
Getting It Right:

Recycled Content Mandate Recommendations for Policymakers

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reloop
resources
remain resources





About Reloop

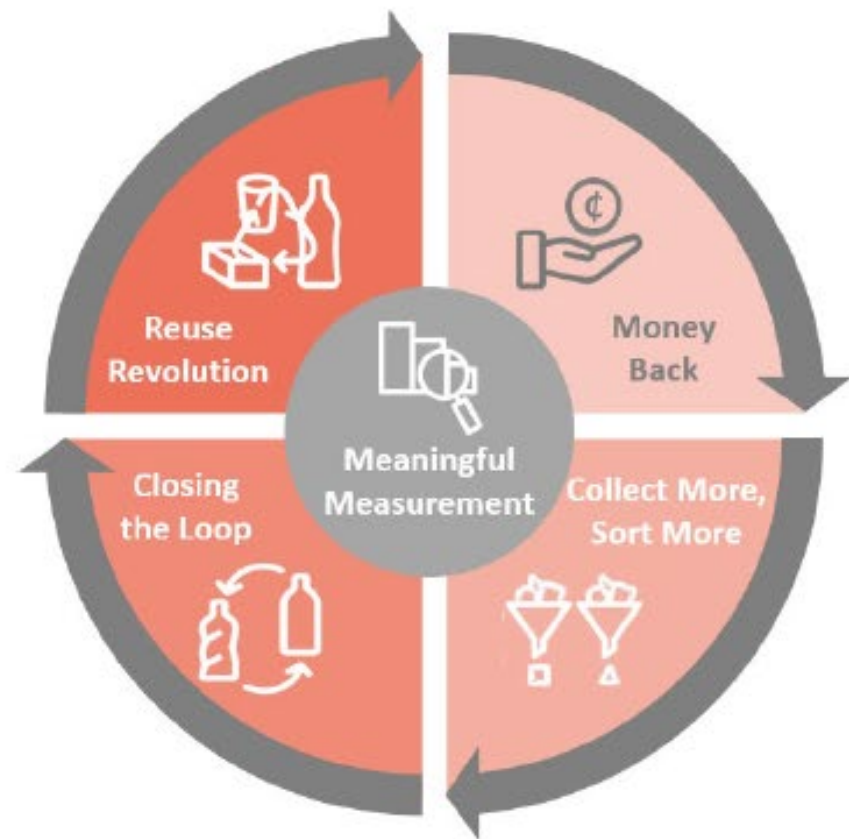
Reloop is an international NGO that brings together stakeholders under a common vision of a system where resources remain resources

We believe a **thriving circular economy is built on policy** that:

- supports the waste hierarchy;
- encourages existing best practices and fosters innovation;
- applies economic instruments when necessary;
- and strives for continuous improvement.

Reloop uses research and multi-stakeholder education to drive public policy and **accelerate the transition** to a circular economy .

To achieve lasting change, our work focuses on five interrelated areas that form the basis of a circular economy.



What We Do



To shift policy, we connect, inform and inspire governments, industry and society on issues related to the circular economy



CONNECT

Share insights and perspectives with key stakeholders and collaborate on solutions



