

September 16, 2026

Comments on the European Commission's call for evidence related to "Packaging and packaging waste – sustainability criteria for plastic recycling technologies"

Dear colleagues,

The [Food Packaging Forum Foundation \(FPF\)](http://foodpackagingforum.org) welcomes the opportunity to provide evidence to develop sustainability criteria for plastic recycling technologies relevant to the Packaging and Packaging Waste Regulation (PPWR). 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.

The available scientific evidence makes it clear that recycled plastics can contain substances of very high concern (SVHCs), other hazardous chemicals, and chemicals with unknown toxicological profiles originating from the original product formulation, previous uses, or contamination via recycling processes. There is a wide range of toxicological effects many of these substances have been found to cause. Therefore, the chemical safety of highly complex and non-inert materials such as recycled plastics deserves to be explicitly included among the sustainability criteria used to assess plastic recycling technologies.

FPF has developed and maintains the [FCCmigex](#) and [FCCprio](#) databases, which compile publicly available scientific evidence on chemicals detected in all types of food contact materials, including virgin and recycled plastic food packaging, together with known hazard information associated with the detected substances. These resources may provide useful evidence to support the development and evaluation of the Commission's chemical safety criteria, and FPF would welcome opportunities to share relevant data and expertise with the Commission.

FPF would also like to refer the Commission to the [work of the OECD](#) on evaluating chemicals in recycled plastics, which provides a comprehensive approach for supporting safe and sustainable material cycles. We would like to further make the Commission aware of our publicly [communicated concerns](#) about the Food and Agricultural Organization's (FAO) recently published report on recycled plastic food contact materials, which contains several scientific shortcomings. Concretely, we have concerns related to the FAO report's framing, interpretation of referenced studies, and scientific shortcomings in the chemical risk assessment approach.

Considering the current lack of available data, FPF would like to highlight the need for improved traceability and transparency of chemicals throughout the packaging value chain. This could include, at a minimum, making information on intentionally added substances, including additives and processing aids, available to all stakeholders in the value chain, including recyclers and consumers. Guidance is further needed for the identification and management of potentially problematic non-intentionally added substances (NIAS) in recycled plastics, of which experts estimate there may be tens of thousands of additional chemicals.

Sustainability criteria applied within the PPWR would benefit from further considering unintended releases and impacts associated with recycling processes, including microplastic generation, hazardous chemicals use and waste streams, and overall resource and energy requirements. Recycling technologies could be assessed for both environmental performance and a high level of protection for human health. Recent reports including those published by the [Swiss government](#) and the [European Commission's Joint Research Centre](#) specifically raise concerns about the environmental benefits, technical feasibility, and cost effectiveness of chemical recycling.

Considering the scientific evidence for all these aspects when assessing plastic recycling technologies can help advance circularity objectives while ensuring a high level of protection for European consumers as well as the natural environment they depend on.

We remain available to provide further information within this process and assist in the development of related chemical safety criteria.

Kind regards,

Narain Ashta, *Communications and Engagement Officer*

Justin Boucher, *Operations Director*

Jane Muncke, *Managing Director and Chief Scientific Officer*