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# CASE STUDY

## A Call for Action on Recycled-Content Mandates

**Building a multi-stakeholder coalition to drive the demand for secondary materials by promoting minimum recycled content requirements in Europe**

### What was our challenge?

According to the United Nations, more than 300 million tons of plastic waste is produced worldwide every year, of which only 9% is recycled.<sup>1</sup> Among the numerous negative impacts, failing to collect plastic waste directly contributes to the loss of valuable resources, leaving governments, manufacturers, and recyclers in a vulnerable position, unable to meet demand for recycled plastics without sufficient flows of input materials. This is the case for processors of PET (polyethylene terephthalate) beverage bottles in Europe, for example, which don't have sufficient material to meet existing PET recycling capabilities.

When Reloop was founded in 2015, no measures had been implemented at the EU level to drive the demand for recycled materials and complete the second half of the cycle in a more circular economy. With a few exceptions, like California in the U.S., legislation mandating a minimum percentage of recycled content in plastic packaging or even plastic products was non-existent. Over the previous decades, European legislation had predominantly focused on the supply side (generation of waste) by setting collection and recycling targets. Although such supply side policies are important, they are not sufficient on their own to achieve significant increases in recycling. To “close the loop” on plastic waste and create a true circular economy, **Reloop knew it was important to increase the demand for recycled materials and get the ball rolling on mandatory recycled-content requirements. And so that's what we did.**

### What did we do?

The first thing we did was dig in to the research and learn everything we could about recycled-content in house. **In addition to web-based research, we interviewed experts in the collection, sorting, and recycling of plastics.** We learned not only about the technical issues associated with recycling of plastics, such as quality of recycled material and yield loss,

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<sup>1</sup> UN Environment Programme. 2 January 2019. “Plastic recycling: an underperforming sector ripe for a remake.” Accessed from <https://www.unenvironment.org/news-and-stories/story/plastic-recycling-underperforming-sector-ripe-remake>

but also about the massive benefits that come from using greater quantities of recycled material (including plastics, metal, paper, and glass) in products and packaging, and the market dynamics of virgin vs. recycled materials.

Following the research, **we summarized our findings into a short position paper and developed a compelling set of recommendations** specifically geared towards European legislators. We shared the paper with our network and asked them to join our coalition - a coalition established on a temporary basis with the singular goal of introducing minimum recycled-content requirements for plastic products and packaging.

The coalition was broad and powerful, and included representation from more than 30 industry organizations, municipalities, and environmental NGOs. The paper titled "[Call for EU Action on Recycled Content Mandates for Plastics](#)" was sent to the Commission in July 2018.

Later, in November 2018, Reloop developed and co-signed a second "[Call to support binding recycled content targets in beverage bottles](#)", which urged the European Council to support the binding target of at least 35% recycled plastic in beverage bottles by 2025. Together, the co-signatories of the coalition call emphasized that this target, voted by the European Parliament on 24 October 2018, is "instrumental in the achievement of the objectives of the Single Use Plastics Directive (SUPD) and in igniting the much supported transition towards a more circular economy."

## What results have we seen to date?

Today, the SUPD includes a 25% target for recycled content in PET bottles by 2025 and at least 30% in all plastic bottles by 2030. The targets cover plastic bottles with a capacity of up to three litres, including caps and lids.<sup>2</sup> The relevant text from Article 6(5) of the SUPD is given below:

### *Each Member State shall ensure that:*

- a) From 2025, beverage bottles listed in Part F of the Annex which are manufactured from polyethylene terephthalate as the major component ('PET bottles') contain at least 25 % recycled plastic, calculated as an average for all PET bottles placed on the market on the territory of that Member State; and
- b) From 2030, beverage bottles listed in Part F of the Annex contain at least 30 % recycled plastic, calculated as an average for all such beverage bottles placed on the market on the territory of that Member State.

### Beverage bottles listed in Part F of the Annex

Beverage bottles with a capacity of up to three litres, including their caps and lids, but not:

- a) Glass or metal beverage bottles that have caps and lids made from plastic,
- b) Beverage bottles intended and used for food for special medical purposes as defined in point (g) of Article 2 of Regulation (EU) No 609/2013 that is in liquid form.

<sup>2</sup>Arthur, R. 21 May 2019. "EU sets out 30% recycled content target for plastic bottles." Accessed from <https://www.beveragedaily.com/Article/2019/05/21/European-Council-sets-out-30-recycled-content-target-for-plastic-bottles>

## Reflections

What is so interesting about this story is that no part of the SUPD proposal included any reference to recycled content mandates. Instead, the Commission launched an EU-wide voluntary pledging campaign to ensure that by 2025, ten million tonnes/year of recycled plastics would find their way into new products on the EU market.<sup>3</sup> The exercise was addressed to both private and public actors, who were invited to come forward with pledges by 30 June 2018.

By the end of 2018, 70 pledges had been submitted to the European Commission by companies and business organizations representing the full supply chains for the major plastic materials recycled in Europe.<sup>4</sup>

While the voluntary commitments represented a first attempt at creating more transparency, the European Commission's first assessment published in 2019 illustrated the gap between committed supply and demand, making it clear that voluntary initiatives were not sufficient and that "harder policies" were needed to push greater uptake of recycled materials. In the end, the Parliament and Council agreed that the case should be made to introduce mandatory recycled content for plastic beverage bottles in EU legislation.

While this success certainly cannot be attributed to Reloop alone, it is fair to say that we had a **significant influence** on the now legislated design requirements for plastic PET bottles in Europe. Reloop was effective because we made the case, put in the work, and did what we needed to do to make it happen. By **establishing a strong, broad-based coalition with diverse interests and uniting them for a common goal, we demonstrated legitimacy with lawmakers**, increasing the likelihood that they would support our position.

Amid current shifts in global markets, the future of the circular economy is at a crossroads, and there's no time to waste. In the U.S., recycled-content mandates present a golden opportunity to stimulate increased domestic investment in recycling infrastructure by providing assurance to sorters and recyclers that key government officials – and society in general – are committed to promoting recycling, improving quality and efficiency, and increasing capacity. Now is the time to bring together the myriad actors in what Reloop likes to call the value chain of circular plastic, so this is what we are focusing on next.

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<sup>3</sup>"How to submit your voluntary pledge?" Guidance document. June 2018, Brussels. Accessed from <http://www.circularity.eu/content/uploads/2018/06/2018-06-14-Guidance-document-voluntary-pledges-Plastics-Strategy-updated.pdf>

<sup>4</sup>European Commission. 4.3.2019. "Commission Staff Working Document: Assessment report of the voluntary pledges under Annex III of the European Strategy for Plastics in a Circular Economy." Accessed from <https://ec.europa.eu/docsroom/documents/34267>