



Sustainability criteria for plastic recycling technologies on PPWR

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The European Association of Chemical Distributors (Fecc) welcomes the opportunity to provide feedback on **the Commission's Call for Evidence on sustainability criteria for plastic recycling technologies under Regulation (EU) 2025/40 on packaging and packaging waste (PPWR)**.

Fecc supports the objective of ensuring that recycled plastics used to meet the PPWR's recycled-content targets deliver genuine environmental benefits and are produced through environmentally sound and high-quality recycling processes. From the perspective of chemical distributors, the practical implementation of these criteria will also be important for the **availability, quality and reliable sourcing of recycled plastics** across European value chains.

Against this background, Fecc would like to share the following considerations.

1. Technology neutrality and innovation

Fecc considers it important that the sustainability assessment remains technology-neutral. Different recycling technologies can address different waste streams and produce materials with different characteristics. Assessing technologies primarily on their demonstrated environmental and economic performance could therefore help ensure that no particular technological pathway is unintentionally favoured.

Such an approach could also provide sufficient flexibility for emerging technologies to develop as the recycling market evolves.

2. A holistic assessment of environmental performance

Fecc supports considering energy use, greenhouse gas emissions and other environmental impacts, as foreseen by the PPWR. These parameters could be considered together when assessing the overall environmental performance of a recycling technology, rather than relying on a single indicator.

Factors such as energy consumption, GHG emissions, resource efficiency, material recovery and yield, residues and the quality of the recycled output may all contribute to the overall performance of a technology.

3. Quality and usability of recycled output

For downstream users and distributors, the practical value of recycled plastics is closely linked to their **quality, consistency and suitability for the intended application**.

Fecc therefore welcomes the consideration of output quality within the sustainability assessment. At the same time, it may be useful to avoid a one-size-fits-all definition of "high-quality" recycling, as technical requirements can differ between applications.

An application-oriented approach could help increase confidence in recycled materials and facilitate their wider uptake across industrial value chains.

4. Economic performance and availability

Fecc also considers the economic dimension relevant to the assessment. The PPWR's recycled-content targets will require sufficient quantities of suitable recycled plastics to be available on the market.

Where sustainability requirements result in significant additional costs or unnecessarily restrict the range of eligible technologies, this could have downstream effects on **availability, supplier choice and the cost of recycled materials**.

Taking economic performance, scalability and market availability into account alongside environmental performance could therefore help support the practical achievement of the PPWR's objectives.

5. Proportionate evidence and verification

The sustainability criteria will interact with the PPWR framework for calculating and verifying recycled content and with the requirements applicable to recycled material originating from third countries.

Fecc considers it important that these elements work together coherently and do not result in repeated requests for the same information.

For downstream economic operators, including distributors, it would be helpful if technical information generated and verified at the recycling stage could be relied upon further along the value chain. Recognising appropriate existing certification and third-party verification could also help keep the system proportionate, particularly for SMEs.

6. International supply chains

Recycled plastics are traded internationally, and Fecc welcomes the PPWR's approach of allowing recycled content from third-country installations where equivalent sustainability standards are met. From a supply-chain perspective, it may be useful for equivalence to focus on **comparable environmental and quality outcomes**, rather than requiring third-country operators to reproduce the EU regulatory framework in every detail.

Recognition of credible international standards and independent verification, where they provide equivalent assurance, could help facilitate access to recycled materials while maintaining a high level of environmental protection.

Fecc supports the Commission's objective of ensuring that recycled plastics used under the PPWR are produced through environmentally sound and high-quality recycling processes.

From the perspective of chemical distribution, Fecc considers that a **technology-neutral, proportionate and outcome-oriented approach** could help achieve this objective while maintaining the availability and usability of recycled materials across European value chains.

In particular, Fecc would encourage consideration of:

- the overall environmental and economic performance of recycling technologies;
- the quality and suitability of recycled output for its intended application;
- the availability and scalability of recycled materials;
- proportionate and non-duplicative evidence and verification requirements; and
- workable approaches for international supply chains and equivalent third-country standards.

Such an approach could help provide the confidence needed to increase the uptake of recycled plastics while allowing sufficient flexibility for the market and recycling technologies to evolve.

To access the Fecc's response on EU Commission's website, please click [here](#).

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