

NGO-industry coalition calls on policymakers to support a mechanism of preferential access for closed-loop recycling in the EU Packaging and Packaging Waste Regulation

In the context of the trilogues on the [Proposal for an EU Packaging and Packaging Waste Regulation](#) (PPWR), the undersigned organisations would like to express their support to several amendments in the European Parliament's and Council's mandates in relation to the development of a mechanism of preferential access which enables closed-loop recycling.

In particular we support the definition of high-quality recycling in the Council's mandate (n°201b – Article 3, first paragraph, point (32b)) and the following amendments from the Parliament's mandate: n°274a (Article 6(7a)), n°617a (Article 43(1a)) and n°1084 (Annex X, fourth paragraph). These provide critical enablers to support industry in meeting its recycled content targets and enable the closed-loop recycling of packaging, whenever it makes sense and is technically feasible.

We are aware that the development of a definition of high-quality recycling and the references to closed-loop recycling systems in the text have generated concerns from other industries for which closed-loop recycling is not necessarily feasible at the moment or even environmentally beneficial. However, enabling closed-loop recycling by providing packaging producers with the possibility to access the recycled material that would allow it to be used again in the same or a similar application is key.

It is indeed the only way to:

- give the sectors covered by the scope of the recycled content targets a fair access to sufficient recycled materials to actually be able to meet the targets;
- avoid downcycling, whenever preserving the quality or value of the material through closed-loop recycling makes more sense from an environmental and circular point of view, and is technically feasible;
- incentivise all sectors to invest in collecting and recycling their own materials;
- reduce the environmental impact of the recycling process by achieving significant reductions in carbon emissions from the continuous recirculation of material resources.

We also understand that EU recyclers have raised concerns on the impact a preferential access could have on their business. In this context, we would like to highlight the below elements:

- The request from our organizations to better support closed-loop recycling in the PPWR is not driven by the will to reduce the price of recycled materials below the market price. Even with a system of priority access in place, recyclers will still be able to sell food-grade recycled materials at the relevant market price. Such a system has already been successfully established in Slovakia and will soon be established in Austria. As an example, the Austrian Law establishing their upcoming DRS clearly states that *"The central body shall offer to each first distributor, on a pro rata basis, the sorted single-use beverage packaging per material and colour for purchase at market prices."*
- The recent decrease in the demand for recycled materials is only temporary. Indeed, the demand will soon increase with the first deadlines to reach the mandatory recycled content targets approaching (2025 for single-use plastic bottles). The additional recycled content targets set in the draft PPWR will also significantly increase the demand for recycled materials in the coming years.
- Different services of the European Commission are currently working on various measures to further protect EU recyclers against the competition coming from outside of the EU and ensure a level playing field.

We therefore urge you to support the above-mentioned amendments and to reject any proposal aiming at watering down their ambition. In particular, the word "shall" in the Parliament's proposed amendment to Art. 43.1a is extremely important to ensure the measure is implemented in all EU Member States.

We thank you in advance for your attention and **remain available for any question,**

Yours sincerely,

Signatories:

NMWE – Natural Mineral Waters Europe

Minderoo Foundation

Reloop

The Changing Markets Foundation

UNESDA – Soft Drinks Europe

Zero Waste Europe

