

## Position Paper

# Strengthening the Single Use Plastics Directive as a Driver of Circularity

*This paper provides input for the European Commission's [Call for evidence for an evaluation](#) (Ares(2025)11556597) of the Single Used Plastics Directive (SUPD)*

The European Sustainable Business Federation - Ecopreneur.eu represents 5,000 business organisations, many of them frontrunners of the circular economy. Our membership includes manufacturers, technology providers, retailers and innovators with circular business models who provide alternatives to conventional single use plastics, as well as organisations investing in high-quality recycling and reuse. Most of these companies are SMEs.

Ecopreneur.eu welcomes the European Commission's initiative to evaluate the impact of the SUPD (EU 2019/904) and appreciate the opportunity to contribute industry perspectives on its effectiveness, implementation and future development. From our perspective, circularity is the key towards a clean, competitive and sustainable economy in Europe. In this transition, the SUPD is key to prevent littering and mandate the packaging industry to take responsibility for the end-of-life of their products. Its assessment offers the opportunity to reinforce regulatory clarity, ensure consistent enforcement and safeguard a competitive internal market.

To this end, we call on the European Commission to

- ensure coherence across EU legislation to support a functioning Single Market for recycled plastic,
- support prevention and reuse while enabling realistic substitution pathways where reuse is not feasible,
- reinforce legally-binding recycled-content obligations, and
- address circumvention practices that undermine bans and distort competition by strengthening enforcement and market surveillance across Member States.

## Safeguarding principles for a level playing field

The SUPD has a direct effect on recycling markets and investment decisions. For responsible businesses, several safeguarding principles are essential to creating a level playing field for sustainable businesses:

- Binding recycled-content requirements remain critical to create predictable demand for recyclates
- Mechanical recycling should be prioritised where technically and environmentally feasible
- Chemical recycling should remain complementary and not displace established recycling streams

- Imports of recycled materials should only count towards EU targets if they meet EU environmental and processing standards

Without these safeguards, European recycling investments risk being undermined by cheaper, less regulated alternatives flooding the EU market from third countries.

### **Ensuring regulatory certainty as a driver for innovation**

So far, the SUPD has proven that clear, targeted regulation can simultaneously deliver environmental benefits and stimulate innovation. By restricting specific single-use plastic products, it has accelerated the design, development and industrial scaling of alternative non-plastic materials and products made of regenerative resources.

In times of structural change, regulatory certainty is crucial for enabling investment, capacity expansion and job creation. The review of the SUPD should therefore aim to strengthen clarity and consistency, not reopen established definitions or create ambiguity that would undermine investor confidence.

As a result, a strengthened SUPD will not only reduce plastic pollution but also reinforce Europe's leadership in circularity, ensure investment and stimulate innovation of regenerative new materials and sustainable products.

### **Coherence of definitions and rules across EU legislation**

Companies expect consistent rules across the Single Market. Inconsistent material definitions or end-of-life rules increase compliance costs delay investment and lead to fragmented markets. From this perspective, coherence between the SUPD, the Packaging and Packaging Waste Regulation (PPWR), the Waste Framework Directive (WFD) and future Circular Economy Act (CEA) is of the essence.

A clear, science-based definition of plastic is fundamental for legal certainty, market surveillance and fair competition. Synthetic and chemically modified polymers, for example, including bio-based and biodegradable plastics, must remain within the scope of the plastic definition as they do not reliably biodegrade under real environmental conditions and can contribute to microplastic pollution.

Moreover, inconsistent implementation across Member States is creating distortions within the internal market. Products prohibited under EU law remain available in some countries, while misleading claims around "reusability" and "biodegradability" allow de facto single-use plastic products to persist. This undermines compliant companies, penalises early movers and erodes trust in EU regulation. From an industry standpoint, enforcement is as important as ambitious laws.

## **Internalise environmental costs through financial incentives**

Plastic pollution and microplastic contamination pose significant material risks to ecosystems and human health, which translate into long term economic costs for public authorities, businesses and individuals. For this reason, the SUPD Revision must aim high to prevent waste generation at source, reduce plastic leakage into the environment, promote reuse and circularity, and internalise environmental costs through financial incentives like eco-modulated Extended Producer Responsibility (EPR) schemes and a financial compensation for reuse schemes and the use of recycled content.

## **Prevention and reuse and realistic substitution pathways**

We support the SUPD's waste hierarchy, with prevention and reuse as priorities. Many of our members are actively developing and deploying reuse systems. However, industry experience shows that certain applications – particularly on-the-go consumption and small-format items – remain challenging for reuse due to hygiene, logistics and consumer behaviour. In these cases, substitution away from plastic remains essential to achieve environmental objectives. Where reuse is not feasible at scale, replacing plastic with genuinely regenerative materials offers a pragmatic and effective pathway to reduce pollution risks without compromising functionality.

## **About Ecopreneur.eu**

The European Sustainable Business Federation, Ecopreneur.eu, represents around 5,000 SMEs and larger companies committed to sustainability across sectors and EU Member States, many of them pioneering circular business models. With its eight member associations, Ecopreneur.eu is the only cross-sectoral business organisation advocating ambitious measures, rules and regulations for a low-carbon, circular and socially inclusive economy in Europe and beyond. We advocate a new economic framework in which sustainability is promoted, the environment respected, and ecological principles are followed. Ecopreneur.eu and our members bring concrete experience from pioneering companies into the political debate, show best practice examples that prove the viability of sustainable business models.

## **Contact**

For more information, contact Michael Laermann, Senior Policy Adviser, Ecopreneur.eu, [laermann@ecopreneur.eu](mailto:laermann@ecopreneur.eu)

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