



CEN/TC 249 N 3391

CEN/TC 249 "Plastics"

Secretariat: **SIS**

Secretary: **Beqiri Bledar Mr**



Annual Report 2023 for Sreq on plastics recycling and recycled plastics (M/584)

| Document type | Related content | Document date | Expected action |
|-----------------|-----------------|---------------|-----------------|
| General / Other | | 2023-08-23 | INFO |

Description

This document contains the first Annual Report 2023 in regards to the standardization request on plastics recycling and recycled plastics (M/584) – as circulated with DG GROW on 2023-08-02.

Annual Report 2023

on a standardisation request to the European Committee for Standardisation and the European Committee for Electrotechnical Standardisation as regards plastics recycling and recycled plastics in support of the European Strategy for Plastics in a Circular Economy

M/584 – Implementing Decision C(2022) 5372 final

Date: 2023/07/18

Table of Contents

| | |
|---|----|
| Executive summary | 1 |
| 1 Introduction | 2 |
| 2 Distribution of work under M/584 | 2 |
| 3 Status of the Work Programme | 3 |
| 3.1 CEN/TC 88 'Thermal insulating materials and products' | 3 |
| 3.2 CEN/TC 134 'Resilient, textile, laminate and modular mechanical locked floor coverings' | 3 |
| 3.3 CEN/TC 155 'Plastics piping systems and ducting systems' | 5 |
| 3.4 CEN/TC 249 'Plastics' | 6 |
| 3.5 CEN/TC 254 'Flexible sheets for waterproofing' | 7 |
| 3.6 CEN/TC 261 'Packaging' | 8 |
| 3.7 CEN/TC 301 'Road vehicles' | 10 |
| 3.8 CLC/TC 111X 'Environment' | 11 |
| 3.9 CLC/TC 213 'Cable management systems' | 12 |
| 4 CEN-CLC Coordination Group on Circular Plastics | 13 |
| 5 Horizontal open points | 14 |
| 5.1 Holistic approach towards a consistent framework | 14 |
| 5.2 Definition of "design-for-recycling" and of recyclability | 14 |
| 5.3 Common structure for Design-for-Recycling standards | 15 |
| 5.4 Terminology across TCs | 15 |
| 5.5 Construction Products Regulation (CPR) Acquis | 15 |
| 5.6 Packaging material of products | 15 |
| Annex 1 – Updated Work Programme | 16 |
| Annex 2 – Abbreviations | 17 |

Executive summary

In August 2022, the European Commission (EC) adopted the Standardization Request as regards *plastics recycling and recycled plastics in support of the European Strategy for Plastics in a Circular Economy*. In September 2022, the two European Standardization Organizations (ESO) committed to develop and revise deliverables on design for recycling, recyclability, quality of the sorted plastic waste, and quality of the recyclates. This commitment had already started in September 2019, when CEN and CENELEC signed the declaration of the Circular Plastics Alliance (CPA).

Given the cross-cutting nature of plastics per sectors of application, preparing the inputs for the Standardization Request required a significant coordination effort within CEN and CENELEC, and between CEN and CENELEC, CPA, and the European Commission. This effort proved to be even more critical now that the Technical Committees (TC) involved are drafting the standardization deliverables, and in consideration of the challenging timeframe for their delivery (August 2025).

To ensure the consistency of the deliverables and to tackle the common issues identified by the various TCs involved, in September 2022, CEN and CENELEC Technical Boards decided to establish the CEN-CLC Coordination Group on Circular Plastics – as further explained in paragraph 4.

The Coordination Group met for the first time in June 2023 and on that occasion some open points for discussion arose, such as the need to use common definitions, to get a common understanding on key concepts as “design-for-recycling” and “recyclability”, and to consider specific aspects of the sector covered (e.g. construction, packaging). These “horizontal open points” are explained in detail in paragraph 5.

