



WORKING GROUP ON FOOD CONTACT MATERIALS

6-7 May 2024

7 May, agenda point 5 + 6

DG SANTE
European Commission

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Bisphenol A (BPA) in FCM

Draft Commission Regulation

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Prohibitions and restrictions

- Ban on use of BPA as a monomer or other starting substance in the manufacture of FCM* and placing on market of FCMs made using BPA
 - Except specific FCM applications listed in annex II for which a derogation is authorised with relevant restrictions (ND 1ppb)
- Ban on use of other bisphenols CMR and ED category 1 (Regulation 1272/2008) as monomers or other starting substance in the manufacture of FCM and placing on market of FCMs made using these bisphenols or derivatives
 - Except specific FCM applications that have been assessed by EFSA and for which a derogation is authorised (possibility for the future)

* All synthetic organic FCMs listed in Annex I to Regulation (EC) No 1935/2004, including plastic and RCF

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Prohibitions and restrictions

- Substances which :
 - are synthesized using BPA in the chemical reaction (including BADGE) or other relevant bisphenols/ derivatives or
 - have the BPA or other relevant bisphenols/ derivatives structure present within their own structure

must not contain free BPA (or other relevant bisphenol/ bisphenol derivative) that can migrate into food in an amount that presents a risk to human health (specific purity criteria)

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Obligations and compliance

- Business operators manufacturing FCM benefitting from the derogations must report on alternatives 4 – 5 years
 - Commission will then review the appropriateness of the derogation
- Compliance requirements in line with Regulation 10/2011
 - Business operators responsible for FCMs subject to the ban should be able to demonstrate compliance using documentation on the manufacturing
 - DoC to indicate if BPA has been used or not
 - QM or migration can be used but above ND does not necessarily mean the article is non-compliant: other sources of BPA/ bisphenols

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Transitional provisions

- Single use FCM (packaging)
 - Can be manufactured and [empty final food contact article] can be placed on the market up to 18 or 36 months after the Regulation applies
 - Thereafter they must be filled within 12 months
 - The packaged food can be placed on the market (remain) until exhaustion of stocks)
- Repeat-use FCM (professional food production equipment, flasks, re-usable drink bottles, containers)
 - Can be manufactured and [final food contact article] can be first placed on the market up to 18 or 36 months after the Regulation applies
 - Thereafter the final manufactured FCM article must be sold through to the final user (food business or consumer)
 - The final article may thereafter no longer be on the market (e.g. in shops) but can remain in the hands of a food business and does not have to be 'removed' from use

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Next steps

- Final remarks and comments from MSs by **Friday 17th May at the very latest**
- Please indicate by this date if MS does not support the measure
- Discussion on BPA/ bisphenols as contaminants and possible monitoring
Thursday 23 May
- Vote PAFF Wednesday 12 June (final text 2 weeks in advance)
- Transmission to EP and Council from 10 July

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Point 6: Recycling



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General

- Progress Amendment to R 2022/1616 still halted
 - priority on register and Decisions
 - particularly imported material remains a concern
- Main discussion points:
 - a) Preparation recycling Decisions
 - b) Progress of the on-line Register (Article 24)
 - c) Novel Technologies and recycling schemes

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Improving certainty over input quality



Poor input quality = poor output quality

Establish third party certification of quality assurance systems

- collaborate with stakeholders on what is needed, including in the Regulation
- laying down essential elements of a standard that would need to be used for certification

Consider certification of collected and pre-processed plastic waste

- possible amendment to Regulation (EU) 2022/1616
- certificate may include the origin (EU/non-EU), and mode of collection (DRS, PCW, ...)

Establish TARIC codes

- increase visibility of specific imported plastic waste
- collaboration with DG Environment

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Recycling – amendments to Regulation 2022/1616

- Amendments to the Regulation presently being considered
 - certification of input materials
 - improved definition of up to which stage compliance documentation is required
 - recyclers allowed to de-activate their installations in the register for economic reasons
 - some corrections of references in the Regulation
 - (perhaps a clarification of the application of the purity requirement considered for plastics)

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Point 6 Recycling:

a. The preparation of Authorisation Decisions, final steps

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Part 6a: Recycling authorisation decisions

Art 24 describes of 2022/1616 the general rules to be included in the Register:

✓3. The Register shall assign the following entities with unique numbers:

- recyclers are assigned a recycler operator number ('RON');
- decontamination installations are assigned a recycling installation number ('RIN');
- recycling facilities are assigned a recycling facility number ('RFN');
- recycling schemes are assigned a recycling scheme number ('RSN');
- authorised recycling processes are assigned a recycling authorisation number ('RAN');
- novel recycling technologies are assigned a novel technology number ('NTN').

