

Revision of the EU Ecolabel criteria for **DETERGENT AND CLEANING PRODUCTS**

29 October 2024

WEBEX SESSION

ETIQUETTE FOR VIRTUAL MEETING PARTICIPANTS

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Revision of the EU Ecolabel criteria for **DETERGENT AND CLEANING PRODUCTS**

Packaging [PACK] sub-Ad Hoc Working Group (sub-AHWG)

2nd sub-AHWG Meeting; 29th October 2024; Virtual (webex)

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The Joint Research Centre (JRC)

Directorate B – Fair and Sustainable Economy
Circular Economy and Sustainable Industry



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1. Introduction – 2nd Sub-AHWG overview.

2. Draft criteria & questions discussion.

2.1 - Recycled materials content

2.2 – Design for recycling

3. Next steps + Any other business (AOB).

1. Introduction – 2nd Sub-AHWG overview.

1. The EU Ecolabel criteria under revision

Commission Decisions establishing the EU Ecolabel criteria for detergents - notified under documents:



- [Hand dishwashing detergents](#) (HDD)

C(2017) 4227 [OJ L 180, 12.7.2017, p. 1–15]



- [Hard surface cleaning products](#) (HSC)

C(2017) 4241 [OJ L 180, 12.7.2017, p. 45–62]



- [Dishwasher detergents](#) (DD)

C(2017) 4240 [OJ L 180, 12.7.2017, p. 31–44]



- [Industrial and institutional dishwasher detergents](#) (IIDD)

C(2017) 4228 [OJ L 180, 12.7.2017, p. 16–30]



- [Laundry detergents](#) (LD)

C(2017) 4243 [OJ L 180, 12.7.2017, p. 63–78]

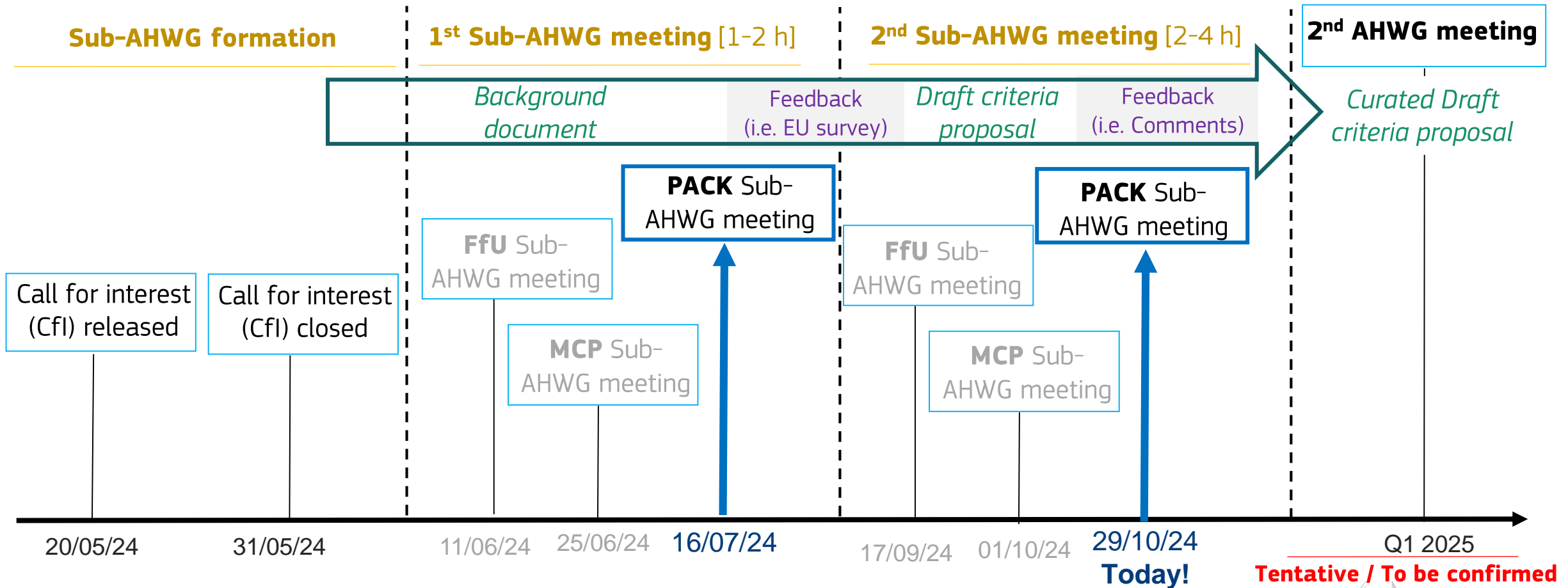


- [Industrial and institutional laundry detergents](#) (IILD)

C(2017) 4245 [OJ L 180, 12.7.2017, p. 79–96]

Validity expiry date 31/12/26

1. Sub-AHWGs “steps” (process) and timeline

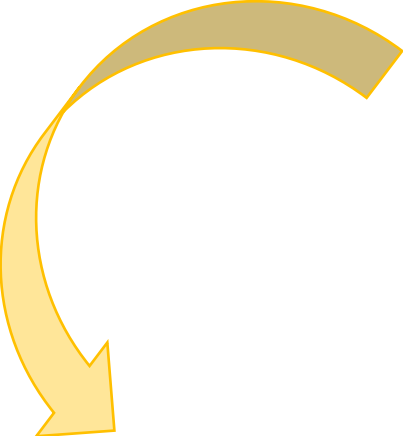


1. *Packaging* criterion


The aim of this criterion is to reduce the environmental impact of packaging encouraging the use of materials that are recyclable and reusable, and promoting recycling and recovery practices to minimize packaging waste

Sub-criteria

1. Recycled materials content (for LD, DD, HDD, HSC)
2. Weight/utility ratio (WUR)
3. Design for recycling
4. Products sold in spray bottles (Only for HSC)
5. Packaging take-back systems (Only for HSC, IIDD, IILD)



