



PPWR: EuRIC's voting guide for the plenary session

Brussels, 22 November 2023

Ahead of the plenary vote on the pivotal revision of the PPWR, EuRIC shares its key recommendations:

Support for AM 435: Robust Methodology Ensuring That Recycled Content Placed on the EU Market Actually Comes from Recycling

EuRIC fully endorses AM 435, laying out a robust methodology to guarantee that recycled materials in products are genuinely sourced from recovery and recycling processes. This is critical to prevent greenwashing, ensure compliance of imports with recycled content targets, and safeguard a level playing field in the European recycling industry.

Reject Priority for Recycled Materials (AMs 102, 266, 341)

Granting large producers a right of first refusal could allow them to dominate the market and control pricing, negatively impacting European recyclers, primarily SMEs. Such a measure could undermine the recycling sector's viability, hindering circularity, investment, and innovation, since it would impede recyclers from operating under viable economic conditions.

Rejection of Bio-Based Plastics in Recycled Content Targets

EuRIC strongly opposes including bio-based plastics in recycled content targets. This move risks confusing the objectives of circular and bio-based economies, diluting the emphasis on design-for-recycling. Manufacturers should be encouraged to create products designed for recycled plastic packaging, not given a loophole. Bio-based plastics should only be supported when they don't compromise the recyclability of plastics and replace petroleum-based materials, not recycled content.

EuRIC opposes Article 7 – paragraph 11 a (new) added by Rapporteur F. RIES and backs AMs 451 and 461, contingent on a separate vote.

Reject a Credit-Based System for Recycled Content

The proposed credit-based system detracts from the high-quality and closed-loop goals of the PPWR, conflicting with "high-quality" standards for secondary raw materials (Article 3 (32a)). To reduce

market interference, fixed minimum targets for recycled content should be maintained, avoiding a credit system that may permit lower quality grades. This approach ensures a more effective and direct influence on recycling market dynamics, removing market interference in recycling markets when it comes to directing flows (priority access).

