



Workshop on New Recycling Regulation

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

FCM WG 20 September 2022

European Commission; DG SANTE E.2

New Regulation on Plastic Recycling

- Short explanation of main concepts
- Hands-on discussion on consequences to competent Authorities
 - Registration and Commission Register
 - Article 26 + Annex II (CMSS)
 - Authorisation
 - Compliance documentation
 - Enforcement
 - Recycling schemes
 - Novel Technologies
- Discussion on draft Guidance

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General explanation



1: scope and purpose

- The new Regulation replaces Regulation (EC) No 282/2008
 - Regulation (EC) No 282/2008 is the present Regulation, **it ceases to exist**
 - the new Regulation sets out transitional provisions
- The new Regulation requires that:
 - **All** recycled plastic **content...**
 - in materials and articles that **foreseeably** come in contact with food...
 - is manufactured with a **suitable recycling technology!**
- There are two exceptions:
 - manufacture of **pure** substances listed in Annex I to Regulation (EU) No 10/2011
 - manufacture of recycled content **with a novel technology**

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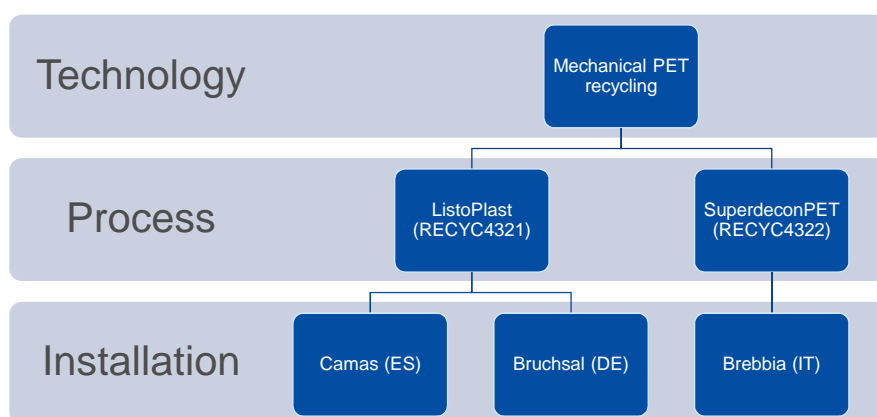
2: Technologies, Processes and Installations

- **Recycling Technology**
 - generic concepts, principles and practices to recycle a defined input into a defined output
- **Recycling Process**
 - well described specific sequential operations based on a recycling technology
- **Recycling Installation**
 - **hardware** that actually recycles the plastic using a process
- **Three associated procedures to establish safety**
 - 'establish' suitable recycling technologies (EFSA + COM)
 - 'authorise' recycling processes (EFSA + COM)
 - 'control' recycling installations (audits) MS Competent Authorities

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example



any correspondence to reality is purely a coincidence

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3: Focus on decontamination

- Under New Regulation a recycling process has **always three parts**
 - **pre-processing** → **decontamination** → **post-processing**
 - subject to specific rules
- The **required amount of decontamination** depends on pre- and post-processing
 - residual contamination in final plastic material sufficiently low so that no harm can occur



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4: Establishment of suitable technologies

- Suitable technologies are established on basis of novel technologies
 1. **publication of safety report** showing the technology results in safe plastic
 2. placing on the market and **monitoring of contaminants** (publication of reports)
 3. **EFSA evaluation** (this will be very strict → take note under 1. and 2.)
 4. if favourable, **technology established** in Annex I to the Regulation (for anyone to use)
- Any technology is defined by input, decontamination principles, use of output
 - if technology so requires, individual recycling processes shall be authorised and/or use schemes
- The new Regulation already establishes two suitable technologies:
 - mechanical PET recycling, max 5% non-food consumer waste, **authorisation of processes**
 - recycling from closed and controlled chain, no authorisation of processes, use of scheme

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5: Authorisation of Processes

