

RESPONSE TO CALL FOR EVIDENCE: Europe's Recyclers' recommendations for a robust PPWR framework for recycled content in plastic packaging



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Introduction

The implementation of the Packaging and Packaging Waste [Regulation](#) (PPWR), alongside other EU legislation such as the Single Use Plastics Directive (SUPD) and the End-of-Life Vehicles Regulation (ELVR), will determine whether the EU succeeds in creating a competitive market in Europe for recycled plastics and in strengthening demand for European-made recycled plastics.

The three pieces of secondary legislation foreseen under Article 7 PPWR¹ will play a key role. At a time when Europe's plastics recycling industry is facing an [unprecedented crisis](#), with numerous plant closures, declining demand, and growing competition from imports of recyclates whose recycled content cannot always be effectively verified, these rules under PPWR must provide a robust framework recognising the strategic importance of a strong European recycling industry and effectively supporting it.

In this paper Recycling Europe calls for an implementation framework built around three principles: support European recycling through fair competition and a Made in Europe preference; guarantee credible and verifiable recycled-content claims; and ensure that recycled content targets deliver measurable environmental benefits.

1. Introduce a clear Made in Europe preference with a robust and effective mirror clause

Recycled content targets should translate into effective demand for European recycling while ensuring that imported materials compete under equivalent conditions. Without this the PPWR risks imposing high environmental and traceability standards on Europe's recyclers while allowing materials produced under different conditions to meet the same EU targets. The framework under Article 7(10) should therefore combine a clear preference for European recyclates with robust equivalence requirements for recycled plastics originating from third countries.

¹ Art. 7(8) Implementing Act on calculation and verification of recycled content; Art. 7(9) Delegated Act on sustainability criteria for plastic recycling technologies; Art. 7(10) Implementing Act on equivalence for admitting recycled content from third countries

Recycling Europe recommends that the future Implementing Act under Article 7(10) PPWR is built around the following three key principles²:

- 1) **Require “Made in Europe” recyclates for packaging produced or filled in the EU:** In that case, compliance with recycled content targets should rely on recycled plastics originating from post-consumer waste collected & recycled in Europe (EU27+EFTA+UK).
- 2) **Establish robust mirror measures for packaging produced and filled outside the EU:** For those packaging placed on the EU market, recycled plastics should only count towards recycled content targets where compliance with requirements and standards equivalent to those applicable in the EU can be demonstrated, or European recyclates can be used.

The mirror clause framework shall ensure equivalence at two levels (following the approach enshrined in the Waste Shipment Regulation):

- **Country assessment:** Only plastic recyclates originating from third countries that can guarantee environmentally sound waste management in line with EU rules, and that have equivalent circular economy measures in place, should be eligible to count towards PPWR recycled content obligations. The European Commission shall assess such country level equivalency.
 - **Facility-level verification:** Only plastic recyclates originating from certified facilities located in authorised countries should be eligible to count towards PPWR recycled content obligations. Independent third-party certification – valid for one year – shall be required to prove that third country recycling installations effectively comply with equivalent environmental, operational and traceability requirements.
- 3) **Ensure effective enforcement, market surveillance and transparency throughout the value chain:** The Implementing Act should establish harmonised verification procedures, while Member States should ensure effective controls on imported packaging and introduce dissuasive harmonised sanctions. The Implementing Act should also ensure robust traceability and transparency throughout international value chains, so that the origin of post-consumer plastic waste and recycled plastics can be verified at every stage, potentially via a chain of custody model. Appropriate documentation and independent third-party verification should support effective enforcement.

² More information in *Recycling Europe’s* published reply to the Call for Evidence (jointly with *FEAD* and *Plastics Recyclers Europe*) – available [here](#)

2. Develop an ambitious and robust calculation and verification method

Recycled content targets can only create a credible market if the methodology underpinning them is clear, consistent and verifiable. The PPWR should provide a common framework that gives recyclers and investors regulatory certainty, ensures that recycled content claims correspond to the actual use of recycled materials, and avoids unnecessary complexity or duplication with existing EU requirements.

