

What is an obstructive packaging?

Obstructive packaging are packaging types that interfere with selective collection and/or sorting or cannot be recycled. Obstructive packaging types are identified by the Interregional Packaging Commission (IVCIE) after advice from an expert panel consisting of representatives from industry, public authorities, sorting and recycling companies. For packaging identified as obstructive, the dissuasive Green Dot fee applies. The IVCIE may grant a temporary derogation from the application of the dissuasive tariff, until end of 2025, on the basis of a derogation file submitted by Fost Plus, listing the actions companies will take to convert these obstructive packaging types to better alternatives for sorting and recycling. From 1 January 2026, the dissuasive fee will apply to the obstructive packaging remaining on the market.

Note: in January 2026 the IVCIE decided that no new categories of obstructive packaging would be added to the existing lists. In accordance with the provisions of the PPWR (Packaging and Packaging Waste Regulation), recyclability will be defined at European level and these criteria will apply from 1 January 2030. In the coming months and years, the European recyclability criteria will be further developed and published. It is expected that most of the obstructive packaging listed on the following slides will also be considered non-recyclable under the PPWR. Please consult the dedicated [PPWR page](#) on our website to stay informed.

What are the obstructive packaging?

LIST 1 (publication IVCIE 2020):

- D001 plastic can with metal bottom or lid
- D002 laminated plastic packaging with aluminium foil for beverages
- D003 laminated cardboard packaging of chips with plastic or metal bottom or top
- D004 laminated cardboard packaging of milk powders with plastic or metal bottom or top
- D005 oxo-degradable packaging
- D006 plastic bottles at least 70% covered by a sleeve (or 50% for bottles <50cl), provided that the sleeve is made of a different material from the bottle and is not perforated
- D007 laminated plastic packaging with aluminium foil for fruit and vegetables
- D008 laminated plastic packaging with aluminium foil for maintenance products and body care products
- D009 laminated plastic packaging with aluminium foil for prepared meals
- D010 laminated plastic packaging with aluminium foil for pet food
- D011 laminated plastic packaging with aluminium foil for wine (bag in box)

WHO IS ELIGIBLE FOR A DEROGATION?

No derogation has been granted for the following obstructive packaging, so that all members putting these types of packaging on the market pay the dissuasive Green Dot tariff:

- D001 plastic can with metal bottom or lid
- D005 oxo-degradable packaging.

For the obstructive packaging of list 1 entering the market in **2023** and/or **2024**, only members who indicated in the end-of-2022 survey that they intended to switch their packaging to recyclable alternatives are eligible for the tariff exemption on obstructive packaging. In this case, you will pay the Green Dot fee for the material used in your packaging. For members who do not wish to change their obstructive packaging, the dissuasive Green Dot fee will be applied. From **2025** all the obstructive packaging of list 1 entering the market pay the dissuasive Green Dot fee.

Obstructive packaging on the market in 2024

LIST 2 (publication IVCIE 2023):

- D012 Colored plastic packaging with colors containing carbon black ;
- D013 Biodegradable or compostable plastic packaging;
- D014 Black glass bottles, colored in the mass;
- D015 Paper/cardboard packaging with plastic coating on all sides making the paper/cardboard fibers inaccessible (except drink cartons – category 008). The accessibility to the fibers by water can be proven by a test following [4evergreen](#) protocol PART 1;
- D016 Laminated paper bags with aluminum inside for powdered sauces and soups;
- D017 Laminated plastic/aluminum packaging for coffee ;
- D018 Laminated plastic/aluminum packaging for cereals.

For the above categories, all members are entitled to a derogation for packaging put on the market in 2024.

Only members who have replied that they wish to switch to recyclable packaging (in the March-April 2023 survey) will still be entitled to the exemption of the dissuasive tariff for packaging put on the market in 2025. For members who do not wish to change their packaging, the dissuasive tariff will be applied for packaging put on the market in 2025.

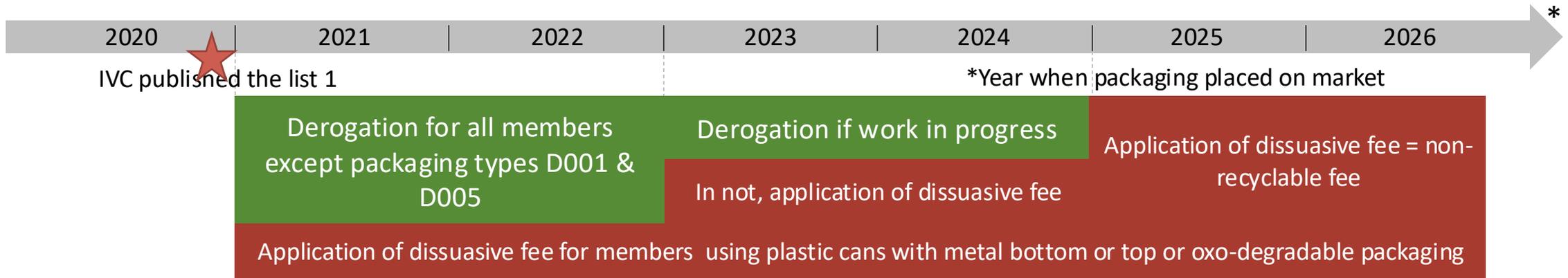
WHO IS ELIGIBLE FOR A DEROGATION?

For obstructive packaging on [list 2](#) put on the market in 2024; all members are entitled to a derogation.

For obstructive packaging on [list 2](#) put on the market in 2025; only members who responded that they wished to change their packaging to recyclable packaging (March-April 2023 survey) are entitled to the obstructive packaging Green Dot fee exemption. In this case, you will pay the Green Dot rate for the material that makes up your packaging. For members who do not wish to change their obstructive packaging, the dissuasive Green Dot tariff will be applied.

From **2026** all the obstructive packaging of [list 2](#) entering the market pay the dissuasive Green Dot fee.

Obstructive packaging – IVC list 1



- D001 Plastic can with metal bottom or top
- D002 Beverage pouch multi-material plastic/alu
- D003 Multi-material cardboard/aluminum/plastic box (for chips)
- D004 Boxes for milk powder (complexe packaging paper/plastic/aluminum)
- D005 Oxo-degradable packaging
- D006 Plastic bottle partially or fully covered with a plastic sleeve (subject to exceptions)
- D007 Pouches for fruits and vegetables (laminated packaging plastic/aluminum)
- D008 Pouches for bodily hygiene and maintenance products: only if laminated plastic/aluminum
- D009 Pouches of prepared meals (laminated packaging plastic/aluminum)
- D010 Pouches/bags for pet food (laminated packaging plastic/aluminum)
- D011 Wine bags (bag in box): only if laminated plastic/aluminum



Obstructive packaging – IVC list 2



Obstructive packaging – IVC lists 1 & 2 – timeline

*Year when packaging placed on market *