INFORM

Use precise and concise evidence-based information to help guide decisionmakers



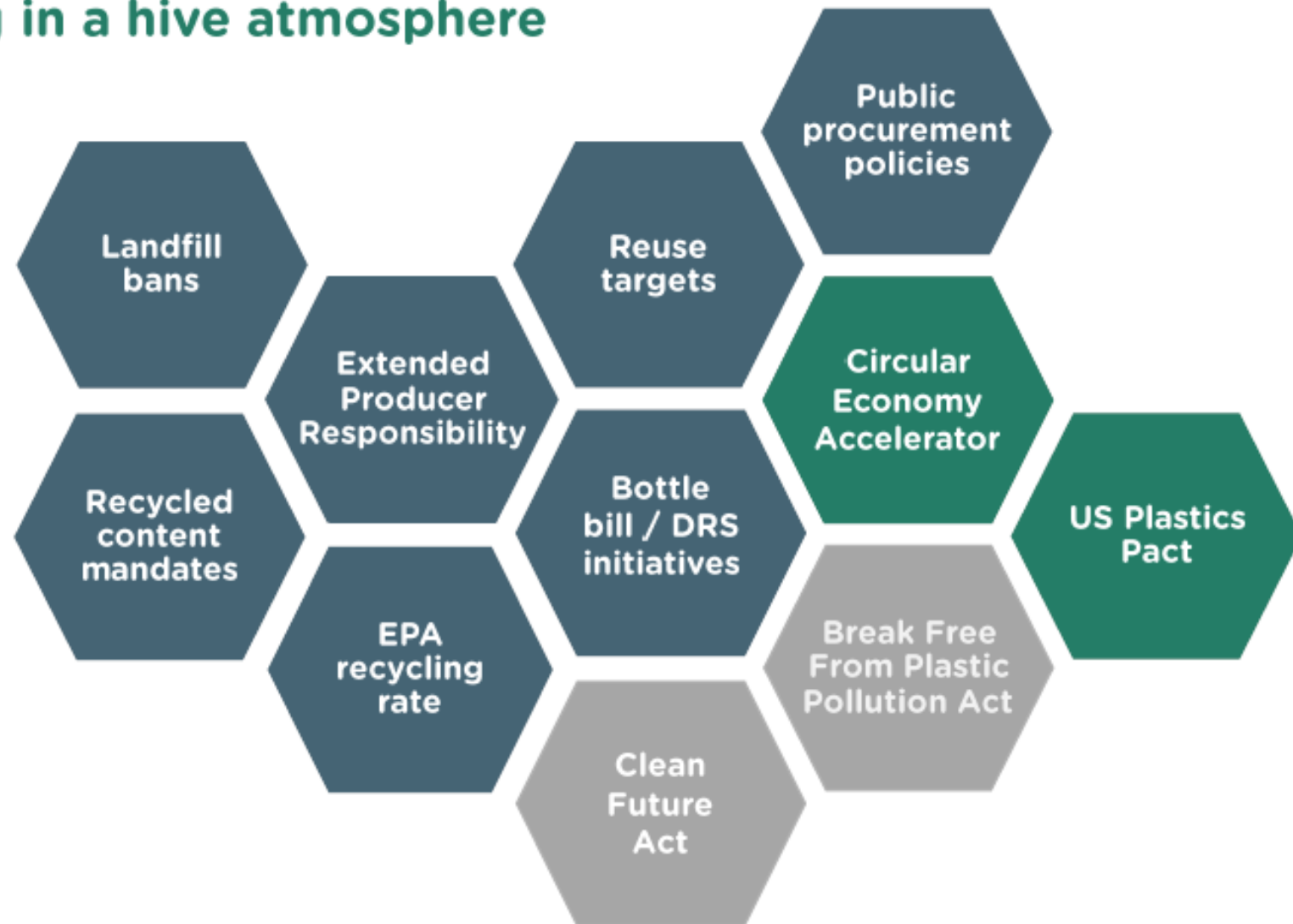
INSPIRE

Employ innovative and easy to understand communications

Waste / Packaging Policy Today



Context-setting in a hive atmosphere



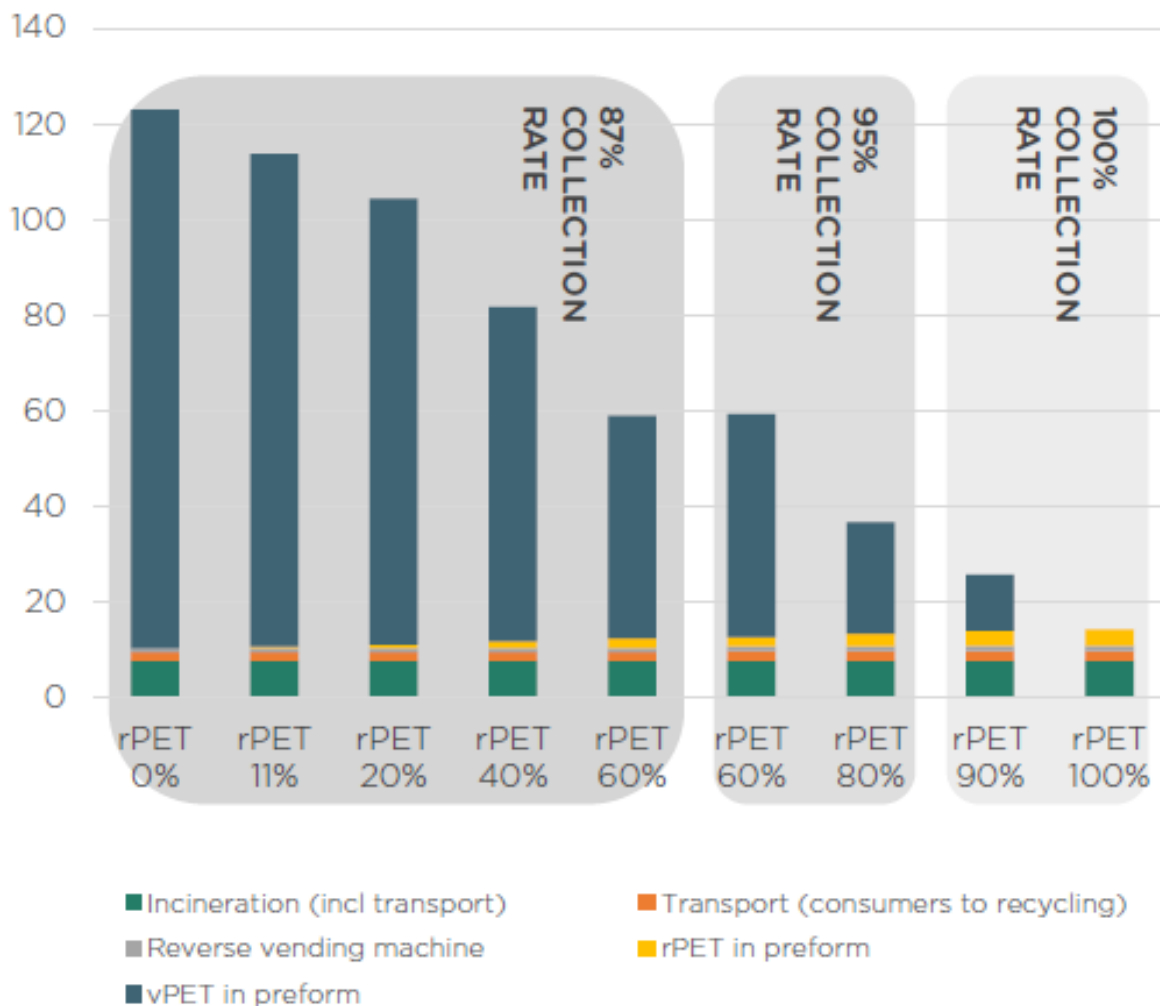


The Opportunity

Why pursue recycled content requirements?

- Market Alignment** → Stimulate investment in efficient and environmentally optimal technologies
- Resilience** → Provide economic incentive to increase effective recycling locally, allowing for more sustainable growth
- Environmental** → Achieve GHG emissions savings and other environmental benefits from avoided resource use

GHG Emissions
(kg CO₂e / 1000 units of 1L containers)





Our Experience

Building a multi-stakeholder coalition to drive minimum recycled content requirements for PET bottles in Europe

EC Single-Use Plastic Directive
Article 6(5)

Each Member State shall ensure that:

a) From 2025, beverage bottles listed in Part F of the Annex which are manufactured from polyethylene terephthalate as the major component ('PET bottles') contain at least 25% recycled plastic, calculated as an average for all PET bottles placed on the market on the territory of that Member State; and

b) From 2030, beverage bottles listed in Part F of the Annex contain at least 30 % recycled plastic, calculated as an average for all such beverage bottles placed on the market on the territory of that Member State.





The Challenges

Examining the primary impediments and risks

MARKET AND TECHNICAL LIMITATIONS

- Infrastructure and connectivity
- Quantity and quality (e.g. food safety) concerns
 - Deposit return systems, which incentivize collection, are a primary, if not the only, way to achieve high collection rates and a clean material stream (the majority of US states lack DRS)



UNINTENDED CONSEQUENCES

- Potential for loopholes, a “race to the bottom”
- Producer accountability without oversight?



Policy Recommendations

