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EuRIC - The European Recycling Industries' Confederation



New rules for the calculation of recycled plastic content in single-use plastic beverage bottles

**EuRIC'S RECOMMENDATIONS
AUGUST 2025**

EuRIC on the new rules for calculating, verifying and reporting on recycled plastic content under the SUPD.

18 August 2025

EuRIC - the European Recycling Industries' Confederation - believes that developing **robust and fair calculation methods for the recycled content** is of paramount importance to ensure **a level playing field** for all recycling technologies. This is particularly relevant at a time when the mechanical recycling industry is experiencing a serious crisis with numerous bankruptcies across Europe, due to lack of demand for recycled materials, low prices for virgin plastics and unfair competition from third countries imports.

Following the publication of the draft **implementing decision on the rules to calculate, verify and report the recycled content in single-use beverage bottles**, EuRIC believes that the current draft contains **major shortcomings** that should be addressed to ensure a level playing field and a technological neutral approach, which enables **the complementarity between different recycling technologies**.

Introduction

The Single-Use Plastics Directive (SUPD), adopted in 2019, established an important precedent by setting recycled plastic content targets for the first time in legislation. How to calculate and verify these targets for plastic beverage bottles, to be met by 2025 and 2030, is equally important. Hence, the **Commission's Implementing Decision on the calculation, verification and reporting data on recycled plastic content in single-use plastic beverage bottles** is of the utmost importance, as it will set a path for upcoming legislation for packaging, vehicles and other products.

EuRIC strongly supports the development of calculation and verification methods at EU level that ensures the highest level of traceability and strength of claim when counting recycled plastic content. Strict and transparent rules are needed to ensure a higher circular use of plastics that drives positive environmental change while respecting the level playing field between recycling technologies

However, EuRIC believes that the current draft implementing decision goes against the principles of proportional traceability, which creates a high risk of contradiction with the spirit of the SUPD and its objective of promoting circularity with the lowest possible impact on the environment. **EuRIC regrets that a fuel exempt method has been chosen, and**

the focus has been placed exclusively on pyrolysis, while other technologies such as solvolysis, that can deliver high-quality PET recyclates, have been ignored. This contradicts the requirement for a technology-neutral approach. We regret that a polymer-only mass balance method was not favoured, which would have provided greater transparency and trust from final consumer.

Definitions, methodology & traceability

Although the draft implementing decision is supposed to be applicable to all relevant recycling processes, the new rules are focused mostly on pyrolysis. However, among the list of definitions, only the definition of “mechanical recycling” is included in Article 1, leaving the interpretation of “chemical recycling” open to interpretation. Moreover, the definition of “chemical building blocks” is also too narrow, as it refers to chemical raw materials for polymer production rather than recovery products from chemical recycling.

Most importantly, we do not support the replacement of “plastics” output by “non-fuels”, as this new category would also include co-products outputs. This prevents having a plastic-focused traceability and clear reporting of recycled content, making no distinction between physical and attributed recycled content and very difficult to have readable data for the 2030 revision, particularly on the evaluation of the ability of chemical recycling to achieve plastic-to-plastic loops, which is the ultimate goal. It undermines the clarity of the rationale for chemical recycling, namely the production of recycled polymers, and does not encourage improvements in process yield in this regard. This blurs the original recycling message and highlights fuel production, i.e., energy recovery. Thus, we recommend keeping **two different categories “plastic” and “non-fuel other than plastic”** to ensure traceability of the different materials.

EuRIC welcome the explicit mention that **data must come from operational production** and not from a decorrelated industry average that would bring inconsistencies with real recycled content quantities.

EuRIC advocates for a transparent and rigorous approach to protect the circular economy's integrity and therefore opposes credit transfer between recycling sites. EuRIC supports reality-based criteria ensuring recycled content is measured at product level. Hence, we support the **ban on negative credits** and **on credit trading between sites or companies** – which are already included in the draft text. In addition, EuRIC does not support the possibility to **carry a positive account of attributed amounts over into the next period without any iteration limit**, as this creates another significant breach of the level playing

field with mechanical recycling and contribute to speculation and market volatility, to the detriment of higher traceability.

Prioritization of the best environmental recycling pathway

EuRIC calls for the legal anchoring of the prioritization of mechanical recycling over chemical recycling, based on their respective environmental impact. Although it is clearly stated in Recital (27), the draft text lacks a provision that ensures that mechanical recycling technologies will be preferred to chemical recycling technologies, unless it is not technically feasible. This is a direct threat for mechanical recycling feedstocks and for the environmental benefits of recycling. We therefore propose to amend the definition of 'eligible material' (Art 1.7) as follows: *'eligible material' means post-consumer plastic waste and material stemming from post-consumer plastic waste, such as recycled plastic and material for which the recycling process has not yet been completed. **If, for a given plastic waste, chemical recycling has a higher environmental impact than mechanical recycling and mechanical recycling is available for equivalent quality applications, then it shall not be considered as eligible material for chemical recycling;***

Ensuring a level playing field through a mirror clause

EuRIC welcome the introduction of **strong verification obligations and a third-party certification**. However, we regret the absence of a mirror clause, which does not guarantee that imported recyclates produced from chemical recycling outside the EU, or products containing such material, with the goal of fulfilling recycled content obligations, are calculated according to the same rules. The absence of such a trade protection measures jeopardizes seriously the competitiveness of the European recycling industry until 2030, from which the mirror clause of the Packaging and Packaging Waste Regulation applies. Five years is enough time to close many recycling facilities and thus to no longer have sufficient capacity in 2030 to meet obligations. Thus, EuRIC urgently **calls for the introduction of a mirror clause** to ensure that plastic waste collected and/or recycled outside the EU complies with the same environmental, social and quality standards applied in the EU. This is essential to safeguard the future of the EU recycling industry while ensuring a level playing field.

EuRIC, the European Recycling Industries' Confederation is the umbrella organisation for the recycling industries in Europe. Through its 80 members from 24 European countries, EuRIC represents more than 5,500 large companies and SMEs involved in the recycling and trade of various resource streams. They represent a contribution of 95 billion EUR to the EU economy and 300,000 green and local jobs