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**To:** [BRAUN Helena \(CAB-TIMMERMANS\)](#); [PETROVA Rozalina \(CAB-SINKEVICIUS\)](#); [CANTON Joan \(CAB-BRETON\)](#)  
**Cc:** [REDACTED] [REDACTED] [REDACTED] [\(CAB-TIMMERMANS\)](#)  
**Subject:** follow-up: meeting with Eastman (linked to Ares(2022)409406 & Ares(2022)545421)  
**Date:** vendredi 11 mars 2022 15:22:41  
**Attachments:** [Eastman EU presentation Feb2022.pdf](#)  
[Eastman Position European Circular Economy French.pdf](#)  
[Eastman Position European Circular Economy.pdf](#)

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Dear Helena, Rozalina and Joan,

It was great speaking to you last week. Thank you so much for your availability.

As promised please find hereby the answers to your questions which we could not answer anymore during the call due to lack of time.

If you have any other questions or would like to receive more information/data, please do not hesitate to contact us.

- **Eastman Technology:**

- Polyester Renewal Technology (PRT) – depolymerization all the way to basic polymer building blocks, monomers (rDMT and rEG).
- Material-to-material recycling, i.e. polyesters (or polyethylene terephthalate) to PET or specialty copolyesters.
- rDMT Eastman depolymerisation technology has a 29% lower global warming potential than fossil-based DMT. Link to detailed [LCA summary report](#).
- At Eastman facility in France, materials could be produced with greenhouse gas emissions up to 80 percent less than traditional methods due to the technology's inherent efficiencies and the renewable energy sources available in France.
- More details in the pre-read/Eastman EU Presentation & Advocacy position paper (please see attached).

- **Feedstock:**

- **What kind of waste will Eastman use? Will there be any primary raw materials mixed in the feedstock?**
  - Polyesters: e.g. textiles (apparel, carpets), packaging that cannot be mechanically recycled, waste from mechanical recyclers, etc.
  - Current plans do not include use of primary raw materials (fossil derived monomers) for polymerization. However, depending on the final polymer product mix, small amounts of primary feedstock may be required.
- **Competition with mechanical recyclers?**
  - As explained during the call we do not want to use waste that can be mechanically recycled, our focus is the waste which is currently not recycled but sent to incineration, or ends up in the environment.
  - Instead of concern regarding competition between recycling technologies, consideration should be given to facilitation of better collection and sorting.
  - There is a lot of waste, which is not properly collected and sorted – even for packaging for which EU MSs already have EPR schemes in place, there are a lot of shortcomings. Current collection and sorting systems are outdated, there is a need for investments for example in advanced sorting technologies.
  - Depolymerization offers possibility to convert waste to pure monomers, which can be safely used in sensitive applications e.g. food contact products, offering complementarity to mechanical recycling leading to **reduction in the use of natural resources** to create

plastics for essential uses.

- **Definition of Recycling:** we completely agree that there is already a definition of recycling in EU legislation and that it serves its purpose. However, when it comes to waste and recycling issues we still face challenges at individual MS level. It is essential that there is harmonisation within the EU how to tackle the waste issue: harmonised definitions like recyclability and end of waste criteria, but also acceptance and recognition by all MSs that chemical recycling is recycling and the output should count towards the upcoming recycling metrics including recycled content targets.
- **Chain of custody Mass Balance** – Acceptance of the principles of a chain of custody mass balance approach for the accounting and attribution of recycled content from chemically recycled materials. Traceability must follow what is **chemically & technically possible. Clear claims backed by certification** & supported by educational materials. Conversion calculations must appropriately reflect manufacturing **yields and losses**, e.g. any process output used for energy or fuel should not count as recycled content (please see more details in the pre-read and position paper).
- **Regulation (EC) No 282/2008** (Recycled plastics) – the regulation exempts chemical depolymerization (reference to use in accordance with Reg (EU) 10/2011). We support this as our chemical depolymerization process results in virgin quality monomers.

Thank you for taking our input into consideration.

Kind regards,

