

Questionnaire for Industry Representatives Regarding the Calculation, Monitoring and Verification of Recycled Content

Introduction

This questionnaire forms part of the data gathering for the project ***“Study to develop options for the calculation, verification and reporting of recycled content”*** which is being conducted by Eunomia Research & Consulting Ltd for the Directorate General for the Environment of the European Commission. The objective of this study is to assist the Commission in developing and assessing a set of options to:

- Develop a general method for the calculation, verification and reporting of recycled content of plastics;
- Refine the method for single-use plastic beverage bottles setting out clear and detailed rules for the calculation, verification and reporting of recycled content that could be directly used in formulating the related implementing acts of the Single-Use Plastics (SUP) Directive; and
- Adapting the method to other relevant policy areas than SUP.

The aims of this survey are as follows:

1. To gain an understanding of any existing policies and practices in Member States or elsewhere for calculating, verifying and reporting the amount of recycled plastic content in products; and
2. To gain an understanding of any existing data regarding recycled content in materials and products.

We would very much appreciate detailed responses to the questions to ensure all available information is taken into consideration. This questionnaire is organised into 2 sections:

1. Questions
2. Contact details

Please record your responses in English in the boxes provided under each question (the boxes will increase in size as you write). Please be concise where possible, but if you are attaching additional documents with your response, please include the document name in the response for the relevant question(s) so it is clear which document relates to which question.

Questions

1. ***Have you implemented or are you aware of any verification/Chain of Custody schemes in your industry that cover the monitoring of recycled content in products placed on the market? If so, please provide details of the scheme and the approach being taken to calculate, monitor, verify and certify the amounts of recycled content. Please provide contact details of the scheme coordinator here if possible.***

Currently there is no widely agreed method for measuring the amount of recycled content. Tests can be conducted in a laboratory on a case by case basis to determine if recycled content is present.

Further methodologies need to be developed to determine the amount of recycled contents in a whole production chain.

Across the range of materials in use, including all suppliers big and small, the only practical way of accounting for recycled content is to measure and audit a business on a mass balance basis according to polymer type across individual sites

See EuCertPlast Certification Scheme for plastic recycling plants and plastic converters. <https://www.eucertplast.eu/> (calculation on a mass balance basis)

Mass Balance definition of Ellen MacArthur Foundation: Mass balance is a consideration of the input, output, and distribution of a substance between streams in a process or stage. A method to match output (i.e. products with recycled content) with input (i.e. quantity of recycled feedstock) within a predefined system boundary (see below) and within a given booking period (usually one year).

- 2. Please describe any verification/Chain of Custody schemes, whether certified or not, that you are aware of in your industry which do not specifically relate to monitoring of recycled content in products. This could include for example, sustainability certifications, organic certifications, hazardous substances, criteria for Green Public Procurement, national eco-labels etc. Please provide contact details of the scheme coordinator here if possible.*

Examples of Green Public Procurement in the public administrations:

- In Italy: with the publication of Law 221/2015 Italy has been the first country among the EU MS, to impose the obligation of Minimum Environmental Requirements application for public contractors.
- In the Netherlands: a voluntary, non-legally binding code for recycled content in products has been established.
- In Sweden: In 2010, Stockholm County Council introduced stringent new environmental requirements for purchasing computers, which must contain at least 10% recycled plastics
- From April 2022, the UK plans to impose an additional tax on plastic packaging containing less than 30% recycle. The proposed rate is GBP 200 (around EUR 227) per tonne of plastic packaging.
- In Germany: The amendment of the German law on circular economy entering into force on the 29.10.2020 creates a new obligation for German federal public authorities to give preference to ecologically advantageous products in future procurement (instead of the simple obligation to verify if ecologically advantageous products are available, as applicable so far).
- The Public Waste Agency of Flanders (OVAM) plans to promote the use of plastic recyclates in building applications via the Flemish purchasing policy (Green Procurement).

- 3. Do you have in place or are you aware of any plans to introduce schemes/policies to increase the levels of recycled content in products, or are you aware of any industry voluntary agreements in your sector? If so, please provide details of these, including how they are intending to calculate, monitor and verify the amounts. Please provide contact details of the scheme coordinator here if possible.*

The Circular Plastics Alliance covers the full plastics value chains and includes over 175 organisations representing industry, academia and public authorities. The signatories take action to boost the EU market for recycled plastics up to 10 million tonnes by 2025'. To help boost the EU market for recycled plastics to 10 million tonnes of recycled plastics by 2025 and to show their commitment to this goal, stakeholders made voluntary pledges to produce or use more recycled plastics.

FEAD is a member of the circular plastics alliance and one of the main discussed topics is how to define the recycled plastics. We insist on defining “recycled plastics” as the plastics originating from waste, namely materials recycled from products which have reached the waste status and we insist not to include by-products in the calculation of recycled contents.

The Public Waste Agency of Flanders (OVAM) plans to promote the use of plastic recyclates in building applications via the Flemish purchasing policy (Green Procurement). They have identified 9 different applications for which a study will identify what the possibilities are to impose a Recycled Content for public procurement. This study will be finished by the end of October.

In Flanders, as from 2021, a Recycled Content is imposed for garbage bags via the Flemish environmental legislation, all garbage bags have to be made of at least 80% RC (of which 50% post-consumer RC).

4. ***Do you already collect data on the levels of recycled content in products placed on the market? If so, please provide details and email any relevant documents to Caroline Bradley at RC_measurement@eunomia.co.uk.***

See EuCertPlast Certification for plastic converters.