Questions and Answers related to “Recyclability under PPWR” by Fost Plus

Please note: The official provisions and standards have not yet been published and are revised every two years. The European Commission is also working on an official FAQ and additional delegated and implementing acts, which may contain additional clarification or amendments. These documents have not yet been published. Regularly consult official EU sources and national guidelines for the most up-to-date information. Current information (presentations, memoranda, notifications, etc.) is solely our own interpretation of the currently available documents, but Fost Plus and Valipac are not liable for any inaccuracies or omissions, nor for the consequences of acting on their basis. For specific advice, we recommend seeking legal advice.

What is CEN?	CEN is the European institute for standardization: https://www.cencenelec.eu/
How is CEN WG10 involved in PPWR?	CEN/ TC 261/ SC4/ WG10 has received a mandate from the EC to draft the design for recycling guidelines for plastic packaging for the delegated act of design for recycling for the PPWR.
How is CEN WG3 involved in PPWR?	CEN/ TC 261/ SC4/ WG3 has received a letter of intent from the EC to draft the design for recycling guidelines for other types of packaging (wood, paper cardboard, steel, aluminium, and glass) for the delegated act of design for recycling for the PPWR.
Where can I find the CEN drafts / EN 18120 for plastic packaging?	You can buy them online. Location will be added when published (expected for Q2 ’26)
Will this definition be valid only in Belgium or also in other European countries?	The definition of Recyclability will be harmonized over Europe and drafted in the CEN workgroups.
Is it possible that these standards will still change before 2030?	There could be changes in the norms as there will be 1 or max. 2 revision periods before 2030. If the state of the art of collection, sorting and or recycling changes, the traffic light tables will be discussed again by the experts and may be updated accordingly. Also, when new evidence rises on compatibility of components of constituents with the stream, the traffic light tables may be updated accordingly.
In the Belgian ambition of the industry 2025, all elements of a household packaging have to be declared under a category. Will the packaging be assessed in a similar way?	No, it will be done in a different way. The packaging will be assessed how it is normally entering the transport belt of a sorting centre. To give an example: a tray with a lidding material and a label. If more than 70% of this type of tray enters the sorting factory without the lidding material, the top web is a separate component. The main body is the tray. In Belgium we see that approximately 50% of the PET trays have the lidding material still attached.
How can you proof that more than 70% is separate?	The packaging will be assessed how it is normally entering the transport belt of a sorting centre.

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How can you proof that more than 70% is separate?	This can be proven by observing the packaging in a sorting site. If you find more than 70 samples of your tray without lidding material, it can be assessed separately. By default, all components are seen as integrated. If you want to prove that a component is separate, you need to organize a test following the cen norm.
-> Does this mean that some trays will be assessed with lidding material and some without lidding material?	This could be the case. In Belgium, we see that half of the trays have their lidding material attached to the tray so we believe the chance is small that trays will be able to be assessed separately but if this can be proven in a sorting centre, it can be assessed separately.
Can we work already on design for recycling?	Yes, there are some uncertainties related to the calculation model from the traffic light table to the rates and grades. But there are also a lot of certainties already. Fost Plus have worked together with several different EPR organizations (Verpact, Citeo, Valipac, Grontpunkt Norway and NPA Sweden) on a presentation that helps you make 'no regret decisions' on packaging. There is some packaging which is clearly disturbing the recycling streams in many countries like e.g., PVC packaging or trays including carbon black pigment. It is likely that they will end up in red as they are in red in many established Design for recycling guidelines.
When will we know the grade and rate of our packaging?	The JRC (Joint Research Centre) of the European Commission is drafting a calculation model to calculate from the traffic light tables to the rates and grades. The project leaders of WG10 are supporting the JRC in this work. They expect to have this published by 2027.

FAQ based on Citeo Webinar on Recyclability on 4th December

In the following part, we have been given permission to add questions and answers that were raised to Citeo for the webinar they gave about this topic on 4th December 2025. We want to stress that the questions and answers related to the CEN activities is work in progress and the situation may change over time. Please follow the Fost Plus newsletter and webinars on this topic to stay up to date.