During the kick-off meeting of the Coordination Group held on June 7th 2023, each TC involved in the Standardization Request reported on the status of its deliverables (see paragraph 3). There is a certain variability in the development timeframe from TC to TC, due to various elements such as the type of deliverables (European Standard or Technical Specification), the scope of the deliverables (e.g. horizontal/vertical, broad/focused), and the interdependency with other standards. Nonetheless, no delay has been registered so far and the TCs involved are confident that they will manage to meet the deadline of August 2025 set in the Standardization Request.

The next meeting of the Coordination Group will take place on October 12th 2023 and will focus in finding a common way forward for the open issues, as well as in approving the Terms of Reference of the Group.

1 Introduction

Through the Commission Implementing Decision *C(2022) 5372 final*, on 2022-08-02 the European Commission issued a Standardization Request to the Standardization (CEN) and the European Committee for Electrotechnical Standardisation (CENELEC) as regards *plastics recycling and recycled plastics in support of the European Strategy for Plastics in a Circular Economy*.

As per article 3 of the Commission Implementing Decision *C(2022) 5372 final*, this document is the annual report indicating the progress made in the implementation of the work programme referenced to in Article 2.

In February 2023, CEN and CENELEC presented the Work Programme indicating all the standards and standardization deliverables listed in Annex I of the Commission Implementing Decision, the responsible technical bodies, and a timetable for the execution of the requested standardization activities.

The updated Work Programme (up to June 2023) is available in Annex 1 to this document.

2 Distribution of work under M/584

The deliverables mandated by the Standardization Request have been assigned to seven CEN Technical Committees (CEN/TC) and two CENELEC Technical Committees (CLC/TC):

| Technical Committee | Secretariat |
|---|-----------------------|
| CEN/TC 88 'Thermal insulating materials and products' | DIN (Germany) |
| CEN/TC 134 'Resilient, textile, laminate and modular mechanical locked floor coverings' | NBN (Belgium) |
| CEN/TC 155 'Plastics piping systems and ducting systems' | NEN (The Netherlands) |
| CEN/TC 249 'Plastics' | SIS (Sweden) |
| CEN/TC 254 'Flexible sheets for waterproofing' | NEN (The Netherlands) |
| CEN/TC 261 'Packaging' | AFNOR (France) |
| CEN/TC 301 'Road vehicles' | DIN (Germany) |
| CLC/TC 111X 'Environment' | NEC (The Netherlands) |
| CLC/TC 213 'Cable management systems' | BSI (United Kingdom) |

The allocation of deliverables per TC as indicated in Annex I of M/584 is available in the Work Programme (Annex 1 to this document).

3 Status of the Work Programme

3.1 CEN/TC 88 'Thermal insulating materials and products'

3.1.1 Scope of the TC

Standardisation in the field of thermal insulating materials and products for application in buildings, including insulation for installed equipment and for industrial insulation, covering: terminology and definitions, list of required properties with regard to different applications, methods for the determination of these properties, sampling procedures, conformity criteria, specifications for insulating materials and products, marking and labelling of insulating materials and products.

3.1.2 Organisation of the work

The work item is developed by CEN/TC 88/WG 2 'Coordinating Group' and its Task Group (TG) 'Design for Recycling'. So far, the TG met once and has another meeting scheduled. The project is led by Jürgen von Auenmüller. The TG consists of experts from WG 4 "Expanded polystyrene foam (EPS)" as well as other relevant working groups.

3.1.3 Status of the deliverables

The work is proceeding according to the plan which foresees the submission of the document to the CEN Enquiry in February 2024.

3.1.4 Challenges to overcome

CEN/TC 88 is working to harmonize the other insulating materials and other construction product TCs. A coordination with the current Construction Products Regulation (CPR) Acquis process for the Construction Products Regulation is seen as necessary.

