EU 2022/1616 Art6 Certification Process



Raphael Jaumotte - PETCORE EUROPE





EU 2022/1616 article 6

Chapter 3:

- General Requirements for Plastic Recycling and the Use of Recycled Plastic

Article 6

- Requirements for collection and pre-processing

Sets the rules on how the raw material origin and collection

With the main objective to guarantee food safety.





The Genesis

- EU Project FAIR CT 98/418
 - Analysis made on post consumer bottles
 - European Collection

• EC 10/2011

 Defines what substances are permitted to manufacture plastic materials and articles to come in contact with food

• EU2022/1616

 Used the above in article 6 to set requirements for the production of safe recycled materials to come in contact with food





Main items of the article 6

Bottles shall

- → Originate from municipal waste, food business or food retail
- → have been used for the contact with food
- → comply with regulation EC10/2011
- → be collected separately
- → be sorted sufficiently to not compromise decontamination





What did PETCORE EUROPE?

- In November 2023, we have been made aware that the commission was intending to limit the amount of recycled content in bottles to 66%
- Main reason put upfront was the fact that imports were putting the food safety at risk
- Deep impact on EU recyclers as the limitation was not targeting directly imports
- PETCORE EUROPE gathered the whole value chain (PRE, EUPC, UNESDA, NMWE, EPRO) to build a counterproposal
- Triggered by PRE, in was proposed to enforce the application of article 6
 with certification schemes





Certification Schemes

- The guidelines for the certification scheme guidelines have been developed by the value chain under the coordination of PETCORE EUROPE
- It has been presented to DG Santé in September 2024
- General perception is that the content meets the expectation to guarantee food safety
- The EC 10/2011 compliance is still under debate on how to enforce this point
- Certification shall start in 2025, (late vs regulation's date of octobre 2024)



