

ECRN feedback on Single-use plastic beverage bottles

EU rules for calculating, verifying and reporting on
recycled plastic content

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ECRN feedback: Single-use plastic beverage bottles – EU rules for calculating, verifying and reporting on recycled plastic content

We welcome the European Commission's draft Implementing Decision laying down rules for the calculation, verification, and reporting of recycled plastic content in single-use plastic beverage bottles, in line with Directive (EU) 2019/904. This proposal addresses critical gaps in reporting methodology and marks an important step forward in aligning plastic recycling rules with Europe's circular economy and climate ambitions.

As underlined in the European Chemical Regions Network (ECRN) [Position Paper on Advancing Plastic Recycling](#), effective plastic recycling must be underpinned by clear definitions, consistent reporting, harmonised methodologies, and SME-friendly implementation to ensure both environmental integrity and industrial competitiveness.

- We strongly support the Commission's decision to integrate **mass balance accounting (MBA)** as a methodology for chemical recycling outputs. ECRN advocates for a **harmonised EU framework** for MBA that is **transparent and traceable**. Clear definitions of "eligible material" and "attributed amounts" across all recycling streams should also be defined.
- ECRN welcomes the **acknowledgment that chemical recycling complements**, but does not replace, **mechanical recycling**. We believe the two approaches should be seen not in competition but as parts of a single, integrated recycling system. To make this integration effective, **more investment in sorting, pre-treatment, and digital tracking technologies is needed**—especially to support the uptake of chemical recycling in small and medium-sized enterprises (SMEs) and regional facilities.
- We appreciated the **inclusion of all beverage bottle components**—caps, lids, labels, and sleeves—in the calculation of recycled content. However, to fully support circularity, the **role of additives must be addressed**. Certain substances can impair recyclability or reduce output quality. We recommend developing EU-level guidelines for safer additives, aligned with design-for-recycling principles and supported by targeted incentives through extended producer responsibility schemes.
- ECRN supports the **reduced burden for SMEs in the verification regime** (verification every 3 years instead of annually). We encourage the Commission to further support SMEs through targeted funding, training and technical assistance to ensure compliance and innovation capacity.
- To prevent fragmentation and increase compliance, ECRN supports the Commission's **efforts to establish a harmonised EU framework for data collection, reporting, and verification**. In line with the Interoperable Europe Act, this Decision must also ensure full digital traceability and comparability across Member States.
- ECRN recognizes the importance that the **rules for recycled content also account for imports**. Traceability and verification of plastic waste treated outside the EU must be subject to the same standards as those applied within the Union. This is necessary to maintain a level playing field and protect the integrity of the internal market for recycled materials

The European Chemical Regions Network in a nutshell

Over the last 20 years, the European Chemical Regions Network (ECRN) has and continues to serve as the **collective voice of its member regions**, in which the chemical industry plays a crucial role in economic development, growth, and employment.

ECRN originally started as an INTERREG IIIc project in 2004, to help regions better tackle common challenges by exchanging information, exploring innovative solutions, and by speaking with a single voice in Europe. Today the network has grown from a temporary project to a **recognized European chemical stakeholder and a network full of expertise**. ECRN is a registered non-profit association under Belgian law and the network currently covers various European chemical regions, whose cooperation is supported by a Brussels-based secretariat.

We work together with European and regional chemical stakeholders and contribute to a range of policy areas from industrial policy, competitiveness, chemical regulation and REACH to skills, innovation, environment, and circular economy.

At ECRN, we advocate for a **stronger regional dimension in European strategies and policies related to the chemical industry**. We believe that the chemical industry can effectively respond to Europe's societal challenges with sustainable and innovative solutions if its economic growth is linked to territorial development. By bringing concrete local experiences and solutions into EU policymaking, the network aims to bridge the gap between policy elaboration and local impact.

We currently represent 12 regions in 7 different countries (Italy, Poland, Netherlands, Germany, Spain, Belgium and Czech Republic). Also, we have contributed to the Union policymaking with 44 policy papers and participated in 11 EU-funded projects.



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