3.2 CEN/TC 134 'Resilient, textile, laminate and modular mechanical locked floor coverings'

3.2.1 Scope of the TC

Standardization of definitions, requirements, classification and test methods, and development of guidance documents and reports for resilient, textile, laminate and modular mechanical locked floor coverings. The main use areas for floor coverings within the scope of CEN/TC 134 are residential (homes, apartments) and commercial, (health care, education, hospitality, public buildings, offices, retail, transportation). These areas are limited to indoor use. Excluded are

screeds, raised access floors, paving, surfaces for sports areas, as well as parquet, wood veneer and bamboo floorings

3.2.2 Organisation of the work

CEN/TS “Resilient, textile, laminate and modular mechanical locked floor coverings –Circular Economy and Sustainability – Recommendations/ Guidelines for Design” (Work Item (WI) 00134302) is being developed by WG 10 ‘Harmonization’, under the lead of Mr Guy Verrue, the CEN/TC 134 Chair, with the assistance of Ms Karin Eufinger, the CEN/TC 134 and CEN/TC 134/WG 10 secretary. When establishing the work item, the wish from the stakeholders was to publish this recommendations and guidance document in a fast track, which is why it was chosen to publish it as CEN/TS, which has a shorter development time as compared to an EN.

WG 10 addresses topics relevant to all product groups within the scope of CEN/TC 134. Therefore, the experts in this working group are usually also experts in, at least, one of the following product working groups:

- WG7 ‘Resilient floor coverings’
- WG8 ‘Textile floor coverings’
- WG9 ‘Laminate floor coverings’
- WG11 ‘Modular mechanical locked floor coverings (MMF)’.

As WG 10 is now also addressing the horizontal issues for sustainability and circular economy – including recycling – some experts with this background have joined the WG.

WG 10 currently has one physical meeting per year, in conjunction with the TC plenary meeting and the other WGs meetings (usually in the month of June). Throughout the year there are additionally 2 or more meetings online, depending on the need.

Usually, the different projects under WG 10 are being developed with the assistance of Ad Hoc Groups, which draft the text which is then discussed during the WG 10 meeting. This is also the case for the development of this CEN/TS. Ad Hoc Groups meet on a schedule determined by the work needed.

As experts from WG 10 were already active the Circular Plastics Alliance, which participated in the preparation of M/584, the work on CEN/TS 00134302 was started before the actual approval of the Standardization Request. The document was then considered as suitable basis for input to the M/584 Work Programme and developed further within its scope.

3.2.3 Status of the deliverables

CEN/TS “Resilient, textile, laminate and modular mechanical locked floor coverings —Circular Economy and Sustainability — Recommendations/Guidelines for Design” is now under preparation for Formal Vote and the aim is to submit it to CEN for editing by December 2023. The original deadline for delivering the Formal Vote draft was mid-September, but due to the need to integrate the requirements from the Standardization Request and some other unforeseen delays, the delivery of the draft will be delayed for a few months. Nevertheless, the document will be delivered well in time before the deadline given in M/584.

3.2.4 Challenges to overcome

There were no further challenges than those stated in 3.2.3.

No specific request for European Commission (EC) financial support was needed by CEN/TC 134, as the participation of experts to the work of the TC could be supported by other funding (e.g. at national level).

3.3 CEN/TC 155 ‘Plastics piping systems and ducting systems’

3.3.1 Scope of the TC

Standardization of requirements and test methods for geometrical, chemical, physical and other characteristics of components, joints and systems; - where "Function TC's" exist, standardization of the plastics related requirements and test methods for fitness for purpose of complete systems related to the application shall be done in liaison with these "Function TC's"; in such cases are excluded from the work of CEN/TC 155 those general requirements for purposes that are independent of the plastics materials.

3.3.2 Organisation of the work

The Working Group in charge of the two Work Items under M/584 is CEN/TC 155/WG 25 ‘Recycling of PVC-U, PE and PP materials’, which meets 3-4 times per year.

For each of the Work Item, a Project Leader has been assigned. The WG is made of Plastic Piping and Ducting Systems producers, Raw Material Producers, Test Houses, and Certification Bodies.

