



Subject: NGO-Business Coalition supports the objection to the draft Implementing Act for the calculation of recycled plastic content in single-use plastic beverage bottles.

On 18 April, the ENVI Committee will discuss and vote on a motion for a resolution by MEP Jutta Paulus to the draft Commission Implementing Decision on the mass balance approach under the Single Use Plastics Directive (SUPD). The undersigned organisations - civil society organisations and companies active along the waste management value chain - strongly support this motion.

We believe that the Commission's draft in its current form would create an unlevel playing field between recycling technologies, keep consumers from taking sustainable purchasing decisions due to structural greenwashing and therefore contradict the objective of the SUPD to promote the transition to a circular economy.

While this Implementing Decision could set a precedent for future regulations in Europe – including Packaging and Packaging Waste Regulation (PPWR), End of Life Vehicle Regulation (ELVR) and Ecodesign for Sustainable Products Regulation (ESPR) – waste management stakeholders warn that a premature decision could influence market dynamics for decades. It is thus crucial to maintain ambitious goals and oppose opaque and distorting rules running against environmental and circularity objectives.

The undersigned organisations recall that **more than 80% of the packaging falling within the scope of this Implementing Decision is made of PET, a plastic that is today properly and safely recycled by mechanical process.** Thanks to the investments of the European mechanical recycling industry, the installed capacity for PET food-grade in 2022 is already enough to meet, not only the 2025 target of 25% recycled content for beverage bottles, but also the 2030 target. Thus, the plastic waste streams that are currently mechanically recycled should not be tampered.

Moreover, pyrolysis or gasification - the very technologies for which this Implementing Decision was designed - cannot accept PET as their feedstock and are designed for recovery of substances from other plastics (mainly PE and PP), for which recycled content targets are set for

2030. It therefore seems inappropriate to expedite and use a legislative instrument with such a narrow scope to shape the future of an entire recycling industry.

Finally, this NGO-Business Coalition stresses that, **as drafted, the Implementing Decision could lead to unfair competition for access to waste feedstocks between technologies that are claimed to be complementary, thus jeopardising the mechanical recycling businesses.** Indeed, the mechanical recycling of plastic waste represents 30,000 jobs in 850 companies, 90% of which are SMEs and could be directly affected by such competition.

In this context, we - civil society organisations and companies active along the waste management value chain - call on you to support the motion for a resolution presented by MEP Jutta Paulus in the ENVI Committee.

Sincerely,