PLASTICS EUROPE
Enabling a sustainable future

Position Paper

Plastics Europe's position on the WSR exports to OECD countries

Plastics Europe believes that plastic waste destined for recycling is a valuable resource and circular feedstock. Policies governing waste movements should support environmentally sound recycling and recovery while maintaining high levels of environmental protection.

However, trade in plastic waste destined for recycling, including EU waste exports, should take place only where there is clear evidence that the receiving country has the capacity, infrastructure and effective controls required for environmentally sound waste management. Such safeguards are essential to prevent environmental leakage and strengthen confidence in recycling value chains.

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Against this background, Plastics Europe encourages the Commission to ensure that:

- assessments remain objective, transparent and evidence-based;
- decisions are based on demonstrated environmental performance, enforcement capability and waste management capacity;
- assessment criteria are applied consistently across applicant countries;
- regular reviews allow countries to demonstrate improvements in their waste management systems and become eligible where appropriate.

Plastics Europe supports a risk-based and science-based approach to policy implementation. Where countries can demonstrate environmentally sound management of imported waste, continued access to recycling and recovery markets can contribute to increasing the value of waste as a secondary raw material, promoting recycling and supporting global circularity objectives.

These principles lead to two linked conclusions. First, the Commission should apply proportionate safeguards where country-level evidence does not yet establish environmentally sound management. Second, it should provide a clear and workable framework for the facility-level audits required under Article 46. Where pollution, dumping or improper treatment is demonstrated, the shipments concerned should be investigated and made subject to robust conditions or, where appropriate, suspension.

Applying these principles to plastic waste exports to Türkiye

Plastics Europe welcomes the Commission's assessment of plastic waste exports from the EU to Türkiye[1] under the Waste Shipment Regulation, which is an important step towards ensuring that EU plastic waste exported abroad is managed in an environmentally sound manner.

Türkiye is by far the main OECD destination for EU plastic waste. According to Eurostat data cited in the Commission's assessment, Türkiye received 510,000 tonnes of plastic waste from the EU in 2025, out of the 1.4 million tonnes exported by the EU to third countries[2]. Given these volumes, decisions on continued exports must rest on solid and transparent evidence.

The Commission's findings identify several significant shortcomings: gaps in the available data; limited transparency regarding waste generation and treatment; insufficient evidence of how the applicable legislation is enforced in practice; and fragmented governance arrangements. Taken together, these shortcomings do not currently provide sufficient assurance that EU plastic waste exported to Türkiye is consistently managed in an environmentally sound manner.

Plastics Europe therefore calls on the Commission to:

- initiate without delay the procedure under Article 45(2), requesting the Turkish authorities to provide, within the 60-day time limit, to the missing evidence on waste flows, treatment outcomes, enforcement and governance; together with an indicative timetable for implementing the required safeguards and addressing any identified shortcomings;
- consider proportionate interim safeguards while that evidence is gathered, including stronger shipment checks, documented proof that waste reaches authorised recycling facilities, independent audits of receiving facilities and public reporting on export volumes and destinations;
- clarify the next procedural steps if the evidence is not supplied by the deadline or does not demonstrate environmentally sound management; and even where exports to an OECD country continue to be permitted following the Commission's monitoring under Article 45,

[1] https://environment.ec.europa.eu/publications/assessment-sustainability-plastic-waste-exports-oecd-countries_en
[2] Ibid.

exporters remain responsible for meeting the audit obligations in Article 46. Significant uncertainty nevertheless remains about how those obligations should operate in practice. Neither the Staff Working Document nor the implementing framework provides sufficient clarity on how exporters should demonstrate that receiving facilities manage waste in an environmentally sound manner.

This uncertainty affects the consistency, credibility and practical implementation of the Regulation. In particular, the following questions remain unresolved:

- what qualifies as authorisation or accreditation 'by a national official body' under Article 46(3) and Part A of Annex X, and whether such accreditation is accepted across Member States; ;
- what audit methodology should be applied by auditors;
- how Article 46 can realistically be implemented in situations involving investigations or alleged non-compliance;
- the interpretation of the Annex X audit criteria, including what constitutes equivalent environmentally sound management;

To make the country and facility-level requirements mutually reinforcing, Plastics Europe recommends that the Commission take the following actions:

1. Establish a harmonised audit framework

Develop a harmonised audit methodology under either the Basel Convention framework or an internationally recognised standard, such as an ISO-based system. This would promote consistent assessments and equal treatment across countries, facilities and auditing organisations.

2. Introduce mutual recognition of audit results

The Regulation does not ensure that an audit accepted by one competent authority will be accepted by others. . Mutual recognition would avoid duplicating audits, reduce administrative costs, improve consistency and facilitate comparison across facilities and jurisdictions.

3. Use country-level findings to inform facility-level audits

Where an Article 45 assessment identifies shortcomings in a destination country, such as data gaps, weak enforcement or fragmented governance, the Commission should specify how Article 46 audits of facilities in that country should address those shortcomings.

. Provide legal certainty through guidance

The Commission should publish guidance clarifying:

- accreditation requirements for auditors;
- acceptable audit standards and methodologies;
- the use of existing environmental management systems and certifications;

- the role, legal status and timely availability of the public register of audited facilities under Article 46(8); and
- the circumstances in which previous audits may be relied upon.

Together, these measures would create a coherent system in which country-level eligibility, facility-level assurance and enforcement reinforce one another. The same standards should be applied consistently across destinations and waste streams.

At the same time, Europe also needs to expand collection, sorting and recycling capacity so that retained waste is properly valorised and recycled-content objectives can be met. A technology-neutral framework should enable mechanical, chemical and other complementary recycling solutions to scale, supported by credible tools such as mass-balance approaches. In parallel, robust monitoring of extra-EU exports and safeguard procedures, combined with a lighter and streamlined PIC procedure for shipments of EU48 waste for recycling in pre-consented facilities, would support recycling and enabling a circular economy for plastics in Europe.

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November, 2026