Content

A) General questions on PPWR related to Recyclability (Article 6)

1. What are the key deadlines for recyclability in PPWR?	The PPWR provides for deadlines for the year 2030, 2035 and 2038 for recyclability.
2. It is impossible to change packaging in two years if you must do adjustments on the packaging line. And that's if the schedule is respected. How are we going to do it?	Fost Plus is aware of the short deadlines. We want to help to reduce the risk, anticipating the necessary changes as much as possible. Our involvement in standards, the webinars we are organising and the support we will offer in 2026 are all aimed at helping you to anticipate these short deadlines. There is uncertainty about specific topics in design for recycling but for most of the packaging types there is already certainty that it will be either ok or that it will not be ok. The 'No regret' presentation that Fost Plus made together with the other EPR schemes (Valipac, Verpact, Citeo, Grontpunt Norway and NPA Sweden) has been made to help you make decisions.
3. Can you share with us the official text describing grades A, B and C?	No, because it does not exist. It will be published in 2028 at the latest in a delegated act.
4. Did I understand correctly that grade A = green column of the standard, grade B yellow column and grade C red column. Where is this clearly marked in PPWR?	No, Grades A, B and C are the result of a recyclability assessment calculation. These grades do not directly correlate with the green/yellow/red columns of the norms. The calculation of the grades is in the hands of the Joint Research Centre, who are responsible for setting up the methodology. It will be published in 2028.
5. Will the standards be published in the official journal to apply?	No, standards are not regulatory text. They should be used by the delegated act, either by quoting them or by copying them.
6. Does Article 6 of the PPWR impact the way packaging is collected, sorted or recycled in Belgium?	PPWR does not require member countries to harmonise the way they collect, sort or recycle. But it might indirectly lead to some changes. Countries will keep their differences. Harmonisation concerns the way in which the recyclability of packaging is assessed. Note: in Belgium, the collection, sorting and recycling streams are regularly reviewed to consider the technical evolutions and comply with the recycling targets.
7. Does the recycled content obligation apply to packaging other than plastic?	The obligation of recyclability applies to all packaging (apart from the exemptions), the obligation to integrate recycled plastic concerns all packaging that contains more than 5% plastic in its composition.
8. Does the recyclability obligation provided for in PPWR apply to industrial and commercial packaging?	Yes
9. Do imported packaged products have to be recyclable?	Yes
10. Are reusable packaging and refills affected by the recyclability obligation?	Yes

Source: Citeo. (2025, December 4). Webinar on Recyclability

11. For reused packaging, is the obligation of recyclability requested at the time of the 1st marketing or at each rotation?	At each rotation because the closure and the decorations such as labels can change with each rotation, and therefore the recyclability.
12. Who is responsible for complying with Article 6 of the PPWR?	The producer, which is usually the brand that markets the packaged product and in some specific cases the packaging manufacturer. This definition must be clarified by the European Commission.
13. Can I request a certificate from my packaging supplier to comply with Article 6 of the PPWR?	In most cases, your supplier will be able to commit to the component it manufactures but not to the recyclability of your packaging overall. Only you know which components and constituents you use in your packaging and can calculate the recyclability.
14. Does PPWR require third-party certification, or will it remain on the model of self-declaration as it is today?	To date, PPWR does not mention the need for a certificate and exchanges with the European Commission suggest that the delegated acts will not require a certificate. The final answer will be given in the delegated act.
15. Will there be a European harmonisation of EPR tariff modulations on recyclability?	A delegated act is expected by 2028 at the latest on the modulation of tariffs according to the grades and rates of recyclability.
16. Will PPWR recyclability be added to the rules of the various EPR organisations in Europe?	No, it replaces national rules in 2030.
17. What is the precise scope of lightweight wooden packaging, exempt from recyclability in 2030?	The European Commission has not given a precise definition. We are waiting for more information.
18. Is there a more precise definition of "textile" in the exemptions?	The European Commission has not given a precise definition. We are waiting for more information.
19. What are the hazardous materials that lead to an exemption from packaging recyclability in 2030?	The European Commission has not given a precise definition. We are waiting for more information.
20. What is contact sensitive packaging following PPWR?	Article 3 (40) : 'contact sensitive packaging' means packaging that is intended to be applied to products in the scope of Regulations: (EC) No 1831/2003, (EC) No 1935/2004, (EC) No 767/2009, (EC) No 2009/1223, (EU) 2017/745, (EU) 2017/746, (EU) 2019/4, (EU) 2019/6, Directive 2001/83/EC, Directive 2008/68/EC or for products as defined in Article 1 and 2 of Commission Decision (EU)2023/1809, Directive 2002/46/EC of the European Parliament and of the Council53 , or Directive 2008/68/EC
21. Can you clarify the case of medical devices?	PPWR specifies that packaging suitable for contact with sensitive medical devices is exempt. PPWR lists the products concerned via the definition of contact sensitive, see above.
23. Who decides whether packaging is innovative and on what criteria?	A company that wishes to market innovative packaging within the meaning of PPWR, i.e. packaging whose predominant material reduces environmental impacts and provides new functionalities, can apply at the national level for a 5-year exemption from recyclability. The competent

