



**Bridging The Recyclate Gap**  
**by**  
**Credit Trading:**  
**Certified Recycled Content**

# AGENDA

- Current Situation 2025: Recycling Crisis vs. High Ambition
- PPWR 2030: Recycled content quotas for plastic packaging
- Remaining challenges 2030:
  - EFSA approval for food-grade polyolefins not expected in time
  - Technical impossibility of recycle on modern packaging machines
  - So far, design for recyclability activities not reaching market in time (flexible packaging: 40% PO-Flex waste)
  - Recyclate gap
- The Solution: Credit trading for recycled content

## Recycling Crisis vs. High Ambition

### Recycling crisis:

- Too little separate collection and sorting in EU
- So far, design for recyclability activities showing no impact on product quality, prices and yields in recycling
- Low recyclate utilisation rate, <7% high value PCR in plastic products
- Recyclers leaving the market due to too low virgin prices



EU **packaging and packaging waste regulation** (PPWR) with recyclate utilisation rates **of 10-35% by 2030**

The background of the slide is a photograph of a dense forest, likely a deciduous forest, with many trees and green foliage. The image is overlaid with a semi-transparent green filter, which makes the colors appear more muted and uniform. The text is centered horizontally and vertically on the slide.

# REMAINING CHALLENGES 2030

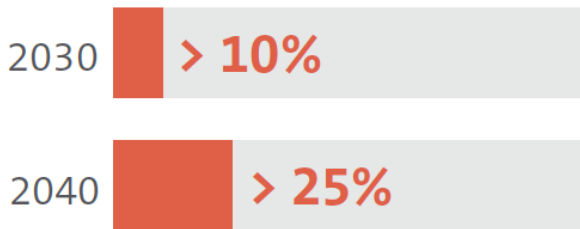
# CONTACT SENSITIVE PACKAGING REQUIREMENTS 2030

EU Packaging Regulation (PPWR) foresees recycling rates of 10% - 35% by 2030

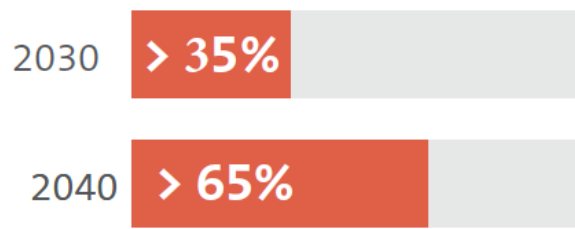
By 01/2029, the Commission will adopt a delegated act on the calculation/review of the recycled content



**contact sensitive packaging<sup>(3)</sup>**  
(all except PET)



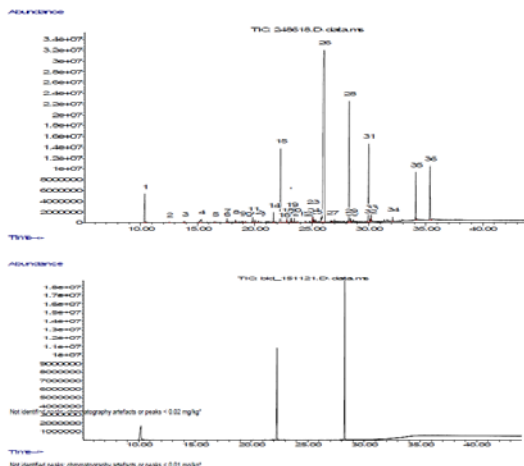
**All other plastic packaging**



*(3) This requirement excludes most medical or compostable packaging or plastic parts that account for less than 5 % of the total weight of a packaging format.*

# REMAINING CHALLENGES 2030

EFSA permit for food grade polyolefins not expected in time (cautionary principle)



