

Brussels, 01 March 2023

Dear Members of the European Parliament,

On behalf of the undersigned NGOs and beverage industry associations, and in light of the upcoming vote on the ENVI Committee's report on the EU Strategy for Sustainable and Circular Textiles, we want to raise your attention to [the issue of downcycling PET beverage bottles in textiles](#) claimed to be "sustainable" or "circular".

The Strategy presented by the European Commission acknowledges as a growing source of concern the accuracy of green claims on textiles made by using recycled plastic polymers where these polymers do not actually come from fibre-to-fibre recycling but come instead from PET bottles. *"Beyond the risk of misleading consumers, such a practice is not in line with the circular model for PET bottles, which are fit for being kept in a closed-loop recycling system for food contact materials"*, according to the Strategy. The Strategy adds that textile businesses should be encouraged to *"prioritise their efforts on fibre-to-fibre recycling and rather make claims on achievements to address this important challenge in closing the loop for textile products."*

We have indeed observed in recent years a worrying trend for non-food sectors (such as the textile sector) to make green claims related to the use of recycled material coming from the food-grade recyclable packaging the beverage sector puts on the EU market (and for which it finances the collection). Let's be clear: this is not circularity!

In the EU today, an estimated [32%](#) of PET drinks bottles collected for recycling remain in a closed loop – that is, recirculated into new bottles. The remaining [68%](#) is cascaded (downcycled) into other PET product applications where it cannot be recovered and recycled back into new bottles due to the change in its material properties¹.

While this trend puts in danger the capacity of the beverage sector (and in particular of SMEs) to access the necessary food-grade recycled material to achieve the EU mandatory recycled content targets, we believe it also goes against the principle of a circular economy where closed loop recycling should be promoted and where so-called "downcycling" is avoided.

We have been extremely pleased to see this critical issue being addressed in the EU Strategy for Sustainable and Circular Textiles, and recognised by the Rapporteur MEP Delara Burkhardt in her report which states that the European Parliament *"agrees with the Commission that the production of clothing from recycled bottles is not consistent with the circular model for PET bottles and calls for extended producer responsibility schemes and other measures for textiles to incentivise investment in fibre-to-fibre recycling solutions and investments in sorting for reuse, ideally local"*.

¹ [Reloop-Target-90-Report-FINAL.pdf \(reloopplatform.org\)](#)

However, we are concerned by some proposed amendments to this report (especially amendments 274, 278, 279 and 280) that seem to tone down the clear signal sent by the Commission and MEP Delara Burkhardt.

We believe that prioritising bottle-to-bottle and fibre-to-fibre recycling is a fundamental objective and the proper legislative framework needs to be put in place urgently to make it happen in practice.

Therefore, we call on the members of the European Parliament to refrain from supporting amendments watering down the clear message against breaking the loop of PET bottles. Instead, the European Parliament should call for the concepts of high-quality and closed-loop recycling to be incorporated and promoted in all relevant pieces of EU legislation (including the Packaging and Packaging Waste Regulation, the Green Claims Directive, the Empowering Consumers for the Green Transition Directive, the Waste Framework Directive, etc.), as an enabler for achieving circularity. Furthermore, a legal mechanism must be created to ensure that food-grade recycled materials are not downcycled anymore.

We would greatly appreciate it if you could consider our views and give us an opportunity to discuss this critical issue in the coming weeks. We thank you in advance for taking our concerns into consideration,

Kind regards,

