

# JRC SCIENCE FOR POLICY REPORT

## Developing technical recommendations on possible elements of a methodology to assess recyclability of packaging

*Background paper for the  
stakeholder workshop*

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# 1 Introduction

## 1.1 Policy context

Article 6 of the **EC proposal for a Packaging and Packaging Waste Regulation** amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC (hereafter: PPWR) sets out recyclability requirements for packaging as conditions for placing packaging on the market.

In this context, the design for recycling approach is proposed for assessing packaging recyclability and is considered to be one of the most effective measures to improve packaging circularity. Design for recycling criteria have been established already for several packaging formats by industry or by some Member States. However, in order to create a regulatory certainty for economic operators and economies of scale, the Commission proposes to harmonise such criteria as mandatory requirements at Union level. It is foreseen to establish design for recycling criteria via delegated acts, which will have to be complied with by 2030. The methodology for assessing recyclability at scale will also be developed at a later stage and will have to be complied with by 2035.

## 1.2 Rationale and objectives of the current study

DG ENV and the JRC are launching a preparatory study aiming at:

- (i) assessing the feasibility of aggregating the packaging categories listed in Table 1 of Annex II of the EC proposal (EC, 2022) (see Annex 1);
- (ii) developing technical recommendations on possible elements for the methodology to assess recyclability of packaging.

It has to be noted that the development of the detailed methodology and criteria for design-for-recycling and recyclability at scale, is not part of this study.

The technical proposals by the JRC will be based on data and evidence submitted by the stakeholders during the consultation phase.

The two goals of the present study are strongly interwoven. The technical proposals by the JRC for clustering packaging categories will be based on identifying commonalities in possible design-for-recycling criteria across the packaging categories listed in Annex II of the PPWR proposal. The outcome of this study will be used as a basis for the development of a recyclability methodology and will also support the co-decision process of the Packaging and Packaging Waste Regulation (PPWR).

## 2 Background information

### 2.1 Packaging categories

Annex II of the EC proposal on PPWR includes a list of 30 packaging categories referred to in Article 6 (see Annex 1).

The packaging materials covered are **glass, paper and cardboard, metal, plastic, wood and cork, textile, ceramics and porcelain stoneware**. The packaging materials are disaggregated by type (e.g. mono-material / composite, rigid / flexible, etc.) and by format (e.g. bottles / films / boxes etc.).

### 2.2 Available design for recycling guidelines for different packaging materials

A first mapping exercise of available design for recycling guidelines was carried out in-house at JRC. Academic papers are not included in this exercise, the focus lays exclusively on technical reports or factsheets by brand owners or associations. The geographical coverage of the reports analysed spans national, EU-wide and global areas. The selected guidelines are either general, i.e. are applicable to all packaging materials, or are material specific.

Table 1 provides an overview of the guidelines analysed within the mapping exercise.

*Table 1: Overview of design for recycling guidelines or other relevant reports screened and packaging categories covered*

Reference	Title	Geo-graphical area covered	Packaging material covered						
			Glass	Paper / Cardboard	Metal	Plastic	Wood / cork	Textile	Ceramic / porcelain
(WPO, 2021)	Packaging Design for Recycling. A global recommendation for circular packaging design	Global	x	x	x	x	x		
(CIRCPACK, 2022)	Design for recycling guidelines for packaging	Global	x	x	x	x			
(FH Campus Vienna, 2021)	Circular Packaging Design Guideline	AT	x	x	x	x			
(ZSVR, 2021)	Minimum standard for determining the recyclability of packaging	DE	x	x		x			
(APCO, 2019)	Design for recyclability. Quickstart guide for glass packaging	Australia	x						
(CPI, 2022)	Design for recyclability guidelines. Helping retailers and brands specify and design cellulose-fibre based packaging that can be reprocessed in standard paper mills	UK		x					
(CEPI, 2023)	Paper-based packaging recyclability guidelines. How to specify and design paper-based packaging in a way to ensure high quality recycling by the paper industry	EU		x					
(CONAI, 2023b)	Guidelines for facilitating the recycling of packaging made predominantly from paper	IT		x					
(ACE, 2022)	Beverage cartons. Design for recyclability guidelines	Global		x					

