## Call to Action to the Danish Presidency of the Council of the European Union and the European Commission

Safeguarding Industrial Leadership in the Plastic Circular Transition & Europe as a region to invest.

The undersigned organizations, representing different segments of the plastic value chain in Europe, welcome the initiative of a Roundtable held on October 29<sup>th</sup>, 2025, in Brussels "Closing the loop: Addressing the Plastic Recycling Crisis in Europe". Although the recycled plastics sector is considered strategic for achieving sustainability goals and industrial resilience<sup>1</sup>, due to unfair competition and a regulatory framework still under development, the European recycling industry is collapsing <sup>2</sup>. We call for urgent policy actions to address the current market crisis and ensure the long-term competitiveness of Europe's recycling industry with new investments to strengthen the sector.

Timeliness, coherence and clarity are essential. We call for the rapid publication of the Single-Use Plastics Directive Implementing Act (SUPD IA), the respect of the timeline to finalize the Packaging and Packaging Waste Regulation's (PPWR) secondary legislation (including "mirror clauses") and quick, concrete measures in the Industrial Accelerator Act (IAA), the Circular Economy Act (CEA) and Eco-design Sustainable Product Regulation (ESPR).

To foster the necessary investments for a circular economy in Europe, ensure sustainable management of European plastic waste, reduce resource dependency from non-European countries, and stimulate demand for European recycled content, we call for a sense of responsibility to prioritize recycling European waste first. We believe that driving the transition toward a circular plastics economy requires a bold, structured approach built on strategic pillars such as:

- Mandatory European Recycled Content Targets: We support the implementation of binding targets for European sourced recycled plastics, essential to strengthening the secondary raw materials market, integrating European waste into value chains, and reducing dependency on non-European resources. Moreover, this will ensure that recycled content in products will be met by leveraging on European waste management capabilities, so that the system continues striving for effective circularity, and that incentives and measures to support the uptake of recycled content do not only drive additional imports into Europe<sup>3</sup> and thus finance the development of infrastructures in non-European countries.
- **Protection Against Unfair Competition:** We emphasize the need to safeguard the integrity of circular products by combating fraud in recycled content claims, including distinguishing such products (e.g. via custom codes) and enforcing verification mechanisms to ensure transparency and trust across the value chain.

External Use 1

 $<sup>^{</sup>m 1}$  Capturing the Potential of the Circular Economy Transition in the EU Plastics Industry-2025, JRC

<sup>2</sup> Wave of Surging Plastic Recycling Plant Closures Hits Europe- Plastics Recyclers Europe

<sup>&</sup>lt;sup>3</sup> ICIS Report "Impact of EU recycling regulations on China's key packaging intensive export sectors", October 2025: <u>CPCIF ICIS-Report EN FINAL.pdf</u>

• **Dedicated Funding Mechanisms:** We advocate for the creation of targeted financial instruments to accelerate the adoption of sustainable solutions across the European plastics industry (e.g. reallocate revenues from Plastic Levy).

We believe in Europe as a region to invest. A region of circular investment opportunity, if conditions are right. Europe must act quickly to maintain its industrial leadership. The intention to foster Europe's independence - as per the 2026 Commission work program released on October 21<sup>st</sup>- crucially depends on action now. Without urgent intervention, Europe's ambitious goal to double recycling capacity by 2030 will remain out of reach, future investments in Europe will dry up, vital jobs within the entire value chain will be lost, and announced projects risk never materializing. It is essential to return to the foundational objective of all regulations concerning recycling and circular economy: to recycle European waste, closing the loop.

























External Use 2