

To the kind attention of:

Mr Thierry Breton, European Commissioner for the Internal Market

Mr Virginijus Sinkevičius, European Commissioner for the Environment, Oceans and Fisheries,

Standardisation request process

Request to cease development of Standardisation Request on 'plastics recycling and recycled plastics'

1 February 2022

Dear Commissioner Breton,

Dear Commissioner Sinkevičius,

ECOS and the co-signing organisations would like to draw your attention to the questionable and opaque role of the Circular Plastics Alliance (CPA) in the preparation phase of the Draft Standardisation Request 'plastics recycling and recycled plastics'. European Commission control in initiating, managing and monitoring the procedure for the adoption of a harmonised standard is crucial, given they form part of EU law.

The CPA has been intensively consulted by the European Commission "as a relevant stakeholder initiative" in the drafting and preparation of this first draft Standardisation Request.

In this consultation process, the CPA has however been prioritised in its role as 'other relevant stakeholder', whereas the European Standardisation Organisations (ESOs) and the Annex III organisations have been consulted at a later stage (e.g. for assessing the standardisation needs). As a result, the environmental ambition of the draft is exceptionally low, and is a missed opportunity to support the European Green Deal and bring circular thinking to the plastics sector.

This practice deviates from the process set out in the Standardisation Vademecum in three ways.

The [Standardisation Vademecum part II](#) (section 2.2.2) specifies that "in the preparation phase, the standardisation request is drafted and consultations and discussions on it are held **in parallel** with the ESOs, the Annex III organisations, any other relevant stakeholders and Member States' sectoral experts".

The Standardisation Vademecum part II (section 2.6) stipulates that "when accepting meetings or dialogue with organisations other than those referred to in Article 10(2) of the Regulation, such organisations must be found in the [Transparency Register](#)." Yet, **the CPA is not a legal entity, and majority of the 300 CPA signatories are not registered in the European Transparency Register.**

The file name "SR CPA Decision" is rather telling, and contrary to the Vademecum (part II, section 2.1), which states the European Commission shall be "ultimately responsible for the content of the

request and monitoring its execution". In this case the European Commission has clearly outsourced responsibility for the content of the request to the Circular Plastics Alliance.

Hence, the consultation process in the preparation phase of drafting this SR has not taken place in sufficient accordance with the [Vademecum on European standardisation](#) and should therefore be regarded as a non-transparent process that risks creating an unfortunate precedent.

Consequently, we request that you cease the development of the Standardisation Request and re-initiate the process from the beginning in line with the Vademecum, in accordance with the appropriate drafting of Commission Implementing Decisions, with an inclusive consultation process of the ESOs, Member States and Annex III organisations.

Similarly, we believe it important for future Standardisation Requests to follow fully the process as set out in the Vademecum.

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. We look forward to your response.

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 Pauline Weinzierl and Mr Joan Canton, Cabinet Members of Commissioner Thierry Breton; Ms Rozalina Petrova, Cabinet Member of Commissioner Virginijus Sinkevičius; Ms Sophie Müller, Deputy Head of Unit (GROW.H.3); Mr Stefano Soro, Head of Unit (GROW.I.3); Ms Laure Baillargeon, Policy Officer (GROW.I.3); Mr Mattia Pellegrini, Head of Unit (ENV.B.3); Ms Maja Desgrées Du Loû, Policy Officer, (ENV.B.3).