Recyclability under PPWR

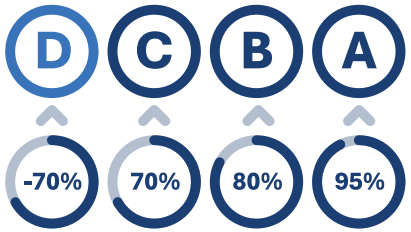
Elke Gijsbrechts

Fost Plus

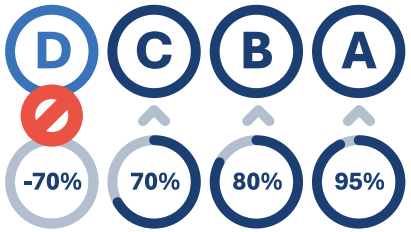
01

Delegated act for design for recycling criteria

2028 | 2030 | 2035 | 2038

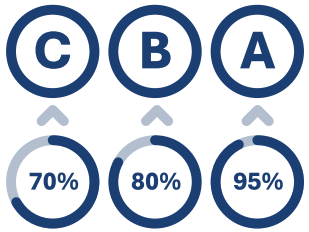


Delegated Acts for recyclability and for EPR fees modulation based on recyclability



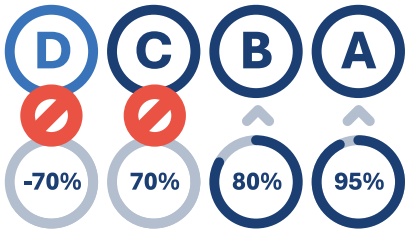
Packaging will not be allowed on the EU market unless recyclable within **grades A, B or C**

EPR fees modulation based on recyclability



Packaging to be recycled **at scale**.

refers to an annual quantity of recycled material of at least 55 % at union level



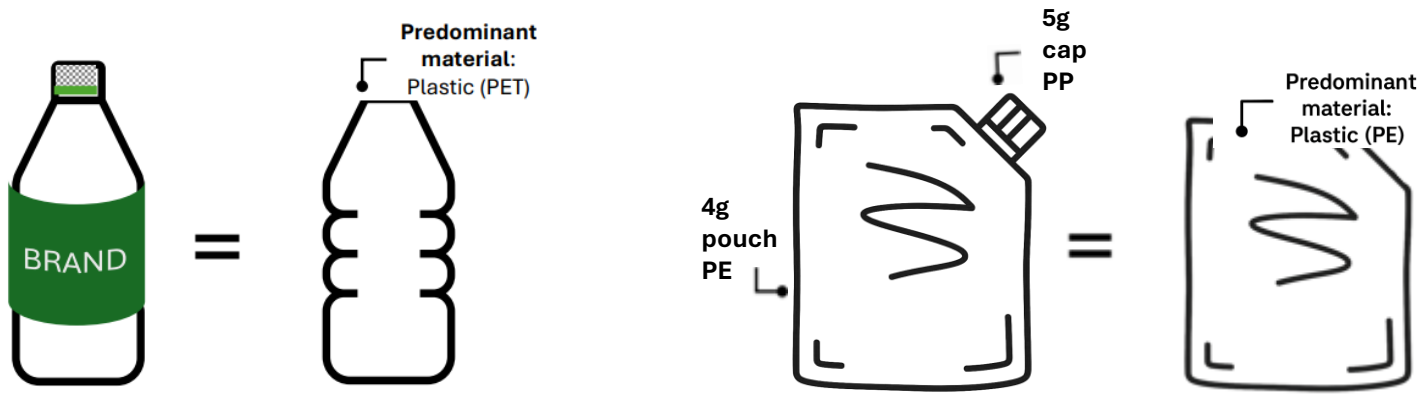
Packaging shall **not** be placed on the EU market if falling in **grade C**

Methodology for recyclability assessment

WHAT CAN YOU DO NOW?

02

Predominant material component



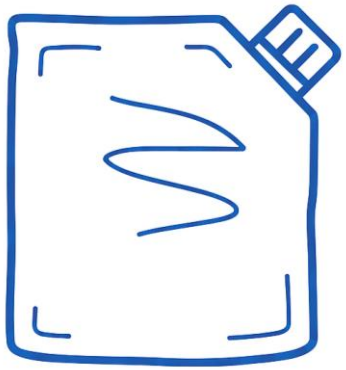
= the heaviest material

(even if it’s less than 50% of the component weight)

without considering the rigid closure for flexible packaging

Flexible or rigid?