Recycling Europe recommends that the future Implementing Act under Article 7(8) of the PPWR is built around the following principles³:

- 1) **Replicate under PPWR the mass balance calculation methodology agreed under the SUPD Implementing Decision.** This approach ensures swift regulatory coherence across files and provides investors with the long-term stability and confidence needed.
- 2) **Add a review clause** that recognises the complementary role of both mechanical and chemical recycling, based on future evidence and experience. **In the longer term, an ambitious vision for mass balance is needed:** strict and transparent rules are crucial to ensure a higher circular use of plastics that drives positive environmental change while respecting the level playing field between recycling technologies. Thus, *Recycling Europe* believes that the polymer-only mass balance method is better suited to the plastic recycling landscape and would provide greater transparency and trust from final consumer⁴.
- 3) **Prioritise recycling technologies with the lowest environmental impact, namely mechanical recycling.** It is important to ensure that mechanical recycling technologies will be preferred to chemical recycling technologies, wherever it is technically feasible, reflecting their lower environmental impact.
- 4) **Ensure proportionate verification and avoid duplication of existing controls.** The verification methodology should build on existing EU regulatory, certification and control frameworks. In particular, for food-contact recycled plastics, existing controls and documentation under [Regulation \(EU\) 2022/1616](#) should be recognised and, where appropriate, relied upon for PPWR verification purposes. Where mass-balance accounting or allocation is used (i.e. for chemical recycling), additional verification should ensure the accuracy, consistency and traceability of recycled-content claims.

³ More information in *Recycling Europe's* published reply to the Call for Evidence – available [here](#)

⁴ Recycling Europe (EuRIC) (August 2025), Position paper: “New rules for the calculation of recycled plastic content in single-use plastic beverage bottles – EuRIC’s recommendations”, p.3., available [here](#)

3. Develop sustainability criteria for plastic recycling technologies where mechanical recycling comes first

Developing sustainability criteria for the incorporation of plastic recycled materials is key to ensuring that the overall process minimises pollution. These criteria should consider the origin of recycled plastics, but also the environmental impact of recycling technologies used, as stressed in Art. 7(9) PPWR. The sustainability criteria should enable a robust differentiation between recycling technologies according to their overall environmental performance. **Mechanical recycling should be prioritised over chemical recycling technologies, with chemical or physical (dissolution) methods reserved only for waste that cannot be mechanically recycled.**⁵

Recycling Europe advocates for the following framework⁶:

- 1) Sustainability criteria should underpin an **environmental hierarchy of recycling technologies**, where mechanical recycling, with its lower carbon footprint compared to chemical recycling, will come first.
- 2) **Recycling technologies should be assessed according to the waste stream and intended application**, covering the relevant stages of the recycling value chain, including sorting, recycling, transport and conversion into new plastic products.
- 3) Sustainability criteria should cover the **full environmental performance of the technology**, i.a. energy and climate performance followed by material efficiency, yields, rejects and residues.
- 4) The assessment should take place at technology level and **not create unnecessary administrative burdens for plastics recyclers**.
- 5) The sustainability criteria should be **regularly reviewed** considering technological developments and innovation, while providing predictability for economic operators on the prioritisation of mechanical recycling.

Conclusion

The implementation of Article 7 PPWR will play a decisive role in determining whether Europe achieves its recycled content objectives while maintaining a competitive domestic recycling industry. *Recycling Europe* stands ready to support the European Commission in developing practical, science-based and enforceable secondary legislation that strengthens circularity, provides legal certainty and reinforces Europe's strategic autonomy in recycled plastics.

Note to editor: Recycling Europe (formerly EuRIC) is the voice of Europe's recycling industry, including 84 national federations and companies across 25 countries in Europe. From metals and paper to plastics, textiles, tyres, ships, construction & demolition waste, WEEE and ELVs, our members transform waste into resources—powering Europe's circular economy, ensuring resource autonomy, and boosting competitiveness

⁵ *Recycling Europe (EuRIC) (2024): "EU Plastics Recyclers' Roadmap: For a competitive & innovative industry", available [here](#)*

⁶ **More information in *Recycling Europe's* published reply to the Call for Evidence – available [here](#)**

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