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FEAD feedback on the JRC's assessment of the definition of recycling

FEAD, the European Waste Management Association, representing the private waste and resource management industry across Europe, welcomes the opportunity to comment on the ongoing **JRC's assessment of the definition of recycling**.

With regards to plastic chemical recycling and plastic chemical recovery in the assessment of the definition of recycling, we deem that some essential aspects should be clearly analysed and considered.

In particular, FEAD reiterates that a clear distinction between “plastic chemical recycling” and “plastic chemical recovery” is essential. There are, in fact, various plastic chemical recycling technologies which produce outputs with very different environmental and economic impacts. **We recommend that only plastic chemical recycling technologies which produce polymer materials would be defined as “recycling”. On the contrary, processes that produce feedstock for petrochemicals (such as syngas or oil) should be defined as “chemical recovery”.** Once entering the petrochemicals industry, tracing the path of materials (while it is used for production of additional middle distillates, fuels or for material production purposes) is nearly impossible. At this stage, further work is needed to establish a strict, certified monitoring/tracking method, allowing chemical recycling to count towards recycling targets if intermediate products (e.g. pyrolysis oil) are used in plastic-to-plastic recycling schemes.

The above distinction within the waste hierarchy serves the purpose of clearly defining a priority scale between different waste management activities with very different environmental, energy and climate impacts and to circular economy objectives. We believe that, in line with the objectives of the circular economy, polymers should be kept in use as long as possible and fuel production should be only kept as last resort.

Moreover, clarifying the distinction between “plastic chemical recycling” and “plastic chemical recovery” minimizes the risk of diverting waste supply chains from reuse and recycling towards fossil fuel recovery.

Another upcoming technology which deserves consideration, in addition to the existing plastic chemical recycling technologies, is Carbon Capture and Utilization, implemented in a WtE plant, which could be used to manufacture recycled plastics (and other organic materials). CCU could in the future complement mechanical recycling of municipal waste streams.

FEAD considers that the definition of “recycling” is clear and well defined in the Waste Framework Directive. The majority of investments made by the mechanical recycling industry are based on this particular definition. Therefore, FEAD reiterates its support to the existing legislative framework, as providing a clear level-playing field for all actors involved.

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