

Cefic response to the consultation on Single Use Plastics Implementing Act

Cefic welcomes the Commission's ongoing effort in preparing the Implementing Act laying down rules regarding the calculation, verification and reporting of data on recycled plastic content in single-use plastic beverage bottles under the Single Use Plastics Directive (SUPD).

Regarding recital 10 of the draft Implementing Act, Cefic suggests replacing the word "may" by the word "shall" as an admissible chain of custody model as defined in ISO 22095-2020 to also account for plastic in PET and non-PET bottles resulting from chemical recycling technologies, including depolymerisation technologies.

Recently, a joint value chain letter signed by 33 associations representing the major market sectors along the European plastics value chain urged the Commission to adopt in 2023 an EU-harmonized rule for calculating chemically recycled content through mass balance.¹

In that regard, Cefic urges the Commission to present the so-called phase II amending the Implementing Act, establishing a methodology to calculate, verify and report recycled plastic content in beverage bottles for content not obtained by mechanical recycling of PET waste in a timely manner, before the end of 2023, to provide legal certainty.

Cefic urges the Commission to allow a mass balance chain of custody for chemical recycling depolymerisation processes to effectively leverage existing infrastructure and to repurpose existing industrial installations for the circular economy.

In addition, it is important that Table 1 of Regulation 2022/1616 (suitable processes) should allow future updates to include other technologies/recycling methods as the circular transition proceeds.

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About Cefic:

Cefic, the European Chemical Industry Council, founded in 1972, is the voice of large, medium and small chemical companies across Europe, which provide 1.1 million jobs and account for 15% of world chemicals production.

¹ <https://cefic.org/app/uploads/2023/03/Joint-letter-to-the-European-Commission-urging-the-adoption-in-2023-of-an-EU-harmonized-rule-for-calculating-chemically-recycled-content-through-mass-balance.pdf>