

Ms Teresa RIBERA RODRÍGUEZ  
Executive Vice-President for Clean, Just and Competitive Transition

Mr Stéphane SÉJOURNÉ  
Executive Vice-President for Prosperity and Industrial Strategy

Ms Jessica ROSWALL  
Commissioner for the Environment, Water Resilience and a Competitive Circular Economy

Mr Maroš ŠEFČOVIČ  
Commissioner for Trade and Economic Security, Interinstitutional Relations and Transparency

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*Transmitted by e-mail*

Monday, 18 August 2025

Dear Executive Vice President Ribera,

Dear Executive Vice President Séjourné,

Dear Commissioner Roswall,

Dear Commissioner Šefčovič,

The signatories of this letter, a coalition of partners representing the interests of the sustainable packaging, plastics, consumer goods and recycling industries, are reaching out to you with an urgent request about the draft implementing decision of the EU Commission on laying down rules for the application of Directive (EU) 2019/904 of the European Parliament and of the Council as regards the calculation, verification and reporting of data on recycled plastic content in single-use plastic beverage bottles and repealing Commission Implementing Decision (EU) 2023/2683.

We would like to contribute to ensuring that the calculation methodology is as clear, reliable, and aligned as possible with the intended objectives of the European circular economy. In its current form, the draft Implementing Decision poses a fundamental threat to the European recycling industry and thereby to the ambitious targets for climate and environmental protection as well as the EU's goals under the Competitiveness Compass and the Clean Industrial Deal to double the share of recycled material in EU's economy and to foster a higher supply of high quality recyclates.

In Art. 1 (5) of the draft implementing decision, the definition of “post-consumer plastic waste” is adapted to the definition of “post-consumer plastic waste” as defined in Art. 3 (48) of the Packaging and Packaging Waste Regulation (PPWR). This has massive effects on the recycled content targets for single-use beverage bottles of Art. 6 (5) of the SUPD, as uncontrolled and often dubious plastic waste from outside of the EU would then count towards reaching those targets:

- **Legal and economic risk:** Aligning the SUPD implementation decision with the PPWR without appropriate safeguards would further undermine the already strained European plastics recycling sector.
- **Market distortion from third-country imports:** Europe is increasingly exposed to imports of recyclates from third countries of questionable quality and unclear legal status as secondary materials. These are sold at dumping prices and harm fair competition, mirroring similar problematic practices known from the textile sector.
- **Undermining environmental and strategic goals:** Recycled content quotas under the SUPD and PPWR are intended to protect the environment and strengthen Europe's resource sovereignty. These goals are jeopardized by unregulated imports of low-grade recyclates.

- **Consumer uncertainty and trust erosion:** The lack of reliable quality standards for imported recyclates leads to consumer confusion and diminishes trust in recycled content claims.

During the **EU Environment Council meeting on 17 June**, the European Commission acknowledged the difficult situation facing the recycling industry and announced intentions to take action. However, adopting the definition of "post-consumer plastic waste" in line with the PPWR without simultaneously establishing a clear equivalence of standards through a legally binding mirror clause would severely distort the European market and cause lasting damage to the competitiveness of the European recycling industry.

We therefore strongly advise the Commission and EU Member States to **keep the definition of "post-consumer plastic waste"** as stated in Implementing Decision 2023/2683. To safeguard a sustainable and fair circular economy in Europe, we call for any alignment of the SUPD with the definitions of the PPWR to be **strictly conditional on the establishment of clear and verifiable equivalence criteria for imported recyclates from third countries** through a Mirror Clause. This is essential to prevent market distortions caused by low-quality imports, to uphold environmental objectives, and to protect the long-term competitiveness of the European recycling industry.

We thank you in advance for your consideration and remain at your disposal for further information and conversation.

Sincerely,

**Reinhard SCHNEIDER**  
CEO



**Philipp LEHNER**  
Managing Director



**Herwart WILMS**  
Managing Director



**Verena Graichen**  
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