It means that:



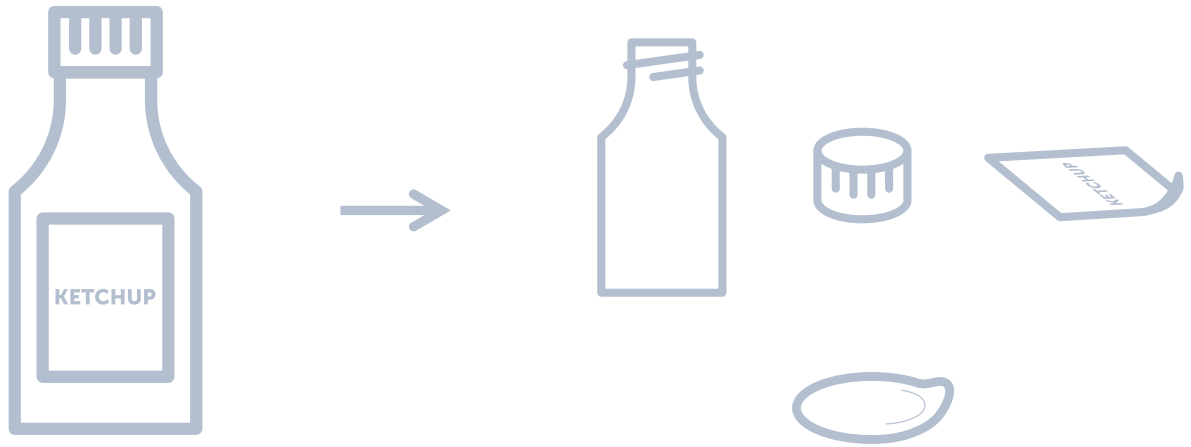
Traffic light table “flexible PE”

Flexible
=
packaging shape changes during filling or emptying

Rigid
=
no evolution of the shape

What is a unit of packaging?

It means that:



the grade is evaluated for the whole unit

METHODOLOGY

Assessment of the packaging

PACKAGING COMPONENT AND PACKAGING CONSTITUENT (WG10)

ISO 21067-2

Packaging component

Part of packaging that **can be separated** by hand or by using simple physical means

Ex: a lid, a label, a pad, a spout ...

ISO 21067-2

Packaging constituent

Part from which packaging or its components are made and which **cannot be separated** by hand or by using simple physical means

Ex: a barrier, a tie layer, an adhesive, an ink ...

Separate or integrated component?

By default, all components must be considered as integrated.
Separation can be proven.

The separation must occur before the recycling process, due to consumer behaviors, a mechanical stress during the sorting stage or a dismantling step prior to recycling.

Standards propose two methods for proving the separation

1. The component must be fully removed to access the product, with a very low risk to put the component back in the packaging body after use.
   No test, self declaration needed

2. A protocol with separation thresholds to reach.
   Standards provide protocols

METHODOLOGY

Separate Components

- Annex C in part 3 is a **waste characterisation test** to be performed at an Material Recovery Facility (MRF)
- A component is **separate** only if **over 70% of the packaging items** are found at the MRF without this component (for green and yellow components) and **90% if this component is classified in red** in the traffic light tables.
- The test, which requires **a sample of at least 100 packaging items**, might be challenging in practice for innovative packaging and niche packaging (these are not easily found back in sorting factories)

Grade per unit of packaging

It means that:

Bottle + cap + label
“integrated components”

= 1 GRADE

Grade per unit of packaging

It means that:

A separate component, by the consumer, doesn't have its own grade,
the grade is evaluated for the whole unit.

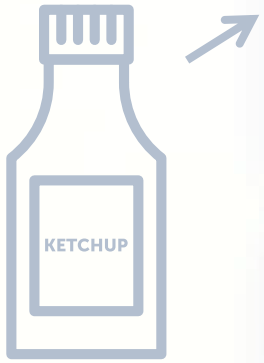
Bottle + cap + label
"integrated components"

Flexible lid
"separate component"

= 1 GRADE

Start the recyclability evaluation

Step 1: evaluate if you have separate components in your packaging unit.



Bottle + cap + label
“integrated component”

Consumers sort the bottle with the cap and the label:

- Sorted together
- Entered the recycling process together

Traffic light table “transparent PET bottle”

Full compatibility	Limited compatibility	Not compatible

Flexible lid
“separate component”

The flexible alu lid is separated by the consumer:

- Sorted in the alu stream
- Recycled with alu packaging

Table “aluminium”

Full compatibility	Limited compatibility	Not compatible

Advance design for recycling

EXAMPLES OF “NO-REGRET” DECISIONS

03

Some examples of non-recyclable packaging

Plastic /
Aluminium /
Plastic laminates

Paper lamination
of PE or PP flex

Carbon black

Residu
Incineration

Avoid aluminium foil in flexible packaging

unless aluminium is the predominant material

Situation in industry guidelines and CEN draft standards	
Solid agreement on bad design choices	Alternatives
Aluminium foil in predominantly PE or PP flexible packaging	Use alternative barriers such as AlOx, SiOx