Relevant published documents which are being taken into consideration are:

- EN 14541-1:2022 “Plastics pipes and fittings - Utilization of thermoplastics recyclates - Part 1: Vocabulary”;
- CEN/TS 14541:2022 “Plastics pipes and fittings - Utilization of thermoplastics recyclates - Part 2: Recommendations for relevant characteristics”.

3.3.3 Status of the deliverables

The work on both deliverables is proceeding according to the plan, with their publication foreseen at latest in August 2025.

3.3.4 Challenges to overcome

- Interpretation of the definition of “design-for-recycling” (DfR), as this may vary from Technical Committee to Technical Committee. CEN/TC 15/ WG 25 decided to follow guidance/definition from M/584 and focus only on design;
- Overlapping activities (scopes) of CEN/TC 155/WG 25 and CEN/TC 249/WG 26 ‘Agricultural plastic products - Design-for-recycling, use, removal, collection and recycling’, which has been recently solved → the two WG have agreed that:
 - CEN/TC 155/WG 25 will deal with thermoplastic pipes and fittings, used as construction products or used in supply systems for irrigation;
 - CEN/TC 249/WG 26 will deal with the other components of an irrigation system.

3.4 CEN/TC 249 ‘Plastics’

3.4.1 Scope of the TC

Standardization of: (1) terminology, (2) test methods, (3) specifications, classifications, and designation systems, (4) environmental aspects, (5) joining systems and techniques – of plastics, plastic-based materials, semi-finished products and products (thermoplastics, thermosets, degradable plastics, bio-based polymers, thermoplastic elastomers, composites, reinforcement products for plastics, recyclates). Rubber is excluded. Specific end-product related items are also excluded if they are covered by the scope of an existing product TC.

3.4.2 Organisation of the work

The Working Groups (WG) involved in the work related to M/584 on plastics recycling are:

- WG 7 ‘Thermoplastic films for use in agriculture’ (convenor Mr. Andrea Ferraresi);
- WG 11 ‘Plastics recycling’ (convenor Ms. Kristin Geidenmark Olofsson);
- WG 21 ‘Profiles for windows and doors’ (Mr. Andreas Franzelin);
- WG 26 ‘Design-for-recycling, use, removal, collection and recycling of agricultural plastic products’ (Mr. Xavier Ferry).

3.4.3 Status of the deliverables

Each WG has either conducted the circulation of the First Working Draft or is planning for it in the beginning of September 2023. The respective WGs are

working actively to respect the proposed target dates for submission to CEN Enquiry, which occurs on 2023-12-29 for most proposed deliverables. See more details on latest realized stage and scheduled target date for next stage indicated in the Work Programme.

3.4.4 Challenges to overcome

One of the challenges at the start of the work has been the availability of project leaders, which has been partly solved, as only two project leader roles remain vacant:

- Project leader for WI 00249A3E 'Plastics – Quality recommendations and basis for specifications for application of plastic recyclates in products – Part 4: Poly(ethylene terephthalate) (PET), developed in a Project Group under WG 11;
- Project leader for WI 00249A3F 'Plastics – Quality recommendations and basis for specifications for application of plastic recyclates in products – Part 6: Polystyrene (PS)', developed in a Project Group under WG 11.

Another challenge in the WGs is the lack of experience in drafting standards for those experts that are new to standardization and thus lack of knowledge on the CEN and CENELEC Internal Regulations, specifically:

- [Part 2](#): Common Rules for Standards Work, 2022;
- [Part 3](#): Principles and rules for the structure and drafting of CEN and CENELEC documents, 2022.

This matter has been partially solved through an extraordinary training session organized by CCMC project managers (addressed both to CEN/TC 249 'Plastics' and CEN/TC 261 'Packaging').

Moving forward, it is foreseen that CEN/TC 249 will be challenged by the need to align the approaches from the various WGs, both within CEN/TC 249 and with the other TCs involved in M/584. In this context, the CEN and CENELEC Coordination Group on Circular Plastics will be an important forum for such alignment.

