

September 16, 2026

Comments on the European Commission's call for evidence related to "Plastic packaging – harmonisation of rules for calculating and verifying recycled content in plastic packaging"

Dear colleagues,

The [Food Packaging Forum Foundation \(FPF\)](https://foodpackagingforum.org) welcomes the opportunity to provide evidence for the harmonization of rules for calculating and verifying recycled content in plastic packaging. FPF is a non-profit, independent, science-based research and communications organization working at the science-policy interface, with expertise in hazardous chemicals in all types of food contact materials.

According to our [Brand and Retailer Initiatives Database \(BRID\)](#), which tracks voluntary actions on food contact materials by major food brands and retailers, there are more than 190 previously made commitments about recyclability or recycled content by companies that they later cancelled or scaled back. FPF therefore sees value in the European Commission prioritizing approaches that ensure recycled-content claims are transparent, scientifically robust, and verifiable throughout the supply chain, and avoiding methodologies that reduce transparency of the relationship between recycled inputs and final products.

For example, the mass balance approach, despite being applied under the Single-Use Plastics Directive (EU) 2019/904, may attribute recycled content to an individual packaging unit in a manner that does not correspond to the physical composition of that packaging unit. This disconnect between attributed and physical recycled content [could mislead consumers](#), which may not be consistent with the objectives of Directive (EU) 2024/825 on empowering consumers for the green transition. It could also complicate assessments, by regulators and other stakeholders, on the chemical safety and sustainability of different materials placed on the market.

Given the importance of product testing, biomonitoring, and environmental monitoring by independent scientists as complementary sources of evidence that support regulatory oversight to better protect European consumers, methodologies used to

demonstrate recycled content should be transparent, auditable, and reflect physical material flows as closely as possible.

We remain available to provide further information within this process to assist in the development of harmonized rules that enable a safe circular economy for plastic packaging.

Kind regards,

Narain Ashta, *Communications and Engagement Officer*

Justin Boucher, *Operations Director*

Jane Muncke, *Managing Director and Chief Scientific Officer*