Source: Citeo. (2025, December 4). Webinar on Recyclability

	national authority will have to decide whether the exemption is accepted and notify the Commission. The company will therefore have 5 years to create a recycling stream, develop recyclability criteria and achieve a sufficient recycling rate.
24. Does a new design or function allow you to be classified as "innovative packaging" and be exempted in 2030?	No, the European Commission has clarified that the scheme was created for innovation on the predominant packaging material.
25. Can you share with us an example, or even the list, of innovative packaging?	The measure will be applicable in 2030 so to date no packaging falls into this category; no request has been made.
26. Are reusable packaging and refills exempted to help the development of reuse?	No
27. Are fruit and vegetable packages exempt?	No
28. Are food supplement packages exempt?	No

B) Questions to the Joint Research Centre (part of European Commission)

Questions from participants	Response from the Joint Research Centre (JRC)
1. What is the JRC's schedule for its work on grades ahead of the delegated act?	We will consider the EN Standards and Technical Specifications developed by CEN TC 261/SC 4 WG3 and WG10 and check them against the provisions under the PPWR that list the elements needed for the calculation of recyclability performance grades, in order to propose a certain methodology. We will be able to develop and present a draft methodology once we have a better view on the final version of these standards and Technical Specifications, i.e. after voting. We aim to have the final technical proposals by the end of 2026, for our colleagues by DG ENV to be used as a basis for the delegated acts.
2. Do I have to wait until 2028 to work on my packaging since the JRC says that it gives itself the right to make changes to the standards?	The JRC plans to rely as much as possible on the proposals for EN Standards and Technical Specifications developed by CEN TC 261/SC4 WG3 and WG10, so it is unlikely that we will change everything from these proposals. The best approach therefore is to design packaging already in a way that ensures maximum recyclability into secondary raw materials for packaging whereby the quality of the recycled material is retained.
3. What is the Commission's vision on updating the guidelines and testing protocols?	We are in contact with our colleagues in DG ENV on this important aspect but have no concrete views yet on how to ensure updates to take account of technological developments and improved knowledge in the field.
4. From the Commission's point of view, is the evaluation of recycling technology addressed by the	JRC has no current plans for this as we consider that the selection of state-of-the-art technology in the EN Standards and Technical Specifications largely covers this and that the specific recycling

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standards or should we wait for a modulation of the additional grade according to the technology?	technology applied in practice is beyond the influence of the packaging designer Citeo translation: "The JRC considers that CEN's choice of 'state-of-the-art' covers this parameter and these choices impact the design, we do not foresee any further action."
5. If I understand correctly, the JRC's work on recycling technologies is to define wheter chemical or mechanical recycling is better?	No, the task on developing sustainability criteria for plastics to be eligible for use as recycled content under Article 7 relates to setting sustainability benchmarks (considering the metrics mentioned in the Regulation) for plastic recycling technologies that can deliver the necessary quality in view of the envisaged application, while being as technology- neutral as possible
6. Will "chemical" recycled be less well regarded than mechanical recycled?	See answer to Q5
7. Will the JRC use LCA for the evaluation of recycling technologies?	For the task on developing sustainability criteria for plastics to be eligible for use as recycled content under Article 7, JRC plans indeed to consider life cycle impacts from recycling technologies, apart from other aspects, such as cost
8. Does the Commission plan to impose the use of grades A, B and C for consumer communication?	The JRC is not aware of such work in the Commission
9. Will the Commission use the definition of flexible and rigid in Article 6 for the obligation to mark the sorting gesture?	See answer to Q2. We plan to rely as much as possible on the proposals in the EN Standards and Technical Specifications developed by CEN TC 261/SC 4 WG3 and WG10, including for definitions of terms used, but not defined, in the PPWR.

