticipating issues that need to be urgently tackled, especially the fight against (marine) litter. However, regarding the provision on litter clean-up as included in the SUP Directive, EPR organisations ask for the clarification of the roles and responsibilities of each stakeholder (citizen/consumer, municipalities, producers and EPR organisations). Furthermore, we would also suggest that the cost proportion born by producers pertains only to the packaging fraction and according to efficiency principals as safeguarded in the SUP directive.

Regarding the multiplication of markings and logos existing in the member states' legislations and in order harmonize messages in the internal market, PROs call the European Commission and member states for a close transposition of the Waste Framework Directive and the Packaging and Packaging Waste Directives with common guidelines regarding logos, recyclability criteria and incorporation of recycled plastics into new products.

This measure will also reinforce the European citizen's awareness and raise collection and recycling of packaging, specially of plastic packaging.

Design for recycling

PROs fully endorse the European Strategy for Plastics in a Circular Economy, urging for the material to be transformed from waste into a economically, socially, and environmentally beneficial resources. As such, PROs will continue their endeavours towards improving the circularity of all types of packaging, while also ensuring its net environmental improvement over the product's life-cycle.

As EPR organisations, we recognize our central role in this work and share the vision of the Circular Plastics Alliance to have EU-wide methods and procedures to test the recyclability of plastic and European design guidelines-standards by packaging format and by polymer. In this way, design criteria should be developed by the packaging value chain, as it is already the case for flexible packaging, with a view to optimise the environmental impacts of the packaging over its life cycle while being addressed in a differenced eco-modulation regarding the maturity and the value chain of the polymer.

Recycled content

As PROs, we can play a significant role in incentivizing the incorporation of more recycled plastics in new products and packaging whenever possible.

We underlined that eco-modulation of EPR fees is an efficient tool to guide producers towards eco-design of packaging.

To assist with this process, we suggest that the EU Commission and EFSA develop guidance and/or legislation to the regulate the interface between products, chemical substances and waste to ensure the increase of recycled content in plastic packaging, especially for food grade.

R&D and investments

According to Eurostat statistics, nearly 7 million tons of plastic packaging waste are recycled by European actors (waste producers, PROs, recycling industry), including a very variable export share depending on the country. The official average recycling rate for all household and industrial plastic packaging in the EU was 42% in 2016.

Europe will have to recycle at least an additional 2 million tons to reach the 55% recycling target of the new Directive by 2030, while taking into account the new methodology of recycling rate calculation that will make the targets harder to achieve.

Considering exporting waste as a solution has become increasingly questionable and Europe will have to develop additional recycling capacities in order to have permanent infrastructure on its territory, it is key to invest in recycling capacity as well as in new output markets.

Since plastics and plastic waste are valuable resources for the circular economy in the internal market, we believe that the EU Commission and the European Investment Bank should ensure a specific funding stream is available for suitable investments to support the circularity of the plastics. This should be in conjunction with the development and the modernisation of recycling infrastructures while supporting new recycling solutions, such as chemical recycling, to help Member States reach the targets and implementing legislation.

In this perspective, it will be essential to progress at all levels of the plastics value chain, and treat topics ranging from the design of products and packaging to facilitate their recyclability to the reincorporation of regenerated materials into new products, for both packaging and non-packaging applications.

About EPR organisation : OECD defines Extended Producer Responsibility (EPR) as an environmental policy approach in which a producer's responsibility for a product is extended to the post-consumer stage of a product's life cycle. An EPR policy is characterised by:

- 1. the shifting of responsibility (physically and/or economically; fully or partially) upstream toward the producer and away from municipalities; and*
- 2. the provision of incentives to producers to take into account environmental considerations when designing their products. While other policy instruments tend to target a single point in the chain, EPR seeks to integrate signals related to the environmental characteristics of products and production processes throughout the product chain.*

The undersigned EPR organisations are as follows