It sets specific targets for recycled content in paper/cardboard and plastic packaging



It ensures packaging is created in a way that facilitates an efficient recyclability

1. PACK sub-AHWG documents

Pack background discussion

New - 2nd draft proposal



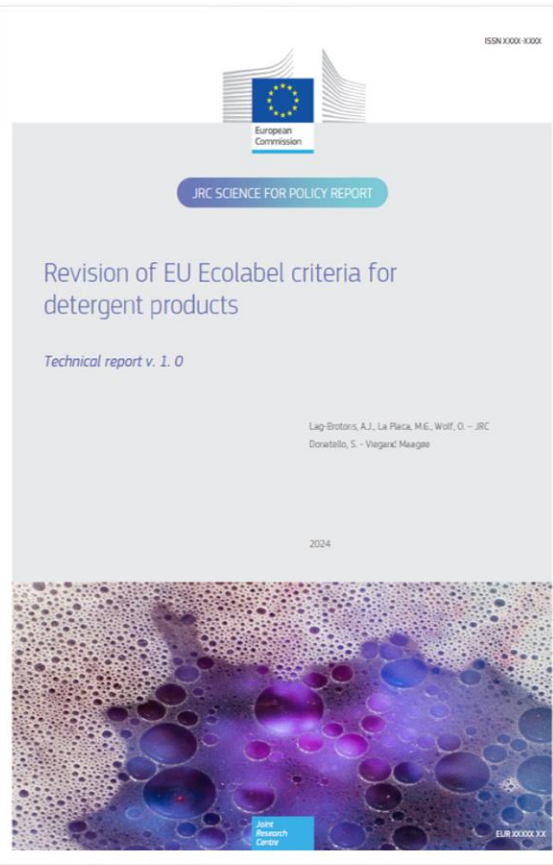
Revision of the EU Ecolabel criteria for detergent and cleaning products

Background paper priming discussions of the 2nd meeting working sub-group on
Packaging (PACK)

This background document aims to provide the context and guide on discussion points to be addressed by during the working sub-group lifetime, particularly during the 2nd PACK sub-AHWG

Technical report 1 (TR1)

1st draft proposal



NEW sub-criterion (x) recycled materials content

The criterion sets requirements for sales packaging (primary packaging) and grouped packaging (secondary packaging).

a) Paper/cardboard used for packaging

Sales packaging (primary packaging) made of paper and/or cardboard shall contain a minimum 80 % of recycled material.

Grouped packaging (secondary packaging) made of paper and/or cardboard shall contain a minimum 70 % of recycled material.

Cardboard packaging for liquid products is exempt from this requirement.

The remaining share (100% minus recycled content percentage) of paper and/or cardboard used for the sales and grouped packaging shall be covered by valid Sustainable Forestry Management certificates issued by an independent third-party certification scheme such as FSC, PEFC or equivalent. The certification bodies issuing Sustainable Forestry Management certificates shall be accredited/recognised by that certification scheme.

b) Plastic used for packaging

Sales packaging (PCR - recycled plastic) shall contain a minimum of 50% of recycled plastic from this requirement.

Packaging element	Excluded materials and components (*)
Body/Material	<ul style="list-style-type: none"> — Dyed black, using soot-carbon-based pigments — Pouch/bag laminates with layer of different materials (composite packaging)
Label or sleeve	<ul style="list-style-type: none"> — PS label or sleeve in combination with a PET, PP or HDPE bottle packaging — PVC label or sleeve in combination with a PET, PP or HDPE bottle packaging — PETG label or sleeve in combination with a PET bottle packaging — PET label or sleeve (except LDPET (< 1 g/cm³)) in combination with a PET bottle packaging — Any other plastic materials for sleeves/labels with a density > 1 g/cm³ used with a PET bottle-packaging — Any other plastic materials for sleeves/labels with a density < 1 g/cm³ used with a PP or HDPE bottle-packaging (except for PP labels and polyolefins (PO) sleeves used in combination with a PP packaging or PE labels and PE sleeves used in combination with a HDPE packaging) — Labels or sleeves that are metallised or are welded to a packaging body (in mould labelling) — Glued cellulose-based labels for PP, HDPE, LDPE, PS packaging, that cannot be removed in cold washing — Non-removable washable adhesive applications (in water or alkaline at 80° C) for PET bottle

LD
DD
HDD
HSC

1. PACK background document (1/2)



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3 Sub-criterion - Recycled materials content

3.1 Mapping of aspects

Scope (professional HSC): The scope of the proposed EU Ecolabel criteria for recycled content in packaging includes product groups such as Laundry Detergent (LD), Dishwashing Detergent (DD), Hand Dishwashing Detergent (HDD), and Hard Surface Cleaning (HSC) products. However, it excludes Industrial and Institutional Laundry Detergent (IILD) and Industrial and Institutional Dishwashing Detergent (IIDDD) from its requirements. Considering that HSC products encompass both professional and household applications, concerns have emerged regarding the distinct requirements applied to the professional segment of HSC products compared to those for IILD and IIDDD. These concerns focus on the difficulties in achieving the minimum Post-Consumer Recycled (PCR) content in the packaging of professional products, where it seems that the reliance on virgin plastics is frequently justified by stringent safety.

3.2 Potential actions

About the **Scope (HSC professional):** The approaches that can be proposed and/or discussed are:

- Consider the exclusion of the recycled material content requirement specifically for professional HSC products, similar to the current exclusion of IILD and IIDDD
- Gather evidences about safety concerns regarding the use of recycled materials versus virgin plastics in professional HSC product packaging and assess feasibility of implementing specific provisions.
- Explore the potential for adjusting the PCR content requirements for professional HSC products based on the findings of the safety assessments (see previous bullet point).

