

Revision of the rules on single-use plastics (SUPD): EU Recyclers' recommendations.

16 March 2026

Executive Summary

In this paper, Recycling Europe sets out a series of recommendations to strengthen the implementation of the **Single-Use Plastics Directive (SUPD)** and to support forthcoming legislation aimed at advancing the circular economy for plastics:

- **Strengthen 2030 PET Targets:** Increase the mandatory recycled content in PET bottles to **50% rPET** to accelerate the transition towards a circular plastics economy.
- **Short-Term Demand Measures:** Introduce a **bonus system** for recycled content exceeding 25% and implement **safeguard measures** on imported virgin PET to protect EU operators from unfair competition.
- **Robust Enforcement and Penalties:** Ensure that penalties for non-compliance **exceed the economic advantage** of non-compliance, thereby reinforcing legislative integrity and incentivising investment in recycled materials.
- **Prioritisation of Recycling Technologies:** Promote recycling technologies based on their **carbon footprint and environmental performance** to ensure efficient achievement of recycled content obligations.
- **EU-Origin Recycled Materials:** Support the use of **recycled plastics derived from EU-collected and recycled waste**, reducing dependence on imports and strengthening the internal recycling market.
- **Mirror Clauses and Import Compliance:** Ensure rigorous enforcement of mirror clauses for non-EU recyclers through **on-site audits, random border checks, and harmonized sanctions**, guaranteeing that imported plastics comply with EU environmental and quality standards

Recycling Europe is the voice of Europe's recycling industry, including 80 national federations and companies across 24 EU & EFTA countries. From metals and paper to plastics, textiles, tyres, ships, construction & demolition waste and WEEE, our members transform waste into resources—powering Europe's circular economy, ensuring resource autonomy, and boosting competitiveness and sustainable industrialisation across the continent. We look forward to continued cooperation with the European Commission to foster a strong and competitive market for recycled materials.

Introduction

The European Union is a global frontrunner in environmental legislation, having introduced pioneering and ambitious measures such as mandatory recycled content targets. In 2019, **the Single-Use Plastics Directive** became the **first piece of legislation** to establish recycled plastic content requirements for beverage bottles. This measure has significantly boosted the uptake of recycled plastics and, in turn, driven a substantial expansion of recycling capacity. As a result, installed input recycling capacity in the EU has doubled in just a few years, rising from 6.6 Mt in 2018 to 13.5 Mt in 2024.

Additionally, the **recycled content targets for plastic beverage bottles under the SUP Directive have been effective in decoupling recycled PET price from oil-based ones**, driving significant investments in food-contact recycling technologies. Consequently, the installed capacity for food-contact rPET is sufficient to meet both 2025 and 2030 targets.¹

This clearly shows how **pragmatic mandatory EU recycled content targets for plastics are the most efficient policy tool** to stimulate demand for recycled materials and secure investments to scale up capacity in Europe.

However, despite significant efforts and investments to expand Europe's plastic recycling capacity, **recycling companies are increasingly struggling to remain viable**. This challenge arises primarily from insufficient demand for recycled plastics and a **growing influx of low-cost imports from third countries**.

In this context, **the main drawback of the SUPD** is the risk that the EU's recycled content targets could be fulfilled through **increased imports of recycled plastics from third countries**, rather than by reinforcing the EU's domestic recycling capacity.

This approach not only risks undermining the European recycling industry but also raises concerns regarding environmental integrity. Recycled plastics imported from third countries may not consistently meet equivalent environmental, social, or traceability standards to those applied within the EU. This creates potential challenges related to verification, quality control, and greenwashing.

In short, although the recycled content targets under the SUPD are intended to promote circularity, the absence of strong safeguards or incentives to prioritise EU-based recycling may ultimately lead to relying on imports instead of strengthening domestic systems.

¹ The installed capacity for food-grade in 2022 was already at 1.4 million tons, while the beverage industry would require 800 thousand tons to meet the 25 % mandatory recycled content target in 2025, and about 1 million tons in 2030.

