

JBCE AND JP4EE FEEDBACK ON SUSTAINABILITY CRITERIA FOR PLASTIC RECYCLING TECHNOLOGIES

INTRODUCTION

JBCE and the Japanese 4EE industrial associations (JP4EE) support the European Commission's objective of establishing sustainability criteria for plastic recycling technologies in order to promote the transition towards a circular economy.

Achieving the recycled content targets under the Packaging and Packaging Waste Regulation (PPWR)¹ will require the utilisation of a diverse range of recycling technologies capable of processing different types of plastic waste. In developing sustainability criteria, it is important to consider not only environmental performance, but also the availability of recycled materials and the practical feasibility of implementation.

JBCE and JP4EE believe that sustainability criteria should be based on objective and science-based assessment, remain technology-neutral, and support the continued development of recycling technologies and value chains. The framework should strengthen environmental performance while ensuring that enough recycled materials remain available to support the achievement of the PPWR's recycled content targets.

KEY MESSAGES

❖ **Technology-Neutral and Science-Based Assessment**

Sustainability criteria should be technology-neutral and based on objective, transparent and science-based assessment methodologies, including lifecycle-based evaluation where appropriate.

❖ **Balancing Environmental Objectives with the Availability of Recycled Materials**

Sustainability criteria should support environmental objectives while maintaining access to enough recycled materials needed to achieve the PPWR's recycled content targets.

❖ **Supporting Innovation and Practical Implementation**

The framework should promote innovation and investment through predictable, proportionate, and practical requirements that reflect technological maturity and remain consistent with existing regulatory frameworks.

¹ [Regulation \(EU\) 2025/40 on packaging and packaging waste \(PPWR\).](#)

1. Technology- Neutral and Science-Based Assessment

Achieving the circular economy objectives of the EU and the recycled content targets established under the PPWR will require the utilisation of a diverse range of recycling technologies. Different recycling technologies are capable of processing different waste streams and provide varying environmental benefits, material recovery outcomes, and end-use applications.

When assessing sustainability, due consideration should also be given to the range of waste streams that different recycling technologies can process. In particular, the contribution of technologies to the recycling of mixed, contaminated, multilayer, or otherwise difficult-to-recycle plastic waste streams should be appropriately recognised.

A circular economy for plastics will require a portfolio of complementary recycling technologies capable of processing the full range of plastic waste generated in society.

Sustainability criteria should therefore be technology-neutral and should not pre-determine the eligibility of particular recycling technologies. Instead, technologies should be assessed on the basis of objective, transparent and science-based criteria.

A technology-neutral framework would promote innovation, support investment in recycling technologies, and enable economic operators to select the most appropriate solutions according to the characteristics of the waste stream and the intended application of the recycled material.

To ensure such technology neutrality in practice, sustainability assessments should focus on the overall outcomes and impacts of recycling technologies rather than on individual process characteristics alone. Assessing only one stage of the recycling process may not provide a complete understanding of the overall contribution of a technology to environmental objectives and circularity.

A sustainability assessment should take into account a broad range of factors, including greenhouse gas emissions, resource efficiency, waste reduction, recycled material yields, and contributions to the circular economy.

Wherever possible, the framework should be based on transparent and science-based LCA methodologies. Such methodologies can support consistency, comparability, and objectivity in the evaluation of different recycling technologies.

Assessment methodologies should be applied consistently across technologies and operators in order to ensure a level playing field and maintain confidence in sustainability assessments.

2. Balancing Environmental Objectives with the Availability of Recycled Materials

Sustainability criteria should be designed to support environmental objectives while preserving the broader circular-economy benefits delivered by recycling technologies. The framework should therefore consider not only environmental performance, but also its potential impact on the availability of recycled materials needed to support circularity objectives and compliance with the PPWR.

If sustainability criteria are excessively stringent or place particular recycling technologies at a significant disadvantage, the availability of recycled materials and packaging could be restricted. This could make it more difficult to achieve the recycled content targets established under the PPWR and may lead to increased packaging costs, reduced sourcing options, and disruptions to supply chains.

Sustainability criteria should therefore strike an appropriate balance between environmental objectives and the need to ensure a sufficient and stable supply of recycled materials.

In developing the framework, due consideration should also be given to the practical availability of recycled materials required by economic operators and to the potential impacts on international supply chains. Sustainability criteria should avoid creating unintended barriers that reduce access to recycled materials needed to support the transition to a circular economy.

Particular consideration should also be given to packaging applications for which suitable recycled materials remain limited or are not yet widely available, including certain medical device and semiconductor packaging applications, as well as packaging materials such as polyurethane and expanded polystyrene for which suitable recycled content is not yet commonly available,

A sustainability framework that unnecessarily restricts access to recycled materials may undermine the achievement of the PPWR's recycled content targets. Sustainability criteria should therefore support both environmental objectives and the practical availability of recycled materials and packaging.