3.3 Feedback to 1st PACK sub-AHWG questions

Q1 - Would you support the exclusion of Hard Surface Cleaning (HSC) products for professional use from the scope of the 'Recycled materials content' criterion? Please, provide detailed data and a reasoned explanation to support your position, focusing on safety concerns or other relevant factors that justify your favourable or unfavourable view

Blank responses = 1

Several stakeholders supported the exclusion differing in full (all cases) or partial support (specific cases). One them cited the unique requirements and challenges associated with professional cleaning products, versus household versions, containing recycled materials, such as:

- higher concentration rates to ensure performance for the expected use (e.g. hospital care, food catering);
- vulnerability to stress crack effects induced by surfactants in combination with other common ingredients for longer contact times;
- the need for medium to high molecular weight HDPE resin for chemical compatibility (as opposed to, for example, PET);
- Decreased performance packaging attributes in comparison with using virgin resin, potentially leading to packaging failure.

As in PACK background document (v1) in sections 3 (*Recycled content*) and 4 (*Design for recycling*)

Mapping of aspects

identified by JRC/stakeholders as requiring further assessment (Sources: Focused questionnaire; Written comments to TR1)

Potential actions

which could lead to improved *micro-organisms sub-criterion* versions

Feedback to 1st PACK sub-AHWG meeting

which further informed JRC on general/specific aspects and contributed to shape proposals made.

1. PACK background document (2/2)



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5 New draft criteria proposal

5.1 Proposal text

Sub-criterion Design for recycling

Existing sub-criterion (x) design for recycling					
ALL	Plastic packaging shall be designed to facilitate effective recycling by avoiding potential contaminants and incompatible materials that are known to impede separation or reprocessing or to reduce the quality of recycle. The label or sleeve, closure and, where applicable, barrier coatings shall not comprise, either singularly or in combination the materials and components listed in Table 4. Pump mechanisms (including in sprays) are exempted from this requirement.				
	<table border="1"> <thead> <tr> <th>Packaging element</th> <th>Excluded materials and components (*)</th> </tr> </thead> <tbody> <tr> <td>Label or sleeve</td> <td> PS label or sleeve in combination with a PET, PP or HDPE bottle PVC label or sleeve in combination with a PET, PP or HDPE bottle PETG label or sleeve in combination with a PET bottle </td> </tr> </tbody> </table>	Packaging element	Excluded materials and components (*)	Label or sleeve	PS label or sleeve in combination with a PET, PP or HDPE bottle PVC label or sleeve in combination with a PET, PP or HDPE bottle PETG label or sleeve in combination with a PET bottle
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5.2 Rationales for proposals

Design for recycling

The 'Design for Recycling' criterion underwent significant revision and changes, leading to the implementation of more ambitious provisions aimed at preventing characteristics or materials/components combinations that might downgrade or disqualify packaging recyclability. Feedback gathered before and after the PACK sub-working group, together with consultations with recycler experts and a review of well-established recycling guidelines in Europe and well-established ISO Type I ecolabel schemes, were instrumental in the proposed

5.3 New questions/discussion points

Q31 – Design for recycling: Do you agree with the new structure of the 'Design for recycling' table? Please provide as specific and comprehensive an answer as possible, including the reasons why.

Q32 – Design for recycling: Do you support the extensive modification of the table to cover all the features and components that can affect recycling? Please provide as specific and comprehensive an answer as possible, and specify which parameters, packaging types, and materials/components you are referring to.

New section

Proposal text showing the suggested changes.

Rationales for proposals

describing rationales for main changes suggested.

New questions/discussion points

identified that are raised with the aim of contributing to refining further the proposals made.

1. Packaging sub-AHWG - summary

Pack sub-AHWG overview

Aim/s: improve existing and new proposed criteria related to packaging of detergent and cleaning products (e.g. Design-for-Recycling criterion and Recycled Materials Content criterion) to balance environmental goals with recycling efficiency, innovation adaptability, and compliance feasibility.

Scope: *Criteria Packaging*, particularly sub-criteria *Recycled Materials Content*, *Design-for-Recycling*; All PGs.

Transparency: all discussions held in the dedicated sub-AHWG meetings and documents used will be publicly available (i.e. minutes; background paper).

Target audience: stakeholders with experience designing packaging and recycled material (e.g. industry – license holder, recycling associations), inclusive of functional traits (e.g. adhesives for labels), as well as the supply –chain involved (e.g. suppliers, recyclers) are especially welcomed here.

Sub-AHWG composition: The total number of sub-AHWG members registered was 30, with industry accounting for the greatest share (18/30), followed by *Other* entities (e.g. testing laboratories; consultancies) (4/30), Competent / ecolabelling bodies (5/30) and NGOs (3/30).

2. PACK sub-AHWG – 2nd meeting discussion.

Highlight / Extract of proposals made + Questions to participants

2. PACK background document denotations



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5 New draft criteria proposal

5.1 Proposal text

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- Contains 1st (in grey font) and new (2nd) draft criteria proposal.
- New draft criteria proposal mark changes from latest version (1st; in TR1). Note that:
 - New text/additions displayed in blue font ([Like this](#))
 - Deletions displayed by strikethrough blue font (~~[Like this](#)~~)
 - Even if content remains, might be re-located within the draft criteria text.

2.1 Recycled Material Content – Highlights and Proposals

NEW sub-criterion (x) recycled materials content

The criterion sets requirements for sales packaging (primary packaging) and grouped packaging (secondary packaging).

3

a) Paper/cardboard used for packaging

1

Sales packaging (primary packaging) made of paper and/or cardboard shall contain a minimum 80 % of recycled material.

1

Grouped packaging (secondary packaging) made of paper and/or cardboard shall contain a minimum 70 % of recycled material.

Cardboard packaging for liquid products is exempt from this requirement.

The remaining share (100% minus recycled content percentage) of paper and/or cardboard used for the sales and grouped packaging shall be covered by valid Sustainable Forestry Management certificates issued by an independent third-party certification scheme such as FSC, PEFC or equivalent. The certification bodies issuing Sustainable Forestry Management certificates shall be accredited/recognised by that certification scheme.

