



Fecc
EUROPEAN ASSOCIATION OF
CHEMICAL DISTRIBUTORS

EU rules for calculating and verifying recycled content in plastic packaging

European Association of Chemical Distributors (Fecc)

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European Association of Chemical Distributors (Fecc) welcomes the European Commission's initiative to establish **harmonised EU rules for calculating and verifying recycled content in plastic packaging**. A common methodology is essential to ensure a level playing field, avoid divergent national approaches and provide the chemical value chain with the legal certainty needed to invest in circular solutions.

From the perspective of the chemical value chain, the practical implementation of these rules will depend not only on the methodology itself, but also on **how information is generated, verified and transferred between different actors**. Recycled and chemically recycled materials can move through complex value chains involving recyclers, chemical producers, compounders, packaging manufacturers, distributors and downstream users. Ensuring that reliable information can move efficiently with the material will therefore be important for the system to work in practice.

Fecc would welcome an approach that combines **harmonisation, proportionality, transparency and interoperability**, while maintaining the credibility of recycled-content claims.

1. A clear and technology-neutral methodology

Fecc supports a harmonised EU methodology that can be applied consistently across Member States and across relevant recycling technologies.

In Fecc's view, maintaining a **technology-neutral approach** could help ensure that different recycling pathways can contribute where they meet the applicable PPWR requirements. The Commission's work under the Single-Use Plastics Directive, including its approach to mass-balance accounting, may provide a useful reference in this respect.

Where possible, alignment with existing EU rules, terminology and accounting approaches could also help avoid parallel systems and reduce the need for companies operating across different parts of the chemical value chain to maintain separate calculation approaches.

2. Robust but proportionate verification

Fecc supports credible verification of recycled-content information. At the same time, it may be beneficial for verification to take place **at the point in the value chain where the relevant information and technical expertise are available**, rather than creating repeated verification requirements for subsequent actors.

Where recycled content has already been appropriately calculated and verified at the relevant production or recycling stage, allowing downstream companies to **rely on and transfer that verified information** could help avoid unnecessary duplication.

This would be particularly valuable for SMEs, which may have limited resources or technical capacity to perform complex calculations or commission multiple audits.

A proportionate, risk-based approach to verification could therefore help balance environmental integrity with the practical realities faced by companies across the value chain.

3. A standardised data package for the value chain

Fecc considers that a **simple and harmonised data template** could facilitate the transfer of recycled-content information between economic operators.

Such a template could, for example, cover:

- identification of the material and relevant batch or production period;
- percentage or quantity of eligible recycled content;
- applicable calculation or allocation methodology;
- relevant recycling pathway;
- verification or certification status; and
- information necessary to demonstrate compliance with the applicable requirements.

Providing a common structure for this information could facilitate its use across different stages of the value chain, while avoiding unnecessary disclosure of commercially sensitive or proprietary information.

Compatibility with existing digital systems used across the chemical value chain could further support efficient information exchange and reduce administrative burden, particularly for SMEs.

4. Avoiding unnecessary duplication of verification

It may also be useful for the future framework to clearly distinguish between **generating and verifying recycled-content data** and using or **transmitting that data further along the value chain**.

Where an upstream operator has obtained the necessary certification or verification, enabling downstream actors to rely on that information could help avoid repeated audits simply because the material changes hands.

This could be particularly relevant where recycled or circular feedstocks pass through several stages before being incorporated into plastic packaging. A **“verify once, use throughout the value chain” approach**, supported by appropriate traceability, could offer a practical way of maintaining confidence in the information while limiting unnecessary administrative burden.

5. Imported recycled materials

The PPWR allows recycled content originating from third countries where the relevant collection, recycling and environmental conditions are equivalent to EU requirements.

In this context, Fecc considers it important that the calculation and verification methodology works coherently with the future rules on third-country equivalence. For companies sourcing recycled materials internationally, the possibility of demonstrating compliance through **recognised and reliable documentation or third-party certification** could help avoid the need to reproduce technical assessments of facilities outside their control.

This would support continued access to recycled feedstocks while providing appropriate assurance regarding compliance with EU requirements.

6. Practical guidance and examples

Fecc considers that practical guidance and worked examples could significantly support implementation, particularly for SMEs and companies operating across complex value chains.

Useful examples could cover:

- mechanically recycled materials;
- chemically recycled materials and mass-balance accounting;
- materials passing through several economic operators;
- imported recycled materials;
- packaging incorporating materials from different sources; and
- transfer of recycled-content information between economic operators.

Clear formulas, consistent terminology and a limited number of mandatory data fields could make the methodology easier to understand and apply in day-to-day business operations.

Fecc supports the objective of establishing a harmonised and credible approach to recycled content in plastic packaging. From the perspective of the chemical value chain, **the ability to generate reliable information and transfer it efficiently between economic operators will be an important factor in making the system work in practice.**

Fecc believes that an approach combining environmental credibility with proportionality and practical usability could help strengthen confidence in recycled materials, facilitate their uptake across the value chain and support the development of a well-functioning European circular economy.

Fecc would be pleased to contribute practical experience from the chemical value chain to the further development of the methodology.

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

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