

“HOW TO SUBMIT YOUR VOLUNTARY PLEDGE?”

Guidance document

June 2018, Brussels

Scene setter

The EU Plastics Strategy published on 16 January 2018 launched an EU-wide voluntary pledging campaign to boost the uptake in recycled plastics in new products on the EU market. To achieve swift, tangible results, this exercise is addressed to both private and public actors which are invited to come forward with pledges by 30 June 2018

The Commission organized in March 2018 four information sessions for packaging, building and construction, automotive and electronic/domestic appliances sectors. The **principal aim** of these workshops was to update potential participants with the latest information about the pledging exercise and to receive feedback.

This guidance document provides information on how to submit the pledge.

The EU Strategy for plastics and the pledging exercise

Objectives of the EU Plastics Strategy

Promoting efficient use of resources makes a lot of sense for business, and should help improve its competitiveness and profitability. The transition towards the circular economy calls for systemic changes that facilitate the emergence of radically new business models, value chains and industrial structures. The circular economy is not only about environmental protection and sustainability; it is also about creating new business opportunities and making Europe's industry more competitive.

By adopting the Plastics Strategy the Commission has set 3 main objectives:

- to improve the economics and quality of plastic recycling, ensuring a stable market for recycled plastics with clear growth perspectives;
- to ensure new economic opportunities combined with social innovation; and
- to curb plastic waste and littering.

Boosting demand for recycled plastics

Weak demand for and lack of a stable and predictable supply of recycled plastics are the major obstacles to transforming the plastics value chain.

The uptake of recycled plastics in new products is low and often remains limited to low-value or niche applications. Recycled plastics today only account for about 6% of the EU demand for new plastics materials, representing 3 million tonnes/year. Uncertainties concerning market outlets, profitability on the one hand and availability of recyclates of sufficient quality on the other hand are holding back the investment necessary to scale up and modernize EU plastics recycling capacity and boost innovation.

While certain actions of the Plastics Strategy will stimulate measures to support recyclability such as design for recyclability and better sorting of plastic wastes, including legislative changes, standardization and better implementation and enforcement of existing tools (e.g.

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Waste Framework Directive), a particular action aims at directly boosting the European market for recycled plastics.

This is the **EU-wide pledging campaign for the uptake of recycled plastics.**

The objective is to ensure that by 2025 ten million tonnes/year of recycled plastics find their way into new products on the EU market.

This represents a significant increase compared to the current situation i.e. 7 million tonnes/year of newly incorporated recycled plastics.

The pledges received will be the basis for an assessment by the Commission (as of October 2018). This assessment will determine next steps to be taken, including possible regulatory actions, to promote the uptake of recycled plastics in the EU.

Guidelines for candidate applicants to the pledging campaign

1. Who can participate?

All stakeholders being part of the plastic value chain are invited to take part in the pledging exercise, from waste management authorities and recyclers, from plastic producers to converters, including final users and procurers. A few examples of potential participants:

- A converter of plastics manufacturing final product (packaging, home appliances, window frames, bumpers etc.)
- A brand owner selling products made of or containing plastics,
- A municipality in charge of waste management,
- A private or public procurer,
- A plastic waste collector and/or recycler, public or private.

It could also mean a national or a European federation representing these actors, for instance, the European food retailers association.

2. What type of pledge do we expect to receive?

The key focus of the pledging exercise is on the contribution to an enhanced **uptake of recycled content** in new products. Therefore, the applicants shall either commit:

- to replace partly or fully the primary (or "virgin") plastic polymers by secondary plastic polymers i.e. resulting from recycling of plastic waste, or
- to collect/sort/make available on the market a certain amount and quality of plastic waste specified by type of polymer, or
- to require that products they purchase will contain a certain amount of recycled plastics.

For example¹:

- a soft drink company can make a pledge that his PET bottles are currently containing 25% of recycled content (if this is the case) and will contain 75% of recycled PET by 2025.
- a waste collector (public or private) can make a pledge that the amount of plastic waste collected and sorted and thus made available for high quality recycling will be increased by 20% compared to the current rate.
- a recycler can make a pledge that currently X tonnes of good quality recycled plastics are made available each year and that by 2025 additional 2 million tonnes of recycled plastic (by polymer or for a certain type of application) will find their way back into new products on the EU market.
- a public authority in charge of public procurement can make a pledge that by 2025, all publicly purchased office equipment containing or made of plastic, will contain at least 10% of recycled plastic content or that by 2025, all plastic drinking bottles purchased for public event purposes will contain at least 25% of recycled content. A similar pledge can also be made by a private company.

¹ The list of examples is not exhaustive and is provided only for illustrative purposes.

Stakeholders may also indicate **complementary pledges** covering other aspects which are relevant to achieving the objectives of the Plastics Strategy, e.g. when they are committing to improve the **recyclability** of plastic products/articles/parts that they are manufacturing or selling or improving plastic waste collection schemes at local level.