3

b) Plastic used for packaging

1

Sales packaging (primary packaging) made of PET shall contain a minimum of 70% recycled material (PCR - recycled plastic made from post-consumer recycled), other plastics (e.g. HDPE) shall contain a minimum of 50% recycled material (PCR).

LD

DD

All closures and trigger closures (e.g. removable closures and pump doses) and pouches are exempt from this requirement.

HDD

HSC

Recycled content and recyclability of sales packaging (primary packaging) and grouped packaging (secondary packaging) shall be indicated on the sales packaging. The recycled content stated on the packaging shall refer to the total weight (body, closure, label/sleeve and trigger closure).

2

Proposals derived from evidence streams (i.e. ecolabelling schemes, legislation, stakeholders feedback, scientific/technical literature) are **grouped according to following points**:

1

- Criterion wording

2

- Criterion Scope

i) Inclusion of professional products

ii) Exclusion of packaging under ADR scope

iii) Exclusion of plastic parts <5%

3

- Criterion Requirements

a) Ambition levels paper/cardboard

b) Ambition levels plastics

i) Sales packaging ambition levels

iii) Plastic grouped packaging

2.1. Recycled Material Content

1 Criterion wording

Definitions added (*Recycled content/Recycled Material*;
removal from legal text (*Post-consumer material – PCR*)

NEW sub-criterion (x) recycled materials content

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b) Plastic used for packaging

LD 1 Sales packaging (primary packaging) made of PET shall contain a minimum of 70% recycled material (~~PCR – recycled plastic made from post-consumer recycled~~), other plastics (e.g. HDPE) shall contain a minimum of 50% recycled material (PCR).

Inclusion of definition of 'Recycled Material' and 'Recycled Content,' which considers only post-consumer materials, according to ISO 14021:2016

*“The **recycled content** is the proportion, by mass, of recycled material in a packaging. “**Recycled material**” refers to material that has been reprocessed from recovered material by means of manufacturing process and made into a final product or into a component for incorporation into a product.*

Only post-consumer materials shall be considered as recycled content, consistent with the following definition:

*“**Post-consumer material**” means material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product, which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.”*

Exclusion of the wording ‘PCR - recycled plastic made from post-consumer recycled’

2.1 Recycled Material Content

2 Criterion scope

i) Inclusion of professional products

Sub-criterion Recycled Materials Content

NEW sub-criterion (x) recycled materials content	
	<p>The criterion sets requirements for sales packaging (primary packaging) and grouped packaging (secondary packaging).</p> <p>a) Paper/cardboard used for packaging</p> <p>Sales packaging (primary packaging) made of paper and/or cardboard shall contain a minimum 80 % of recycled material.</p> <p>Grouped packaging (secondary packaging) made of paper and/or cardboard shall contain a minimum 70 % of recycled material.</p> <p>Cardboard packaging for liquid products is exempt from this requirement.</p> <p>The remaining share (100% minus recycled content percentage) of paper and/or cardboard used for the sales and grouped packaging shall be covered by valid Sustainable Forestry Management certificates issued by an independent third-party certification scheme such as FSC, PEFC or equivalent. The certification bodies issuing Sustainable Forestry Management certificates shall be accredited/recognised by that certification scheme.</p>
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DD	
HDD	
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IIDD	<p>b) Plastic used for packaging</p> <p>Sales packaging (primary packaging) made of PET shall contain a minimum of 70% recycled material (PCR – recycled plastic made from post-consumer recycled), other plastics (e.g. HDPE) shall contain a minimum of 50% recycled material (PCR).</p> <p>All closures and trigger closures (e.g. removable closures and pump dosers) and pouches are exempt from this requirement.</p> <p>Any plastic part representing less than 5% of the total weight of the whole packaging unit is exempt from the plastic packaging requirements.</p> <p>The requirements set for recycled materials content shall not apply to packaging used for the transport of dangerous goods in accordance with Directive 2008/68/EC, which refers to the Agreement concerning the International Carriage of Dangerous Goods by Road (ADR).</p> <p>Recycled content and recyclability of sales packaging (primary packaging) and grouped packaging (secondary packaging) shall be indicated on the sales packaging. The recycled content stated on the packaging shall refer to the total weight of the whole packaging unit (body, closure, label/sleeve and trigger closure).</p> <p>Assessment and verification: The applicant shall submit: (1) a signed declaration of compliance specifying the percentages of recycled content in the sales (primary) and grouped (secondary) packaging when relevant; (2) a high resolution photograph of the sales packaging where information regarding recycled content appear clearly.</p> <p>The applicant shall provide audited accounting documents that demonstrate that the remaining share (100% minus recycled content percentage) of the paper and/or cardboard used for the sales and grouped packaging is defined as certified material according to valid FSC, PEFC or equivalent schemes. The audited accounting documents shall be valid for the whole duration of the EU Ecolabel license.</p> <p>Recycled content shall be verified by complying with the EN 45557 or ISO 14021. Plastic recycled content in the packaging shall comply with chain of custody standards such as ISO 22095 or EN 15343. Equivalent methods may be accepted if considered equivalent by a third-party, and shall be accompanied by detailed explanations showing compliance with this requirement and related supporting documentation. Invoices demonstrating the purchase of the recycled material shall be provided.</p>

1st PACK Sub –AHWG stakeholders consultation

Feedback in favour of exclusion of professional products:

- higher concentration rates
- vulnerability to stress cracking due to surfactants and other ingredients in contact for longer time
- Decreased performance packaging

Feedback against exclusion of professional products:

- Same supplier/ virgin plastics granulates and manufacturing process of consumer products
- Harmonization with the PPWR scoping and derogation

EU Ecolabel's objective: promote products with the best environmental performance within the European market.

EU ecolabel criterion should go beyond the minimum provisions set by mandatory legislation.

The inclusion of professional products has been proposed.