3.5 CEN/TC 254 'Flexible sheets for waterproofing'

3.5.1 Scope of the TC

Preparation of European Standards on factory made flexible sheets for waterproofing for use in building construction and civil engineering.

3.5.2 Organisation of the work

The work is being carried out in CEN/TC 254/SC 2 "Synthetic sheets", which develops standards on flexible sheets for waterproofing composed largely of thermoplastics and elastomeric polymers.

The Working Group in charge is CEN/TC 254/SC 2/WG 1 'The development of EN Re-cycling', which meets approximately 2-4 times per year. The Project leader for the EN on "Flexible sheets for waterproofing – Plastics recycling and recycled plastics – Plastic waterproofing sheets" is Ms. Sabina Holdener.

3.5.3 Status of the deliverables

The work is proceeding according to the plan. The circulation of the First Working Draft is expected to take place in September 2023. The submission of the draft for CEN Enquiry is expected to take place in November 2023.

3.5.4 Challenges to overcome

No challenges have been encountered.

3.6 CEN/TC 261 'Packaging'

3.6.1 Scope of the TC

CEN/TC 261 is responsible for the elaboration of standards dealing with terminology, dimensions, capacities, marking, test methods, performance requirements and environmental aspects in the field of packaging and unit loads. The field covers primary, secondary and transport packagings and unit loads, whatever the materials, shapes, contents or distribution system used.

CEN/TC 261 has two specific Sub-Committees:

- SC 4 'Packaging and Environment';
- SC 5 'Primary packaging and transport packaging'.

3.6.2 Organisation of the work

The standards developed in response to the standardisation request M/584 are managed by CEN/TC 261/SC 4/WG 10 "Design for recycling for plastic packaging products", a working group set up for the purpose.

Like CEN/TC 261 and SC 4, WG 10 is managed by Valentin Cottin (Secretariat, AFNOR - France) and Vincent Colard (convenor).

WG 10 was organised by consensus over several meetings. The result of these discussions is as follows: 8 specific sub-groups have been created, each of which will be responsible for developing between one and two standards by August 2025.

The list of sub-groups is given below:

- SG 1 : Methodology
- SG 2 : Sorting
- SG 3 : PET bottles packaging
- SG 4 : PET rigid (except bottles) packaging
- SG 5 : PE and PP rigid packaging

- SG 6 : PE and PP flexible packaging
- SG 7 : PS and XPS rigid packaging
- SG 8 : EPS packaging

The intention of the CEN/TC 261/SC 4/WG 10 convenor and secretariat was to appoint one project leader for each sub-group. Project leaders are responsible for developing standards, applying the WG 10 strategy and organising sub-group meetings.

The aim was for each sub-group project leader to represent a stakeholder in the sector and to have real expertise and a degree of availability in their subject. After an 8-week consultation period, 8 project leaders, from 8 different organisations, were unanimously appointed.

WG 10 meets on average every 6 weeks to provide the sub-groups with the right information, including possible exchanges with the European Commission. The sub-groups, whose work on standards began in May 2023, have met on average 3 times so far.

At date, WG 10 is representative of the packaging industry, with sorting professionals, manufacturers, users, European organisations, and more. While the WG continues to welcome new members from different countries, it now has over 160 members and more than a dozen liaison organisations. Attendance at the various meetings already held is also satisfactory, with more than 70 members taking part on average.

3.6.3 Status of the deliverables

While WG 10 is responsible for drawing up 15 European Standards, the decision to divide this workload into sub-groups should enable the working group to see its standards published by the date set by the Standardization Request M/584.

The works is progressing well, although some issues need more time to be resolved. At date, the project leaders are finalising first drafts that will be shared with members of the parent structures in October 2023. The drafts for CEN Enquiry are expected to be sent to CEN for editing at the beginning of March 2024.

