

# CEN Standardization

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Overview of the draft standard EN 18120-4

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261/SC4/WG10



# ANTITRUST

## For a competition safe environment

### MEETINGS MANAGEMENT

- PETCORE EUROPE staff and Chairperson of the meetings will issue in advance an agenda that must not cover subjects likely to infringe the competition laws;
- Agenda and registration forms shall carry the following words: "PETCORE EUROPE is committed to complying with EU Competition Law. The participants to this meeting agree to adhere to the PETCORE EUROPE manual on competition law compliance";
- A lawyer expert in EU competition matters or a PETCORE EUROPE executive from the staff, should be present in the meetings. Discussions which occur during the meeting will be recorded in the minutes;
- If any prohibited subject is raised, Chairperson and/or PETCORE EUROPE staff should request to stop the conversation. If the discussion is continued the meeting will be closed and the foregoing recorded in the minutes;
- If necessary, PETCORE EUROPE will provide its staff and members with training and up-to-date to ensure that no activity deemed to be anti-competitive is undertaken.

### MEMBERSHIP CONDITIONS

Membership rules should be transparent and non-discriminatory. In particular ,they should not place any member at a competitive disadvantage.

### TECHNICAL STANDARDS

Voluntary technical industry standards set up by PETCORE EUROPE members should be objective and accessible to everyone.

### PROHIBITED DISCUSSION TOPICS

Never discuss with undertakings in fact or appearance in formal or social meetings about:

#### PRICES

Agreements or coordinated practice on individual prices, costs, discounts, allowances, price changes. Exchange information on price decisions, profit margins, terms of sales.

#### PRODUCTION

Information on production capacity, suppliers or distribution. Fixing of production quotas.

#### MARKET SHARES

Agreements on market shares, boycott suppliers, divide up the market, allocation of sales territories, distribution or marketing.

#### CUSTOMERS

Blacklist customers, agree to classify or select potential customers.

#### INVESTMENTS AND TRENDS:

Do not share credit terms, future plans concerning technology. Do not apply dissimilar conditions to equivalent transactions with other trading parties.

Please refer to the full PETCORE EUROPE competition law policy as distributed and available from the secretariat