Flexible PP snack packaging

Situation in industry guidelines and CEN draft standards		
Solid agreement on good design choices	No full consensus / still under discussion	Solid agreement on bad design choices
• All films made from PP • AlOx, SiOx as barrier layers • < 3 wt% PU / acrylic adhesives • < 5 wt% of PU inks	• Metallised PP • Nitrocellulose ink • Larger amounts of adhesives and inks • EVOH, PA barriers	• PET / PE film combinations • Aluminium foil barrier

Green dot rates 2026

Materials	Category	Rate (EUR/kg) excl. VAT
Other plastic packaging – whether or not composite – where plastic accounts for the greatest weight Rigid and flexible packaging elements that do not fall under the previous material categories. These include e.g.: – laminated plastic packaging elements with an aluminium film (= aluminium laminates); – rigid and flexible packaging elements made of PVC, PVdC, PETG, PET GAG; – flexible CPET materials.	014-03	4,4190
Flexible Plastics		
PE – Films Flexible packaging elements with at least 95%* of PE.	011-07	1,0804
PP – Films Flexible packaging elements with at least 95%* PP.	011-09-A	2,2095

Carbon black

Situation in industry guidelines and CEN draft standards	
Identified concerns	Alternatives
Full face printing with carbon-black containing inks	Limit coverage of carbon-black based print (small features, e.g., text, line graphics, bar codes, smaller graphics not an issue)

Large area carbon black print can prevent correct sorting

Choose a non-carbon black pigment or reduce amount of black surface

Carbon black

Situation in industry guidelines and CEN draft standards	
Solid agreement on bad design choices	Alternatives
Carbon black mass colouration	Non-carbon black pigments and dyes

Green dot rates 2026

Materials	Category	Rate (EUR/kg) excl. VAT
OBSTRUCTIVE PACKAGING		
Household packaging that obstruct the collection, sorting or recycling Cf application rules p. 6	–	4,4190

coloured plastic packaging with colors containing carbon black (D012)

PP – Bottles, flasks and other rigid packaging Rigid packaging elements, including bottles, flasks and caps with at least 95%* PP. Except beverage capsules disposed of together with the product (051).	011-01	1,0161
PE – Bottles, flasks and other hard packaging Rigid packaging elements in PE including bottles, flasks and caps, trays, cups etc. with at least 95%* PE.	011-03 (or 007)	0,8019
PE – Films Flexible packaging elements with at least 95%* of PE.	011-07	1,0804
PP – Films Flexible packaging elements with at least 95%* PP.	011-09-A	2,2095

Avoid lamination of paper to PE or PP flexible packaging

Situation in industry guidelines and CEN draft standards	
Solid agreement on bad design choices	Alternatives
Paper layers in predominantly PE or PP flexible packaging	Use only plastics or paper for all flexible plastic packaging layers

PE flexible packaging with a layer of paper on the outside for optical effect

Choose a design that uses only PE films or only PP films (or only paper layers)

Green dot rates 2026

Materials	Category	Rate (EUR/kg) excl. VAT
Other plastic packaging – whether or not composite – where plastic accounts for the greatest weight Rigid and flexible packaging elements that do not fall under the previous material categories. These include e.g.: – laminated plastic packaging elements with an aluminium film (= aluminium laminates); – rigid and flexible packaging elements made of PVC, PVdC, PETG, PET GAG; – flexible CPET materials.	014-03	4,4190
Flexible Plastics		
PE – Films Flexible packaging elements with at least 95%* of PE.	011-07	1,0804
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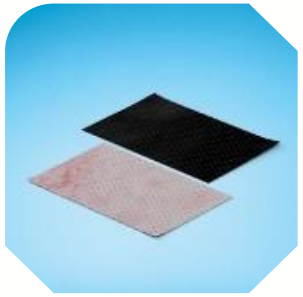
PACK FOR THE FUTURE














Unwrapping 21 Food Packaging Challenges

Conclusion: What can you do already?

- Work on **design for recycling** – using current guidelines e.g. Recyclass, EPBP,…
- **Purchase CEN norms/ technical specifications** when published
- **Attend the "Pack for the future"** event together with Verpact on 16th June 2026 in Breda
- **Follow Fost Plus PPWR webpage** + newsletter
- Examples of **"no-regret" decisions** to advance design for recycling
- Questions? Contact form sustainable packaging | Fost Plus

Questions & answers

ABOUT THE PRESENTATION