

**To:** PELLEGRINI Mattia (ENV); [REDACTED] (ENV); [REDACTED] (ENV);  
[REDACTED] (ENV); [REDACTED] (ENV); [REDACTED]  
(ENV); [REDACTED] (ENV); [REDACTED] (ENV)  
**Cc:** [REDACTED] (ENV); [REDACTED] (ENV)  
**Subject:** Flash report: Meeting CAB Timmermans with Plastics Europe on chemical recycling and mass balance

Flash report: Oct 13 Meeting CAB Timmermans Plastics Europe

Topic: Chemical recycling and mass balance

Participants:

- [REDACTED] – CEO, Covestro & President, PlasticsEurope
- [REDACTED] – Managing Director, PlasticsEurope
- [REDACTED] – External Affairs Director, PlasticsEurope
- [REDACTED] – CEO Europe & VP Olefins/Polyolefins Europe and Asia, Braskem
- [REDACTED] – CEO, INEOS Olefins & Polymers Europe North
- [REDACTED] – Director Government Relations & Public Affairs, SABIC
- [REDACTED] (??), Exxon
- COM: [REDACTED] (CAB Timmermans), [REDACTED] (ENV B.3), [REDACTED] (ENV.B.3)

Plastics Europe:

- Green Deal is important to them.
- Industry is changing but asks for a supportive policy framework.
- Plastics Europe is conducting a Flagship study with [REDACTED]. This study will come up with new investment needs. They offered to present findings by Jan 2022 to EVP Timmermans directly.
- Plastics industry wishes to contribute to CE, but they need to develop scenarios related to the 7 billion euro investment needs that have been identified for chemical recycling.
- Chemical recycling is an umbrella for several technologies, is complementary to mechanical (not an either or).
- Industry wants to be at the forefront of circular economy globally.
- Key points are required to open the door. Acceptance of a mass balance approach is essential. Necessary to integrate existing facilities fast. Accountability will be ensured. LCAs are important.
- They want Europe to become the leader in this field. Unintended consequences by not setting the framework conditions in the right way should be avoided.

[REDACTED]:

- Stated that so far they took a rather cautious approach.
- Research needs on energy consumption, overall environmental impacts and LCA. Also negative impacts on CE need to be avoided.
- The relation to product design related efforts also would need to be better clarified, if and how product design will be effected.
- On mass balance she indicated that she had not yet the time to dive deeper into the topic but that some stakeholders brought forward that this could be problematic for transparency.

I made the following points:

- It is important that also the technologies summarised under chemical recycling adhere to the provisions of the existing legal framework given in the WFD, i.e. that plastic waste used for internal energy consumption or resulting in fuel products cannot count towards the targets.
- It is important to ensure complementarity with mechanical recycling instead of being in competition, as mechanical recycling tends to have a better environmental profile.
- Trust building by verification, certification and audits will be as important as calculation rules in the context of the SUPD and the PPWD.
- Some concerns were raised on the transfer of credits of recycled content from a food contact materials perspective as the actual recycled content does not seem to be under control anymore.

Next steps:

- [REDACTED] invited all to send relevant documentation to her.
- Plastics Europe indicated the wish for a follow up meeting with Env.B.3 to provide further input on how to appropriately reflect chemical recycling in ongoing and upcoming initiatives.

Thanks and best regards, [REDACTED]