C) General questions about CEN standards

Questions from participants	Response from Fost Plus
1. Are we moving towards harmonization between Fost Plus and other EPR organizations in Europe on recyclability?	Yes in 2030 via PPWR, which harmonizes and imposes recyclability rules for all packaging in Europe. Organisations like Fost Plus will continue to work to feed its knowledge into the European framework.
2. Should we anticipate changes between the current recommendations of Fost Plus and the standards?	There are some differences between the categorisation of recycled versus non recycled of Fost Plus and the CEN guidelines. There is uncertainty about specific topics in design for recycling but for most of the packaging types there is already certainty that it will either be ok or that it will not be ok. The 'No regret' presentation that Fost Plus made together with the other EPR schemes of the Packforward initiative (Verpact, Valipac, Citeo, Grontpunt Norway and NPA Sweden) has been made to help you make decisions.
3. My packaging is recyclable according to the European X	No, there are currently more than 30 conflicting sources of information on good practices in terms of packaging design. The goal of PPWR is

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standard, so I can say that I will also be ok with regard to the standards?	precisely to have a single method in Europe, which will by definition be different from the 30 existing sources to create a consensual synthesis based on science.
4. How will standards and grades be updated to reflect innovations?	The standard operates through national offices. Any company can request a revision of one or more standards, if it manages to obtain support in its state, this national office will make a request for revision to the CEN which will accept it or not. The process takes about two years. At the same time, every 3 years without revision, the CEN is considering an automatic revision. The desire of the CEN members to date is to request revisions every two years.
5. When will the standards be published?	There is a delay of publication with the standards for plastics. It is postponed to the end of June ’26. And we expect the technical specifications for the other materials (paper cardboard, steel, aluminium, wood, glass) by the third quarter of ‘26.
6. The standards will be published in 2026 but will not be used in Belgium before 2030, it's confusing! How can this discrepancy be explained?	At the European level, we have adopted an approach that is very widespread in Europe: on the one hand, green/yellow/red traffic light tables to describe packaging and its impacts, and on the other hand, a methodology that makes it possible to transform these traffic light tables into grades. The tables will be published in ‘26 but the methodology to calculate towards grades and rates will not be known before 2028.
7. Is sorting taken into account in PPWR for design criteria?	Yes, the green/yellow/red standards tables take into account the suitability of household packaging to pass the sorting stages via the design recommendations. A sorting test protocol is also proposed to test innovations. The European Committee for Standardization (CEN) has stated that sorting will not be taken into account for industrial and commercial packaging, even if it exists, it remains a non-generalized practice.
8. Will small packaging be banned because it is poorly sorted?	No, being small or large is not a design choice, so we don't penalize small packaging because of their size. On the other hand, small packaging must have a design that is compatible with recycling streams.
9. What is a "packing unit"?	A packaging unit is at least a main body that contains the product, to which components such as for example a closure system and constituents such as inks, barriers can be added.
10. Is recyclability assessed at the level of a package or individual packaging item?	At the level of the packaging unit meaning the predominant material with its components and constituents
11. Are the definitions of "multipack" and "sales packaging" finalized?	No, this is ongoing work between the leaders of the CEN workgroups and the European commission. This is not finalised yet.
12. Can packaging that is banned in 2030 become recyclable in 2040?	Yes, for example if a recycling stream is created and becomes ‘state of the art’ for this packaging. The standards are only the reflection of good practices in the field, which evolve over time when state of the art of collection, sorting and recycling changes.
13. Are the decorations, including labels, staples, closures, etc.	Yes, their impact on recycling is described in the traffic light tables.