2.1 Recycled Material Content

2 Criterion scope

ii) Exclusion of packaging under ADR scope

Sub-criterion Recycled Materials Content

NEW sub-criterion (x) recycled materials content	
	<p>The criterion sets requirements for sales packaging (primary packaging) and grouped packaging (secondary packaging).</p> <p>a) Paper/cardboard used for packaging</p> <p>Sales packaging (primary packaging) made of paper and/or cardboard shall contain a minimum 80 % of recycled material.</p> <p>Grouped packaging (secondary packaging) made of paper and/or cardboard shall contain a minimum 70 % of recycled material.</p> <p>Cardboard packaging for liquid products is exempt from this requirement.</p> <p>The remaining share (100% minus recycled content percentage) of paper and/or cardboard used for the sales and grouped packaging shall be covered by valid Sustainable Forestry Management certificates issued by an independent third-party certification scheme such as FSC, PEFC or equivalent. The certification bodies issuing Sustainable Forestry Management certificates shall be accredited/recognised by that certification scheme.</p>
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PPWR

Article 7

Minimum recycled content in plastic packaging

1. *By 1 January 2030 or three years after the date of entry into force of the implementing act referred to in paragraph 8, whichever is the latest, any plastic part of packaging placed on the market shall contain the following minimum percentage of recycled content recovered from post-consumer plastic waste, per packaging type and format as referred to in Table 1 of Annex II, calculated as an average per manufacturing plant and year:*

This Article shall not apply to the following:

-
- (f) *packaging used for the transport of dangerous goods under Directive 2008/68/EC;*

Text included in the criterion

The requirements set for recycled materials content shall not apply to packaging used for the transport of dangerous goods in accordance with Directive 2008/68/EC, which refers to the Agreement concerning the International Carriage of Dangerous Goods by Road (ADR).



2.1 Recycled Material Content

2 Criterion scope

iii) Exclusion of plastic parts <5% of the total weight

Sub-criterion Recycled Materials Content

NEW sub-criterion (x) recycled materials content	
	<p>The criterion sets requirements for sales packaging (primary packaging) and grouped packaging (secondary packaging).</p> <p>a) Paper/cardboard used for packaging</p> <p>Sales packaging (primary packaging) made of paper and/or cardboard shall contain a minimum 80 % of recycled material.</p> <p>Grouped packaging (secondary packaging) made of paper and/or cardboard shall contain a minimum 70 % of recycled material.</p> <p>Cardboard packaging for liquid products is exempt from this requirement.</p> <p>The remaining share (100% minus recycled content percentage) of paper and/or cardboard used for the sales and grouped packaging shall be covered by valid Sustainable Forestry Management certificates issued by an independent third-party certification scheme such as FSC, PEFC or equivalent. The certification bodies issuing Sustainable Forestry Management certificates shall be accredited/recognised by that certification scheme.</p>
	<p>b) Plastic used for packaging</p> <p>Sales packaging (primary packaging) made of PET shall contain a minimum of 70% recycled material (PCR—recycled plastic made from post-consumer recycled), other plastics (e.g. HDPE) shall contain a minimum of 50% recycled material (PCR).</p> <p>All closures and trigger closures (e.g. removable closures and pump dosers) and pouches are exempt from this requirement.</p>
LD	
DD	
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HSC	
IILD	
IIDD	<p>The requirements set for recycled materials content shall not apply to packaging used for the transport of dangerous goods in accordance with Directive 2008/68/EC, which refers to the Agreement concerning the International Carriage of Dangerous Goods by Road (ADR).</p> <p>Recycled content and recyclability of sales packaging (primary packaging) and grouped packaging (secondary packaging) shall be indicated on the sales packaging. The recycled content stated on the packaging shall refer to the total weight of the whole packaging unit (body, closure, label/sleeve and trigger closure).</p> <p><i>Assessment and verification:</i> The applicant shall submit: (1) a signed declaration of compliance specifying the percentages of recycled content in the sales (primary) and grouped (secondary) packaging when relevant; (2) a high resolution photograph of the sales packaging where information regarding recycled content appear clearly.</p> <p>The applicant shall provide audited accounting documents that demonstrate that the remaining share (100% minus recycled content percentage) of the paper and/or cardboard used for the sales and grouped packaging is defined as certified material according to valid FSC, PEFC or equivalent schemes. The audited accounting documents shall be valid for the whole duration of the EU Ecolabel license.</p> <p>Recycled content shall be verified by complying with the EN 45557 or ISO 14021. Plastic recycled content in the packaging shall comply with chain of custody standards such as ISO 22095 or EN 15343. Equivalent methods may be accepted if considered equivalent by a third-party, and shall be accompanied by detailed explanations showing compliance with this requirement and related supporting documentation. Invoices demonstrating the purchase of the recycled material shall be provided.</p>

1st PACK Sub-AHWG proposal

Plastic used for packaging

Sales packaging (*bottles, canisters*) made of PET shall contain a minimum of 70% recycled material (PCR recycled plastic made from post-consumer recycled), other plastics (e.g. HDPE) shall contain a minimum of 50% recycled material (PCR).

All closures and trigger closures (e.g. removable closures and pump dosers) and pouches are exempt from this requirement.

2st PACK Sub-AHWG proposal

b) Plastic used for packaging

Sales packaging (primary packaging) made of PET shall contain a minimum of 70% recycled material (~~PCR—recycled plastic made from post-consumer recycled~~), other plastics (e.g. HDPE) shall contain a minimum of 50% recycled material (~~PCR~~).

~~All closures and trigger closures (e.g. removable closures and pump dosers) and pouches are exempt from this requirement.~~

Any plastic part representing less than 5% of the total weight of the whole packaging unit is exempt from the plastic packaging requirements.