11	19.84	NM/W	possibly branched Alkylester	N/P							
12	20.03	NM/W	possibly Alkylcytoster	N/P							
13	20.34										
14	21.06	250	2-Ethylhexyl salicylate		118-60-5						
15	22.28		4-Nonadecane (S)								
18	22.83	276	7,9-Di-tert-butyl-1-oxaspiro[4.5]deca-6,9-diene-2,8-dione		82304-06-3						
19	23.21	256	n-Hexadecanoic acid		57-10-3						
20	23.48	284	Ethyl palmitate		628-97-7						
22	24.44	NM/W	possibly Alkylcitrate	N/P							
23	25.08	342	probably Tributyl aconitate		7988-58-3						
24	25.12	284	Octadecanoic acid		57-11-4						
25	25.32	390	probably n-Butyl citrate		77-94-1						
26	26.10	402	Tributyl acetyltritate		77-60-7						
29	28.41	NM/W	probably Alkylamide	N/P							
31	30.01	337	Eruoylamide		112-84-5						
33	30.22	NM/W	possibly sugar derivative	N/P							
34	32.10	NM/W	possibly Alkylcytoster	N/P							
35	34.13	646	Irgafos 168		31570-04-4						
36	35.38	682	Irgafos 168 ox		95606-11-9						
		sum	sum of branched hydrocarbons		N/P						
Sum						1.12	6.72				

# REMAINING CHALLENGES 2030

Technical impossibility of running recyclate on modern packaging machines (odour, colour, gels)



# REMAINING CHALLENGES 2030

- Approx. 40% of all packaging cannot be “high value” recycled
- Taxes in England and Spain without impact

