

WORKING DOCUMENT:
ORGALIME KEY MESSAGES FOR THE DRAFTING OF THE DECLARATION OF
THE CIRCULAR PLASTICS ALLIANCE
Status: 13 May 2019

1. GENERAL COMMENTS

Orgalim suggests the following elements for the VISION to be expressed in the declaration:

- Creating a competitive European market for secondary raw materials where Europe leads
 - o in the development and deployment of cutting-edge intelligent waste management technologies (from collection, to sorting, recycling up to the production of secondary plastics granulate and production of plastic materials with higher recycled content), and
 - o subsequently, in the uptake of quality secondary raw materials in products at competitive prices.
- Europe shapes the circular economy with an international outlook in mind that connects fluently to global markets and sets industry driven standard worldwide. In a Circular Economy, there will be no landfill of waste.
- Europe demonstrates that environmental sustainability, economic prosperity and competitiveness can go hand in hand: we aim at further optimising the use of plastic throughout its life cycle in the light of Europe's broader ambition of a Circular Economy and to do so with the aim of modernising our economy and important long-term societal objectives in mind: a competitive, low-carbon, circular, sustainable economy that creates jobs and growth, and increases the quality of life of citizens.

Orgalim suggestions for OVERALL RECOMMENDATIONS to be given in the declaration:

From technological perspective, the take up of secondary plastics in a first generation of products is generally feasible as soon as secondary raw material in proper quality, quantity and price is made available. The main barriers to be overcome include:

- at the material level: proper quality for the application and its specific use; lack of a method measuring recycled content
- at consumer level: acceptance, affordability of recycled products
- at regulatory level: fragmentation (different waste treatment criteria, no harmonised material quality standards, policy conflicts i.e. with substance legislation or material efficiency vs energy efficiency);

To strengthen the match between supply and demand for recycled plastics and allow as a next step the better uptake of recycled plastics in products, **demand side needs for better take up of secondary plastics need to be addressed, in particular through:**

- **More harmonisation of collection, sorting and recycling of waste:** European standards help creating a level playing field. European standards for the treatment of Waste Electrical and Electronic Equipment (WEEE) have already been developed and are published on the Commission website; the Commission should use the mandate given in article 8.10 of the WEEE Directive 2012/19/EU and adopt implementing acts laying down minimum quality standards based in particular on these standards developed by the European standardisation

- organisations. These standards should then also be pushed at international level. Finally, similar waste treatment minimum standards should be developed for waste streams beyond WEEE.
- **Minimum quality standards for secondary raw materials:** we must improve the output of the recycling process and lift the quality of secondary raw materials to make secondary raw materials more attractive for use. For more use of recycled materials in their products, materials need to meet the right technical criteria in terms of performance, robustness and safety, next to their availability in sufficient quantities at a competitive price. Minimum quality criteria for secondary raw materials based on ISO or EN standards should be set.
 - **Investment into waste management infrastructure:** Europe urgently needs to modernise its existing waste management infrastructures and invest in innovative waste management technologies, including digitally enabled systems as digitalisation and artificial intelligence will be key enablers and innovation catalysts. This will lay the groundwork for the development of large-scale sorting and recycling technology solutions here in Europe.
The future EU budget needs to be coherent with policy requests. MFF, Cohesion Fund, Structural Funds, Horizon 2020 need to support the transition.
 - **Insist on high environmental standards in EU global trade policy instruments** – in particular, to elevate (harmonised) EU waste treatment standards to the global level
 - **At product level:**
 - o **for further implementation of the Ecodesign Directive on ErP:**
 - there is no one size fits all; product specific ecodesign measures where justified from life cycle perspective and on a case by case basis; ensure a transparent, science-based process with stakeholder involvement and minimising life cycle impacts
 - a full-lifecycle approach should be taken to determine whether the use of recycled materials as inputs is necessarily the best approach in all cases. It would be useful to **develop a robust methodology to weigh up the overall costs and benefits for society** of re-using recycled materials containing certain substances compared to energy recovery/disposal. This can also help ensure effective implementation of the Ecodesign Directive as regards resource efficiency, by avoiding simple shifting of environmental burden from one lifecycle stage to another – something that could ultimately expose consumers to safety risks, or manufacturers to the risk of non-compliance with sector-specific product legislation
 - o develop a reproducible, liable method to measure recycled content
 - At the material level, consider ecodesign standards for materials