(4evergreen, 2023)	Circularity by design guideline for fibre-based packaging	EU		x					
(APEAL, 2022)	Why steel recycles forever. How to collect, sort and recycle steel for packaging	EU			x				
(CONAI, 2023a)	Guidelines to facilitate the recycling of aluminium packaging	IT			x				
(GIZ, 2021)	Design-for-recycling. State of play	EU				x			
(Eco Design, 2022)	Instruction Design for Recycling	DE				x			
(Der Grüne Punkt, 2022)	Design for recycling	DE				x			
(Briedis & Syversen, 2019)	Plastic packaging recyclability in a nordic context	Nordic countries				x			
(RECOUP, 2023)	Plastic packaging recyclability by design	UK				x			
(Recyclass, 2022)	Recyclass methodology	EU				x			
(Recyclass, 2023)	Recyclass factsheets for different plastic packaging formats	EU				x			
(CONAI, 2023c)	Guidelines to facilitate the recycling of plastic packaging	IT				x			
(CEFLEX, 2023)	Recyclability of polyolefin-based flexible packaging	EU				x			
(APR, 2023)	APR Design Guidance for Plastic Packaging	Global				x			
(Watkins et al., 2020)	Support to the Circular Plastics Alliance in establishing a work plan to develop guidelines and	EU				x			

	standards on design-for- recycling of plastic products								
(GROW International , 2023)	The Lightwood Packaging Industry	EU					x		
(UBA, 2019)	Waste wood	DE					x		
(Rilegno, 2014)	The wood packaging supply chain. Sustainability and environmental virtuosity (Original title: <i>La filiera degli imballaggi di legno. Sostenibilità e virtuosità ambientale</i> )	IT					x		

Please note that the information found on wood and cork is not very comprehensive (no specific design for design guidelines) and that no information was found for the packaging categories textile and ceramic / porcelain stoneware.

### 3 Developing technical recommendations

As mentioned above, the objective of this work is to provide technical recommendations on possible elements of a methodology to assess recyclability of packaging and evaluating the feasibility of aggregating the packaging categories listed in Table 1 of Annex II of the EC proposal.

The conclusions will be based on the JRC knowledge-base on packaging recyclability and on complementary information provided by the stakeholders during the consultation.

#### 3.1 JRC knowledge-base on packaging recyclability

Based on the information extracted from the design for recycling guidelines listed in section 2.2, the JRC has developed an extensive database for the different packaging categories, including elements for a possible methodology to assess recyclability of packaging, parameters and sub-parameters.

The term **element** refers in the current exercise to the overarching category of possible building blocks of the recyclability assessment that encompass a specific part of the packaging or present a specific feature.

Within each element different **parameters** can be taken into account and within each parameter, different **sub-parameters** can be listed. Please note that at this stage the sub-parameters are only listed. No judgement on recyclability performance is made.

The elements and parameters identified at this stage of the study can be summarised as follows (non-exhaustive list):