# Too many recyclability guidelines

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RecyClass

National pact  
guidelines



RECOUP



COTREP



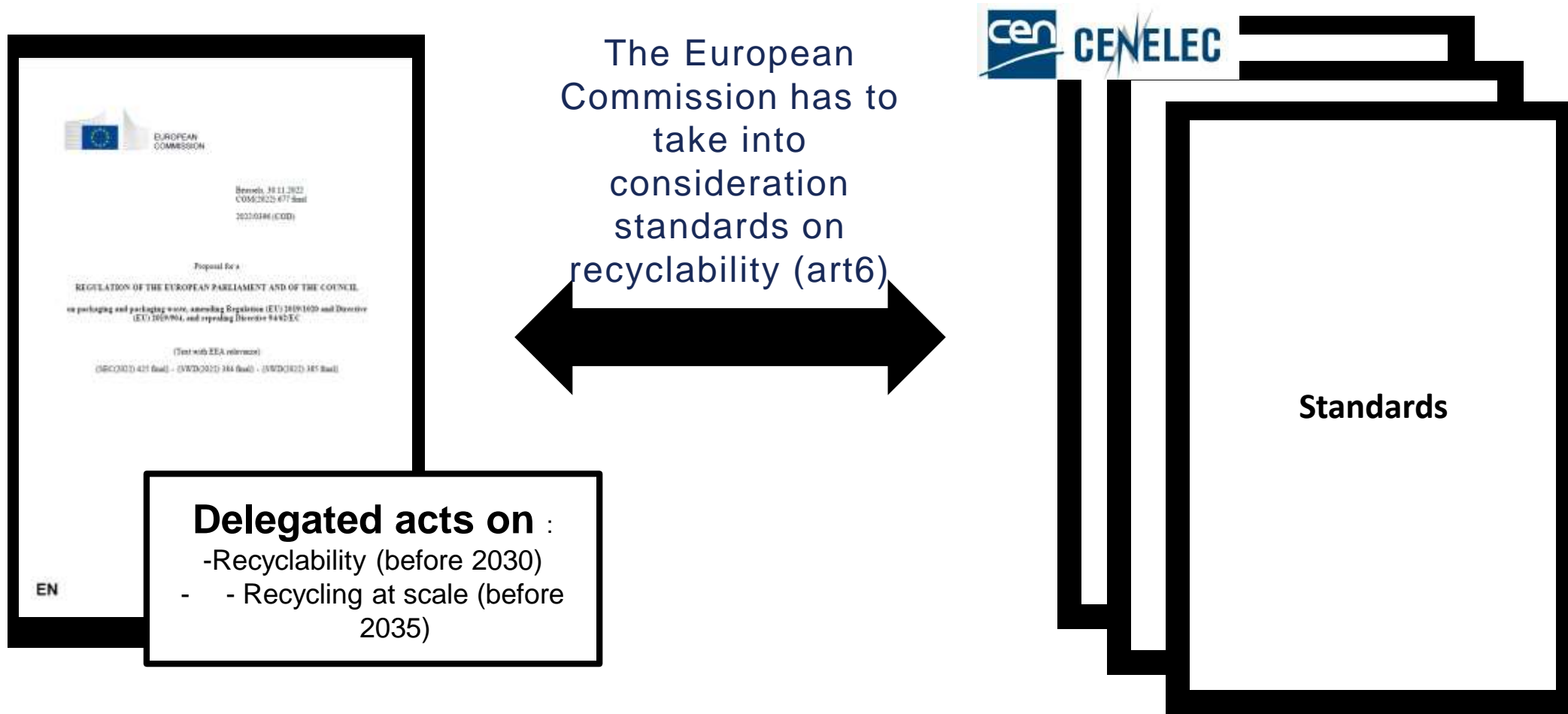
CYCLOS-HTP



Retailer guidelines



# Harmonization is needed



Moving from « voluntary » design criteria to enforced one to reach 100% of recyclable packaging

# How standards will be used after 2030 ?

PPWR article 6 uses “recyclability” to allow/ban packaging from the market in 2030 and modulate ERP fees

PPWR article 11 on communication doesn't mention recyclability, so this aspect won't be harmonized at European level through PPWR (some countries have national law on that point).

## Packaging ban

2030 : a packaging will be banned from the market if it reaches a grade D = recyclability score < 70%

Our standards define the recyclability score methodology and say a red constituent conducts to a recyclability score of 0%

## Ecomodulation

EPR fees are approximately 10% of the price of an empty packaging in 2022

2030 : apply a modulation of the fee based on the grade

Grades are partially based on recyclability score developed by WG10



# TC261 SC4 WG10 ambition

**Deliver consensual standards which could be used by**

**PPWR**  
A unique opportunity for plastic  
packaging



# From CPA to standards



- CPA started to build a vision of the future standards on plastic packaging recyclability and protocols
- Standardization process will help to find consensus on methodology and criteria. New actors, new vision, consensus rule
- EN standards don't refer to existing websites so we have to write our own methodology and criteria in our publications.

# Planning

	06/23	07/23	08/23	09/23	10/23	11/23	12/23	01/24	02/24	03/24	04/24	05/24	06/24	07/24	08/24	09/24	10/24	11/24	12/24	01/25	02/25		08/25
Draft consultation (WG10 level)	01/06		31/08																				
Subgroups deal with comments				01/09	09/10																		
Draft consultation (SC4 level)					10/10		04/12																
Subgroups and WG10 deal with comments							05/12			03/03													
CEN admin time, WG10 isn't allowed to work on documents										04/03			03/06										
CEN inquiry (TC261 + TC in liaison)													03/06		26/08	19/9-12-12							
Subgroups and WG10 deal with comments															27/08								
NSB inquiry on wording, WG10 isn't concerned																					24/02		
NSB final votes																						05/05 30/06	
Admin and publication																					24/02		26/08

- PPWR planning : end of 2024, enter into force mid of 2026
- Delegated act on recyclability : 2028



# WG10 organization

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PET bottles

(2 standards  
prEN 18120-4  
prEN 18120-10)

PETCORE

PET rigid

(2 standards)

SULAYR

PE & PP rigid

(2 standards)

PCEP

PE & PP  
flexible

(2 standards)

CEFLEX

PS & XPS rigid

(2 standards)

SYNDIFRAIS

EPS

(2 standards)

BEWI

Methodology

(2 standards)

CITEO

Sorting

(1 standard)