2. WORKING GROUP SPECIFIC RECOMMENDATIONS AND KEY MESSAGES

WG Collecting and Sorting:

- **Improving the output of the recycling process and lifting the quality of the recycled plastic to make them more attractive for use:** For companies using recycled materials in their products, their number-one concern is understandably that materials meet the right technical criteria in terms of performance, robustness and safety, next to their availability in sufficient quantities at a competitive price. Therefore, the development of industry driven quality standards (CEN/CLC) is needed.
- **Harmonised waste treatment standards across Europe:** when it comes to waste electrical and electronic equipment (WEEE), for example, laying down minimum quality standards for the

treatment of WEEE based on the already existing standards developed by European standardisation organisations could help more consistent quality levels across the EU. Also, more innovative technologies can be brought quicker to the waste treatment sector through the implementation of the Industrial Emissions Directive (for example minimum technical requirements for sorting facilities). In addition, the definition of minimum requirements for sorting plants for packaging waste would be an important step.

- **Further improvement of collection systems in Europe:** establishment of user-friendly collection systems, especially for household waste; feedback systems for emptying process (see e.g. Saubermacher) and dynamic emptying; digitally enabled solutions will be an important enabler for improving collection systems.

WG R&D and Investments, including chemicals recycling:

- To stimulate a long-term market for recycled plastics, it will be essential to **prioritise stepping up the deployment of the cutting-edge intelligent collection, sorting and recycling equipment**. In this context, Europe urgently needs to modernise its existing waste management infrastructures and invest in innovative waste management technologies, including digitally enabled systems. This will lay the groundwork for the development of large-scale sorting and recycling technology solutions here in Europe. This includes although the digitalization of processes processing secondary plastics.
- A key step will be to foster the transparency of the market for secondary plastics. If this is done there will be a chance to scale up business models.
- R&D is especially necessary for food contact materials.

WG Recycled Plastic Content in Products:

- **Minimum quality criteria for secondary raw materials based on ISO or EN standards should be set.** Easy and fair access to competitive, affordable and quality raw materials that meet technological and safety requirements will be a must to secure the competitiveness of Europe's industry in a circular economy. Ensuring REACH compliance of secondary raw materials is one essential parameter for being legally allowed to use them in products.
- **Guidelines for improved recyclability of materials:** Monomaterials in general are better recyclable and lists of desired materials (in terms of recyclability) would be helpful.
- **Acknowledge and address trade-offs:** a higher amount of recycled plastic in products does not automatically lead to environmental improvements. Life-cycle-assessment could help in this regard - develop a robust methodology to weigh up the overall costs and benefits for society of re-using recycled materials containing certain substances compared to energy recovery/disposal.

WG Product design for recycling - recyclability:

- Plastics applied in the technology industry are high-tech materials fulfilling a specific and customized function. It is important to consider that there is no "one-fits-all" approach. Depending on the function and operating conditions, recycling-friendly fixing techniques could contradict with the safety requirements of machines. **To carry forward the success made under the Ecodesign Directive, case-by-case assessment remains crucial. A robust methodology to weigh up the overall costs and benefits for society** of re-using recycled materials containing certain substances compared to energy recovery/disposal should be developed.

- We remind of the **ongoing work of different platforms to develop design for recycling standards for packaging**, e.g.: CEFLEX for packaging or the Round Table Eco Design for plastic packaging (to be available in May 2019).
- **Think in a value chain approach and not in single steps of the recycling and application process of secondary plastics**

WG Monitoring:

- The monitoring system should track
 - the volumes and type of secondary plastics according to the Internat Codesystem der Society of the Plastics Industry (SPI) offered by the supply side pledges;
 - the volumes and types of secondary plastics according to the Internat Codesystem der Society of the Plastics Industry (SPI) that are demanded by the demand side pledges