- **Packaging material / main packaging body**, referring to the main body of the packaging product and including the following parameters:
  - *Materials*, i.e. the material of which the main packaging body is made (origin of the material) and the way it is assembled in the final packaging product (finishing);
  - *Colorants (pigments / dyes)*, i.e. the substance that imparts color to the packaging material;
  - *Additives*, i.e. the substance added to the material to confer specific properties;
  - *Barriers / Coatings*, i.e. the material or substance added to confer barrier properties (barrier), or a variety of materials applied on the surface to impart other properties (coating).
- **Information / branding**, referring to aiding components for information purposes, including the following parameters:
  - *Coding*, i.e. printing applied directly to primary packaging, including e.g. batch coding and best-before-date;
  - *Inks / Lacquers*, i.e. a mixture of colorants with other substances applied onto the material by a printing or coating process (ink) or a protective coating made of resin and/or cellulose ester dissolved in a volatile solvent (lacquer);
  - *Labels – Materials*, i.e. the material of which the label is made of;
  - *Labels – Adhesives / Glue*, i.e. the adhesive or glue used to attach the label to the main packaging body;
  - *Labels – Product coverage*, i.e. the coverage rate (%) of the label on the main packaging body;
  - *Sleeves – Materials*, i.e. the material of which the sleeve is made of. Sleeves are attached to the main packaging body without using adhesives;
  - *Sleeves – Product coverage*, i.e. the coverage rate of the sleeve on the main packaging body.
- **Closure system**, referring to aiding components used to close or seal the packaging, including the following parameters:
  - *Tamper evident shrink wraps*, i.e. the shrink film applied on the closure to seal the packaging, to provide guarantee to the consumers that the product is unopened;
  - *Closures (rigid and flexible)*, i.e. rigid or flexible closures (e.g. caps) used to close or seal the packaging;



- *Liners, seals and valves*, i.e. specific closure systems that protect the content of the package until it is opened by the consumer.
- **Other**, referred to other aiding components or specific properties of the packaging material, including the following parameters:
  - *Size of packaging*, i.e. the dimension of the packaging;
  - *Separability of packaging (ease of dismantling)*, i.e. ability to dismantle the packaging components and/or ability to separate different packaging materials from each other;
  - *Product residues (ease of emptying)*, i.e. the ability to empty the packaging;
  - *Other components*, such as attachments (e.g. straws on beverage cartons);
  - *Others*, i.e. any other category of parameters not included above.

For more details on the elements, parameters and sub-parameters for each packaging category, the reader should refer to the excel file (*RC\_Packaging\_data-validation\_Feedback-XX.xlsx*) as follows:

- **Glass** (category No 1-2 in Annex II of the PPWR proposal): please refer to the excel sheet “*3. Glass*”.
- **Paper and Cardboard** (category No 3-4 in Annex II of the PPWR proposal): please refer to the excel sheet “*4 Paper\_Cardboard*”.
- **Metal** (category No 5-9 in Annex II of the PPWR proposal): please refer to the excel sheet “*5. Metal*”.
- **Plastic (rigid)** (category No 10-12, 14-15, 18-19, 22-26 in Annex II of the PPWR proposal): please refer to the excel sheet “*6. Plastic (rigid)*”.
- **Plastic (flexible)** (category No 13, 16-17, 20-21, 27 in Annex II of the PPWR proposal): please refer to the excel sheet “*7. Plastic (flexible)*”.
- **Wood and cork** (category No 28 in Annex II of the PPWR proposal): please refer to the excel sheet “*8. Wood\_cork*”. Please note that the information found for this category is not very comprehensive.
- **Textile** (category No 29 in Annex II of the PPWR proposal): please refer to the excel sheet “*9. Textile*”. Please note that no design for recycling guidelines were found for this category.
- **Ceramics or porcelain stoneware** (category No 30 in Annex II of the PPWR proposal): please refer to the excel sheet “*10. Ceramics\_porcelain*”. Please note that no design for recycling guidelines were found for this category.

### 3.2 Expected outcome of the stakeholder consultations

In order to validate and complement the JRC database on packaging recyclability, JRC is launching a stakeholder consultation phase. Stakeholders are invited to provide feedback on the excel file (*JRC\_Packaging\_data-validation\_Feedback-XX.xlsx*) following the instructions provided in the first excel sheet “*1. Instructions\_contact info*”.

Based on the input provided by stakeholders, JRC will consolidate the information on packaging recyclability and develop technical recommendations on elements and parameters of a possible methodology to assess recyclability of packaging and on the feasibility of aggregating the packaging categories listed in Table 1 of Annex II of the EC proposal.