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evaluated in the recyclability analysis?	
14. Can the content of the packaging prevent the recyclability of the packaging and condemn the packaged product?	No, for the moment the application is not taken into account. The packaging can for the moment not be "non-recyclable" because of its content, the obligations provided by PPWR are on the design of the packaging. On the other hand, in fact, it happens that a "recyclable" packaging is not "recycled" because of its content, but this does not mean a ban.
15. Do we have to wait until 2028 to calculate the recyclability score/grade?	The 'No regret' presentation that the Packforward members (Fost Plus, Valipac, Verpact, Citeo, Grontpunt Norway and NPA Sweden) created, has been made to help companies already make the decisions as you get further information on what is certain already and what is not yet certain.
16. Will Fost Plus provide us with a computer tool to start calculating our recyclability scores?	No, it is not planned at the moment but will be looked at with the different EPR systems.
17. What packaging information do we need to comply with the standards and Article 6 of PPWR?	The standards specify the necessary information through the tables.
18. Are there standards for household packaging and standards for professional packaging?	Not different documents, but standards may offer different recommendations for household packaging and industrial packaging.

D) Methodology: Questions about integrated and separate components

Questions from participants	Response from Fost Plus
1. I am a brand owner; I am in the first stage of the analysis to find out if I have separate components or not. In concrete terms, what should I do?	By default, you don't need to do anything in this step and all components of your packaging will be considered integrated by default unless: • The component must be completely removed to access the product, without the possibility of putting it back on/in the packaging, or • There is a documented process for dismantling packaging components (for professional packaging). In both cases, the component is considered separate, no additional proof is required. If you think that the components are separated by the consumer or during sorting, you can conduct separation studies at this stage, using the protocol of the standard. It is a non-mandatory action; it is the choice of the company to mobilize resources to try to prove a separation without guarantee of result.
2. Can I consider the components to be separated since I have marked on the packaging to separate them?	No, marking can help separation but is not enough, the standard requires effective proof of separation

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3. Can you explain again how we can have two packaging elements separated by the consumer, with two very different end-of-life (two tables at once) but only one grade?	The example in the presentation is the ketchup bottle with a lid. You must remove the entire lid to screw the cap back on, no reason to put the lid in the bottle after finishing the ketchup. So, two separate components by default, without testing. We analyze the bottle in the table; it gets a score. We analyze the operculum on another table; it obtains a second score. The grade is the combination of these two scores.
4. Where can I find the method to proof separation?	In the future EN 18120-3 standard and in the technical specification (TS) being written within CEN TC261/SC4 WG3 on definitions and methodology.
5. Do the standards propose a consumer study methodology to measure the act of separation?	No, we are looking to prove an effective separation and not an intention to separate.
6. Who is responsible for proving separation?	It is not an obligation to prove separation; it is a voluntary action by the company that believes it is important to prove separation for the packaging being analysed.
7. I understand that each packaging unit will have a grade, but it encourages me to add a "useless grouping" in PE or easily recyclable cardboard to increase my grade. Have there been any measures to avoid this?	The point is well identified, the European Committee for Standardization (CEN) and the Commission have discussed this undesirable effect and agreed on the importance of not trying to manage all Ecodesign issues via a recyclability grade. A dedicated chapter on packaging reduction exists in PPWR and this topic will be managed in this chapter.
8. Is there a list of components that have been proven to be separable?	Not to date. The idea has already been discussed at the level of the European Committee for Standardization (CEN) but has not been the subject of consensus to date, as studies are rare and at the national level to date.
9. If I prove separation, I have two recyclability assessments to complete, which I will then combine into a single grade. Will the two evaluations be weighted?	Yes, by the weight of each component.
10. Do a lidded tray and a bottle of ketchup have the same numbers of grades?	Yes, 1 grade because in both cases it is a sales packaging.
11. Is a pump on a cylinder a "separate component"?	No, in general, by default all components are integrated. It would require a particular design that would result in a separation of the pump during collection or sorting to be separated. If you can proof that in more then 70% the cases the pump arrives separately on the sorting belt, it is considered as a separate component.
12. For a peelable lid on a tray, is this an integrated component since consumers don't remove it often?	Yes, the lid is a built-in component by default.