Recommendations

Review of the 2030 targets and complementary measures

Following the review of the Directive, the targets may be revised and increased according to the implementation. Recycling Europe believes it is necessary to call for greater ambition and faster implementation of the recycled content obligation for PET bottles by raising the target to 50% rPET in bottles by 2030

However, given the current crisis facing the plastic recycling sector, short-term measures to stimulate demand are also needed. In particular, Recycling Europe calls for the implementation of:

- **A bonus system for the incorporation of recycled material mandatory beyond the 25% rPET target**, which should be incorporated in the reviewed SUPD.
- **Safeguard measures on imported virgin PET from third countries.** Following the approval of anti-dumping measures on PET from China in 2024 and the investigation concerning PET from Vietnam in 2025, Recycling Europe calls on the Commission to establish safeguard measures to protect the EU industry from unfair competition. These trade measures could prove more effective than anti-dumping duties, given their broader scope and the existing evidence of the negative impact of growing imports on EU operators.

Enforcement gaps and penalties

Penalties must constitute a genuine and effective incentive to comply with circularity and recycled content requirements. To achieve this, they should be set at a level higher than, the economic benefit gained from non-compliance.

If penalties are equivalent or lower than the financial advantage obtained by failing to meet the requirement, non-compliance risks becoming a rational business decision rather than an exception. **Recycling Europe calls for a robust penalty framework to ensure a level playing field, safeguard the integrity of the legislation, and effectively drive investment in recycled materials.**

Recycled Content & Equivalence Implementation

The **rules for accounting for recycled content under the Single-Use Plastics (SUP) Directive** are fundamental to the future of plastics circularity in Europe, as they set a precedent for the rules that will apply under the PPWR, ELVR and potentially the ESPR.

Taking into account the latest developments in the methodology for target calculation, when the Commission is requested to assess the complementarity of different technologies, **Recycling Europe recommends a prioritisation of recycling technologies based on their carbon and environmental footprint to ensure the achievement of recycled content obligations.**

Moreover, Recycling Europe would like to highlight the **urgent need to promote and prioritise the use of recycled plastics derived from waste collected and recycled within the European Union.** Thus, Recycling

Europe welcomes the adoption of the SUPD implementing act that will reserve recycled content exclusively for materials recovered from recycling operations (including sorting) carried out in the European Union. However, limiting this support measure to 2027 significantly reduces its scope and effectiveness at a time when the European plastics recycling industry is facing a critical situation that requires a strong and lasting response. Such a limitation also risks setting a highly negative precedent for the PPWR.

The implementing act also establishes that, as of 21 November 2027, the recycled plastic can also be recycled (included sorted) in **an OECD country** or in **a non-OECD country with which the Union has concluded an agreement** to ensure the plastic waste is treated in accordance with EU standards related to human health and environmental protection requirements.

Recycling Europe urges for **the “mirror clause”** to be rigorously enforced with regard to third countries and for Member States to receive the necessary resources to ensure that imported plastics and products containing recycled materials fully comply with EU standards.

Recycling Europe emphasizes the need to ensure the **quality of imported rPET** by conducting on-site audits at facilities outside the EU, in order to monitor compliance with EU environmental and quality standards by non-European recyclers.

EU equivalence should apply not only to individual facilities in third countries, but also at national level. Only countries that can guarantee environmentally sound waste management in line with EU rules, and that have equivalent circular economy measures in place (including separate collection systems, extended producer responsibility schemes, and recycled content requirements) should be granted access to the European market.

Last but not least, Recycling Europe advocates for a **robust enforcement** framework to ensure compliance with mirror clauses. This includes monitoring their implementation through **random checks** at EU borders and establishing **harmonized sanctions** in cases of non-compliance with the equivalent EU standards. Moreover, **gradual and coordinated penalties** should be applied across Member States for companies that fail to meet these requirements, ranging from financial fines to the withdrawal of import authorizations, ensuring a level playing field and consistent enforcement throughout the Union.