



Fecc
EUROPEAN ASSOCIATION OF
CHEMICAL DISTRIBUTORS

Conditions for importing recycled materials into the EU for use in packaging

European Association of Chemical Distributors (Fecc)
September 2026
www.fecc.org | info@fecc.org

Contact:

Diana Khrystych, Trade and Sustainability Manager (dkh@fecc.org)

The European Association of Chemical Distributors (Fecc) welcomes the opportunity to provide feedback on the Commission's initiative on **conditions for importing recycled materials into the EU for use in packaging**.

Fecc supports the objective of ensuring that recycled plastics originating from third countries meet requirements equivalent to those applicable in the EU. A credible and harmonised verification framework is important both to protect the integrity of the EU recycled-content targets and to ensure fair competition between EU and non-EU supply chains.

At the same time, the implementation should remain **proportionate, risk-based and workable for international supply chains**, particularly for SMEs and distributors that may source recycled materials from multiple suppliers and countries.

1. Demonstrating equivalence in practice

Fecc considers that equivalence should primarily be demonstrated at the level of the **recycling installation and the recycled material**, rather than through a comprehensive assessment of the regulatory framework of the exporting country.

A country-by-country assessment could create unnecessary complexity and exclude otherwise compliant recycling facilities simply because national regulatory systems are structured differently. The key question should be whether the relevant installation and recycling process deliver outcomes equivalent to the requirements applicable in the EU, particularly regarding:

- separate collection and traceability of post-consumer waste;
- environmentally sound recycling operations;
- protection of human health and the environment; and
- quality and reliability of the resulting recycled material.

A clear set of EU-level criteria would provide greater predictability for operators while maintaining the intended level of protection.

2. Making use of existing certification systems

The Commission should build on **existing internationally recognised certification and chain-of-custody schemes**, where they demonstrably cover the requirements established under the PPWR.

Requiring companies to undergo multiple audits or obtain several certificates for essentially the same requirements would increase costs without necessarily improving environmental or safety outcomes. The methodology should therefore provide for recognition of equivalent third-party certification, subject to appropriate safeguards and oversight.

A harmonised EU approach would be particularly valuable for SMEs, which may otherwise face significant costs when qualifying suppliers from outside the EU.

3. Clear responsibilities and standardised information

The verification framework should clearly distinguish between the responsibilities of the **recycler, material supplier, importer and distributor**.

Companies further downstream in the supply chain should not be expected to independently verify information that can only reasonably be established by the recycling installation or material producer. Instead, the system should allow downstream operators to rely on standardised documentation or certificates issued by qualified and recognised third parties.

Fecc would therefore support a **standardised EU declaration or digital certificate** accompanying recycled material, containing the essential information needed to demonstrate compliance and enabling traceability through the supply chain.

This would reduce repeated data requests and make compliance more manageable for SMEs.

4. A proportionate and predictable system

The methodology should provide sufficient flexibility to accommodate different recycling technologies and international supply chains, while maintaining a common level of assurance.

In particular, Fecc recommends:

- allowing **digital records and chain-of-custody documentation** as evidence of compliance;
- establishing clear rules on the validity and renewal of certificates;
- avoiding requirements for repeated verification where no material change has occurred;
- providing a reasonable transition period for existing supply contracts and certification arrangements; and
- ensuring that verification requirements are aligned with the wider PPWR rules on calculation and verification of recycled content.

A harmonised and risk-based system would help prevent fragmented approaches and unnecessary administrative barriers to the availability of compliant recycled materials on the EU market.

Fecc supports the Commission's objective of ensuring that recycled content imported from third countries meets standards equivalent to those applicable within the EU. The effectiveness of the framework will, however, depend on whether equivalence can be demonstrated through a **clear, internationally workable and proportionate verification system**.

Fecc therefore encourages the Commission to prioritise **recognition of credible existing certification, installation- and material-level verification, clear allocation of responsibilities and standardised digital documentation**. Such an approach would protect the integrity of the PPWR recycled-content targets while facilitating access to recycled materials and avoiding disproportionate burdens, particularly for SMEs and companies operating across international supply chains.

To access the Fecc's response on EU Commission's website, please click [here](#).

Contact

[Fecc](#), European Association of Chemical Distributors
EU Transparency Register with ID no. 0346440357-87
Rue du Luxembourg 16b, 1000 Brussels, Belgium
T: +32 2 679 02 60

This document has been designed using the best knowledge currently available and is to be relied upon at the user's own risk. The information is provided in good faith and no representations or warranties are made with regards to the accuracy or completeness, and no liability will be accepted for damages of any nature whatsoever resulting from the use or reliance on this paper. This document does not necessarily represent the views of all member companies of Fecc.