Source: Citeo. (2025, December 4). Webinar on Recyclability

13. How many grade(s) for a tray of ham with a lid and a divider?	One sales package, one grade and 3 components (tray, lidding material and divider)
14. How many grade(s) for a PP butter tub, PP lid with a paper on butter?	One sales package, one grade and 3 components (tub, lidding, paper).
15. I have a carton that includes my consumer packaging, so I have two grades (one for carton and one for sales packaging)?	Yes, one grade for the multipack and one grade for the sales packaging.

E) Methodology: Rigid versus flexible packaging

Questions from participants	Response from Fost Plus
1. Is a wine BIB (bag in box) flexible or rigid?	A wine “bag-in-box” is a rigid cardboard packaging consisting of two components: a cardboard box and a flexible plastic bag, the weight of the tap not being a factor in the "flexible" or "rigid" determination.
2. I can deform a PET bottle for ketchup Does that count as a flexible packaging?	The PET bottle for ketchup is a rigid packaging. It does not deform at the filling/ emptying and returns to its shape.
3. A medicine blister will puncture, deform, when you take out the medicine. Is it a flexible?	The medicine blister pack is a rigid packaging with an integrated component, a flexible lid that can indeed deform.
4. Why was it decided not to count the closure system of the caps or taps to categorize it as a "flexible" or "rigid" and to define the predominant material?	Let's imagine a 5g PE flexible virtual packaging with a 6g PP cap. Without this rule, this packaging would be described as a rigid PP. This modelling would lead to 1) an unintuitive classification for companies looking for information on recyclability 2) a need to precisely describe flexible products in the standard on rigid PPs. For the sake of simplification, this rule has been agreed within the CEN in agreement with the European Commission.
5. Will these standardised "flexible" and "rigid" definitions be used by Fost Plus for the 2025 and 2026 tariffs?	A similar distinction between soft and rigid packaging already exists in the Green Dot categories of Fost Plus, see green dot fees.
6. Does this mean that I will no longer be able to declare to FOST PLUS the weight of the closure of the flexible packaging?	No, the weight of the closure of the flexible packaging will still have to be declared just as the closure will be described in the green/yellow/red tables. It is only to determine the shape and the determining material that a simplification rule was chosen.
7. I use OPP/PE packaging, is the predominant material OPP/PE?	No, generally in this type of packaging, the PE part is the majority by mass. If this is the case, it would be a flexible PE.
8. In an aluminum/PP packaging mainly made of PP in mass, do I have a predominant material?	Yes, the PP.
9. In a glass packaging, even if I have a plastic pump, a metal cover,	Yes, exactly.

Source: Citeo. (2025, December 4). Webinar on Recyclability

the glass being heavier, is it a glass packaging?	
10. Is a staple on a cardboard a flexible steel packaging?	No, it's not a packaging. It is a steel integrated component in a cardboard packaging. Cardboard is the predominant material.
11. A tray is first a flexible sheet and then after thermoforming a rigid packaging. Flexible or rigid?	Rigid, we look at the packaging once it is formed.
12. A tube of cream, some deform, some don't, it also depends on the consumer: Flexible or rigid?	Rigid as a rule. This is specified in the standards. If the tube is very thin and designed to change its shape when filling and emptying, then it is a flexible.
13. Is shrink film a flexible film?	Yes, exactly.
14. Should a paper bag with cotton handles be considered a flexible paper?	It depends on the weight of the paper and the weight of the cotton, whichever is heavier will determine the predominant material. It's a flexible in any case.
15. A water bottle, with a flexible body and a rigid cap, 50/50, flexible or rigid?	Flexible, we do not consider the closure.
16. Is the seal in the ketchup bottle example a flexible aluminium packaging?	No, it's a separate component of the ketchup bottle, not a packaging. In the example of the slides, this separate component uses aluminium as the predominant material.
17. Since the lid remains on the rigid tray, is the lid a rigid packaging?	No, it is a flexible component integrated into the rigid tray. The packaging is a rigid one.
18. For the calculation of the predominant material, I must consider everything or only the materials (not the glue, not the inks...)? It's impossible to weigh the glue and ink, how do you do it?	The exact percentage is not important in determining the predominant material. We don't try to find out whether we exceed 50%. But yes, if possible, you need to count all the components and constituents.
19. What's the point of knowing if it's a soft or a rigid? to know the predominant material?	This information is important to know which standard and table to look at.