Article 7 (5)

Paragraphs 1 and 2 shall not apply to:

- (b) *to any plastic part representing less than 5% of the total weight of the whole packaging unit.*

Alignment with PPWR

2.1. Recycled Material Content

3 Criterion requirements

a) Ambition levels paper/cardboard

sub-criterion (x) recycled materials content

The criterion sets requirements for sales packaging (primary packaging) and grouped packaging (secondary packaging).

a) Paper/cardboard used for packaging

Sales packaging (primary packaging) made of paper and/or cardboard shall contain a minimum 80 % of recycled material.

Grouped packaging (secondary packaging) made of paper and/or cardboard shall contain a minimum 70 % of recycled material.

Cardboard packaging for liquid products is exempt from this requirement.

The remaining share (100% minus recycled content percentage) of paper and/or cardboard used for the sales and grouped packaging shall be covered by valid Sustainable Forestry Management certificates issued by an independent third-party certification scheme such as FSC, PEFC or equivalent. The certification bodies issuing Sustainable Forestry Management certificates shall be accredited/recognised by that certification scheme.

1st PACK Sub –AHWG stakeholders consultation

Q5 - Would you support increasing the minimum recycled content in paper/cardboard for sales packaging to over 80%, and for grouped packaging to over 70%? Please provide reasoned explanation to support your position

Stakeholders concerns

- Limit innovation
- Issues with humidity sensibility
- Issues with vertical compression resistance (packaging formats with pump or spray heads)

Nordic Swan requirements

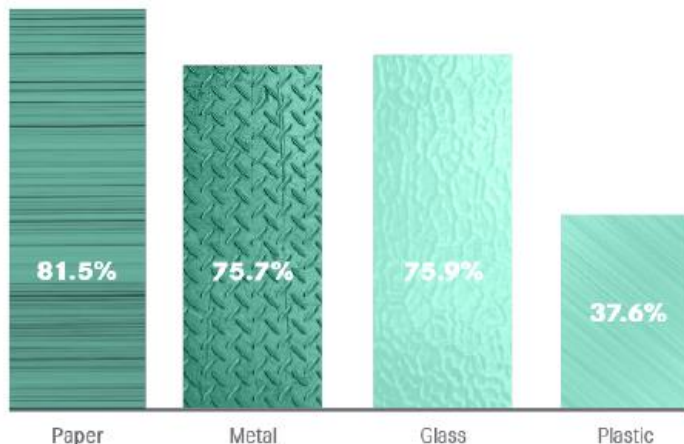
- 90% recycled paper/cardboard for LD, DD and IIDD.
- Exceptions for corrugated cardboard (50%, 60% or 70%)

EU Ecolabel for Absorbent Hygiene Products

- 80% recycled content for grouped packaging

JRC supports increasing the % of recycled material.

Q26 -Recycled material content: Would you support increasing the recycled content requirements for paper and cardboard beyond 80% for sales packaging and beyond 70% for grouped packaging, either for all product groups or specific detergent product categories (e.g., LD and DD)? Are there specific types of paper and cardboard on the market where limitations on recycled content should be considered? Please provide as specific and comprehensive an answer as possible, including the reasons why.



Paper and board is the most recycled packaging material in Europe.

Source: Eurostat
EPCR report 2022

2.1. Recycled Material Content

3 Criterion requirements

b) Ambition levels plastics (sales packaging)

Currently proposed requirements

Sales packaging (primary packaging) made of PET shall contain a minimum of 70% recycled material (~~PCR~~ ~~recycled plastic made from post-consumer recycled~~), other plastics (e.g. HDPE) shall contain a minimum of 50% recycled material (~~PCR~~).

Household products (LD, DD, HDD, HSC consumers)

The requirements remain unchanged

Main streams of evidences:

- Data collected (focused questionnaire, stakeholders consultations)
- Other ecolabel schemes (Blue Angel awarded licenses)

Professional products (IILD, IIDD, HDD, HSC professional)

Requirements shall be below household products (70% PET, 50% other plastics) but above PPWR (35% all non-contact sensitive plastic packaging)

Main streams of evidences:

- Data received was limited
- Stakeholders concerns (higher concentration rates, vulnerability to stress cracking, etc.)
- Lower market value and volume of professional products compared to household products

Q27 - Recycled material content: Would you be in favour of setting the recycled material content requirement for household product sales plastic packaging to 70% for PET and 50% for other plastics? Please provide as specific and comprehensive an answer as possible, including the reasons why.

Q28 - Recycled material content: Would you be in favour of setting the recycled content requirement for professional products (i.e. HSC professional, IILD and IIDD) at a lower level than for plastic consumer packaging (70 % for PET and 50 % for other plastics), but still higher than the minimum PPWR requirement of 35% for all plastics? If you support the proposal, what target percentage do you consider feasible? Please provide as specific and comprehensive an answer as possible, including the reasons why.

2.1. Recycled Material Content

3

Criterion requirements

b) Ambition levels plastics (grouped packaging)

No requirements currently included for grouped plastic packaging

1st PACK Sub-AHWG

Different proposals:

1. Grouped packaging shall be made exclusively of cardboard and/or paper and shall adhere to the recycled content requirements for paper/cardboard secondary packaging. Plastics grouped packaging would not be permitted.
2. Plastic grouped packaging shall be recyclable with a recyclability performance grades of at least 95%. Recyclability shall be verified by complying with the EN 13430 or ISO 18604.
3. Plastic grouped packaging shall comply with the same recycled content requirement as primary (sale) packaging).

Option excluded

Banning of all plastic packaging may hinder future innovations.

NEW proposal

- Ban of **single-use plastics** for grouped packaging (in line with the PPWR)
- Plastic grouped packaging shall be recyclable with a recyclability performance grades of at least 95%
- Recyclability shall be verified by complying with new CEN 'Design for recycling of plastic packaging' standards or alternatively with the RecyClass recyclability methodology.

Q30 - Recycled material content: Would you support a ban on single-use plastics for grouped packaging? Additionally, do you agree that non-single-use plastics used for grouped packaging should achieve a minimum recyclability of 95%? Would you endorse the use of the CEN "Design for Recycling of Plastic Packaging" standards currently under development or the RecyClass recyclability methodology for verifying recyclability?

