

To the kind attention of:

Ms Sophie Müller, Deputy Head of Unit, Standards Policy (GROW.H.3)

Mr Stefano Soro, Head of Unit, Green and Circular Economy (GROW.I.3)

Mr Mattia Pellegrini, Head of Unit, Waste Management and Secondary Materials (ENV.B.3)

Plastics recycling

A call to stop the development of an overarching standardisation request

26 May 2021

Dear Ms Müller,
Dear Mr Soro,
Dear Mr Pellegrini,

ECOS and the co-signing organisations would like to draw your attention to the fact that the planned standardisation request on plastics recycling and recycled plastics risks not to help meet the 2020 Circular Economy Action Plan objectives, and the related ambitious EU targets, which are currently being set for selected sectors. As it stands, this request would contain a list of standards proposed to be developed by the Circular Plastics Alliance (CPA), focusing primarily on industry needs, without sufficient consideration for long-term EU policy goals or ongoing legislative processes.

Consequently, we urge you not to issue this request. Instead, we call for sector-by-sector standardisation requests, supporting the upcoming ambitious EU requirements and methodologies, and following an inclusive and appropriate process in CEN and CENELEC in line with the [Vademecum](#) on European standardisation.

Towards a more ambitious sector-by-sector approach

The proposed standardisation request for plastics recycling relies on an end-of-pipe policy basis: the 2018 European Strategy for Plastics, which sets a ten million tonnes of recycled plastics target by 2025. However, we urge the European Commission to **refocus the standardisation approach to circular design, considering the numerous sectoral initiatives in development**. This will help ensure the supremacy of mandatory legislation over voluntary standards.

Given that, within the Circular Economy Action Plan, the European Commission is currently developing ambitious requirements for packaging, batteries, vehicles, electronics and ICT, as well as construction and buildings, we believe that a **sector-by-sector approach to standardisation, including plastics recycling, should be established in support of these upcoming EU legal requirements, instead of an overarching standardisation request**. These underpinning standards will fully consider key European environmental objectives and definitions, such as plastics recyclability or reusability, and respect the EU waste hierarchy prioritising prevention and reuse over recycling.

In addition, should industry wish to develop standards besides those directly supporting EU legal objectives, the European Standardisation Organisations should develop them without public money.

Towards prioritising EU legislation on plastics recycling

We acknowledge that the development of quality standards for sorted plastic waste and for recycled plastic, put forward by the CPA, can help create a market for recycled plastics and enable their safe incorporation into new products. Yet, **in this situation, we believe that the European Commission should first set the legislative ambition, and standards then be developed or revised to facilitate implementation.**

This is true, for instance, for the EU calculation method for counting, verifying and reporting the recycled content of beverage bottles, which is being developed for the purpose of the SUP targets: the Commission should first set the rules in an EU legal act. CEN should then be mandated to align the standard EN 15343:2007, *Plastics - Recycled Plastics – Plastics recycling traceability and assessment of conformity and recycled content*, as well as any other related standards, with the EU method.

This is also the case for chemical recycling, for which the European Commission should first and foremost set clear regulatory direction. Such legislation should be based on thorough Life Cycle Assessments and should limit chemical recycling feedstock to contaminated and degraded durable [plastics](#). It is only after the regulatory process is completed that standardisation activities in support of these decisions can be envisaged.

Towards an inclusive process

The development, and preparation, of standards should remain transparent and inclusive, ensuring an effective participation of societal stakeholders as set out in EU Regulation 1025 (2012). However, the industry-led process which resulted in the list of standards proposed for the standardisation request was anything but inclusive. European Standardisation Organisations and its contributing members were only consulted for input in the last stages of the process. The consultation timing was also a concern for specific sectors, such as plastics in agriculture and electronics, where the corresponding CEN and CENELEC working groups had very little (if any) time to comment on the CPA list in question.

For all these reasons, **we call on the European Commission to stop the development of an overarching standardisation request on plastics recycling and recycled plastics, and plan sector-by-sector specific requests in its place.**

We would be happy to meet with you to discuss this at your earliest convenience and remain at your disposal for any questions you may have.

Your sincerely,

Justin Wilkes
ECOS Executive Director on behalf of the Rethink Plastic alliance
Environmental Coalition on Standards

Joan Marc Simon
ZWE Executive Director
Zero Waste Europe

CC: Ms Laure Baillargeon, Policy Officer (GROW.I.3), Ms Maja Desgrées Du Loû, Policy Officer, (ENV.B.3), Mr Rana Pant, Policy Officer (ENV.B.3).