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Timeline and process: Verification of Recycling authorisation decisions by MS

1. The following working and Authorisation Decision documents will be shared with MSs through **CIRCA BC** [FCM - Library \(europa.eu\)](https://europa.eu/fcm):

A. General docs - Cat Decisions

- MSs Authorisation Decision distribution
- MSs Authorisation Decision distribution + RECYC Number per MSs
- Evaluation Categories

➤ B. Individual Authorisation Decisions

- Recycling Efsa Opinion RECYC001
- Recycling Authorisation Decisions for RECYC001

2. Member state CAs will have **three weeks** to study, consider, and make any necessary revisions to the Authorization Decisions

3. In response to the CAs's feedback, COM will outline the next steps in the procedure (by e-mail) and revising and cleaning up the Authorization Decisions as needed.



**March & 17th
April 2024**

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Steps to be followed: Recycling authorisation decisions

1. MSs Authorisation Decision distribution + RECYC
Number per MSs

← Step 1

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Steps to be followed: Recycling authorisation decisions

Row-Labels	1	2	3	4	5	6	7	8	9	Grand-Total
Australia	1				1					2
Austria	10	1			1	3	1			16
Belgium		1								1
Bulgaria	1		1							2
Canada					1					1
Croatia						1				1
Czech-Republic						1				1
Egypt	1									1
Estonia	1									1
Finland	1									1
France	4		2			4				10
Germany	20	3	1	1		20		1		46
Greece	1		1							2
Hungary	2									2
Indonesia						1				1
Ireland	1		1							2
Italy	11	1	1		1	5				19
Latvia	2									2
Luxembourg	1					1				2
Malaysia						1				1
Morocco	1									1
Netherlands	5	1	1		1	1				9

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Category	No-of-Authorisation-Decision(s)	Categorisation-of-the-Authorisation-Decisions-depending-on-the-specifications-given-by- EFSA -in-conclusion-section			
1	1	1a-1	1b-1	1c-1	1d (old) 1d
1	1	1a-1	1b-1	1c-1	1d (old) 1d
19	91 + 63a	1a-1	1b-1	1c-1	1d (old) 1d
1	1	2a-1	2b-1	2c-1	2d-1
2a	19a	2a-1	2b-1	2c-1	2d-1
1	1	3a-1	3b-1	3c-1	3d-1
3a	6a	3a-1	3b-1	3c-1	3d-1
4a	6a	4a-1	4b-1	4c-1	4d-1
5a	6a	5a-1	5b-1	5c-1	5d-1
19	191a	19a-1	19b-1	19c-1	19d-1

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Steps to be followed: Recycling authorisation decisions

➤ MSs Authorisation Decision distribution + RECYC
Number per MSs

Step 1

➤ MSs Authorisation Decision distribution + RECYC
Number per MSs

Step 2

- BE: Cat 2
- BE: RECYC Decisions: RECYC030

➤ EFSA opinion – BE: EFSA RECYC 030

Step 3

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Brussels, XXXX
[...](2023) XXXX draft

COMMISSION IMPLEMENTING DECISION
of XXX
[...]

authorising the mechanical PET recycling process 'XXXX' in accordance with Regulation (EU) 2022/1616 on recycled plastic materials and articles intended to come into contact with foods
(Only the English text is authentic)

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COMMISSION IMPLEMENTING DECISION
of XXX
[...]

authorising the mechanical PET recycling process 'XXXX' in accordance with Regulation (EU) 2022/1616 on recycled plastic materials and articles intended to come into contact with foods
(Only the English text is authentic)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Commission Regulation (EU) 2022/1616 of 15 September 2022 on recycled plastic materials and articles intended to come into contact with foods, and repealing Regulation (EC) No 282/2008, and in particular Article 19(1) thereof,