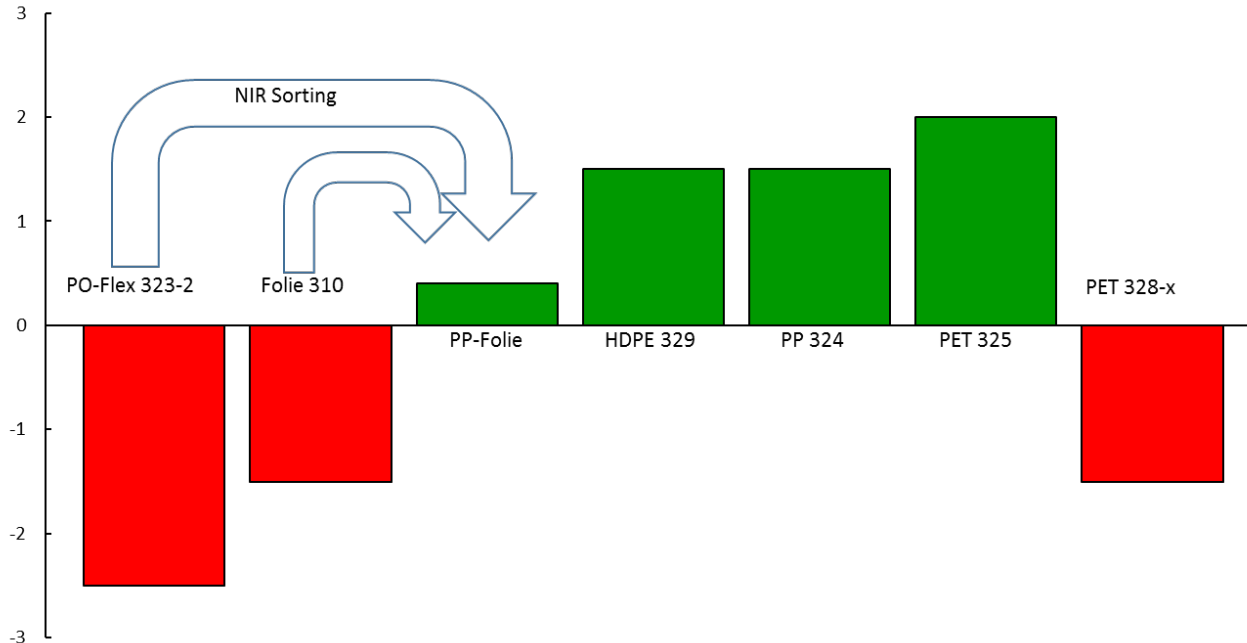




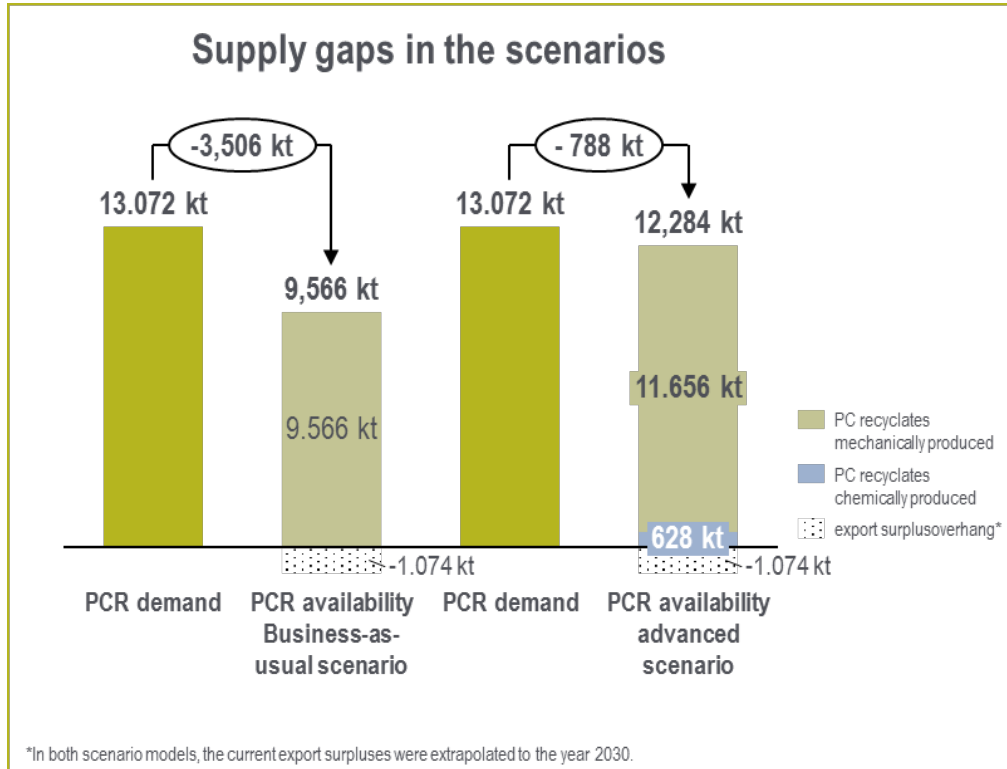
# REMAINING CHALLENGES 2030

## Recyclability vs. Circularity

Price

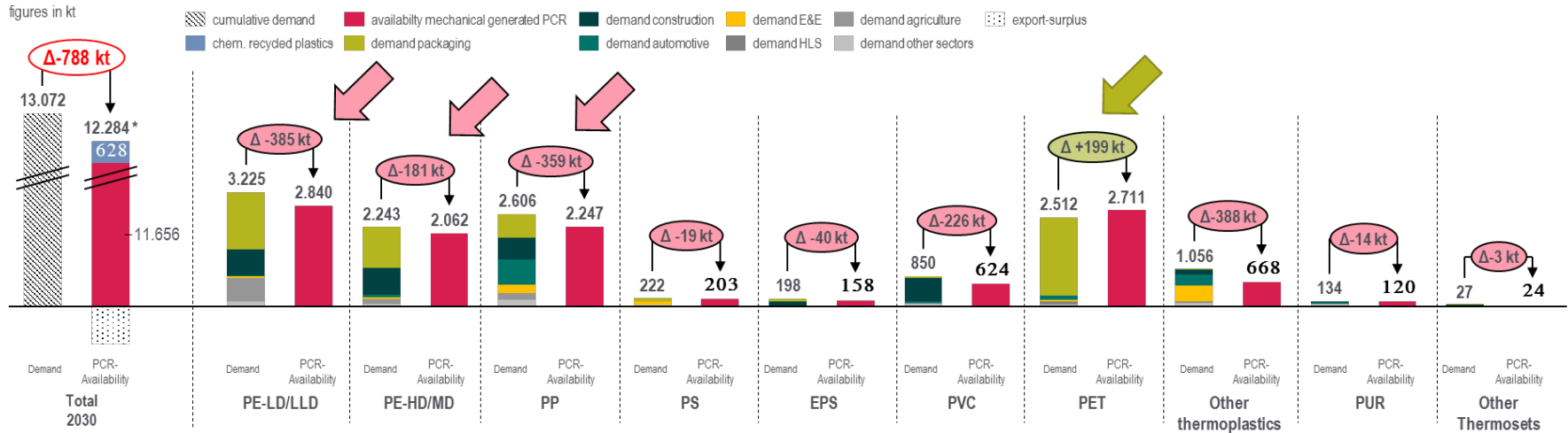


# REMAINING CHALLENGES 2030



# MAJOR PCR BOTTLENECKS

- GAP VARIES, IN PARTICULAR FOR POLYOLEFINS THAT ARE IMPORTANT FOR THE PACKAGING SECTOR



\* Post-consumer recyclates produced less export surplus; the supply GAP is calculated taking into account an assumed export surplus of 1,074 kt (unchanged from 2022)  
