

Brussels, 13th October, 2020

To the kind attention of:

Ms. Florika Fink-Hooijer

Director-General, DG Environment
European Commission

CC: Ms. Joanna Drake

Deputy Director-General, DG Environment
European Commission

CC: Mr. Gilles Gantelet

Head of Unit Policy, coordination, LIFE, Governance and Resources
European Commission

CC: Mr. Kestutis Sadauskas

Head of Unit Circular Economy & Green Growth

CC: Ms. Susanne Szech-Koundouros

Deputy Permanent Representative of Germany

Subject: Clarification on the definition and position of chemical recycling in the waste hierarchy

Dear Ms. Florika Fink-Hooijer

Dear Ms. Joanna Drake

Dear Mr. Gilles Gantelet

Dear Mr. Kestutis Sadauskas

Dear Ms. Susanne Szech-Koundouros

The undersigned European NGOs are writing to request a clarification on the role of different technologies marketed as 'chemical recycling' in the [EU waste hierarchy](#).

Various chemical recycling technologies produce outputs with very different environmental and economic impacts. **We recommend that only chemical recycling technologies which produce polymer materials are legislated as 'recycling' while processes that produce feedstock for petrochemicals are defined as 'chemical recovery'.**

This distinction in the waste hierarchy is important to define the priority order between different waste management activities according to their environmental impacts, in order to successfully achieve the EU climate targets. In a circular economy, polymer materials should be kept in use as long as possible and processing of plastic to oil or gas should be approached only as a last resort. Clarifying the distinction between 'chemical recycling' and 'chemical recovery' minimizes the risk of diverting waste supply chains away from reuse and recycling towards petrochemicals feedstock recovery.

Yours sincerely,

Zero Waste Europe, and:

Bellona

Bond Beter Leefmilieu

Humusz Szövetség

Break Free from Plastic

BUND fuer Umwelt und Naturschutz Deutschland e.V.
(FoEE Germany)

Center for International Environmental Law (CIEL)

Circular Economy Wales CIC

ClientEarth

Danish Association of Nature Conservation

Društvo Ekologi brez meja

ECOLOGISTAS EN ACCIÓN VALENCIA

ECOS

Ekologi brez meja

Environmental Action Germany

Environmental Investigation Agency

European Environmental Bureau

Friends of the Earth Croatia

Gallifrey Foundation

Green Liberty

Health and Environment Alliance (HEAL)

Health Care Without Harm (HCWH) Europe

HEJSupport

Let's Do It Foundation

NABU - Naturschutzbund Deutschland e.V.

No Plastic In My Sea

Plastic Change

Polskie Stowarzyszenie Zero Waste

Rethink Plastic alliance

Retorna

Rezero

Sciaena

SEAS AT RISK

Society for Earth (TNZ)

Spółka GWDA

Trash Hero World

United Kingdom Without Incineration
Network (UKWIN)

VOICE of Irish Concern for the Environment

Vsl "Ziedine ekonomika"

ZERO - Association for the Sustainability of
the Earth System

Zero Waste Austria

Zero Waste International Trust

Zero Waste Latvija

Zero Waste North West

Zero Waste Romania



