

From: [REDACTED] (ENV)
To: [REDACTED] (ENV)
Subject: Meeting report - Meeting between FFH and Cefic on chemical recycling and mass balance
Date: lundi 7 novembre 2022 09:09:23

On 7 September a meeting took place on chemical recycling and mass balance in the framework of SUPD/PPWD.

Participants :

Martin Brudermueller (MB)	Cefic (BASF)
Richard Roudeix (RR)	PlasticsEurope (LyondellBasell)
Marco Mensink (MM)	Cefic
[REDACTED]	BASF
Virginia Janssens (VJ)	PlasticsEurope
[REDACTED]	BASF

For ENV:

FFH

KS

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FFH and KS congratulated PlasticsEurope and Cefic on their commitment to support a 30% mandatory recycled content target for all plastic packaging by 2030. This was seen by all as a step in the right direction.

MB stated that there is no silver bullet to achieve circular economy for plastics and that several pathways have to be explored and implemented in parallel.

MB highlighted that this 30% recycled content commitment was not easy to agree with all member companies and it was important that chemical recycling and mass balance are essential to implement it.

MB mentioned different approaches to mass balance that would lead to different cost increases to industry and agreed that while a mass balance with free allocation is what industry would like to achieve, they can work with a mass balance approach that exempts fuel use.

MB highlighted the relevance of gaining legal clarity and security for significant upcoming investments of 2.6 billion Euros by 2025 to 7.2 billion Euros by 2030 in Europe in chemical recycling.

MB stressed that for a fast implementation of ambitious recycling and recycled content targets it was important to be able to use existing plants.

FFH highlighted the positive role that chemical recycling can play in complementing mechanical recycling due to the high quality of the output.

FFH mentioned the current framework for chemical recycling which would exclude energy use and the use as fuel products from counting towards recycling and recycled content targets.

KS elaborated that the Commission is technology neutral but that all technologies have to play under the same rules, which are given under the Waste Framework Directive (WFD).

KS mentioned that the WFD is to be reviewed in 2023, and that any action would need to have a

very strong justification as per Better Regulation rules.

RR agreed that Chain of Custody (CoC) approaches will be needed and accepted by industry to control the source of the input plastic waste and the outputs, including audits, similar to financial accounts.

RR mentioned that industry preferred an existing scheme like ISCC+.

RR also mentioned the relevance of imports from outside of the EU to be taken into consideration.

MM and MB reiterated the importance to build and maintain trust with robust rules and audits.

KS highlighted that the calculation points that were recently adapted to more appropriately calculate the recycling targets of the PPWD cannot be changed. Any calculation rules for chemical recycling need to be future proof.

FFH mentioned that we still need to know more about the environmental footprint of the various technologies involved in chemical recycling.

FFH closed the meeting thanking all participants for the constructive spirit.

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