Chemically recycled plastics only partially reduce the supply gap. Different polymers are produced from the base materials (naphtha and monomer) depending on market demand

Source: Conversio 12/24





# THE SOLUTION



**CERTIFIED<sup>®</sup>  
RECYCLED  
CONTENT**



Kofinanziert von der  
Europäischen Union

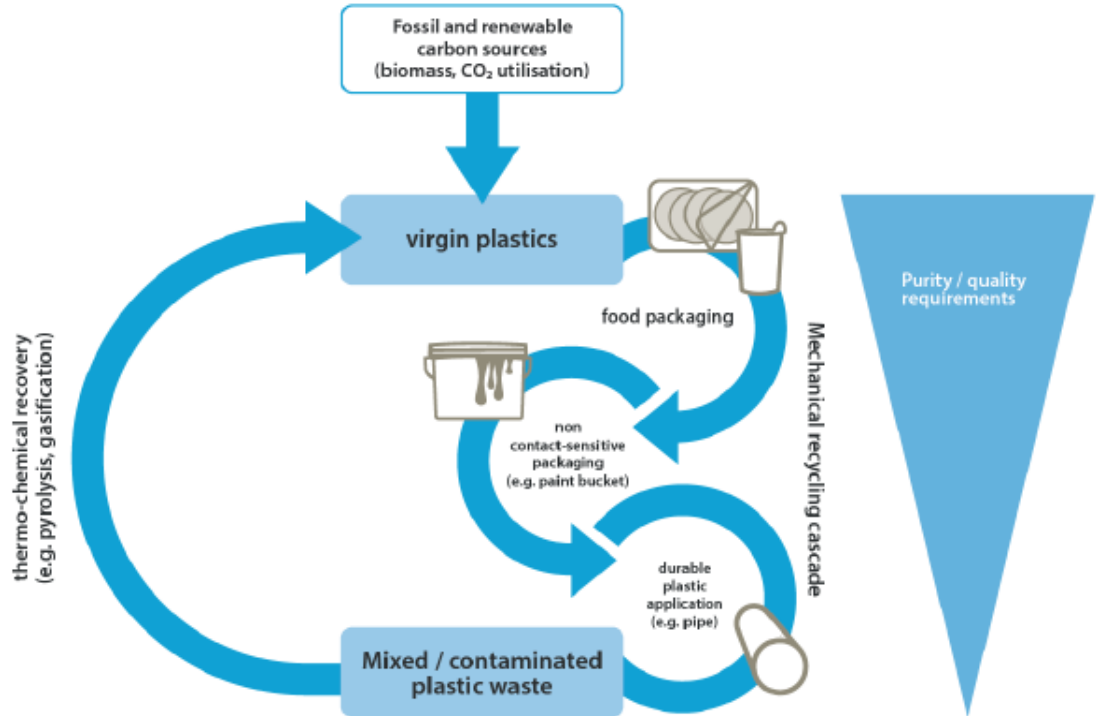
Ministerium für Umwelt,  
Naturschutz und Verkehr  
des Landes Nordrhein-Westfalen



# UNDERLYING PRINCIPLE

“Some product can use more, others less recycled materials.