Whereas

(1) → Regulation (EU) 2022/1616 provides that recycled plastic materials and articles can only be placed on the market if the recycled plastic therein is obtained using a manufacturing process that applies a suitable recycling technology. Post-consumer mechanical PET recycling is such a suitable technology. Recycling processes applying this technology as set out as technology no. 1 in the list of suitable technologies contained in Table 1 of Annex I to that Regulation, require an authorisation by the Commission based on an application to be submitted to the European Food Safety Authority ('the Authority'). In accordance with Article 31(1) of Regulation (EU) 2022/1616, an application for authorisation submitted under Commission Regulation (EC) No 282/2008 is to be considered equivalent to an application received in accordance with Article 17(1) of Regulation (EU) 2022/1616.

(2) → The Authority received an application for the post-consumer mechanical PET recycling process 'XXXX' ('the recycling process') in accordance with Article 5 of Regulation (EC) No 282/2008, which received the number EFSA-Q-00XXXX ('the application'). In its opinion on the use of the recycling process to recycle post-consumer PET into food contact materials ('the opinion'), the Authority concluded that the applicant had demonstrated in a challenge test that the recycling process can reduce contamination of the plastic input to a concentration that does not give rise to a concern for a risk to human health provided that the process is operated under

→ OJ L 243 20.9.2022, p. 3.

→ Commission Regulation (EC) No 282/2008 of 27 March 2008 on recycled plastic materials and articles intended to come into contact with foods and amending Regulation (EC) No 2023/2006 (OJ L 86, 28.3.2008, p. 29).

→ EFSA CEF Panel (EFSA Panel on Food Contact Materials, Enzymes, Flavourings and Processing Aids), 2013 - Scientific Opinion on the safety assessment of the following processes based on EFSA Advanced technology used to

Article 2
Authorisation of the recycling process

1. → Recycling process 'XXXX' is authorised for the manufacturing of recycled plastic using the 'post-consumer mechanical PET recycling' technology listed in point 1 of Table 1 of Annex I to Regulation (EU) 2022/1616 in accordance with the conditions set out in this Decision.

2. → The authorisation holder of Recycling process 'XXXX' shall be XXXX.

3. → The authorisation holder shall provide a copy of this Decision to all recyclers applying this process under its license.

Article 3
Requirements for the use of the authorised recycling process

1. → The pre-processing operations shall ensure that the plastic input is collected and sorted in accordance with Article 6 of Regulation (EU) 2022/1616 and complies with the specification set out in column 5 of row 1 of Table 1 of Annex I thereto.

2. → The decontamination operations shall be configured and operated in such a way that they correspond to the process described in the subsection 'Decontamination and production of recycled PET material' of Chapter 3 of the opinion, and the equipment used to construct an installation based on the process shall correspond to the detailed description provided in the application.

3. → The post-processing may be configured or applied differently from the description in the application provided that the obligations set out Article 8 of Regulation (EU) 2022/1616 are complied with.

Article 4
Operating conditions applicable to the authorised recycling process

The decontamination operations shall be controlled to ensure that each critical step described in the opinion operates under conditions at least as severe as the conditions defined for the challenge test as described in Annex C to the opinion.

Article 5
Authorised use of recycled plastic manufactured with the authorised recycling process

Recycled plastic manufactured with the process shall meet the specification set out in column 6 of row 1 of Annex I to Regulation (EU) 2022/1616, and may be used up to 100% for the manufacturing of the following materials and articles:

→ bottles manufactured with up to 40% recycled plastic originating from the process.

→ thermoformed trays and containers manufactured with up to 65% recycled plastic originating from the process and that are not to be used for packaging water.

