

AIP State of Industry Webinar Questions that require answers

1. Was Table 2 that Lina was talking about those grades are coming from RECYCLASS grading?

No, the tables are showing Grades A, B and C from the PPWR Annex 2, Table 3. This is the grading system according to PPWR, not RecyClass.

2. What do you mean by 70% Recyclable? How can we separate 30% non-recyclable material from 70% recyclable packaging?

If you calculate the recyclability of packaging the result must be 70% recyclability or over 70% recyclability.

The PPWR recyclability calculation methodology will be further defined in future delegated acts. However, until delegated acts to the PPWR determine a uniform approach to the recyclability calculation, the AIP will look to do a webinar on the status quo calculation of recyclability.

Furthermore, you will find the recyclability assessment guideline that was created together with ECR Austria attached. Since the original is only available in German, the attached version that was translated using Google Translate. Please keep in mind that the guideline was last updated in 2023, so it still references to the PPWR proposal and not to the final PPWR version.

3. Did I hear that chemical recycling is not allowed in EU. Would rPET which is chemically recycled be allowed.

Chemical recycling is currently not allowed in the EU as below.
https://environment.ec.europa.eu/topics/plastics/single-use-plastics_en

rPET is usually manually recycled.

Currently, companies from the recycling, petrochemical and plastics industry are working together to expand chemical recycling. However, no chemical recycling technology has yet reached market maturity, although some supplies have made great progress and are on the verge of commercializing plants with relevant capacities. Significant investments are planned by the industry to scale up production to millions of tons by 2030. Furthermore, the European Commission is working to clarify the legal framework, including rules for calculating recycled content and environmental impact, which are crucial for the technology's integration into the circular economy. <https://lnkd.in/p/gBQWPJqi>

<https://www.plasticstoday.com/legislation-regulations/eu-sets-chemical-recycling-standards-for-plastics>

<https://www.innovationnewsnetwork.com/eu-greenlights-e500m-investment-in-chemical-recycling-for-plastic-waste/55118/>

<https://cefic.org/news/the-recognition-of-the-mass-balance-chain-of-custody-is-key-to-accelerating-chemical-recycling-and-meeting-the-eus-climate-and-circularity-targets/>

4. Why is chemical recycled material not included in the totals?

As above.

5. Is FDA certified food grade recycled content accepted in the EU?

Depends on the recycling method used. Chemical recycling is currently not accepted as above, mechanical recycling is accepted in the EU.

6. Without consideration for chemical recycling, how is recycled content expected to be achieved for food grade flexible plastics?

This is not yet legally finalized.

7. Currently, is monolayer soft plastic chemically or mechanically recycled in EU?

Depends on the type of plastic. Chemical recycling is currently not allowed in the EU as above. So, only mechanical recycling is permitted.

8. How is recycled content measured in a packaging?

Recycled content is calculated as percentage of recycled content recovered from post-consumer plastic waste, per packaging type and format as referred to in Table 1 of Annex II, as an average per manufacturing plant and year. A future implementing act (Dec. 2026) will give more detail on the calculation method.

9. How will enforcement occur across these requirements under the regulation? Will there be additional taxes/fees/penalties for lower grade material usage to drive improvements?

If you do not fulfil the minimum criteria of the PPWR, your products will not be placed on the European market. There will also be sanctions that have to be further defined by the Member States.

Furthermore, there will be packaging fee modulations according to the recyclability performance grades. Meaning, the higher the grade (e.g. grade A) the lesser the fees.

10. Is there a minimum amount of packaging in tonnes that is being placed on the EU market before you need to comply by 2030?

Depends, there are only minimum amounts regarding transport packaging before you have to comply with the reusability requirements. Apart from that, no. Meaning each and every packaging placed on the European market has to comply with the requirements set.

11. Will better guidance be provided on what is truly considered packaging and what is packaging waste?

Clarification on what items are considered packaging and which not, can be found in Annex I.

12. For example, medical tests- plastic pipettes, plastic test tubes, etc., so it is clear what is to be weighed?

Answered as extension to question 11:

Most requirements do not apply to contact-sensitive medicinal products. In general, plastic test tubes, etc., are considered products rather than packaging, depending on the usage.

13. Does PPWR apply to all importing businesses or are there minimum thresholds based on revenue or quantity of imported good etc?

Generally speaking no. Please look to question 10, considering transport packaging and the reusability requirement.

14. If I sell packaging to a company in Australia and they use it to pack a product in that is then shipped to the EU, which is then further processed in the EU, packed into different packaging before being sold to a consumer, does my packaging need to comply?

As soon as the packaging enters the EU, it has to comply with the requirements set by the PPWR, even if its repackaged.

15. Could be that 70% is the minimum % weight of main material on the item e.g. PET, which may have secondary materials (attachments), that can be up to 30%, by weight before being classified as D.

No, recyclability is not calculated in that way.

16. Does PPWR apply to B2B packaging as well as retail and HORECA packaging?

Yes, dependent on the type of packaging different obligations apply.

17. Does PPWR packaging apply to shipping medium size (2-4 cubic meters) machines?

Large-scale machinery is exempted, however no definition of "large-scale machinery" available.

18. Do these regulations apply to packaging components or materials, or are they more focused on the final format that would be on the retail shelf?

19. How does 'technical recyclability' compare with 'theoretical' vs 'effective' recyclability? Is there a firm definition?

Theoretical recyclability is the material's potential to be recycled based on its composition and properties, while technical recyclability assesses if a product can be collected, sorted, and processed into new raw materials or products given current technology. Effective recyclability considers both technical feasibility and practical factors such as market demand for the recycled material, the infrastructure for collection and processing, and consumer participation, determining if the product is actually recycled in the real world.

20. I think there is still confusion around the 70%. According to the slide on recycled content, it ranges from 10% to 35%. I think they meant 70% recyclable material?

There is a difference between 70% recyclability (applies to **all** packaging) and recycled content targets for **plastic** packaging starting at 10%!

21. Are there considerations for how brands will be able to work together/collaborate to scale-up reuse and refill? And how could we apply this to the Australian context?

This has not yet been finalized!

22. Are European Consumers well aware/concerned/educated about PPWR? Meaning how does it matter to them? If the brand owners go through all the PPWR requirements and the consumers' waste behavior doesn't change... ; consumers' education is critical... not sure it is given sufficient effort/attention... in the PPWR objectives ...

No, there is no information campaign or similar to educate consumers about PPWR. The PPWR is focused on manufacturers and Member States.

23. Interested in understanding where PPWR fits for B2B packing, please?

More or less all requirements also apply to B2B packaging.

24. There was a reference to importers needing to be within an EPR scheme. What does that mean? Does that mean that they need to join an EU scheme or does this provide us with the incentive to have mandatory EPR in Aus and NZ to ensure our exporters comply? Article 45.3 seems to suggest this would be the case unless the producer registers directly with each European country.

When placing packaging on the European market you have to be part of the Member States' EPR scheme (this applies since the Waste Framework Directive entered into force). As a producer established in a third country (e.g. AUS or NZ) you have to appoint an authorised representative for the

extended producer responsibilities in each and every EU country you place packaging on the market.