3. Supporting Innovation and Practical Implementation

Continued investment in recycling technologies and infrastructure will be essential to accelerate the transition towards a circular economy and to increase the availability of recycled materials.

The development, commercialisation, and deployment of innovative recycling technologies require long-term investment decisions. However, investment may be discouraged if sustainability criteria are unclear, unpredictable, or subject to frequent changes.

Transparency, regulatory predictability, and adequate transition periods are essential to support innovation and investment in recycling technologies. A stable regulatory framework would encourage continued technological development while enabling companies to invest with greater confidence in new recycling solutions.

Sustainability criteria should also avoid creating unnecessary regulatory complexity or disproportionate compliance burdens, or excessive certification requirements that could discourage innovation or delay the deployment of recycling technologies. Requirements should remain practical, proportionate, and aligned with the realities of recycling value chains.

Given the differing levels of maturity of recycling technologies and recycling value chains, a progressive approach should be adopted. Sustainability criteria should initially be set at realistic and achievable levels and subsequently be reviewed in light of technological progress, market development, and growing operational experience.

A progressive approach is essential to avoid unintended disruptions to recycling value chains, support continued investment, and facilitate the effective deployment of innovative recycling technologies.

Such an approach would help balance environmental ambitions with practical feasibility while supporting investment, innovation, and the effective implementation of the sustainability framework.

By encouraging innovation and investment, the sustainability framework can contribute to expanding recycling capacity, improving the availability of recycled materials, and supporting the achievement of the PPWR's recycled content and circular economy objectives.

The framework should also remain consistent with existing EU regulatory requirements and avoid creating overlapping obligations, unnecessary complexity or additional compliance burdens. Particular care should be taken where dedicated regulatory frameworks already apply, including Regulation (EU) 2022/1616² for food-contact recycled plastics.

² [Regulation \(EU\) 2022/1616 on recycled plastic materials and articles intended to come into contact with foods](#)

CONCLUSION

JBCE and JP4EE recognise that sustainability criteria under Article 7 of the PPWR will play an important role in supporting the transition towards a circular economy and strengthening the environmental performance of plastic recycling.

At the same time, achieving the PPWR's recycled content targets will require both continued innovation in recycling technologies and access to sufficient volumes of recycled materials.

JBCE and JP4EE therefore call on the European Commission to establish sustainability criteria that are **technology-neutral, science-based, and designed to support both environmental objectives and the practical availability of recycled materials.**

The framework should promote innovation and investment, remain proportionate to the maturity of recycling technologies and value chains, and be implemented in a practical and predictable manner that supports the achievement of the PPWR's circular-economy objectives.

Such an approach would contribute to a competitive, innovative, and sustainable circular economy in Europe.

ABOUT JBCE

Founded in 1999, the Japan Business Council in Europe (JBCE) is a leading European organisation representing the interests of over 110 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceuticals, textiles, and glass products.

For more information: <https://www.jbce.org/> / E-mail: info@jbce.org

EU Transparency Register: [68368571120-55](https://ec.europa.eu/transparency/regexpert/?s=68368571120-55)

ABOUT JP4EE

JEMA (The Japan Electrical Manufacturers' Association)

The Japan Electrical Manufacturers' Association (JEMA) consists of major Japanese companies in the electrical industry including power & industrial systems, home appliances and related industries. JEMA will contribute to sustainable global development through improvement and enhancement of social and living infrastructures by strengthening international competitiveness of Japanese electrical machinery equipment industry.

<https://www.jema-net.or.jp/>

<http://www.jema-net.or.jp/English/>

EU Transparency Register: [871347495386-10](https://ec.europa.eu/transparency/regexp1/index.html)

JEITA (Japan Electronics and Information Technology Industries Association)

JEITA aims to create digital technologies, improve the business environment, enhance industrial competitiveness, and, of course, to realize Society 5.0. To that end, we urgently need to accelerate society's digital transformation (DX). JEITA will work closely with member companies, the government, and related organizations to solve social issues and energize the Japanese economy, contributing to the society and lifestyles of the future.

<https://www.jeita.or.jp/japanese/>

<https://www.jeita.or.jp/english/>

JBMIA (Japan Business Machine and Information System Industries Association)

Japan Business Machine and Information System Industries Association (JBMIA) is the industry organization which aims to contribute the development of the Japanese economy and the improvement of the office environment through the comprehensive development of the Japanese business machine and information system industries and rationalization thereof.

<https://www.jbmia.or.jp/index.php>

<https://www.jbmia.or.jp/english/index.php>

CIAJ (Communications and Information Network Association of Japan)

With the cooperation of member companies, CIAJ is committed to the healthy development of info-communication network industries through the promotion of info-communication technologies (ICT), and contributes to the realization of more enriched lives in Japan as well as the global community by supporting widespread and advanced uses of information in socio-economic and cultural activities.

<https://www.ciaj.or.jp/>

<https://www.ciaj.or.jp/en/>