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 Commissioner for Better Regulation, Interinstitutional
 Relations, the Rule of Law and the Charter of Fundamental Rights
 The European Commission
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Brussels, 29 January 2019

Dear Vice-President Timmermans,

Subject: Accelerating the transition towards a Circular Economy for plastics

Happy new year! I'd like to express Unilever's appreciation for your efforts in addressing the negative effects of plastics and stimulating the transition towards a circular economy for plastics in 2018. We look forward to supporting these efforts in the new year and are grateful for your leadership.

The reason I write is twofold. First, I would like to reiterate Unilever's commitment to circular packaging, especially in Europe, and confirm the leadership role we plan to continue to play in this area. Second, I would like to seek your help in unlocking barriers to accelerating and scaling solutions. At Unilever, we value legislation that creates a level playing field for businesses and encourages all relevant actors to get on board.

Pioneering & ambitious commitments

Unilever was one of the pioneers, two years ago, to:

1. Commit to 100% recyclable plastic packaging by 2025. Specifically, to ensuring our plastic packaging is fully recyclable, reusable or compostable¹. More companies have now joined this journey, together representing over 6 million tonnes of plastic packaging per year².
2. As part of the *Pledging Campaign* of the European Strategy for Plastics; we have committed to increase the amount of recycled plastic content in our packaging, developing a new market for recycled plastics and driving demand for quality throughout the plastics value chain³.

CC: Vice-President Mr. Jyrki Katainen, Commissioner for Jobs, Growth, Investment and Competitiveness

¹ [Unilever commits to 100% recyclable plastic packaging by 2025](#) (January 2017)

² [Eleven companies take major step towards a New Plastics Economy](#) (January 2018)

³ [European Strategy for Plastics - voluntary pledges](#) (November 2018)

Taking our responsibilities with a solutions-based approach

Unilever continues to innovate, recently adopting a progressive plastics strategy with three objectives: **'Less, Better and No plastic'**⁴.

To deliver these objectives, we are working with multiple starts-ups and scale-ups to create more supply of recycled plastic for use in our products. Examples include Netherlands-based Quality Circular Polymers (QCP) and Ioniqa, part of the EU PolynSPIRE Project⁵. We now use QCP's mechanically recycled polymers in Axe and Dove products and worked closely with Ioniqa to scale up its novel chemical 'upcycling' process for food grade plastic (to be used in our Hellmann's dressings bottles). The first commercial scale Ioniqa plant, will be opened in Geleen at the Brightlands Chemelot Campus, in the first half of 2019.

Potential unlocks

As we move at speed, designing and implementing these changes, we have encountered challenges which require collaboration to unlock. Key issues that are currently preventing an increase in the availability and usage of Post-Consumer Recycled Material (PCR) are:

- **Improving quality across the plastics value chain:** the key purpose of packaging is ensuring product safety and quality. As we aim to use more PCR in our packaging, we require high quality PCR. Currently, there is not a sufficient supply of high quality PCR in Europe. Quality requirements in various steps of the plastics value chain will support players (sorters, recyclers, compounders) to increase and standardize levels of purity and so increase the quality and number of applications.

It would therefore be helpful if:

- The European Commission (EC) defines quality criteria for each step of the plastics value chain, helping to develop a market where recycled plastics can be used for different consumer product categories, ranging from household cleaning to food packaging.
- **Clarity on criteria for recycled plastic for packaging across the Single Market:**
100% recycled content is a bold ambition for various Unilever-brands. Partnerships, such as with Ioniqa, are crucial to ensure technical feasibility. However, the lack of pan-EU approved processes for recycling plastics for food use is limiting PCR application in many types of food products. We are able to move much faster towards more PCR for our European Home and Personal Care products than for Foods. As long as the EC - supported by positive EFSA opinions- does not formally approve additional recycling processes to increase PCR capacity, the regulation 282/2008 is not fully enacted. We also still face a patchwork of local rules and enforcement approaches. For example, Italy maintains a limit of 50% recycled PET for food packaging (although technically, 100% recycled content is possible and found safe in other markets).
Secondly, for several types of polymers, like PP and PE, it has been difficult technically to meet the strict EFSA criteria for recycling, whereas such processes already have been permitted for food use for example in the USA. 'Chemical' recycling is a potential alternative to these physical recycling processes, but with other economic limitations.

⁴ [Rethinking plastic packaging: Towards a more circular economy](#)

⁵ [PolynSPIRE: Demonstration of Innovative Technologies towards a more Efficient and Sustainable Plastic Recycling](#)

It would therefore be helpful for:

- The EC to swiftly approve the materials that can be used safely for food packaging based on the positive opinions that EFSA has published. On publication, the regulation 282/2008 would come into full force and would make any current country specific provisions obsolete. The sooner these processes are formally approved, the faster we can expand some of our existing plans.
 - The EC to ensure that the current provisions on chemical recycling for food use remain largely intact to ensure that such processes remain acceptable from a regulatory perspective to enable a viable route for food use of recycled polymers like PP and PE and to enhance options for recycling PET.
 - The EC to review the safety assessment criteria of EFSA versus those in other countries like USA, with the objective to speed up routes to have physical recycled PP, PE and HDPE approved for food use.
- **Eco-fee Modulation to incentivise recyclable packaging and PCR use:** Currently most recycled plastics are of lower quality, experience more volatility in supply and carry a 10-15% price premium vs virgin plastic from fossil raw materials. Also, there are no financial incentives to further purify recycled plastics, thus limiting full circularity. A bonus-malus system built in the Extended Producer Responsibility (EPR)-schemes can provide an incentive to develop recyclable packaging and increase the level of good quality recycled material if implemented Europe-wide (national examples include CITEO in France and the Dutch Packaging Waste Fund).

My team and I would be happy to discuss progress, as well as potential areas to further unlock acceleration, with you and your organization. We could do so in Brussels or at one of the companies I referred to near Geleen, if you are interested, so we can see the circular economy 'in action'.

Thank you again for your leadership. We are convinced that joint public/private efforts will stimulate more progress towards a circular economy for plastics across the EU.

Warm regards,