Transmission to CEN of the drafts for Formal Vote is scheduled for the end of February 2025, enabling the start of Formal Vote 8 weeks later and official publication of the document by 25 August 2025 at the latest.

3.6.4 Challenges to overcome

A number of issues remain unresolved in the work of WG 10. The first concerns the design of sorting in Europe. The aim of WG 10 is to standardise several dozen of different visions and ways of operating with regard to sorting. The second central issue is to represent the reality of what plastics packaging is and how it is

manufactured, used and sorted, while at the same time – thanks to this work and the support of the European Commission – pushing the stakeholders towards greater rigour over the next few years.

3.7 CEN/TC 301 'Road vehicles'

3.7.1 Scope of the TC

Preparation of road vehicle European Standards answering essentially to European mandates. Since the automotive industry is acting globally, the international level (ISO/TC 22 Road vehicles) shall have top priority for any other standardization projects.

3.7.2 Organisation of the work

CEN/TC 301/WG 17 'Plastics recycling and sustainability for road vehicles', established November 2021, is in charge of the Technical Specification 'Road vehicles – Post Shredder Technology recycling – Design recommendations for plastic products'. The WG is composed of experts from six countries: Sweden, France, Germany, Spain, Italy, United Kingdom. Plastic Recyclers Europe (PRE), The European Recycling Industries' Confederation (EuRIC) and Environmental Coalition on Standards (ECOS) are also participating in the WG. The EC also has one representative in the group from DG GROW. The stakeholder categories represented are:

- vehicle manufacturers (parts or whole vehicles);
- recycling industry;
- environmental organisation;
- European commission.

The work is carried out virtually, both the meetings and the drafting of the deliverables. Meetings are held monthly to reach consensus on clauses drafted in between meetings. There is a project leader who is planning the work together with the Convenor and Secretary.

3.7.3 Status of the deliverables

The WG will meet the deadline set out in the standardization request.

3.7.4 Challenges to overcome

According to CEN rules, a Technical Specification shall not repeat legal requirements, therefore the WG will read through the proposal for the Directive on end-of-life vehicles which is planned to be available June-July 2023. The WG has invited a representative from DG GROW to help the experts understand the Directive. The representative has been invited to the WG meeting in June and will be invited to all planned meetings. The input would be valuable from June 2023 until end of November 2023.

The major problems to solve are:

- Terminology: is it possible to repeat terminology from EU regulation/directive in clause 3 and give the regulation as source?
- Reach consensus between recycling industry and manufacturers of road vehicles.

3.8 CLC/TC 111X 'Environment'

3.8.1 Scope of the TC

Deal with environmental aspects for electrical and electronic products and systems. To promote activities in CENELEC relevant to reducing detrimental impacts of electrotechnical activities/products/systems on the natural environment (in this context "reducing" means a process of continual environment improvement aimed towards an optimum balance with social, economic, safety and performance requirements). To enhance CENELEC's environmental links with the European legal framework, particularly in the context of standardization aspects of EU environmental regulations and directives. To improve energy and resource efficiency of electrotechnical products and systems as important aspects in order to reduce impacts on the environment (for example climate changes and depletion of resources). To prepare the necessary standards framework and in co-operation with other CENELEC Technical Bodies co-ordinate the development of, or when necessary produce, the needed standardization deliverables. Product TCs remain autonomous in dealing with environmental aspects relevant to the products included in their scope. To assist product committees in the elaboration of environmental requirements of product standards in order to foster common technical approaches and solutions for similar problems and thus promote consistency in CENELEC standards. To cooperate with recognized standardization bodies and other relevant organizations for matters of common environmental interest. To communicate with and to give advice to CENELEC BT and Technical Committees on questions related to work on environmental issues. EMC and EMF aspects are excluded, but relevant developments will be noted.

