

**02 March 2022, Brussels**

# Targets for Plastic Recycled content in Packaging (Eunomia)

Please find below some questions, related to the document from Eunomia.

## Plastic recycled content targets

Table

Description automatically generated

**Assumptions**:

* The Ambitious scenario represents the maximum recycled content that is possible, accounting for the material that would be available by meeting the existing 55% recycling rate target by 2030
* The medium scenario is a less optimistic and considers that recycling targets are missed and/or capacity is not increased as predicted
* No distinction between food contact primary and secondary/tertiary
* No distinction between flexible/rigid
* Targets based on expected increases in post-consumer RC but includes pre-consumer RC with the effect of a 5% increase of each target to account for this inclusion (based on data of pre/post-consumer recycled content from Germany)
* No exemptions for other ‘contact sensitive’ applications such as pharma and cosmetics due to chemical recycling outputs meeting the requirements of these industries
* A derogation from these targets is given to packaging components below 5% by mass

1. **Are the targets set at the appropriate level?**

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1. **Are there any other plastic product/group/categories that should have their own separate targets and why?** e.g. films, ridged, by polymer type

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**Other proposals**:

* Option of a joint bio-based recycled content target
* Can reach targets by either including RC or bio-based
* Must meet sustainability criteria e.g. 30% reduction in GHG compared with fossil
* Provides additional option for applications where RC is challenging

1. **Is it appropriate to accept an equivalence between recyclates and bio-based?**

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1. **Any further comment?**

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**Exemptions form the RC targets:**

* Non-food “Contact sensitive” e.g. cosmetics and pharma

Possible that exemption is unnecessary with either chemical recycling/biobased?

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* Packaging containing plastic (>5%)

Will applying the joiunt bio-based target solve this issue?

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* ‘Small operators’ identified with de minimis thresholds

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* Reusable plastic packaging

Any consequences of providing an exemption?

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## Output capacity requirements for 2030 [ktonne]

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**Assumptions**:

* The estimated recycling capacity are given as an output of material, after recycling process
* The capacity and more is still required for the current recycling targets in the PPWD
* All food grade polyolefins will be recycled by chemical (thermal) recycling and all non-food grade will be recycled through physical processes
* In the ambitious scenario the predicted capacity for chemical depolymerisation of PET is significantly higher than required to reach 35% RC for food contact non-beverage PET

1. **Are the required recycling capacities (for each level of target) achievable in the timeframe?**

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1. **Will the targets set at these levels and for these categories result in material switching? e.g. from or to different polymers or out of plastics entirely**

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1. **Capacity and technology are focused towards polyolefins and PET; ~11% of the packaging market uses other materials such as PS and PVC. Are any materials/product types considered incapable of including recycled content and moving to alternative polymers is not possible?**

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