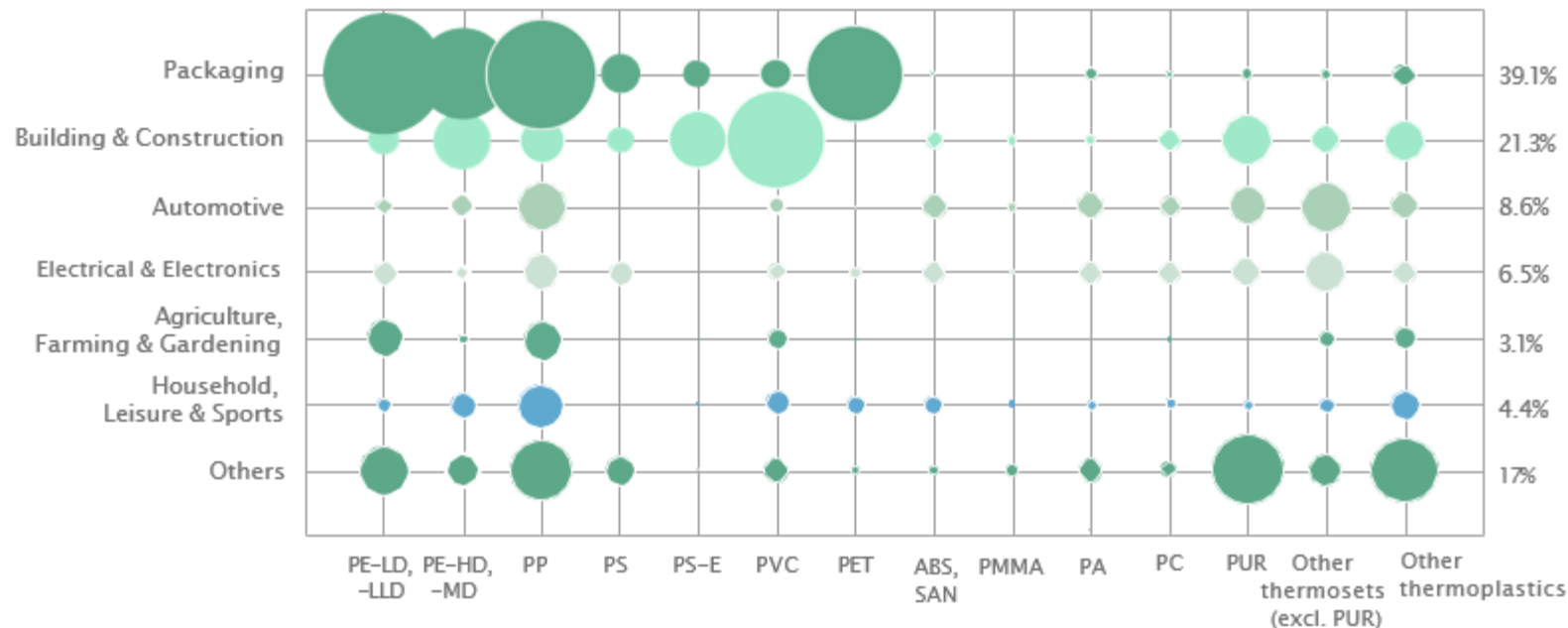
**The cascading use of recycled materials** enables a long-lasting and energy-efficient use of materials. To allow for the economically **most efficient use** of recyclates a crediting system should be established.”  
(IK Industrievereinigung Kunststoffverpackungen e.V.)



Source: IK Industrievereinigung Kunststoffverpackungen e.V.