3. How to avoid double counting?

Double counting can occur when a pledge made by an individual member of an association or federation is accounted as part of the pledge of the same association for the same product.

In order to avoid **double counting**, a stakeholder pledging individually cannot include this pledge into the pledge of an association or federation it is a member of. When a pledge is made by an association or a federation on behalf of its members, the position paper complementing the questionnaire (see below) shall contain a list of its members contributing to its pledge and indicate their respective share. The stakeholder may however make a separate pledge that is not covered by the collective pledge covering different polymers/plastics.

Pledges that are not about the uptake of recycled content in products such as share of recycled content in articles publicly procured, guarantee to ensure availability of a certain amount of high quality recycled plastics, ensuring adequate plastic waste collection and sorting will be assessed as push/pull measures contributing to achievement of the overall goal and therefore accounted separately.

4. How to submit a pledge?

All applicants are invited to submit their pledge to the Commission by 30 September 2018.

The **template** for submitting the quantitative data concerning the pledge is the questionnaire that is available at the [EU Survey homepage](#).

After filling the questionnaire with all the quantitative data requested applicants are invited to notify the Commission by sending an email to the functional mailbox: GROW-ENV-RPLASTICS-PLEDGE@ec.europa.eu.

The Commission encourages applicants to submit short position paper (4 pages max.). In their position paper they should provide at least the following information:

- Information about the current use of recycled plastics e.g. is it the first time that you intend to use recycled plastics, etc., if the pledge refers to new use or increased use of recycled plastics, as new application, in the same or new product.
- Does the pledge refer to the whole finished product or just a component of such product e.g. PET bottle (whole finished product), bumper (component of a car). Please also provide information about where the product is manufactured and if possible, where recycled content will come from.
- Description of the product in which you plan to incorporate recycled content e.g. color, functionality, other technical aspects, application etc.
- Description and explanation of conditions for a best-worst case scenario, including possible bottlenecks, enabling conditions to be met, etc. Please also provide information about milestones and how you will monitor the progress made.
- If a pledge is made by an association on behalf of its members, the position paper should also contain a list of those members who are part of the pledge and indicate their respective share in the pledge made.

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- Contact details in case of additional questions.

The two documents (the questionnaire and the short position paper) will serve as a basis for the assessment that the Commission will elaborate: the questioner will gather all the quantitative data to analyze and aggregate, the position papers will be the input for a qualitative analysis that will help identifying what are the steps to be undertaken at policy and legislative level.

A message confirming the good receipt of the pledge will be sent to the applicant by the coordinator of the functional mailbox. This may be accompanied by some questions to the applicant to complement the information it provided initially.

5. Confidential treatment of information and aggregation of data

The Commission will aggregate the information submitted by applicant per polymer and per sector (packaging, construction, automotive, appliances, others) and publish the figures of the pledges as well as the names of the applicants or associations/federations. Only the overall quantity of recycled plastics pledged for will be communicated to general public.

This information will be made publically available on a dedicated page of the website set up by DG GROW and DG ENV in the context of the Circular Economy Platforms, where stakeholders have been invited to come forward with circular economy-related commitments.

Optionally, the applicant for the pledge may also be providing the information that can be made public in a separate dossier to be published on the website. Similarly, information that the applicant for the pledge does not want to be made publicly available should be clearly indicated.

In any case, the Commission will ensure confidential treatment of information accordingly to the existing data protection rules.

Annex III to the Plastics Strategy

Annex III to the Strategy gives more detail on this initiative:

- 1. The European Commission calls on stakeholders to come forward with voluntary pledges to boost the uptake of recycled plastics. The objective is to ensure that by 2025 ten million tonnes of recycled plastics find their way into new products on the EU market.*
- 2. Interested companies and/or industry associations have until 30 June 2018 to submit their pledges to the following email address: GROW-ENV-RPLASTICS-PLEDGE@ec.europa.eu*
- 3. When sending in their pledges, stakeholders are asked to provide the European Commission with data illustrating how their pledge contributes to achieving the quantitative objective set in paragraph 1. Such data will be treated confidentially and will be used exclusively for the purpose of monitoring overall progress towards the quantitative objective. Pledges will be put under quality check, and assessed against their reliability and ability to meet declared deadlines.*
- 4. When sending in their pledges on recycled content, stakeholders are welcome to make pledges covering other aspects which are relevant to the strategy, such as design for recyclability.*
- 5. The pledges received will be made public through a dedicated webpage.*
- 6. By 31 October 2018, the Commission will present an assessment of the pledges received and their overall contribution to the quantitative objective set in paragraph 1. Should the contribution be deemed insufficient, the Commission will start work on possible next steps, including regulatory action.*