Please provide as specific and comprehensive an answer as possible, including the reasons why.

2.1 Recycled content. List of questions

Q26 - Recycled material content: Would you support increasing the recycled content requirements for paper and cardboard beyond 80% for sales packaging and beyond 70% for grouped packaging, either for all product groups or specific detergent product categories (e.g., LD and DD)? Are there specific types of paper and cardboard on the market where limitations on recycled content should be considered? *Please provide as specific and comprehensive an answer as possible, including the reasons why.*

Q27 - Recycled material content: Would you be in favour of setting the recycled material content requirement for household product sales plastic packaging to 70% for PET and 50% for other plastics? *Please provide as specific and comprehensive an answer as possible, including the reasons why.*

Q28 - Recycled material content: Would you be in favour of setting the recycled content requirement for professional products (i.e. HSC professional, IILD and IIDD) at a lower level than for plastic consumer packaging (70 per cent for PET and 50 per cent for other plastics), but still higher than the minimum PPWR requirement of 35% for all plastics? If you support the proposal, what target percentage do you consider feasible? *Please provide as specific and comprehensive an answer as possible, including the reasons why.*

Q29 - Recycled material content: Would you support exempting any plastic part that accounts for less than 5% of the total weight of the entire packaging unit from the plastic 'Recycled Materials Content' requirements? *Please, provide detailed data and a reasoned explanation to support your position, focusing on safety concerns or other relevant factors that justify your favourable or unfavourable view*

Q30 - Recycled material content: Would you support a ban on single-use plastics for grouped packaging? Additionally, do you agree that non-single-use plastics used for grouped packaging should achieve a minimum recyclability of 95%? Would you endorse the use of the CEN "Design for Recycling of Plastic Packaging" standards currently under development or the RecyClass recyclability methodology for verifying recyclability? *Please provide as specific and comprehensive an answer as possible, including the reasons why.*

2. 2 Design for Recycling - Highlights

Significant changes have been made to the content and structure of the Design for Recycling criterion

Updated 'Design for Recycling' table with stricter, more ambitious provisions.

Parameters included in the criterion in force

- Label or sleeve
- Closure
- Barrier coatings

NEW proposal

- Main Body/ Material composition
- Colours
- Label or sleeve
- Adhesives
- Closure
- Barrier coatings
- Additives
- Inks/Printing

In line with PPWR

Requirements categorized by:

Packaging type

- Fibre-based
- Pouches/plastic bags
- Etc.

Plastic type

- PET
- HDPE
- PP
- PE and PP flexible films

Evidence streams:

- Stakeholders feedback
- Consultation recycler experts
- Consultation recycling guideline
- Consultation ISO Type 1 scheme

Recycling guideline

- RecyClass Design for Recycling
- Minimum German standard
- CEFLEX (D4ACE)

ISO Type 1 scheme

- Nordic Swan
- Blue Angel

2. 2 Design for Recycling

Main Body/ Material composition

Packaging element	Excluded materials, components and treatment (*1)
Main Body/ Material composition	<p><u>For fibre-based packaging</u></p> <ul style="list-style-type: none">— Lacquered surface (excluding clear protective lacquer up to a thickness of $\leq 5 \mu\text{m}$)— Plastic-coated surface <p><u>For pouches/plastic bags and other laminates</u></p> <ul style="list-style-type: none">— Multilayer structure composed of different polymers/materials (except PP up to 5 wt% in PE flexibles and PE up to 10 wt% in PP flexibles) <p><u>For all plastic packaging</u></p> <ul style="list-style-type: none">— Fluorination treatment— <u>Electrobeam</u> treatment

2. 2 Design for Recycling

Colours

Packaging element	Excluded materials, components and treatment (*1)
Colours	<p><u>For all plastic packaging</u></p> <ul style="list-style-type: none">— Non-NIR detectable colours— Black, carbon black, inner black layer, fluorescent, opaque

2.2 Design for Recycling

Label and sleeve

Packaging element	Excluded materials, components and treatment (*1)
Label or sleeve	<p><u>For all plastic packaging</u></p> <ul style="list-style-type: none">— Metallised labels or sleeves— Non-releasable or welded to a packaging body (in mould labelling)— Paper labels with fibre loss— Label/sleeve on container > 500 ml covering more than 70% of the container. Label/sleeve on container ≤ 500 ml covering more than 50% of the container¹. <p><u>For PET packaging</u></p> <ul style="list-style-type: none">— PS, PVC, PETG, C-PET, POM, PET (except LDPET (< 1 g/cm³)) labels/sleeves or any other plastic materials for sleeves/labels with a density > 1 g/cm³ <p><u>For HDPE and PP packaging</u></p> <ul style="list-style-type: none">— PS, PVC, PET, PETG, C-PET, PLA, PE-X (crosslinked PE), or any other plastic materials for sleeves/labels with a density < 1 g/cm³ (except for PE labels/sleeves, PP labels and PO sleeves) <p><u>For PE and PP flexible films packaging</u></p> <ul style="list-style-type: none">— Labels of a different material to the main material— PE-X (cross-linked PE),— Fibre-based (paper) labels

The **calculation of the percentage** shall be based on the **two-dimensional profile of the container** i.e., the area of the top and bottom of the packaging and the sides of a box/ container/bottle/can shall not be included in the calculation. The calculation of the percentage shall be based on the two-dimensional profile of the container i.e., the area of the top and bottom of the packaging and the sides of a box/ container/bottle/can shall not be included in the calculation.