# EUROPEAN PLASTICS CONVERTERS' DEMAND BY APPLICATION AND TYPE



Source: Conversio Market & Strategy GmbH based on the input of the Plastics Europe Market Research Group (PEMRG) The above data are rounded estimations.

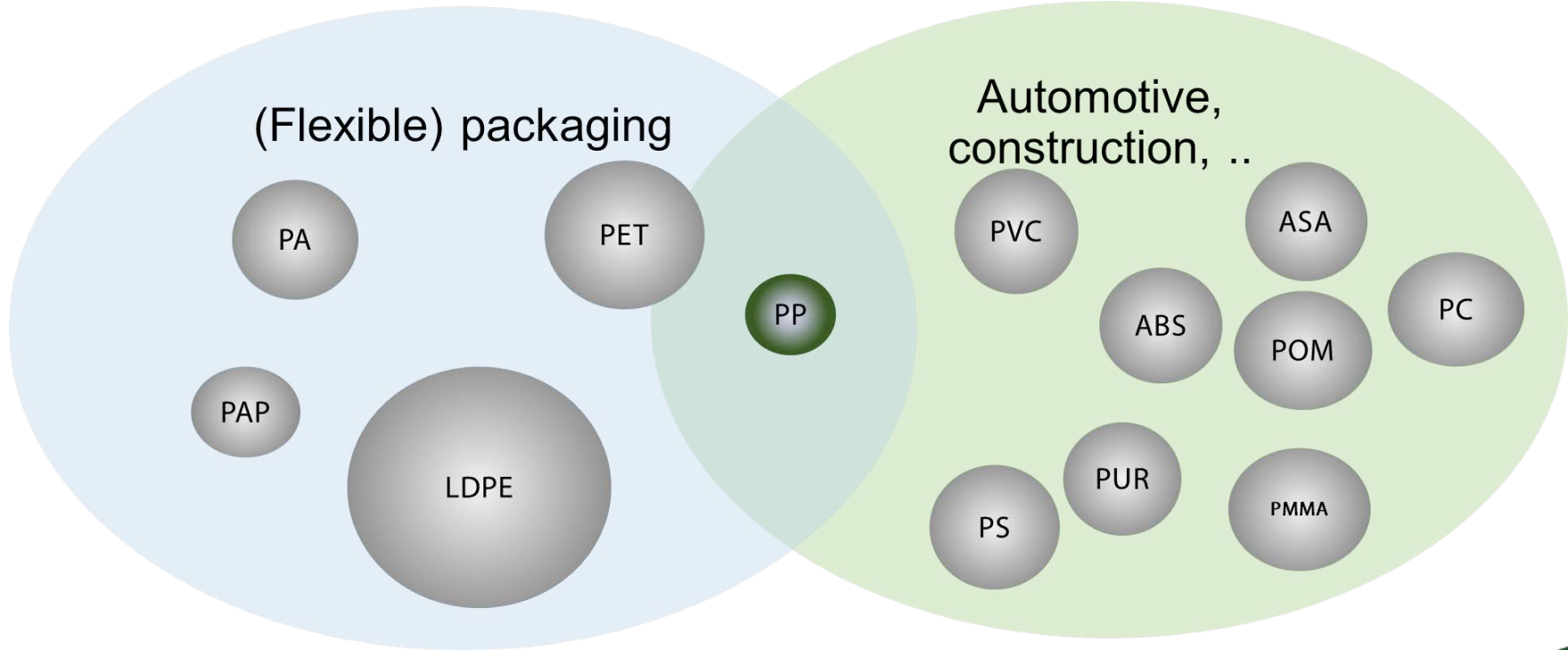
Demand data are built on estimations of quantities bought by European converters, including imports.

Demand for recycled plastics and bio-based/bio-attributed plastics is not included.

Polymers that are not used in the conversion of plastic parts and products (i.e., for textiles, adhesives, sealants, coatings, etc.) are not included.

Numbers behind this graph are available upon request. Plastics – the Facts figures on PA only cover PA6 and PA66.

