

Brussels, 22 September 2026

# Written Views in Advance of the Second Informal In-Person Meeting of Heads of Delegation to the Intergovernmental Negotiating Committee on Plastic Pollution

## INTRODUCTION

In response to the invitation from the INC Secretariat to accredited observer organisations, this document sets out Plastics Recyclers Europe's (PRE) views on the guiding questions under **Cluster B** (releases and leakages, existing and legacy plastic pollution, plastic waste management, product design and plastic products) and **Cluster C** (capacity-building, technical assistance, technology transfer, international cooperation and financial resources).

For plastics recyclers, the instrument should serve two purposes: ensuring that plastic products are designed and managed so that they can effectively be collected, sorted and recycled into high-quality materials; and ensuring that the systems delivering those operations are adequately and predictably financed.

## CLUSTER B

### 1. What considerations should guide decisions on determining which plastic products will require possible global measures, actions or cooperation?

Decisions should rest on **transparent and evidence-based criteria**, covering recyclability, leakage risk, necessity and function, the availability and environmental performance of alternatives, technical feasibility, affordability, national circumstances and the waste hierarchy. **No application should be restricted solely because it contains plastic**, where it can be effectively collected, sorted and recycled and where available alternatives would result in greater overall environmental impacts.

Recyclability should be assessed based on the operational reality and **verified by an independent third party**. [The RecyClass Recyclability Certification](#) demonstrates that such assessments are operationally feasible at scale, evaluating compatibility with collection, sorting and recycling processes through standardised testing methodologies.

Critically, what makes a product problematic is its **design features**: multi-material and composite structures, incompatible sleeves, disruptive additives, and inks and adhesives that contaminate the stream. Criteria expressed at feature level apply consistently across materials and streams. [Design for recycling guidelines](#) and [recyclability evaluation protocols](#), updated through laboratory and industrial testing campaigns, already provide a methodological basis.

Therefore, the Convention should:

- Establish an obligation to ensure that plastic products placed on its market are designed to facilitate collection, sorting and recycling by **applying design-for-recycling requirements** based on internationally recognised, regional or national standards and assessment methodologies.
- Establish transparent and evidence-based **criteria for identifying avoidable or problematic applications**, including a safeguard that prevents restrictions on applications that can be effectively collected, sorted and recycled solely because they contain plastic.

## 2. What type of enabling factors should be considered to address existing and legacy plastic pollution, including the process to identify and evaluate the locations or accumulation zones and subsequent remediation efforts?

The first enabling factor is to **stop the diversion of recyclable material out of the circular loop** by [reducing the landfilling and incineration of plastic waste](#) and requiring that plastic waste suitable for recycling be sent exclusively to permitted and certified recyclers.

In regions where waste management systems remain underdeveloped this should be complemented by **investments in collection, sorting and recycling infrastructure**, alongside measures that **increase consumers awareness** and hence participation in collection systems. Increasing the quantity and quality of the material entering the recycling chain can improve its economic value.

**Recycling should also take place as close as possible to where material is collected.** Supporting regional recycling capacity in line with the proximity principle, improving the availability of feedstock for recyclers and strengthening demand for recycled materials at regional level.

The second enabling factor is **ensuring that waste management practices support recycling treatments afterward**. Collected material may be mixed, degraded or contaminated, and whether it can be recycled depends on its quality and on the recycling options available. PRE's [mapping of plastics recycling processes and technologies](#) provide examples of how material quality requirements and available recycling routes can be assessed in practice.

Therefore, the Convention should:

- **Promote waste management systems that prioritise recycling and support regional recycling capacity in line with the proximity principle**, so that material collected for recycling remains available to support local recycling markets, strengthen demand for recycled materials and reduce the diversion of recyclable material to disposal.
- **Promote waste management practices that support recycling activities**, ensuring that collected material can be effectively directed to available recycling processes.

## CLUSTER C

### 1. What elements must be considered to ensure that all available financial sources, including public finance, are effectively mobilized for the implementation of the instrument?

Public finance should help reduce the price gap between virgin and recycled materials. Such measures are increasingly necessary as [Europe's plastics recycling industry](#) faces declining demand and capacity losses, with turnover falling by 5.5% in 2024 and facility closures increasing by 50%. [PRE recommends extending the green VAT](#) approach beyond second-hand products, by applying reduced VAT rates to products containing recycled materials and a 0% VAT rate to recycling activities, alongside tax reductions for recycled-content products and criteria prioritising local RC recycled content within public procurement. Public support should

also be directed to collection and sorting infrastructure, which determines the quality and availability of material reaching recyclers.

## **2. What role should the private sector have in facilitating the mobilization of financial resources, capacity building and technical assistance, and what elements could be considered under the financial mechanism to promote such a role?**

Fees paid by producers through **Extended Producer Responsibility (EPR) schemes** should be the principal private financing mechanism. As packaging EPR systems are not yet widely implemented globally, the Convention should encourage Parties to establish and implement EPR schemes in accordance with national circumstances and capabilities, as a core mechanism for financing collection, sorting and recycling activities. Each Party should ensure that such schemes include a clearly defined scope of covered materials and producers, clear roles and responsibilities for relevant stakeholders, transparent reporting and monitoring requirements, effective enforcement mechanisms, and eco-modulated fees reflecting recyclability and other relevant design characteristics.

Therefore, the Convention should:

- **Encourage the establishment of packaging EPR schemes globally**, as a core mechanism for financing collection, sorting and recycling systems.
- **Establish minimum requirements for eco-modulation**, ensuring that EPR fee structures reward recyclability and the verified use of post-consumer recyclers through performance-based fee differentiation.
- **Promote transparent and accountable governance of EPR schemes**, including the participation of waste management and recycling operators in oversight and monitoring activities.
- **Promote EPR systems that support stable and predictable material flows to recyclers**, enabling long-term investment in recycling capacity.

## **CONCLUSIONS**

In this context, the Plastics Treaty should support circular systems that reward recyclability, strengthen recycling markets, and ensure the financing of high-quality recycling, fostering a fully circular plastics global market. PRE remains available to provide technical input to the Parties and to the Secretariat on design-for-recycling criteria, quality specifications for sorted and recycled materials, and the design of producer responsibility schemes.

## **ABOUT PLASTICS RECYCLERS EUROPE**

**Plastics Recyclers Europe (PRE)** is an organisation representing the voice of European plastics recyclers, who reprocess plastic waste into high-quality material destined for the production of new articles. Recyclers are important facilitators of the circularity of plastics and the transition towards the circular economy. The plastics recycling industry in Europe represents over €8.6 billion in turnover, 13.5 million tonnes of installed recycling capacity, around 850 recycling facilities, and around 30,000 employees.

[www.plasticsrecyclers.eu](http://www.plasticsrecyclers.eu)

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