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## List of abbreviations

ACE	Alliance for beverage Cartons and the Environment
APCO	Australian Packaging Covenant Organisation
APEAL	Association of European Producers of steel for packaging
APR	Association of Plastic Recyclers
CEAP	Circular Economy Action Plan
CEFLEX	Circular Economy for Flexible packaging
CEPI	Confederation of European Paper Industries
CONAI	<i>Consorzio Nazionale Imballaggi</i> (National Packaging Consortium)
CPI	Confederation of Paper Industries
DG ENV	Directorate General for the Environment
(DG) JRC	(Directorate General of the) Joint Research Centre
EC	European Commission
EU	European Union
GIZ	<i>Gesellschaft für Internationale Zusammenarbeit</i> (Society for International Cooperation)
PPWR	Packaging and Packaging Waste Regulation
RECOUP	Recycling of Used Plastics
RFID	Radio Frequency Identification
UBA	<i>Umweltbundesamt</i> (Federal Environmental Agency)
WPO	World Packaging Organisation
ZSVR	<i>Zentrale Stelle VerpackungsRegister</i> (Central Packaging Register Office)

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## Annexes

### Annex 1. Categories and parameters listed in Annex II of the PPWR proposal

Annex II – Categories and parameters for assessment of recyclability of packaging

Table 2: Indicative list of packaging materials, types and categories referred to in Article 6.

Cat. No	Predominant packaging material	Packaging type	Format (illustrative)	Color
1	Glass	Glass	Bottles, jars, flacons, cosmetics pots, tubs etc. made of glass (soda lime silica)	
2	Glass	Composite packaging, of which the majority is glass	Bottles, jars, flacons, cosmetics pots, tubs	
3	Paper/cardboard	Paper/cardboard packaging	Boxes, trays, grouped packaging	
4	Paper/cardboard	Composite packaging of which the majority is paper/cardboard	Including beverage cartons, plates and cups, i.e., metallised or plastic laminated paper/ card, liquid paperboard, paper/cardboard with plastic liners/ windows	
5	Metal	Steel	Boxes, trays, grouped packaging Rigid packaging formats (aerosols, cans, paint tins, boxes, etc.) made of steel, including tinplate	
6	Metal	Composite packaging of which the majority is steel	Drums, tubes, cans, boxes, trays, etc.	
7	Metal	Aluminium	Rigid formats (food and beverage cans, bottles, aerosols)	
8	Metal	Aluminium	Semi rigid or flexible formats (containers and trays, tubes, foils)	
9	Metal	Composite packaging of which the majority is Aluminium	Drums, tubes, cans, boxes, trays, etc.	
10	Plastic	PET - rigid	Bottles and Flasks	Transparent clear/ light blue
11	Plastic	PET - rigid	Bottles and Flasks	Transparent other colors
12	Plastic	PET - rigid	Rigid packaging other than bottles and flasks (Includes pots, tubs and trays)	Transparent
13	Plastic	PET - flexible	Films	
14	Plastic	HDPE - rigid	Containers and Tubes	natural /clear
15	Plastic	HDPE - rigid	Containers and Tubes	colored
16	Plastic	PE - flexible	Films	natural /clear
17	Plastic	PE - flexible	Films	colored
18	Plastic	PP - rigid	Containers and Tubes	natural /clear
19	Plastic	PP - rigid	Containers and Tubes	colored
20	Plastic	PP - flexible	Films	natural /clear
21	Plastic	PP - flexible	Films	colored
22	Plastic	HDPE and PP - rigid	crates and pallets	
23	Plastic	PS - rigid	Rigid packaging (except EPS and XPS)	
24	Plastic	EPS - rigid	Fish boxes/ white goods	
25	Plastic	XPS - rigid		
26	Plastic	Other rigid plastics including. PVC, PC - rigid	Rigid	

27	Plastic	Other flexible plastics including multilayer plastic films and multi-material materials - flexible	Pouches	
28	Wood, cork	Wooden packaging, including cork	Pallets, boxes	
29	Textile	Natural and synthetic textile fibres	Bags	
30	Ceramics or porcelain stoneware	Clay, stone	Pots, containers, bottles	

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