# DIVERSITY OF POLYMERS IN INDUSTRY





# Cooperation?

Why don't we connect the two sectors working together already?



contact sensitive  
packaging<sup>(3)</sup>  
(all except PET)

2030

> 10%

2040

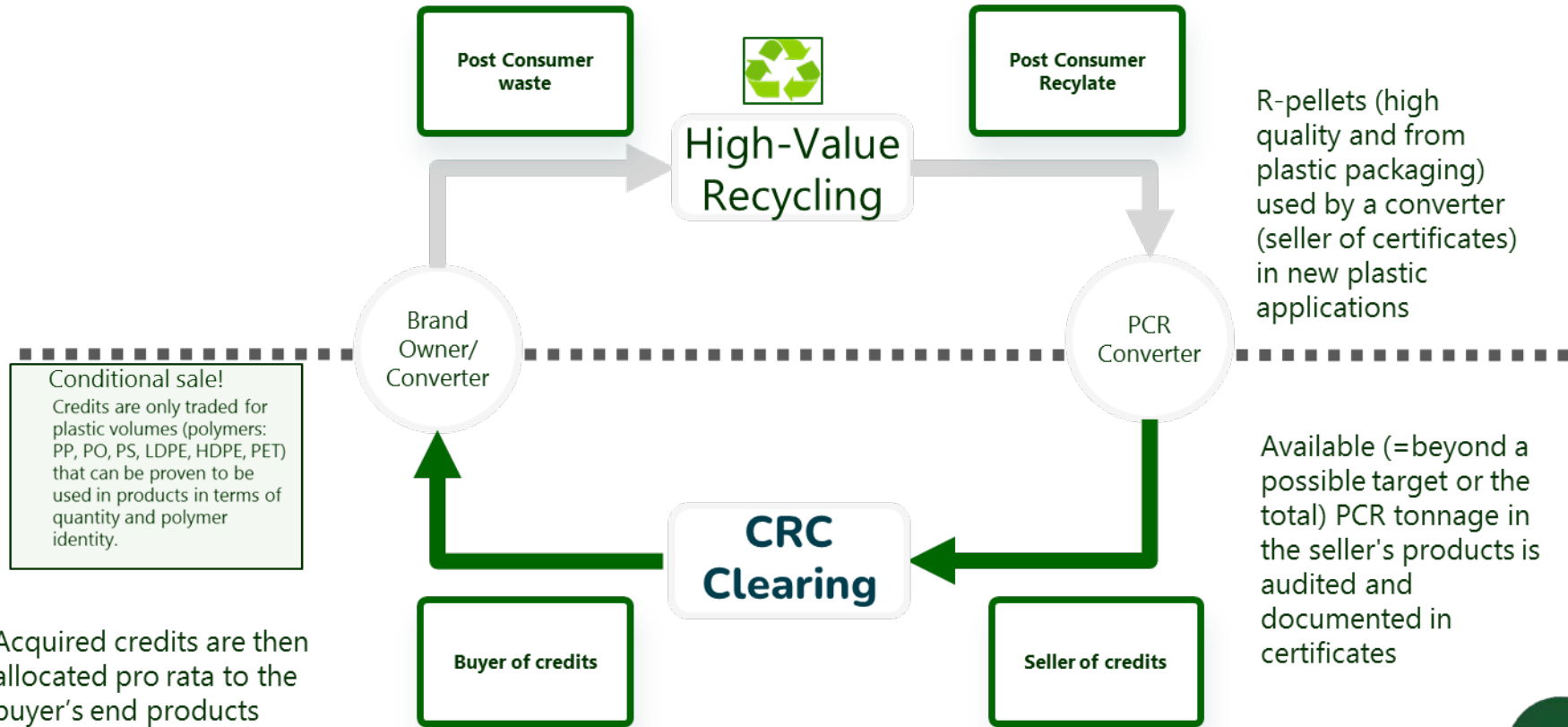
> 25%



Automotive, household, sports,  
leisure, construction, ...