Source: Citeo. (2025, December 4). Webinar on Recyclability

F) Questions about packaging composition vs. recyclability

Questions from participants	Response from Fost Plus
1. Has Fost Plus provided a list of high-risk packaging by sector?	Together with the other EPR's from Packforward (Verpact, Citeo, Grontpunkt Norway, NPA Sweden, Valipac) we have made a presentation about 'no regret' decisions you can already take.
2. Can packaging with multiple materials be recyclable?	Yes. It all depends on the materials involved, whether they are recycled or separated.
3. Do the standards consider the impurities (e.g. carbon black) present in the recycled material I use in my packaging?	The standards specify for simplicity not to consider the rate and nature of impurities in the recycled material, which is difficult to measure and highly variable.
4. I didn't understand how to calculate the recyclability score from the tables; how do I know what I'm putting as the numerator and denominator of the division?	In the numerator, the mass of all components and constituents of the tables that do not have an asterisk (or are not in the "removed and not recycled" column). In the denominator, the total mass of the packaging.
5. Will PETG and copolyester bottles used in cosmetics be banned in 2030?	The family of copolyesters is very broad, it includes for example PET. If your material falls within the definition of PET in the standard, the packaging must comply with the design criteria and the future delegated act. If not, then the ban is likely. PETG, like many other copolyesters, is not a plastic resin that has a recycling stream and there are no plans to develop one by 2030.
6. Will PS packaging be banned? EPS shock absorbers for transport? XPS trays?	No, there is no ban in principle in 2030 on the PS, the XPS and EPS. Packaging must meet design criteria in 2030 and then also achieve a sufficient recycling rate in 2035.
7. Given the emergence of a stream for rigid packaging made of coloured PET, is there a higher risk of a ban in 2030?	No, if design rules are followed, rigid packaging made of coloured PET will not be automatically banned in 2030. Recycling at scale in 2035 is the main challenge for this category of packaging.
8. Will flexible packaging made of a mix of PE and PP be banned in 2030?	The standard specifies the maximum accepted amount of PE in PP and vice versa. If they comply with the design for recycling recommendations defined in the standards, there is no reason why they should be banned in 2030.
9. Will flexible packaging made of a mix of PE and PA be banned in 2030 ?	The current version of the standards has classified certain types of PA as compatible with the mechanical recycling of PE films. Fost Plus believes that there is a chance that this may change over the review period. Please look at the presentation that the different EPR organizations made on 'no regret' decisions.
11. Will PET/PE flexible packaging be banned in 2030?	For pouches and bags, in line if the predominant material is flexible it is likely to end up in the red category. As a lidding material on PET trays, it is not certain yet. (It will depend on the revision period). Please have a look at the presentation that the different EPR systems made on 'no regret' decisions.

