

TotalEnergies Corbion is pleased to respond to the consultation regarding the Amendment of the Environmental Management Act for a National Circular Plastic Standard (NCPN).

We share the Ministry's vision that a circular policy is essential to enhance the sustainability of plastic throughout the entire product life cycle. We support the common target of recycled and biobased as all alternatives are complementary to reach global targets; focusing only on recycled plastics is not viable to replace the majority of our needs in plastics for technical, sanitary and economic reasons.

We endorse the introduction of the National Circular Plastic Standard and specifically support the following elements:

Mandating a Minimum Proportion of Recycled and Bio-based Plastic

The reliance on fossil resources is a primary driver of global warming. While the energy sector can achieve near-complete decarbonisation through electrification and hydrogen, this approach is not feasible for chemicals and materials that inherently require carbon. Transitioning to renewable carbon sources such as biomass, direct CO₂ utilization, or recycling is crucial for transforming our economic system.

Obligation to Incorporate a Percentage of Recycled or Bio-based Plastic from 2027 and Increasing to 25%-30% by 2030

The ambitious targets of the Green Deal can only be realised through supportive policies. Introducing a mandatory percentage of recycled or bio-based plastic will expedite the phase-out of virgin plastics and promote the shift to renewable carbon. This requirement will establish a level playing field for chemicals and materials, aligning them with other climate-relevant sectors such as energy and storage.

We further observe that the NCPN proactively aligns with European legislation, which currently mandates only a minimum proportion of recycled content. We believe this proactive stance provides an opportunity for the Netherlands to influence European policy. While European standards set a baseline for recycled content, the national standard can be more stringent, thus offering enhanced environmental protection.

Lastly, we believe circularity is not only renewable material use, but rather the impact of plastic during its full life cycle. Future policies need to be created to help the circularity of plastic by developing sustainable end of life solutions for all plastics, including compostable plastics and new recyclable plastics.