On-going



# How 14 standards work together?



Part 1

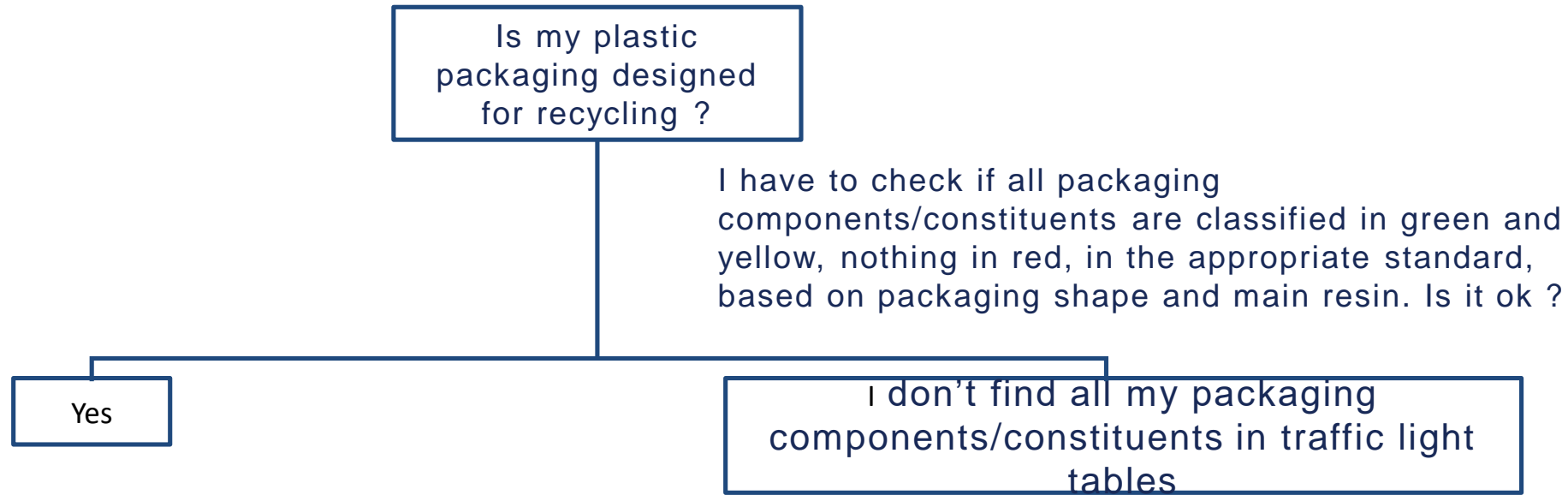


Parts 2-15

Vigilant to align all parts with the part 1 on:

- Definitions
- Wording
- A packaging which is recycled day by day without high negative impact should be classified in green and yellow column rule

# Concrete use by industry



Ok so I have my conclusion, no test

If I want to claim “recyclable packaging”, I have to check at national level if a recycling stream exists (at minima before 2035 and at scale rule).

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A single company or a group of companies will conduct test (sorting, recycling, sorting+recycling) following protocols and methodology developed by WG10. A positive result could be used as a proof of conformity before the next standard update. The results could be shared to WG10 to improve traffic light tables.

# Methodo rules - examples

What's plastic ? >50% rule preferred to the SUP/PPWR definition

Traffic light table approach

Set of criteria classified in green, yellow and red columns, based on sorting and

- recycling behavior
- Red = 0% recyclability
- Yellow = a negative impact on the final recyclability score

On which perimeter packaging recyclability is evaluated ?

Traffic light table :



+



Final graduation :



State of the art definition

- Standards and PPWR based on “state of the art”, not TRL9, not best in class
- Experts have to define what's the sorting process, the recycling process and the main outlet state of the art

# Link between standards and graduation

- PPWR graduation will be defined in a delegated act In 2028 and enters into force in 2030
- On-going discussions with industry on how reducing the uncertainty and proposing a graduation system as soon as possible. CEN 261 SC3 will launch work to propose a standard

## PETCORE EUROPE work in Q4/2024

- Present standard Overview to PETCORE members, specifically the Labels WG
- Review, comment, align on the content of the standard and modifications needed before going into the last round of revisions, so that work is done timely and in the best interest of the PET Bottles value chain



# EPBP and CEN interactions



CEN standards are vastly influenced by EPBP protocol



Recyclability assesement starts with a recycling process type and recyclete outlet that drive DfR, that drives testing procedures