Points to be checked highlighted in the text (in green)

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Verification process outcome

We have received comments from 15 Member General docs - Cat Decisions, almost 100 revised version in CIRCA BC

- related to restrictions - all decisions in line with EFSA opinion
- still to address or naming of the recycler and/or process (limited number)
 - important that procedure is properly followed
- article wording and more specific issues related with specific RECYC decisions
 - Revising on the wording of Art 5 & 6 of the decisions - changes to be communicated & be reflected in the final version of the Author Dec

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Changes to Article 5 and 6

Article 5

Authorised use of recycled plastic manufactured with the authorised recycling process

Recycled plastic manufactured with the process shall meet the specification set out in column 6 of row 1 of Annex I to Regulation (EU) 2022/1616, and may be used for the manufacturing of the following materials and articles for contact with all types of foodstuffs for long term storage at room temperature, with or without hot-fill:

- bottles manufactured with up to 40% recycled plastic originating from the process;
- thermoformed trays and containers manufactured with up to 65% recycled plastic originating from the process and that are not to be used for packaging water;

- Article 5: some individual changes
 - foodstuff → foodstuffs
 - 'with or without hot-fill' always applies
 - 100% not in leading sentence if bullets with other percentages

6 of row 1 of Annex I to Regulation (EU) 2022/1616, and may be used up to 100% for the manufacturing of the following materials and articles:

- up to 50% in mixtures with virgin PET to produce bottles intended for contact

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Article 6 Declaration of compliance and labelling

The declaration of compliance or labelling, as appropriate, shall include at least the following instructions for converters and users of recycled plastic and recycled plastic materials and articles:

- the relevant instructions necessary for meeting their obligations under Article 5, and if relevant these instructions are also to be provided to end-users;
- the statement 'not for oven or microwave use', and these instructions are provided to end-users;
- and, where if recycled content exceeds 50%, the statement 'not for packaging water', if relevant this instruction is also to be provided to end-users.

If relevant these instructions are also to be provided to end-users.

Article 6

- some general changes to the wording,
 - to the title '...and labelling' is added
 - general sentence on instructions
- verify whether general to all Decisions
 - some specific issues, example above
- legal check

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naming of authorisation holders and processes

- Changes to application owner; 3 cases:
 - Recyclers already informed the COM with a registered letter – Changes should be reflected in the final version of the Decisions
 - MSs requests following the evaluation take place - Next step is to ask from the Recyclers a registered letter like in the past - registered letter procedure initiated by COM
 - Recyclers inform the COM but without a registered letter - registered letter procedure initiated by COM
- Without written proof no change in ownership!
 - EFSA opinion will be leading
- Process name changes generally much more simple
 - also letter required
 - recital to explaining the name change
 - in case of duplicate name of the process, the Commission has rename

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Final steps towards vote

1. Finalisation of first batch of decisions
 - which are in, which are out?
(out are Decisions based on confidential information in conclusion of EFSA opinions, undecided EFSA opinions, closed loop EFSA opinions)
2. Finalisation of individual draft Decisions
 - a) A number of issues following bilateral communication with MSs involved (in the next few days) – communication to follow for those case before the changes reflected in the final version of the Author Dec
 - b) Final drafts in CIRCA BC – for your information
 - c) Internal legal check
3. Written voting procedure will be followed
 - *kick-off probably in the SC- PAFF of 12 June, directly followed by written procedure*

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Point 6 Recycling:

b. The Register - Progress of the on-line Register (Article 24)

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Point 6b: Register - Registration of mechanical PET installations

WG 11th of September

**Year
2023**

1. Consultation and evaluation of Forms: COM & CAs in EU Level
& preparation of the Register Lists (received till 31st of December 2022) upload
in FCM SANTE website – 1st of June 2023

← **June 2023**

2. Register Lists (forms received from 1st of January till 30th of June 2023)
uploaded in FCM SANTE website

← **18th of July**

3. Publication of the next Vers of Register Lists (forms received from 1st of
January till 27th of October 2023) in FCM SANTE website

← **27th October**

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Year
2023

Last vers:
27th of October

2. The Union Register

Section A: Year 2022 (Forms received until 31 December 2022)

i. EU Union register of technologies, recyclers, recycling processes, recycling schemes, and decontamination installation

This draft list contains installations, facilities and companies located in the EU registered before 31 December 2022. The current lists of the Register (established in accordance with Article 24 of Regulation (EU) 2022/1616 on recycled plastic materials and articles intended to come into contact with foods) will be updated in regular basis.

- List 1: [Register of Recycling installations in the EU](#) (EN | ...)
- List 2: [Register of Recycling Facilities in the EU](#) (EN | ...)
- List 3: [Register of Recycling Companies in the EU](#) (EN | ...)