“Getting It Right” with recycled content mandates is crucial.

1 Establish Clear Definitions & Scope

2 Set Appropriate Targets

3 Develop Robust Standards

4 Consider Product Design & Safety

5 Follow the Waste Hierarchy

1 Establish Clear Definitions & Scope



What's included? What's not?

- **DEFINE TERMS** using credible and objective sources, e.g.:
 - Recycling
 - Recovered material
 - Pre-consumer or post-industrial content (PIC) vs. post-consumer content
- **CLEARLY DELINEATE** included / excluded material, e.g.:
 - Plastic (PET), aluminum, glass, paper
 - Compostable and bio-based plastics

2 Set Appropriate Targets



What are the results you're hoping to achieve?

- **ASSESS TECHNICAL FEASIBILITY**
Mandates should be appropriately aggressive, but technically feasible
- **“RIGHT SIZED” APPROACH**
Understand volume and quality dependencies across the supply chain and the mechanisms – like **deposit return systems** – capable of collection and sorting optimization
- **TIMEFRAME MATTERS**
Milestone targets can help ensure appropriate action and investment

3 Develop Robust Standards



How do you measure performance?

- **INCLUDE CLEAR GUIDANCE / CAREFUL OVERSIGHT ON:**
 - What is / not considered "recycled content"
 - What is required (of producers)?
 - Truthful labeling / marketing claims
 - Environmentally appropriate exclusions / allowances, e.g.:
 - Additives and fillers
 - Mechanical vs. chemical recycling
 - Mass balance approach and product labelling / marketing claims
 - Credit or Trading schemes

4 Consider Product Design & Safety

What supporting mechanisms can increase recyclability and reduce harmful outcomes?

- **CARROT VS. STICK**

Use of design standards for product recyclability and non-toxicity can be alternatively adopted as a requirement, or as a precursor for higher rating by certification schemes

- **ENVIRONMENTAL JUSTICE PRINCIPLES**

5 Follow the Zero Waste Hierarchy



Where are we now? Where do we want to be?



Thank you!

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