

I FEAD & EuRIC POSITION I

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Single-use plastics proposal: Importance of moving towards binding recycled content targets to support the uptake of recycled plastics

FEAD and EuRIC welcomes the publication of the Commission's proposal related to single-use plastics, aimed at reducing their impact on the environment¹.

Our industry sees it as another step towards a more circular economy. The private waste and resources management industry together with the recycling industry play a key role in making this progress by collecting, sorting, processing waste and, finally, providing high quality recycled materials for Europe's manufacturers and consumers. But an even stronger leadership from EU policy makers is needed to provide the right legal framework and market signals. The necessary investments for a more circular economy, creating many more jobs in Europe while making our economy more resilient and resource efficient, will be done by our companies only if there is enough legal and economic certainty.

Consequently, EuRIC and FEAD members deeply regret that the text wrongly sees Extended Producer Responsibility (EPR)² schemes as one of the main instruments to tackle issues stemming from single use plastics and failed to embed a commitment towards legally binding proposals on recycled content in selected products.

Indeed, large investments will be needed to keep innovating and expanding the separate collection, sorting and recycling capacity at EU level (4 times more compared with 2015, as estimated by the Commission). Our industry is prepared to make further investments if there are legislative measures ensuring economic visibility on a significant uptake of plastic recyclates. Most "green" markets" need strong pull measures to take off, to this extent recycling plastics is not an exception. In addition, mandatory recycled content would not only contribute to pull the demand for recycled plastics but will also contribute to reward plastics recycling environmental benefits in terms of CO² and energy savings³ that the market currently fails to internalize.

A strong demand for recycled plastics will only result from concrete binding rules, accompanied by economic measures to bridge the price gap detrimental to plastics from recyclates. Raising the collection performance of plastic bottles through deposit schemes or extended producer responsibility (ERP) is very important, but it will not be sufficient to create a solid European demand for recycled materials.

Therefore, we urge the EU co-legislator to make sure that the finally adopted Directive foresees a proposal on binding recycled content at first for plastic bottles with regards to the targets already set in the Packaging and Packaging Waste Directive.

¹ Proposal for a Directive on the reduction of the impact of certain plastic products on the environment
http://europa.eu/rapid/press-release_IP-18-3927_en.htm

² EuRIC and FEAD would like to remind the longstanding position according to which it is preferable that EPR Schemes solely have financial responsibility in order to prevent unfair competition in waste management and recycling markets.

³ As outlined in the Plastics Strategy, recycling 1 million tons of plastics equals the CO₂ savings of taking 1 million cars off the road ([Commission Plastics Strategy](#), figure stemming from a [study made by FEDEREC together with ADEME – the French EPA](#)).



For further information, please contact:

FEAD Secretariat: info@fead.be

EuRIC Secretariat: pcech@euric-aisbl.eu

Note to the editor:

FEAD is the European Federation representing the European waste management industry. FEAD's members are national waste management associations covering 19 Member States, Norway and Serbia. They have an approximate 60% share in the household waste market and handle more than 75% of industrial and commercial waste in Europe. Their combined annual turnover is approximately € 75 billion. FEAD represents about 3000 companies with activities in all forms of waste management. These companies employ over 320000 people who operate around 2400 recycling and sorting centres, 1100 composting sites, 260 waste-to-energy plants and 900 controlled landfills. They play an important role in the determination of the best environmental option for waste management problems.

EuRIC - The European Recycling Industries' Confederation is the umbrella organisation for recycling industries. Through its Member Federations from 20 EU & EFTA countries, EuRIC represents across Europe over:

- ✓ *5,500+ companies generating an aggregated annual turnover of about 95 billion €, including large companies and SMEs, involved in the recycling and trade of various resource streams;*
- ✓ *300,000 local jobs which cannot be outsourced to third EU countries;*
- ✓ *Million tons of waste recycled per year (metals, paper, plastics, glass and beyond).*

Recyclers play a key role in a circular economy. By turning wastes into resources, recycling is the link which reintroduces recycled materials into the value chains again and again.