EU Member States

ii. EU Union register for countries located outside EU of technologies, recyclers, recycling processes, recycling schemes, and decontamination installation

This draft lists contains installations, facilities and companies located outside EU registered before 31 December 2022. The current lists will be updated in regular basis.

- List 1: [Register of Recycling installations outside of the EU](#) (EN | ...)
- List 2: [Register of Recycling Facilities outside of the EU](#) (EN | ...)
- List 3: [Register of Recycling Companies outside of the EU](#) (EN | ...)

Non EU Member States

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Year
2023

Section 2 - Year 2023:
Forms received from 01st
January to 27th October

Section B: Year 2023 (Forms received from 1 January until 27 October 2023)

i. EU Union register of technologies, recyclers, recycling processes, recycling schemes, and decontamination installation

This draft list contains installations, facilities and companies located in the EU registered from 1 January to 27 October. The current lists of the Register (established in accordance with Article 24 of Regulation (EU) 2022/1616 on recycled plastic materials and articles intended to come into contact with foods).

- List 1: [Register of Recycling installations in the EU](#)
- List 2: [Register of Recycling Facilities in the EU](#)
- List 3: [Register of Recycling Companies in the EU](#)

EU Member States

ii. EU Union register for countries located outside EU of technologies, recyclers, recycling processes, recycling schemes, and decontamination installation

This draft lists contains installations, facilities and companies located outside EU registered from 1 January to 27 October.

- List 1: [Register of Recycling installations outside of the EU](#)
- List 2: [Register of Recycling Facilities outside of the EU](#)
- List 3: [Register of Recycling Companies outside of the EU](#)

Non EU Member States

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Point 6c: IT development for Recycling Registration

Year
2024

• FFSPM- Food and Feed Information Portal Database

Main assets of the online database:

1. Access to all the parties involved (COM & CAs, Companies & Public) -Year 2024
2. Register Lists online
3. Documents in the portal
 1. Forms
 2. Guidance documents
 3. Legislation
4. Ability to revise the data in real time
 1. COM
 2. COM & CAs
 3. Applicants

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EN English Search Search

Food and Feed Information Portal Database

European Commission > Food > Food and Feed Information Portal

Search Search all domains

Feed Additives

The Commission has established the European Union Register of Feed Additives, which is regularly updated, and it makes reference/links to the relevant authorisation Regulations. Those Regulations include the specific requirements for placing the additives on the EU and EEA market.

[Search for Additives](#)
[Disclaimer](#)
[Download Register in Excel format](#)
[Latest updates to the Register](#)

Food Additives

This database is a searchable tool informing about the food additives approved for use in food in the EU and their conditions of use. It is based on the Union list of approved food additives laid down in Annex II to Regulation (EC) No 1333/2008.

[Search for Additives](#)
[Browse by categories](#)
[European Legislation on Food Additives](#)
[Information documents](#)
[Disclaimer](#)

Food Flavouring

This database is a searchable tool informing about the flavouring substances approved for use in food in the EU and their conditions of use. It is based on the Union list of approved flavourings and source materials laid down in Annex I to Regulation (EC) No 1334/2008.

[Search for food flavouring](#)
[Browse by categories](#)
[European Legislation on Food flavourings](#)
[Disclaimer](#)

Food Contact Materials

[Search for Additives](#)
[Disclaimer](#)
[Download Register in Excel format](#)
[Latest updates to the Register](#)

Health Claims

The search tool only allows searches for health claims, and not nutrition claims.