3.8.2 Organisation of the work

CLC/TC 111X/WG 12 'Design for Plastics Recycling' has been established in order to develop the TS "Design for recycling guidelines for styrenics and polyolefins products and parts in electrical and electronic equipment, with focus on ABS, PP and PS". Experts to contribute to this WG are currently being appointed

3.8.3 Status of the deliverables

The definition of the time schedule and the registration of the WI in the Work Programme of CLC/TC 111X will take place in September 2023.

3.8.4 Challenges to overcome

CLC/TC 111x has a long-standing experience in development of standards on WEEE (such as on collection, logistics & treatment), whereas the topic of design-for-recycling guidelines for products and parts in EEE through is new.

For this reason, it was decided to establish a WG 12, where manufacturers with recyclers, sorters, Extended Producer Responsibilities (EPR) schemes, European organisations, and others could participate.

The establishment of WG 12 caused some delays, but the work will resume at full speed in September 2023.

3.9 CLC/TC 213 'Cable management systems'

3.9.1 Scope of the TC

Prepare European standardization publications for products and systems used for the management of all types of cables, information and communication lines, electrical power distribution conductors and associated accessories. Management includes support and/or containment and/or retention and/or protection against external influences.

3.9.2 Organisation of the work

CLC/TC 213 'Cable management systems'/WG 07 "Fire performances and environmental performances of cable management systems" oversees the development of the TS "Cable management systems – Design-for-recycling guidelines for PVC cable management products" assigning the project to its existing horizontal".

Two meetings of WG 07 about this project were held on 2023-04-26 and 2023-06-27 and two other meetings are planned on 2023-09-21 and 2023-11-17.

CEN/TC 155 'Plastics piping systems and ducting systems' has been invited to nominate experts to contribute to the development of the TS, and they appointed a liaison officer to be the reference point among the two TCs.

3.9.3 Status of the deliverables

The First Working Draft is expected to be circulated to CLC/TC 213 in January 2024, whereas the Vote should take place in March 2025.

A structure for the draft Technical Specification was agreed and the drafting of various parts has been allocated within WG 07.

The work benefits from a more advanced project of CEN/TC 155 on a similar deliverable and relies on a fruitful cooperation.

- As reported on behalf of CLC/TC 213 during the 2023-06-07 kick-off meeting of the CEN-CLC Coordinating Group:
 - The Coordinating Group is expected to facilitate sharing inputs between various TCs;
 - Homogeneity in structure of similar deliverables prepared by the Technical Committees involved in M/584 was recommended but it is understood that differences in progress of the various Technical Committees make it difficult for the first edition of the deliverables to be fully aligned;
 - CLC/TC 213 recommended focusing on Cable Management products excluding their packaging and relying on the relevant TC for the packaging.

3.9.4 Challenges to overcome

Confirmation that CLC/TC 213 deliverable can focus on Cable Management product and exclude the packaging (relying on the relevant TC for the packaging) is needed by the European Commission.

4 CEN-CLC Coordination Group on Circular Plastics

During the preparation of M/584, the group in charge of coordinating the inputs was the Standardization Request Ad Hoc Group (SRAHG) on “Plastics recycling and recycled plastics”, which was disbanded after the acceptance by CEN and CENELEC of M/584.

Nonetheless, it was still needed to ensure alignment among all the TCs involved and between those and the European Commission. For this reason, in September 2022 the CEN and CENELEC Coordination Group on Circular Plastics was established by the Technical Boards (BTs).

The objectives of the group are, among others:

- Act as an advisory and coordinating body on horizontal and strategic matters related to the Circular Plastics sector on behalf of the CEN and CENELEC BTs;
- Provide a platform for exchange of information among concerned Technical Bodies (TBs);
- Provide a platform for exchange of information between concerned TBs and other stakeholders (e.g. liaison organisations, Annex III organisations, European Commission);
- Provide support and guidance to the relevant TBs, essentially on horizontal or sectorial matters (including harmonisation of deliverables under Standardization Requests);

- Follow up and discuss policy issues/European initiatives relating to the Circular Plastics sector, including new areas of standardisation and creation of CEN and CENELEC Technical Committees.

