

## Call for a new CEN Packaging Standard on Design for Recycling & Recyclability Assessment

The undersigned organisations support the European Standardisation Organisation CEN to develop a new Standard on Design for Recycling (DfR) & Recyclability Assessment for Packaging, in the context of the Packaging and Packaging Waste Regulation (PPWR) implementation, and call upon the European Commission to endorse this proposal. The responsible CEN/TC261/SC4/WG3 has taken the initiative to develop such a standard, as per its decision of 11<sup>th</sup> July 2024, but in order to have a meaningful impact it has to be linked to the forthcoming PPWR, ideally via an official mandate of the European Commission to CEN.

The future PPWR will mandate packaging recyclability and lay down sustainability requirements that all packaging will need to fulfil in order to be allowed on the European market as of 2030, the so-called design for recycling criteria. In line with Article 6(4) of the PPWR provisional agreement, the European Commission will clarify DfR and recycling performance grades in forthcoming delegated acts, which will have to be adopted by 1<sup>st</sup> January 2028.

Although there is no official mandate yet from the European Commission, Article 6(4) of the PPWR already requires the co-legislators to take into consideration the standards developed by the European Standards Organisations when adopting the above-mentioned delegated acts. The packaging industry and Competent Authorities will also need a clear and common interpretation of the definitions and criteria regarding DfR. The proposed standard will provide this interpretation and support the timely adoption of a highly technical piece of secondary legislation by:

- Elaborating an umbrella standard (part 1), which will provide definitions and principles for DfR and be material neutral;
- Developing specific standards (parts of the same standard) for the respective material categories, following the packaging categories and formats laid down in the PPWR.

The PPWR includes an obligation for the European Commission to request CEN to work on, for example, harmonised standards for packaging compostability and minimisation. Most importantly, CEN/TC261/SC4/WG10 is already working on plastic packaging recyclability, under a DG GROW mandate<sup>1</sup> and Technical Specification 13688 “Report on requirements for substances and materials to prevent a sustained impediment to recycling” has recently been developed. Given its existing collaboration with the JRC and track record on delivering industry standards<sup>2</sup>, bridging the technical expertise of the packaging industry with the oversight role of standardisation and civil society organisations, we believe CEN is best placed to provide a solid base for the adoption of a Packaging Standard on Design for Recycling & Recyclability Assessment for Packaging by the European Commission. This will ensure a smooth implementation of the recyclability requirement while ensuring that the resulting standard also serves products’ protection and waste prevention, overall supporting the environmental objectives of the PPWR.

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<sup>1</sup> While work on plastic packaging recyclability started back in 2018 under the [Circular Plastic Alliance](#) (CPA), in August 2022, the European Commission notified to CEN and CENELEC a new Standardization Request on plastics recycling and recycled plastics ([M/584 – C\(2022\)5372](#)), in support of the European Strategy for Plastics in a Circular Economy.

<sup>2</sup> For instance, there are a number of CEN standards and Technical Specifications, including the DfR document on plastics, being developed under a DG GROW mandate, as well as the TS13688 – “Report on requirements for substances and materials to prevent a sustained impediment to recycling”. More recently, CEN also supported the transposition of Directive (EU) 2019/904, delivering on the EU Commission mandate to adopt a harmonised standard on tethered caps by the given deadline.

## Signatories



ACE - The Alliance for Beverages Cartons and the Environment



Cepi - Confederation of European Paper Industries



Cosmetics Europe



ECMA - The European Carton Makers Association

**europeanbioplastics**

EUBP - European Bioplastics



EUMEPS - European Manufacturers of Expanded Polystyrene



European Aluminium



EUROPEN - The European Organisation for Packaging and the Environment



FEA - European Aerosol Federation



FEVE - European Container Glass Federation



MPE - Metal Packaging Europe



PCEP - Polyolefin Circular Economy Platform



Pro Carton - European Association of Carton and Cartonboard Manufacturers



Plastics Europe



SfPE - Steel for Packaging Europe



Styrenics Circular Solutions



UNESDA - Soft Drinks Europe