2.2 Design for Recycling

Adhesives

Packaging element	Excluded materials, components and treatment (*1)
Adhesives	<p><u>For PET packaging</u></p> <ul style="list-style-type: none">— Alkali/water non-soluble adhesive— Alkali/water non-releasable adhesive at 60-80°C <p><u>For HDPE packaging</u></p> <ul style="list-style-type: none">— Non-releasable in the recycling process for HDPE packaging <p><u>For PP packaging</u></p> <ul style="list-style-type: none">— <u>Non-releasable in the recycling process for PP packaging</u> <p><u>For PE and PP flexible films packaging</u></p> <ul style="list-style-type: none">— Non-soluble in water or non-releasable in water at less than 40°C

2.2 Design for Recycling

Closure

Closure	<p><u>For all plastic packaging</u></p> <ul style="list-style-type: none">— Closures made of metal, glass, EVA which are not easily separable from the packaging— Closures made of silicone. Silicone closures with a density $< 1 \text{ g/cm}^3$ in combination with a PET bottle packaging and silicone closures with a density $> 1 \text{ g/cm}^3$ in combination with PEHD HDPE or PP bottle packaging are exempted.— Metallic foils or any seals which remain fixed to the bottle or its closure after the product has been opened <p><u>For PET packaging</u></p> <ul style="list-style-type: none">— PS, PVC, C-PET, POM, PETG closures with a density $> 1 \text{ g/cm}^3$ and any other materials and blends with density $> 1 \text{ g/cm}^3$— EVA- containing component (e.g. liner or valve) with density $\geq 1 \text{ g/cm}^3$ <p><u>For HDPE packaging</u></p> <ul style="list-style-type: none">— PS, PVC closures,— PET, PETG, PLA (all with density $> 1 \text{ g/cm}^3$)— PP, PE-X (cross-linked PE),— Non-PO-plastics with a density of $< 1 \text{ g/cm}^3$— Foams with density $< 1 \text{ g/cm}^3$ <p><u>For PP packaging</u></p> <ul style="list-style-type: none">— PS, PVC closures,— PET, PETG, PLA (all with density $> 1 \text{ g/cm}^3$)— HDPE, LDPE, LLDPE, MDPE, PE-X (cross-linked PE),— Non-PO-plastics with a density of $< 1 \text{ g/cm}^3$— Foams with density $< 1 \text{ g/cm}^3$ <p><u>For PE and PP flexible films packaging</u></p> <ul style="list-style-type: none">— Closure of a different material to the main material— Aluminium, PVC, PET, PETG, PS, PLA, nonPO— Foams with density $< 1 \text{ g/cm}^3$
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2.2 Design for Recycling

Barrier coatings

Barrier coatings

For all plastic packaging

- Polyamide (PA)
- Functional polyolefins
- Metallised and light blocking barriers

For PET packaging

- EVOH
- PGA

For HDPE and PP packaging

- EVOH ≥ 6 wt% provided with tie layers ratio ≥ 2 made by a polymer different that the one used for the packaging body
- PVDC
- PVOH

For PE and PP flexible films packaging

- EVOH ≥ 5 wt% provided with tie layers made by a polymer different that the one used for the packaging body
- PVC, PVDC, PE-X (cross-linked PE),
- PVOH, AlOx coating with PVOH primer
- Aluminium

2.2 Design for Recycling

Additives

Packaging element	Excluded materials, components and treatment (*1)
Additives	<p><u>For all polyolefin plastic packaging</u></p> <ul style="list-style-type: none">— Additives that do increase the density higher than $0,97 \text{ g/cm}^3$ (e.g. CaCO_3, etc.)— Bio-<u>oxo</u>-/photodegradable additives; <p><u>For PET packaging</u></p> <ul style="list-style-type: none">— Nanocomposites— Bio-<u>oxo</u>-/photodegradable additives— UV stabilizers; Acetaldehyde (AA) blockers; Optical brighteners; Oxygen scavengers <p><u>For HDPE and PP packaging</u></p> <ul style="list-style-type: none">— Flame-retardant additives, plasticizers <p><u>For PE and PP flexible films packaging</u></p> <ul style="list-style-type: none">— Foaming agents used as expanding chemical agents

2.2 Design for Recycling

Inks/printing

Packaging element	Excluded materials, components and treatment (*1)
Inks/Printing	<p><u>For all plastic packaging</u></p> <ul style="list-style-type: none">— Direct print (excluding production codes, date codes and UFI codes²)— Inks non-compliant with <u>EuPIA</u> Exclusion Policy for Printing Inks and Related Products³— Bleeding inks— De-inking/washable inks

² The UFI (Unique Formula Identifier) code is used to uniquely identify hazardous mixtures in order to enable poison control centres to administer first aid faster. The code is found on products classified as hazardous to health or physical hazards under EU Regulation (EC) 1272/2008 (CLP Regulation).

³ [EuPIA Exclusion Policy for Printing Inks and Related Products](#)

2.2 Design for recycling. List of questions

Q31 – Design for recycling: Do you agree with the new structure of the ‘Design for recycling’ table? *Please provide as specific and comprehensive an answer as possible, including the reasons why.*

Q32 – Design for recycling: Do you support the extensive modification of the table to cover all the features and components that can affect recycling? *Please provide as specific and comprehensive an answer as possible, and specify which parameters, packaging types, and materials/components you are referring to.*

Q33 – All sections: Do you have any other remarks on any aspect about the draft criteria proposal not already included within previous questions? *Please provide as specific and comprehensive an answer as possible, including the reasons why.*

3. Next steps +
Any other business (AOB).

3. Next steps – Feedback & 2nd AHWG meeting

- **Feedback** to questions (Q26 –Q31), if needed, via email (deadline 15/11/24).
- The **2nd AHWG** is scheduled during Q1 2025 (details to be confirmed via email).
-
- The **draft criteria proposal** for 2nd AHWG will be a curated version of the draft proposal made in this 2nd PACK sub-AHWG meeting.

3. Any other business (AOB)

- **Please, share any pending feedback**, for example, about:
 - aspects covered (or not covered!) in the draft proposal presented during this meeting.
 - the PACK sub-AHWG and/or the revision process

Thank you for your attention!



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