

Position Paper on the revision of the Packaging and Packaging Waste Directive (PPWD)

The Polyolefin Circular Economy Platform (PCEP) welcomes the European Commission's upcoming revision of the Packaging and Packaging Waste Directive. Ensuring a supportive and coherent policy framework that encourages innovation, incentivises investment and establishes a well-functioning market for secondary raw materials is much needed, but inevitably complex. PCEP would like to propose a series of recommendations, building on industry data and insights, to support the EU institutions in this endeavour.

PCEP brings together actors from across the polyolefin value chain, united in our common mission to drive the transition to a circular economy for polyolefins - the most commonly used family of plastics. 71.4% of plastics packaging in Europe is made of polyolefins, accounting for 71% of collected plastic waste.¹ This collected material goes on to be transformed into 84.7% of post-consumer recycled polyolefins, used today in European products across building and construction, packaging, agriculture, automotive, electronics, and other sectors.

PCEP is actively engaged in voluntarily increasing the use of recycled content across all polyolefin applications, through our own work and in platforms such as the Circular Plastics Alliance. We have also recently upgraded our voluntary recycled plastic pledge, committing ourselves to increase the volume of recycled post-consumer polyolefins in European products to 4 million tonnes a year by 2025. This is an increase of 2 million tonnes against a 2016 baseline, and 1 million tonnes increase against our 2018 pledge. PCEP has also developed a set of overarching [design principles](#) and is evaluating how well format-specific Design for Recycling (DfR) guidelines meet our circular polyolefin criteria.

1. Need for harmonised and material-neutral definition of recyclability

PCEP supports a **harmonised and actionable definition of recyclability which is technology and material neutral**. Our proposed definition, developed jointly with fellow packaging associations and industry stakeholders, is:

"Recyclable packaging is that which can be effectively and efficiently collected, in line with article 3 (11) and article 11 (1) of the WFD, – by a minimum of 50% of the EU population and with a goal to reach 90% within 5 years –, sorted – meaning the majority of these packaging is oriented into the defined and recognised waste streams for recycling processes – and is capable of being recycled at scale with full transparency on the tonnages recycled and outlets, and with guarantees that the secondary materials produced, in line with Article 6a of the PPWD, are of sufficient quality that they can find end markets to substitute for the use of fossil-based primary raw material, and based on the updated guidelines of the European technical committee representing the entire value chain mandated by the European Commission. Recyclable packaging is that which does not contain elements or substances that prevent recycling."

¹ PCEP study by Conversio of collected Polyolefin waste in 2021, covering EU27, UK, Norway and Switzerland.

No hierarchy should be set amongst existing recycling technologies in the future Essential Requirements.

2. Prioritise Design for Recycling over a 95% recyclability threshold to avoid contradictions

Mandatory **Design for Recycling (DfR)** criteria are the best tools for determining whether **packaging is recyclable**. Packaging recyclability should be assessed based on recognized DfR guidelines specific to each material and packaging type, drawing on existing guidance from across the packaging value chain and ongoing work by CEN. An **EU-harmonized one-step Design for Recycling conformity assessment** is a must to ensure packaging recyclability is assessed in practice.

This is why a **95% recyclability threshold in the recyclability definition should be abandoned**, as it would be in **direct contradiction with the use of design guidelines**, which would already set material and format specific recyclability thresholds. Moreover, a level of 95% is too high and would likely lead to unintended negative consequences, such as compromising the protective qualities of packaging (e.g. necessary thickness of barrier layers), resulting in higher costs and carbon emissions from food waste.

3. A negative list of packaging characteristics would hamper recyclability and innovation

A negative list of packaging characteristics **contradicts material and format-specific design for recycling guidance** where incompatibilities of packaging features with given recycling streams would be specified. Such a negative list would require frequent updates to reflect advances in recycling technologies and infrastructure, and could inhibit innovation in recycling technologies which are ever improving their ability to process hard-to-recycle packaging.

4. Facilitating access to the right quantity of high-quality recyclates is a prerequisite to recycled content targets

While we fully support recycled content obligations, facilitating access to large quantities of high-quality recyclates is the necessary prerequisite to introducing any targets. Such access can only be secured through a **restriction or ban on landfilling and incineration of recyclable materials, as well as thanks to improved collection, sorting and processing infrastructure**. The latter is particularly needed for 'contact sensitive' packaging, since recycling outputs have varying degrees of quality, based on different yields and process losses of recycling technologies, limiting the availability of food grade suitable recyclates for packaging producers.

The following **enabling factors** will be critical to the success of mandatory recycled content targets:

- a) Clear recognition that **all recycling technologies** are counted by the PPWD in its recycling rate targets and recycled content targets.
- b) Clear recognition and establishment of a **common approach to mass balance methodology** for recycled content in packaging and products.

- c) Dedication of resources to support the development and timely approval of technologies to **enable recycled polyolefin content in food contact applications**, without compromising food safety.
- d) **Alignment of PPWD with** measures and targets in **waste policies**, such as the recent revision of Waste Framework Directive, that focus on improving recovery of materials to optimise the recycling rate.
- e) Maintenance of **EU single market for the shipment of waste** to get streams of polymer to recyclers in the volumes required to make recycling economically feasible.
- f) Legal framework that **encourages investment in recycling innovations, sorting and collection** and allows adequate **transition time** for that investment to be translated into on the ground capacity.

PCEP also welcomes the option of **joint bio-based recycled targets**, which can be reached either including recycled content or bio-based materials, the latter being **recognised by using mass balance approach**. All bio-based plastics should be subject to appropriate sustainability criteria.

5. Need for an enforceable definition of reusable packaging and harmonised measurement of reuse

PCEP supports a clear and enforceable **definition of reusable packaging as well as a clear and harmonised approach to measuring reuse**. However, for **sector-specific reuse targets** to be effective, the following **social, environmental and technical aspects need to be taken into consideration**: environmental footprint, logistics and infrastructure, hygiene and consumer safety, consumer behaviour, product integrity and losses in transport and at home as well as different packaging types, business models and markets. Assessment of these need to be science-based and holistic, considering both the pack and the product.

6. Eco-modulation of EPR fees to drive investment in collection, sorting and recycling

Eco-modulation of EPR fees will drive investment in collection, sorting and recycling as well as design for recycling of packaging. This policy therefore should be fully implemented to see how the funds are invested in on-the-ground infrastructure to enable packaging placed on the market to meet the recyclable definition.

7. Single market requires harmonisation of labelling requirements

Harmonisation of labelling requirements is also needed to ensure a single market for packaging in the EU. Such work should be aligned with harmonisation of collection and sorting and work on green claims to ensure new rules are complimentary.

About Polyolefin Circular Economy Platform (PCEP)

PCEP is a unique association and forum for dialogue and cooperation between companies and organisations operating at every point in the polyolefin value chain: brand owners, retailers, waste management organisations, recyclers, converters, producers and any other stakeholders. Our goal is to transform the entire polyolefin system from a linear to a circular one, keeping this valuable material in the economy, at its highest value, for as long as possible.

For more information please visit www.pcep.eu or contact: secretariat@pcep.eu.