[EU Register of Health Claims](#)
[Some health claims subject to the individual authorisation procedure](#)
[Download Register in Excel format](#)

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Year 2024

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Search EU Register of Recycling companies

European Commission > Food > Food and Feed Information Portal > Food Contact Materials > Search EU Register of Recycling companies

Recycling companies (6 matching records)

(note: RON - 'Recycling operator number'; RIN - 'Recycling installation number'; RFN - 'Recycling facility number')

RON	Name of Recycling company	Country
		Austria
AT1-61T-00A	PET to PET Recycling Österreich GmbH	Austria
AT2-7U4-00G	Steinbeis PolyVert GmbH	Austria
AT3-11L-005	PETman GmbH	Austria
AT3-1E8-00A	Steinbeis PolyVert GmbH	Austria
AT3-6ED-00H	Dannemann Global Extrusion GmbH	Austria
AT3-6MJ-00S	Polytec Plastics Ebensee GmbH	Austria

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Search EU Register of Recycling companies

European Commission > Food > Food and Feed Information Portal > Food Contact Materials > Search EU Register of Recycling companies

Recycling companies (6 matching records)

(note: RON - 'Recycling operator number'; RIN - 'Recycling installation number'; RFN - 'Recycling facility number')

RON	Name of Recycling company	Country
		Austria
AT1-61T-00A	RFN(s) linked AT1-61T-0FC	Austria
AT2-7U4-00G	RIN(s) linked AT1-1FL-0IG AT1-7HK-0I5	Austria
AT3-11L-005	PETman GmbH	Austria
AT3-1E8-00A	Steinbeis PolyVert GmbH	Austria
AT3-6ED-00H	Dannemann Global Extrusion GmbH	Austria
AT3-6MJ-00S	Polytec Plastics Ebensee GmbH	Austria

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European Commission

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Search EU Register of Recycling companies

European Commission > Food > Food and Feed Information Portal > Food Contact Materials > Search EU Register of Recycling companies

Recycling companies (6 matching records)

(note: RON - 'Recycling operator number'; RIN - 'Recycling installation number'; RFN - 'Recycling facility number')

RON	Name of Recycling company	Country
		Austria
AT1-61T-00A	PET to PET Recycling Österreich GmbH	Austria
AT2-7U4-00G	Steinbeis PolyVert GmbH	Austria
AT3-11L-005	PETman GmbH	Austria
AT3-1E8-00A	Steinbeis PolyVert GmbH	Austria
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AT3-1E8-00A	Steinbeis PolyVert GmbH	Austria
AT3-6ED-00H	Dannemann Global Extrusion GmbH	Austria
AT3-6MJ-00S	RFN(s) linked AT3-6MJ-0FU RIN(s) linked AT3-2UY-0IQ	Austria

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Point 6 Recycling:

c. Novel Technologies and recycling schemes

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Point 6c : Recycling schemes

- Art 24 describes of 2022/1616 the general rules to be included in the Register:
 - 3.The Register shall assign the following entities with unique numbers:
- recyclers are assigned a recycler operator number ('RON');
- decontamination installations are assigned a recycling installation number ('RIN');
- recycling facilities are assigned a recycling facility number ('RFN');
- **recycling schemes are assigned a recycling scheme number ('RSN');**
- authorised recycling processes are assigned a recycling authorisation number ('RAN');
- novel recycling technologies are assigned a novel technology number ('NTN').

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• recycling schemes are assigned a recycling scheme number

92 dossiers Recycling Schemes									
RSN EU	Austria	Belgium	Bulgaria	Czech Republic	Croatia	Cyprus	Denmark	Estonia	France
	6	7	5	5	4	4	4	4	7
	Finland	Germany	Greece	Hungary	Ireland	Italy	Lithuania	Latvia	Luxembourg
	4	14	5	4	4	13	5	4	5
	Malta	Netherlands	Poland	Portugal	Romania	Slovenia	Slovakia	Spain	Sweden
	4	10	9	6	4	4	4	12	4
RSN (Non-EU)	China	Mexico	Oman	South Africa	Switzerland	Thailand	Turkey	UK	
	4	1	2	1	4	1	2	3	

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Point 6c: Recycling schemes - Recycling schemes are assigned a recycling scheme number ('RSN'); 1st Step: Verification of the 92 Recycling schemes dossier received till today, with the recyclers in order to verify (second week of May) : - The definition of the recycling scheme as indicated under article 2 (2.15) 'recycling scheme' means an arrangement between legal entities to manage the use, separate collection and recycling of plastic materials and articles with the objective to limit or prevent their contamination in order to facilitate their recycling; - The requirements as established for an operation of the recycling schemes under Article 9 (1) a single legal entity shall act as the manager of a recycling scheme, and shall be responsible for the overall functioning of the recycling scheme. - The recycling scheme shall be set up in accordance with the specific requirements applicable to the applied suitable recycling technology as laid down in table 1 in Annex I and, where applicable, with the authorisation of the applied recycling process 2nd Step: Evaluation of the dossiers COM & updating the Register with the RSN codes (May to June)	
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Point 6c : Novel technologies