# THE ENTIRE COLLABORATION SYSTEM



# TRACEABILITY, EFFICIENCY



Licensing of packaging by the **Central Packaging Register** and comparable international bodies.

Material/  
Consumer  
waste



High-Value  
Recycling

50 T



**RecyClass and other officially accredited auditors**  
Audit of recycling processes and the amount of recycled content

Brand  
Owner/  
Converter

PCR  
Converter

plastic applications

**Conditional sale!**  
Credits are only traded for plastic volumes (polymers: PP, PO, PS, LDPE, HDPE, PET) that can be proven to be used in products in terms of quantity and polymer identity.

Acquired credits are then allocated pro rata to the buyer's end products

Buyer of credits  
25 credits

CRC



Auditing of CRC's entire processes (including IT) by accredited auditors like **TÜV** in accordance with DIN ISO 9001

credits  
credits

The available (beyond a possible target or the total) PCR tonnage in the seller's products is checked and documented in certificates

CRC

# BENEFITS IN SUMMARY



## Utilisation of existing sorting routes and infrastructure

- ✓ No additional bureaucracy, efficient
- ✓ Strengthening the existing recyclate market



## Optimisation of the recycling ecosystem through economic incentives

- Certificates will be scarce, with prices higher than the prices for physically available recyclates
- ✓ Optimisation of the packaging design
  - ✓ Increasing the qualitative quantity of recyclate for all sectors



## Promotion of high-value recycling = replacing fossil-based plastics in typical polymer applications. (Definition according to German Central Body ZSVR, PPWR (Art 3.1 (41))

- ✓ Contribution to decarbonisation



## Proof of recyclability through officially recognised test procedures

- ✓ Quality, traceability, safety

STRENGTHENING  
THE CIRCULAR ECONOMY  
FOR  
PLASTIC PACKAGING  
IS  
CLIMATE PROTECTION



INITIAL SITUATION

- GHG EMISSION REDUCTION
- WASTE VOLUMES CONTINUE TO RISE
- UNSUFFICIENT RECYCLING RATES
- LOW RECYCLATE USE TARGETS
- 40% OF PACKAGING IS NOT RECYCLABLE (MIXED COMPOSITES)



FOUNDING

- FOUNDING "CERTIFIED RECYCLED CONTENT CRC" IN 2022/ GERMANY, NRW
- INNOVATIVE CERTIFICATE TRADING WITH THE AIM OF INCREASING THE USE OF RECYCLED MATERIALS. **THE MASS EQUIVALENT CREDITSYSTEM**



- POINT OF THE GERMAN GOVERNMENT'S CIRCULAR ECONOMY STRATEGY
- FUNDED BY  **Kofinanziert von der Europäischen Union** |  Ministerium für Umwelt, Naturschutz und Verkehr des Landes Nordrhein-Westfalen
- BROAD INDUSTRY SUPPORT



OUR  
FUNDING  
JOURNEY

# THE TEAM BEHIND CRC

We combine the expertise of plastic conversion and high-quality recycling



**Dr. Dirk Textor**  
**Managing Director**

25+ years experience in plastic (packaging) recycling. **Chairman of Plastic Recycling** section of **bvse e.V.** (German Association of Secondary Raw Materials and Recycling). Strong international and national network.

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**Ansgar Schonlau**  
**Managing Director**

Ansgar Schonlau is an **international packaging expert with over 25 years experience** in the plastics industry. He has covered different sales and management roles, always striving for sustainable, cost-effective products and processes. Since 2018, Ansgar is owner of the climate-neutral and highly innovative packaging manufacturer Maag.

[ansgar.schonlau@crc.earth](mailto:ansgar.schonlau@crc.earth)



**Dr. Michael Scriba**  
**Managing Director**

Dr Michael O.E. Scriba is a pioneer of the circular economy for packaging. He played a key role in the introduction of the Green Dot in Germany and developed the mtm plastics group into one of the largest polyolefin recyclers in Europe. As chairman and advisor to important industry organisations and as a shareholder of a recycler, he actively shapes and advises the plastics recycling value chain.

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**THANK YOU**