



Raising standards for consumers

POSITION PAPER

ANEC position on EC initiative:

“Single-use plastic beverage bottles – EU rules for calculating, verifying and reporting on recycled plastic content”



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1. Principle of prevention and the chemicals strategy are a priority

ANEC strongly calls for the principle of prevention to be applied to hazardous substances by eliminating them at the beginning of the product cycle rather than at the end.

Minimum recycled content requirements for plastic packaging should be aligned with the Chemicals Strategy for Sustainability and combined with objectives to minimize and phase out hazardous substances.

These and other measures to increase recycling rates must be accompanied by an assessment of environmental and health impacts, and effective measures to minimize or phase out the use of hazardous substances.

2. Recycled plastics in food and beverage packaging

As mentioned in our paper on the Proposal for a Regulation on Packaging and Packaging Waste (<https://www.tinyurl.com/ANEC-PPWR>), objectives for the increased use of recycled material in packaging should be combined with objectives on quality and safety, such as measures or requirements aimed at the minimisation or phasing out of the use of hazardous chemicals in packaging. With these ambitions missing, the quantitative objectives for high-recycling rate risks an incentive to achieve low-quality recycling and an increase in contaminated recycled materials, resulting in increased exposure of humans and the environment.

Further, there is a need to improve the availability of information on the chemical content of the material. Hence, requirements for information on content of hazardous substances should be included in the PPWR (or there should be a link to the ESPR and chemicals information on the ecodesign / performance requirements, and the product passport or to the SCIP database).

As we stated in our position paper, when replying to the EC proposal¹ for updated rules on recycled plastic in food packaging, and in the open letter² we sent with other Civil Society Organisations to the Commissioner for Health & Food, in that context we call on the EC to update the FCM legislative framework before turning to recycled plastics.

ANEC also underlines at this occasion that the legislative framework on Food Contact Materials (FCM) should be updated urgently before turning to recycled plastics in food

¹ Regulation (EU) 2022/1616 on recycled plastic materials and articles intended to come into contact with foods was then adopted in the summer of 2022 and entered into force on 10 October 2022.

² <https://bit.ly/3HjUn8r>

packaging due to further evidence of increased levels of toxic chemicals in recycled plastics³.

Human health must not be used as a bargaining tool and measures to eliminate hazardous substances must be implemented immediately, moreover through the ongoing revision of the rules on packaging and packaging waste.

These could lead to a complete ban on recycling plastics in terms of food and beverages if necessary, and use such recycled plastics in other industrial production lines.

³ - Geueke, B., Phelps, D., Parkinson, L., & Muncke, J. (2023). Hazardous chemicals in recycled and reusable plastic food packaging. *Cambridge Prisms: Plastics*, 1-43. doi:10.1017/plc.2023.7 and - Pyridoula Gerassimidou, Paulina Lanska, John N. Hahladakis, Elena Lovat, Silvia Vanzetto, Birgit Geueke, Ksenia J. Groh, Jane Muncke, Maricel Maffini, Olwenn V. Martin, Eleni Iacovidou, Unpacking the complexity of the PET drink bottles value chain: A chemicals perspective, *Journal of Hazardous Materials*, Volume 430, 2022, 128410, ISSN 0304-3894, <https://doi.org/10.1016/j.jhazmat.2022.128410>.



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ANEC was established in 1995 as an international non-profit association under Belgian law and is open to the representation of national consumer organisations in 34 countries.

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