TEPPFA Position Paper on the draft SUPD Implementing Act - Mass Balance credit method for chemically recycled content

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TEPPFA welcomes the European Commission's public consultation regarding the draft Single-Use Plastics Directive (SUPD) Implementing Decision, which proposes a credit-based mass balance method for attributing chemically recycled content in plastic beverage bottles.

It is essential that EU policymakers establish a precedent as to when and how a mass balance credit method for chemically recycled plastics will be applied for the first time within the EU. This precedent should also guide policy in non-packaging sectors, including building and construction.

Such guidance is crucial, as EN 15804:+A2 is currently interpreted inconsistently with regard to the compliance (or non-compliance) of using a credit-based mass balance model for developing Environmental Product Declarations (EPDs) for construction products.

TEPPFA supports both chemical and mechanical recycling technologies in order to increase the availability of secondary raw materials within the EU — availability currently limited by the extended service life of plastic pipes (50 to 100 years or more).

Legal requirements restrict the use of mechanically recycled material in plastic pressure pipe systems, such as those used for drinking water and gas distribution. Consequently, chemical recycling solutions may offer potential in the future, especially for pressure pipe applications.

While mechanical recycling should remain the preferred option, increased investment in all relevant technologies is necessary to enhance recycling rates. Chemical recycling enables the use of plastic waste—especially feedstock unsuitable for mechanical recycling—to produce new chemicals, including plastics. Thus, chemical recycling can provide additional high-quality material for plastic pipes, which demand high-grade recycled plastics due to safety, regulatory, and performance requirements.

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For this approach to succeed and become available at scale, it is imperative that the EU establish harmonised rules for calculating chemically recycled content, thereby intensifying investment in these technologies.

To support a low-carbon, circular economy, the mass balance credit method should also be considered as a tool to attribute biogenic carbon content in plastic applications for the building and construction sector, using renewable feedstock. This would help to increase both the amount of circular polymers and the proportion of recycled content within the EU supply chain.

In addition to these general considerations, we would like to highlight several specific points regarding the draft SUPD Implementing Act, as its provisions could serve as an inspiration for the revision of future legislation, such as the EU Construction Products Regulation.

1. Integration of "Pre-consumer" as Eligible Material

Eligible material, as defined in Article 1(7), states that only "post-consumer plastic waste" and "material stemming from post-consumer plastic waste" are considered "eligible material". Pre-consumer scrap (excluding rework) should also be recognised as "eligible material".

2. Attribution vs Allocation

Attributed amount is defined in Article 1(13) as "the weight of eligible material allocated to the outputs of the process…". However, "attribution," as defined in ISO/FDIS 13662 – Chain of Custody – Mass Balance – Requirements and Guidelines, is conceptually different from allocation as defined in ISO 14044 on Life Cycle Assessment (LCA).

"Attribution" is a term associated with Chain of Custody modelling (value chain model), whereas "allocation" pertains to LCA modelling (impact assessment). To avoid confusion, the definition should be revised as follows:
"**Attributed amount** is defined in Article 1(13) as the weight of eligible material 'earmarked' or 'allotted' to the outputs of the process…"

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About TEPPFA
TEPPFA is the European Plastic Pipes and Fittings Association founded in 1991 with headquarters in Brussels. TEPPFA's 14 multinational company members and 13 national associations across Europe represent 350 companies that manufacture plastic pipes and fittings. TEPPFA members' final products represent an annual production volume of 4 million tonnes, are directly employing 40,000 people with €12 billion combined annual sales. TEPPFA positions itself as polymer neutral. TEPPFA members' final products are subdivided into two application groups: above ground systems for hot and cold water, surface heating and cooling, wastewater discharge and rainwater drainage, and below ground systems for sewers, stormwater and drainage, drinking water and gas supply, and cable ducts.

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