- Art 24 describes of 2022/1616 the general rules to be included in the Register:
 - 3.The Register shall assign the following entities with unique numbers:
- recyclers are assigned a recycler operator number ('RON');
- decontamination installations are assigned a recycling installation number ('RIN');
- recycling facilities are assigned a recycling facility number ('RFN');
- recycling schemes are assigned a recycling scheme number ('RSN');
- authorised recycling processes are assigned a recycling authorisation number ('RAN');
- novel recycling technologies are assigned a novel technology number ('NTN');

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36 dossiers Novel Recycling Technologies

- novel recycling technologies are assigned a novel technology number ('NTN').

NTN	Austria	Belgium	Denmark	Germany	Spain	Italy	Lithuania	Poland	Sweden
EU	2	6	1	5	1	5	1	1	1

NTN (Non-EU)	China	Taiwan	Turkey	UK
	1	1	1	6

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Point 6c: Novel Technology

- Novel recycling technologies are assigned a novel technology number ('NTN').
- 36 Novel recycling technologies dossier received till today
 - Nine (09) EU MSs and four (04) non EU MSs
- Process to be followed as described in Art 10,11 & 14, Com Regulation (EU) 2022/1616
- Verification of the 36 Recycling Novel Technology dossier, COM will consult by e-mail MSs competent authorities in order to validate (second / third week of May):
 - Step 1: Whether they have the dossier mentioned in Annex II (if not, send us an email and we'll transfer the relevant documents).
 - Step 2: After the first check (Step 1), Annex I a & b must be completed in order to verify the evaluation of the forms and documents that were provided.
 - Step 3: Notify the Commission by e-mail about that the preliminary assessment and verification

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AoB points

Point 4B – Codex Letter



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Codex circular letter on FCM recycling

- Request for information on a proposal for the investigation and development of recycling guidance in Codex Alimentarius
 - CL 2024/20-CAC
- North America (US) presented a proposal for the investigation and development of recycling guidance in Codex Alimentarius
- Questionnaire with DL of 1 May was sent around
 - very short internal DL mid-April for our services
 - presently consultation in the Council DL today
 → too quick for proper consideration

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Background

- **Safe food aspect**
 - There is a need to develop guidelines pertaining to appropriate recycled material feedstock for food packaging as well as recycling technologies to produce such material. Food safety could be compromised by the incorporation of inappropriate recycled material into food packaging which provides a route for **toxic substances to migrate to food**. Food safety could also be compromised by the production of **inferior food packaging** from recycled material which could itself contaminate the food or increase food spoilage during holding and transport.
- **Fair-trade aspect**
 - There is a need for consistency in the criteria used to determine **appropriate recycled material feedstock and recycling technologies** used for food packaging for food in international trade. It should be expected that the patchwork of national legislation across the globe and the implementation of **divergent criteria** pertaining to packaging material, particularly recycled material, could **result in trade barriers** and create confusion for countries still developing policies and regulatory frame
- US proposes to **compile discussion document** for further consideration of potential next steps on **basis of questionnaire**

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Questions & our Answers

- Would it be useful for Codex to develop guidance on food safety considerations related to the use of recycled material in food packaging?
 - merit for standards aiming at the safety of recycled materials from a natural origin
 - plastics not, because legislation in place, glass metal not needed
- Are there any aspects in addition to those outlined in CAC/46 CRD36 that should be considered for future work?
 - standardization of waste collection practices and of waste streams
- Would you be interested in participating in work on this topic?
 - yes – to start with considering risk assessment
- Several factual questions on what is in place, most relevant
 - Do these requirements vary depending upon packaging type (e.g., plastic, metal, paper)?
 - Yes, highlighting the missing framework at EU level for paper and board
 - What type of technologies are currently approved and are you evaluating any new?
 - Only PET – novel technologies allowed

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Thank you

➤ Comments and questions to be forward

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