The secretariat of the Coordination Group is held by AFNOR (secretary Ms. Djida Laoubi). The Chairperson is Mr. Gerald Feigenbutz (appointed by DIN) and the Vice-Chairperson is Mr. Gilles Dennler (appointed by AFNOR).

The group met for the first time virtually on 2023-06-07. The next meetings are scheduled to take place on 2023-10-12 (in Brussels) and on 2023-12-05 (virtually).

The horizontal open points discussed during the first meeting of the Coordination Group are available in paragraph 5 below.

5 Horizontal open points

5.1 Holistic approach towards a consistent framework

One of the main challenges identified by the Coordination Group is how to make sure that the deliverables of M/584 will result in a consistent and coherent framework for the whole value chain.

The goal is to involve “all players in the plastic value chain, from plastic producers and designers, through brands and retailers, to recyclers, in line with the European Strategy for Plastics in a Circular Economy”, as quoted in recital 4 of M/584.

The “silo effect” shall be avoided at all costs and opportunities should be created to encourage interactions between different expertise and TCs. For this reason, TCs are encouraged to use the CG as a platform to share relevant documents and working drafts, as well as to exchange views with the other TCs and WGs in a continued and organic way.

5.2 Definition of “design-for-recycling” and of recyclability

The drafting of the deliverables is still at a relatively early stage and for this it is premature to get a full picture on the various definitions of “design-for-recycling” and of recyclability adopted by the TCs. Nonetheless, alignment of these definitions is crucial to have a consistent framework as defined in 5.1.

This topic will be on the agenda of the next meeting of the CG in October 2023. It has already been anticipated that one of the challenges for succeeding in this endeavour is the intrinsic relation of the DfR concept with the recycling practices/technologies available for a given product/polymer.

It has also been suggested to look into already existing standards, such as EN 45555:2019 'General methods for assessing the recyclability and recoverability of energy-related products'.

5.3 Common structure for Design-for-Recycling standards

Related to point 5.1 is also the goal to have a common structure of the deliverables covering DfR guidelines.

During the first CG meeting, it has been suggested to investigate the Joint Research Centre (JRC) work on the "Safe and sustainable by design chemicals and materials" and to invite the JRC to share their views (by joining the CG and/or through ad-hoc meetings).

5.4 Terminology across TCs

It is desirable that the various TCs adopt consistent terminology whenever possible (e.g. 'post-consumer', 'scrap'). It should be investigated whether on top of existing EN standards, also ISO standards could help meeting this objective.

During the next meeting of the CG, the possibility of creating a subgroup within the CG to tackle this point will be discussed.

5.5 Construction Products Regulation (CPR) Acquis

For the construction products addressed in Annex I, table 1, point 4 of M/584, it is considered important to ensure alignment between the design-for-recycling guidelines under development and the revisions of the Mandates, which are currently being carried out in the framework of the CPR Acquis.

The upcoming revised CPR puts great emphasis on the environmental performance of construction products. The manufacturers will have to deliver environmental information about the life-cycle of their products, which will have to be assessed according to the standard EN 15804 "Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products".

One of the action points resulting from the first meeting of the CG is to invite representatives from DG GROW H1 (construction unit), as well as representatives from CEN/TC 350 'Sustainability of construction works'.

5.6 Packaging material of products

The product TCs also wish to seek confirmation from DG GROW that the packaging of products for which DfR are being developed should be excluded from the scope of the DfR standards (yet treated within the TC 261 deliverables).

CEN – European Committee for Standardization
CENELEC – European Committee for Electrotechnical Standardization



Annex 1 – Updated Work Programme

Available in the excel file accompanying this report.

Annex 2 – Abbreviations

- CG: Coordination Group
- EC: European Commission
- EN: European Standard
- ESO: European Standardization Organization
- DfR: Design-for-Recycling
- SC: Subcommittee
- TC: Technical Committee
- TS: Technical Specification
- WG: Working Group
- WI: Work Item