

Press release

Renewable Carbon Initiative (RCI)

www.renewable-carbon-initiative.com

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Bio-based content, compostable plastics, and chemical recycling – many opportunities for more innovation and sustainability in the new Packaging and Packaging Waste Regulation (PPWR)

The Renewable Carbon Initiative's position paper highlights chances for the EU to lead the way to a sustainable packaging industry and to promote innovation

In November 2022, the Commission adopted the Proposal for a Regulation of the European Parliament and of the Council on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC. The proposed regulation includes several rules that would – if implemented – push for a much stronger circular economy in the packaging sector, due to higher re-use and refill quotas, higher use of recycled materials and mandatory composting of certain hard-to-recycle products. The Renewable Carbon Initiative (RCI) (www.renewable-carbon-initiative.com) welcomes this proposal and wants to offer several suggestions to strengthen it further and get implementation closer to the market realities of Europe.

As a proponent of an accelerated shift from using fossil resources to renewable carbon sources in the European industry, the Renewable Carbon Initiative promotes recycling, biomass and carbon capture and utilisation (CCU) as sustainable carbon sources for sectors that cannot be decarbonised due to their very nature – which includes all products made from organic chemistry, also packaging. All three carbon sources – we call them *renewable carbon* – should receive support to enable a truly circular carbon economy that does not require any additional, virgin fossil feedstocks from the ground.

For this reason, RCI calls on policy makers to increase efforts in several areas. First and foremost, the PPWR proposal should seize the opportunity to boost the potential of biomass and direct carbon capture and utilisation in contributing to a sustainable packaging industry. These materials can offer similar GHG reductions as recycled packaging and they offer flexibility for producers in implementing sustainable solutions, thus accelerating the EU's green transition and decreasing dependency on fossil feedstocks in the packaging sector. RCI therefore asks the Commission, the European Parliament and the Council to include in the proposal a complementary renewable content target promoting the use of bio- and CO₂-based feedstocks in packaging similar to recycling.

Furthermore, RCI is delighted to see that Article 8 of the Commission proposal requires that certain types of tea and coffee packaging, sticky labels attached to fruit and vegetables as well as very lightweight plastic carrier bags shall be compostable in industrially controlled conditions in bio-waste treatment facilities. This provision follows scientific evidence that has

shown that for certain types of packaging, biodegradation or composting offers true environmental benefits. RCI therefore strongly urges policy makers to respect the science and keep article 8 as it is – it is a great step towards a more sustainable packaging landscape in Europe.

RCI is convinced that to actually achieve the ambitious recycling quotas and recycled content targets, technologies will have to evolve. Mechanical recycling technologies undoubtedly provide important and valuable solutions for managing plastic waste. They have been well established, operate at scale and show lower GHG emissions than chemical recycling. However, they also have significant limitations. These especially relate to the polymers they cover, acceptable contamination and to only covering the plastics loop. Advanced recycling technologies, such as depolymerisation (thermochemical, solvolysis, enzymolysis), gasification, pyrolysis and others offer opportunities to valorise waste streams that cannot be recycled by conventional technologies and are able to close the polymer, monomer, and molecular loops.

The new technologies would profit strongly from higher political support and RCI calls on policy makers to create dependable framework conditions. As one urgent step, acceptable mass balance methods for tracing recycled and renewable materials through the value chains need to be determined by policy makers to provide market security. The methodology for calculating and verifying the percentage of recycled content recovered from post-consumer waste and contained in packaging prescribed in the text of the PPWR should account for the mass balance chain of custody models and determine appropriate rules.

The full position paper is available at: <https://renewable-carbon.eu/publications/product/the-renewable-carbon-initiatives-position-on-the-commission-proposal-for-a-packaging-and-packaging-waste-regulation-pdf/>

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The Renewable Carbon Initiative (RCI) was founded in September 2020 by eleven leading companies from six countries under the leadership of nova-Institute (Germany). The aim of the initiative is to support and speed up the transition from fossil carbon to renewable carbon for all organic chemicals and materials. www.renewable-carbon-initiative.com

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