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European PET Industry encourages adoption of the CEN Design-for-Recycling Standards: A Needed Major Step Towards PPWR Implementation

The European PET value chain encourages the adoption of the pr EN18120 series for design for recycling and recyclability assessment protocols for plastics packaging developed by CEN TC261/SC4/WG10 Design for Recycling (DfR) standards for plastic packaging, developed under the European Commission's mandate. These standards form the technical backbone for the delegated act the Commission will adopt by 1 January 2028 under the Packaging and Packaging Waste Regulation (PPWR – EU 2025/40).

This achievement is the result of three years of intense collaboration, nearly 150 expert meetings for plastics (more than 25 meetings only for PET bottles), and the direct involvement of hundreds of specialists across the entire packaging ecosystem: material producers, converters, brands, retailers, recyclers, academia, testing laboratories, technology providers and national standardisation bodies.

We extend our sincere appreciation to all experts who contributed to this comprehensive and consensus-based result.

We call the commission to confirm the support it has been showing to the development of these standards during the last 3 years by adopting them as the basis for the recyclability performance assessment provisioned in the PPWR under article 6.

A Transparent, Consensus-Driven, Value-Chain-Wide Process

The CEN process provided a neutral, rules-based platform where each technical element was examined repeatedly, supported by data, and agreed under the formal consensus rules that govern European standardisation.

Importantly:

- Recycling industry representatives, including their representative association (including national and European associations), participated fully in the process, engaged in discussions and contributed with technical expertise.

- Every requirement in EN 18120 and related standards passed with consensus, meaning no element could be included without agreement from all participating sectors, including recyclers.
- The standards integrate real-world experience, drawing on many years of best practices and established guidelines, including nearly two decades of proven technical foundation from the European PET Bottle Platform (EPBP) and the Tray Circularity Evaluation Platform (TCEP)
- The PET value chain was represented by PETCORE EUROPE and many of its members (Retailers, Brand Owners, Raw Material Manufacturers, Converters and recyclers) were also present, via National Standardization Bodies.

This transparent and inclusive process ensures that the resulting standards reflect both the realities of packaging production and the operational needs of European recyclers.

A Foundation for Europe's Circularity Ambitions

These standards are not the final endpoint, but the first harmonised foundation Europe has ever created for:

- improving recyclability at scale,
- enhancing material quality,
- ensuring investment certainty,
- and enabling the PPWR's 2030 recyclability and recycled-content targets.

For manufacturers and brands, the standards provide clear and unified design criteria, bridging a long-standing gap in the internal market. For recyclers, they offer predictability, support for high-quality output and a mechanism to guide future investments.

This is the strongest technical foundation the plastics value chain has ever built together.

Constructive Path Forward: Deploy, Monitor, and Continuously Improve

While robust and technically grounded, the standards represent the first version. As innovation accelerates (new materials, new sorting technologies,...) the standards will naturally require refinements and updates.

We therefore propose the creation of a PET value chain permanent platform, led by PETCORE EUROPE to:

- Support and monitor the standard's deployment
- Observe their impact on quality, yield, economics
- Monitor technology evolutions that are relevant to be included in the standards for both design for recycling and recyclability assessment
- Get feed-back from brand owners, collectors, converters, pre-processors and recyclers and other PET value chain stakeholders
- Aggregate experience and prepare material for the update and the improvement of the standards within the framework of the CEN.

This platform will allow the value chain to jointly assess the effectiveness of the standards.

The first formal revision is expected before the end of 2027 and PETCORE EUROPE is committed to contributing operational insights, scientific data and field results to further strengthen future versions.

We will continue close cooperation with the European Commission, involved European Commission Directorate Generals and all stakeholders to ensure these standards continue to evolve in line with Europe's circularity goals and technological advancements.

Facts supporting the Standard's robust development process

Several misconceptions have recently circulated. It is essential—particularly for policymakers—that the facts are clearly stated.

Quote 1: “The standards were developed without adequate recycler input.”

Fact: Recyclers—including various EPR systems such as CITEO, COREPLA and recycler organizations—participated in every phase of drafting, discussion and approval. Consensus rules mean no provision could be adopted without recycler agreement.

Quote 2: “The standards rely on limited or biased data.”

Fact: The standards were built on multiple scientific data sources, inter-laboratory inputs, industrial testing, and shared datasets from across the value chain. Where data variation existed, CEN used conservative, technically robust criteria, documented in the standardisation files.

Quote 3: “CEN ignored existing guidelines”

Fact: Existing Guidelines including the data generated to create them such as those developed by CEFLEX, EPBP, TCEP, RecyClass and others were actively considered and discussed.

However, CEN standards must reflect the harmonized entire European PET value chain, including multiple recycling technologies, brands, materials producers, national practices, and existing sorting infrastructure—not only the operational model of a single system.

Quote 4: “The standards endorse materials or components that recyclers cannot handle.”

Fact: All compatibility assessments were:

- evidence-based,
- validated in working groups,
- and aligned with recyclability at scale as defined under the PPWR.

When differences appeared between industry guidelines and real-life variability across Europe, CEN applied consensus-driven, technically neutral criteria.

Quote 5: “The standards weaken recyclability requirements.”

Fact: The standards strengthen them by:

- introducing harmonised design rules across the EU,
- defining performance grades,
- and creating the basis for the Commission's delegated acts.

This is the first time in EU history that recyclability requirements are anchored in harmonised European standards.

Quote 6: “The standards cannot be improved.”

Fact: Like all CEN standards, these will undergo systematic revision, informed by industrial data, sorting and recycling performance, and technology progress. The value chain is already organising to support this process efficiently and transparently.

A Call for Unity and Constructive Progress

Europe's circular economy transition depends on collaboration, not fragmentation. The CEN standards represent a shared achievement and a shared responsibility:

- They give manufacturers clarity.
- They give recyclers a stronger input mechanism.
- They give the Commission a harmonised basis for PPWR implementation.
- And they give Europe a credible path to meet its 2030 objectives.

We remain committed to working together—constructively, transparently and with respect for the CEN process—to continue strengthening recyclability across Europe.

*PETCORE EUROPE is a Brussels based, **non-profit** industry organization, **representing the entire PET value chain**. Our membership consists of more than 160 **companies** (corporations) including brand owners, recyclers, technology providers, PET producers, converters, labels, cap suppliers, masterbatch suppliers, waste management companies, retailers and includes 9 associations. Our vision is to achieve **widespread** recognition of the performance of PET as a circular material of choice for packaging and to make sure PET is collected and recycled. **PETCORE EUROPE's** priority is to **focus on** circularity and to communicate PET as **circular and environmentally sound** material through innovation evaluation, design for recycling guidelines and **direct engagement with the entire PET value chain and the decision makers**. Ensuring, thus, that all stakeholders have a broad understanding of the market needs for consumer safety, environmental impact, sustainable resourcing and processing, alongside a fully circular business model. **PETCORE EUROPE** is recognized as a PET pioneer that produced the first guidelines for PET bottle recycling and has conducted annual surveys on PET recycling since 1997. We **represent the PET industry** before European institutions and other stakeholders and **support and validate innovative packaging solutions** from a recycling perspective. At **PETCORE EUROPE** we work with all interested parties to **ensure a continuous increase of PET post-consumer collection and recycling**, so join the forces today to improve the circularity of PET.*