

Circular Plastics Economy for Non-food Packaging

Requirements for the Implementation of the EU Circular Economy Action Plan

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Executive Summary

Plastic packaging is light, inexpensive, durable, versatile and therefore an integral part of everyday life today. In principle, plastics can be recycled several times, but this requires cooperation between manufacturers, consumers and the recycling industry. If plastics are not disposed of and treated properly, uncontrolled plastic pollution of the environment will occur.

The “**circular economy**” aims to retain resources and return materials to the economic cycle during the entire “life cycle” of products. Raw materials or the products made from them should be used as long, as often and as efficiently as possible. Primary raw materials – such as crude oil – are replaced by secondary raw materials recycled from waste – such as recycled plastics.

In March 2020, the EU Commission presented its new **EU Circular Economy Action Plan**, which envisages various amendments to EU waste legislation, including specifications for plastic packaging, in order to create a circular economy:

- The Ecodesign Directive 2009/125/EC is to be extended to as many products as possible and sets targets for the proportion of recycled plastics. In addition, new requirements in the Packaging Directive 94/62/EC are intended to reduce “overly complex” packaging and to ban certain packaging materials for specific applications.
- With regard to product labelling, minimum requirements are to be laid down for sustainability labels and logos and for the information provided by manufacturers. This is to ensure that no inaccurate environmental claims are made and that consumers are protected from “greenwashing”.
- Separate collection systems for waste should be harmonized to ensure effective collection and sorting of waste.
- In order to create a “well-functioning” EU internal market for plastics recycles EU-wide harmonization of end-of-waste criteria for certain waste streams. In addition, the market for secondary raw materials is to be strengthened by standards that ensure a high quality of the collected waste.

In principle, in many cases the proposals of the EU Commission point in the right direction in order to strengthen an **EU-wide recycling-oriented plastics industry also for non-food packaging**. However, rigid regulatory targets and binding specifications should be replaced by a higher degree of flexibility. In addition, efforts to create an EU internal market for plastics recycles should be intensified. Against this background, the further implementation of the EU Circular Economy Action Plan through measures of the EU and its Member States should fulfil the following requirements:

▶ **Design of plastic packaging**

In the context of “extended producer responsibility”, the EU Member States should in future have to adopt a more uniform approach. In particular, the cost allocation for packaging waste should be harmonized throughout the EU within the framework of eco-modulation. This prevents conflicting incentives in the EU internal market and facilitates packaging design without harming the environmental objective. Binding targets for a minimum content of plastics recyclates in packaging should be replaced by a phased fiscal incentive for companies to use higher proportions of recycled plastics in packaging.

▶ **Labelling of plastic packaging**

EU-wide uniform provisions on the environmental properties of plastic packaging can help consumers to make an informed choice. The labelling of plastic packaging should not, however, give the impression that a high proportion of plastics recyclates or the best possible recyclability automatically goes hand in hand with the best environmental performance. Other dimensions such as the weight of packaging should also be taken into account.

▶ **Collection and sorting of plastic waste**

EU-wide harmonization of systems for collecting and sorting plastic waste can improve the economic efficiency of plastics recycling.

▶ **EU internal market for plastics recyclates**

It should be possible to trade plastics recyclates in the EU internal market under uniform conditions throughout the EU. To this end, EU-wide criteria should be laid down for the classification of plastics as “by-products” and for determining the “end of waste status of plastics”. Furthermore, standards for EU-wide quality standards for plastics recyclates should be laid down. This would reduce the existing uncertainty about the quality of plastics recyclates. To ensure that these are used for as many purposes as possible, graduated standards for food and non-food packaging would be appropriate.