

Towards a policy framework that enables efficient waste collection, closed loop recycling and access to recycled content

The EU Circular Economy Action Plan has the ambition of accelerating the transition to a circular economy. This will require significant changes in the way we collect, reuse, recycle and incorporate recycled materials. The objective we should aspire to is achieving fully closed and resource efficient waste management systems for all materials. Indeed, the more closed-loop a system is, the more resource efficient it will be by delivering quality recycled materials which can be re-used multiple times for the same application. Therefore, **for each sector, the ultimate goal should be to achieve “closed loop recycling”¹. With the right enabling policy framework this can be achieved.**

For beverage bottles, the first elements of such an enabling framework already exist with the introduction of mandatory separate collection and recycled content targets in the EU Single-Use Plastics Directive. However, it is clear today that **a number of additional policy measures are needed** for beverage producers to be able to meet those targets and move further towards a closed loop system. These are:

- **mandatory minimum requirements² for Deposit Refund Schemes (DRS)** to facilitate the roll-out of efficient waste collection schemes and the achievement of the EU 90% separate collection target;
- **a mechanism to make sure that beverage producers are granted the necessary access** to a fair quota of the recycled materials deriving from the containers they put on the market. This will enable them to comply with the mandatory EU targets for the incorporation of recycled PET and ideally meet their more ambitious voluntary pledges (e.g. UNESDA’s Circular Packaging Vision of achieving 50% rPET in 2025 and 100% in 2030 and NMWE commitments of achieving 50% rPET by 2030) towards fully circular packaging.

A priority of upcoming EU legislation should be to look beyond beverage containers and enable the creation of closed loops for all products and packaging applications. The revision of the Packaging and Packaging Waste Directive, as well as the new

¹ Process in which post-consumer waste is collected and recycled preserving the value of the material so it can be used again to make the same product category it came from with minimal loss of quality or function

² [PRESS-RELEASE-Minimum-requirements-for-NEW-efficient-Deposit-Refund-Systems-in-Europe-for-beverage-packaging.pdf \(unesda.eu\)](#)



Sustainable Products Initiative, the Recycled Plastics Regulation and the Sustainable Textiles Strategy - all offer great opportunities to achieve this.

Recent reports³ have illustrated that post-consumer recycled PET from beverage bottles is increasingly used by non-food sectors (textiles, automotive, etc.) to boost their environmental sustainability credentials. This means that bottles are being recycled (“downcycled”) into other, lower grade applications. The new material created as a result of this process will no longer be recyclable neither for a new non-food application nor for high quality (food grade) new bottles. This is considered as ‘breaking the loop’ (a loss from the circular bottle stream) and goes against the very principle of circularity. In addition, it also creates an unfair situation because food and drink producers are obliged to comply with strict EU health and safety requirements for food contact materials⁴.

The [EU Strategy for Sustainable and Circular Textiles](#)⁵ acknowledges that a growing source of concern is the accuracy of green claims on textile made on using recycled plastic polymers where these polymers do not come from fibre-to-fibre recycling but from sorted PET bottles. *“Beyond the risk of misleading consumers, such a practice is not in line with the circular model for PET bottles, which are fit for being kept in a closed-loop recycling system for food contact materials”*, according to the strategy.

It is time to raise EU ambitions and define “high-quality recycling”⁶. Introducing such a definition in the EU legislation will incentivise investments in recycling infrastructure and foster resource efficiency across the whole production of products and packaging materials.

The EU Strategy for Sustainable and Circular Textiles adds that textile businesses should be encouraged to *“prioritise their efforts on fibre-to-fibre recycling and rather make claims on achievements to address this important challenge in closing the loop for textile products.”*

³ “How circular is PET?” <https://zerowasteurope.eu/library/how-circular-is-pet/>

“PET market in Europe state of play 2022” <https://www.petcore-europe.org/news-events/409-pet-market-in-europe-state-of-play-2022.html>

⁴ [Scientific Opinion on the criteria to be used for safety evaluation of a mechanical recycling process to produce recycled PET intended to be used for manufacture of materials and articles in contact with food | EFSA \(europa.eu\)](#)

⁵ [Textiles strategy \(europa.eu\)](#)

⁶ High-quality recycling could be defined as: “Recycling that ensures that the distinct quality of the material (the polymer, or the alloy, or the glass, or the paper fiber) is preserved or recovered so as to ensure they can be re-used in products with the same market value (compared to the correspondent virgin product) and allows further recyclability of the same quality when reaching their end-of-life. Such “distinct quality” should include, for example, food-contact quality /suitability.”



The shift towards truly circular products and packaging can only be successful if each producer invests in the design for recyclability, collection and incorporation of its own (recycled) materials, without free-riding on others' efforts.

Food and drinks producers are already investing heavily into separate collection to enable good quality material to be recovered. It is time for everyone to play its part.

A number of different policy options should be explored:

- **Inclusion of legal provisions facilitating access to recycled content in the Packaging & Packaging Waste Directive (PPWD)**

The revised PPWD should, as a general principle, grant beverage producers fair access to the food grade recycled materials issued from the products they placed on the market (and which were successfully collected) via a “priority access”, or a similar mechanism that guarantees a “right of first refusal”. This way, it can be used again as recycled content for new beverage packaging. If some of this material is not claimed by beverage producers, it can then be made available for other applications. Such a legal mechanism should be introduced through the governance of the waste collection schemes (EPR and DRS through minimum requirements/guidelines).

- **Introduction of definitions of high-quality recycling and recycled content**

In addition, EU policy initiatives (e.g. PPWD, Sustainable Products Initiative, EU Textile Strategy) should promote the concepts of “closed loop recycling” and “high quality recycling” as recommended best-practices of product-to-product recycling.

EU legislation (including the PPWD) should introduce a harmonised definition of high-quality recycling⁷ and establish, based on this definition, a ranking of recyclability classes. In such ranking, the highest position (priority) should be attributed to packaging that does not pose any recyclability issues and the recycled material can feed a closed-loop scheme and allows further recyclability of the same quality (for example, food-contact) when reaching their end-of-life.

⁷ Currently, high-quality recycling is mentioned in the framework legislation, namely the Waste Framework Directive (e.g. Article 11 – *Preparing for reuse and recycling* and 11a - *Rules on the calculation of the attainment of the targets*); the Packaging and Packaging Waste Directive (e.g. Art. 6a - *Rules on the calculation of the attainment of the targets*) as well as the Single Use Plastics Directive which contains an explicit reference to high-quality recycling for beverage bottles (Preamble 27) and the recently adopted Implementing Decision 2021/1752 on calculation, verification and reporting of beverage bottles (Preamble 5).



A similar logic could be applied to the definition of recycled content which should guarantee that the recycling output is used for the same or a similar (equivalent in terms of quality) application, as a priority.