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12. Will silicone-coated PE films be banned in 2030 ?	Fost Plus is not authorised to communicate the detailed content of the standards; we invite you to consult the standard on PE flexibles as soon as it is published to have the right answer for your packaging.
13. Is a packaging that combines cardboard and plastic, for example, with lamination or coating, be banned in 2030?	As a rule, not for packaging where cardboard is the main material. It will be necessary to look closely at the standards on the recyclability of cardboard and paper packaging to know if your specific packaging meets the design criteria for recycling or not.
14. Will silicone paper used as baking papers be banned in 2030 ?	Fost Plus is not authorised to communicate the detailed content of the standards; we invite you to consult the standard on cardboard and paper packaging as soon as it is published to have the right answer for your packaging. Be aware that there is a revision period foreseen before 2030.
15. Does a PET unscrew pump allow a PET bottle to be recyclable?	It all depends on the composition of the pump, but metal remains a disruptor of PET recycling, whether the pump can be unscrewed or not.
16. Will pumps be banned because they contain several materials?	No, it all depends on the composition of the pump and on which packaging it is used. To find out more, you will have to look at the description of the different pumps in the standards.
17. Does a staple prevent cardboard from being recycled?	No, but the metal will not be recycled.
18. How do the standards deal with the metallisation?	At the very least, the observation is shared at the European level that the metallized surface must be limited to allow the packaging to be sorted. It will be necessary to look closely at the standards to know if your specific packaging meets the design criteria for recycling or not, since metallization concerns many types of packaging.
19. How do the standards address the topic of complex lids?	It will be necessary to look closely at the standards to know if your specific packaging meets the design criteria for recycling or not, since the topic of lids concerns a large number of different packaging and recycling processes (recycle the lid with the body of the packaging or, on the contrary, separate them to recycle them, or separate them and they are not recycled...).
20. How do the standards treat IML labels?	IML are described in the standards, most of them are compatible with packaging recycling. It will be necessary to look closely at the standards to find out whether your specific packaging meets the design criteria for recycling or not.
21. How do the standards address the topic of sortable dark pigments?	There is a European consensus that carbon black has an impact on packaging sorting. It will be necessary to look closely at the standards to find out whether your specific packaging meets the design criteria for recycling or not.
22. Do you confirm that grade C will be banned in 2038?	Yes. Packaging with a grade C will be banned in 2038. From 2038, packaging units will have to have a minimum grade B to be authorized to be marketed.
23. Do you confirm that only one non-separated (= integrated) component in red makes the entire packaging non-recyclable?	Yes. A component of the packaging classified as red and not separated leads to 0% recyclability for the entire packaging.

Source: Citeo. (2025, December 4). Webinar on Recyclability

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24. On the other hand, if I have a separated component in red, minor in weight, am I not forbidden?	Yes, this is the choice to date in our exchanges between the European Committee for Standardization (CEN) and the European Commission. This rule should be written in the delegated act in 2028 with still a low probability that the final rule will be different.

G) Recycling at scale

Questions from participants	Response from Fost Plus
1. How have the standards been able to harmonise design for recycling recommendations when sorting, recycling and recycling outlets are not harmonised?	In Belgium, we may find that the choice of state-of-the-art recycling is not the same as the Belgian infrastructure. And every country may be confronted with this discrepancy. This approach was adopted by consensus to be able to propose a harmonization of packaging design rules in the face of non-homogeneous practices.
2. What is the standard process for defining the "state-of-the-art", the typical recycling on which the design rules are based?	A definition, derived from the rules for financing European projects, has been adopted by the European Committee for Standardisation (CEN) and the Commission. Based on this definition, the companies involved in the standardization work had to seek a consensus on "typical" collection, "typical" sorting and "typical" recycling technologies for each category of packaging. It is not an average of the facilities, or the best in the class, but a collective choice.
3. Is the "state-of-the-art" technology necessarily a recycling of packaging into new packaging?	No, PPWR does not require closed-loop recycling, and "packaging-to-packaging" recycling does not exist for all materials.
4. Has chemical recycling been considered in the standards?	Yes, it was considered for the "state-of-the-art" of flexible plastic packaging and PS.
5. If I have a packaging with a design A but it is not recycled in 2030 in the country where it is marketed, does PPWR require its recycling in another country where this recycling exists?	No, Article 6 of PPWR concerns the design of packaging, not the way in which the market is or is not organised to recycle packaging.
6. What does "recycled at scale" mean?	The principle is to have efficient recycling in all countries that use this packaging, with a recycling rate of 55% to be achieved by category. If the 55% is not reached for the category, then there will be a negative impact on the grade, which can go as far as banning.
7. When will we have the delegated act that defines this concept?	The Commission plans to publish a delegated act in 2030 to clarify the concept and its application in 2035.
8. What if my packaging has a good design but is not recycled at scale?	We admit we do not know today. We are waiting for the delegated act on recycled at scale.
9. Does not reaching 55% recycling for my packaging category lead to a ban?	We admit we do not know today. We are waiting for the delegated act on recycled at scale.

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10. Will the 55% be calculated at the European level? By country? Will each company have to prove the 55% individually?	We do not know at this stage. We understand from the PPWR that this would be at the European level.

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