- For now, only mechanical PET processes require authorisation
- The 230+ processes that applied for authorisation will be authorised
 - authorisations to follow quickly after entry into force of new Regulation
 - only small changes to regime under Regulation (EU) No 282/2008
- Slightly different regime for future applications, only by developers
- Recycling installations to be registered and audited
 - registration shall be **immediately after entry into force** of the new Regulation
 - Compliance Monitoring Summary Sheet to be agreed with competent authorities
 - **batch based** declarations of compliance

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Entry into force – 10 October 2022

- Regulation (EC) No 282/2008, is repealed; it will no longer be in force;
 - it is no longer possible to use recycled plastic Food Contact Materials (FCMs) subject to national legislation;
- Specific rules become directly applicable to the placing on the market of plastic with recycled content
 - collection and sorting of plastic input, its decontamination, and conversion, affecting also quality control, documentation and labelling;
- Union register including recyclers and recycling installations is established
 - to be published on Commission's website;
- All kinds of recycled plastic and recycling technologies are in the scope of the Regulation
 - Including mechanical recycling, recycling of products from a closed and controlled product chain, the use of recycled plastic behind a functional barrier, and forms of chemical recycling;
- new rules applicable to novel recycling technologies and the evaluation of recycling processes become applicable.

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Transition

- With respect to mechanical polyethylene terephthalate (PET) recycling processes:
 - processes subject to an application received by European Food Safety Authority (EFSA) before 10 July 2023 may continue after that date to be used to place recycled plastic on the market without authorisation, until they are notified of a decision on their authorisation;
 - authorisation decisions place restrictions on recycling processes; these are based on the EFSA opinion applicable to the process;
 - from 10 July 2023 onwards, processes for which EFSA did not receive an application before that date may not be used to place recycled plastic on the market, they must be authorised first;
- from 10 July 2023, only plastics containing recycled plastic manufactured with a suitable recycling technology may be placed on the market,
 - unless manufactured with a novel technology and in accordance with Chapter IV of the Regulation;
 - the Regulation lays down two suitable technologies:
 - post-consumer mechanical PET recycling; this requires authorisation of individual processes
 - recycling from product loops which are in a closed and controlled chain; this requires the use of a recycling scheme
- from 10 October 2024, quality assurance systems used to collect and pre-process plastic input need to be certified by a third party, and participation in

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Hands-on discussion



1: Hands-on Discussion

- To provide Member States with overview
 - on main tasks (administrative and enforcement)
 - to ensure uniform implementation
 - to explain main tasks
- Please ask questions, participate in the discussion
 - let us know if you do not understand, or if you disagree
 - of great help to mutual understanding

- Confucius:

'The person who asks a question is a fool for a minute, the person who does not ask is a fool for life'

- we don't consider our participants to be fools at all...
- but it surely helps the discussion to ask if you have a question on your mind!

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Register and Registration

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Register and Registration

- **What:** Commission website will hold Union register (basis Article 24)
- **Actors:** business operators, Commission, Competent Authorities
 - recyclers must register their installations, facilities, companies, and schemes
 - developers of novel technologies must register these in addition to the above
 - Commission will register, CAs to register for their own purposes
- **When:**
 - As soon as possible – registration to open from next week
 - formally: 30 working days before start date of installation
 - for existing installations, starting date is 2 months after entry into force
 - i.e. mid December minus about 6 weeks, is end of October
 - registration numbers required for compliance documents (and helpful for authorisations)

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Placing on the market of recycled plastic and recycled plastic materials and articles

Article 4

Requirements for recycled plastic materials and articles

6. **The Union register** established in Article 24 includes the following information regarding the manufacture of the recycled plastic:

(a) the **decontamination installation** where the recycled plastic was manufactured, the address of the **recycling facility**, and the identity of the **recycler operating it**;

(b) the applied authorised recycling process, if the applied suitable recycling technology requires the **authorisation of recycling processes**;

(c) the name of the **recycling scheme** used, the identity of the entity managing it, and the applied markings, if the applied recycling technology requires the use of a recycling scheme;

(d) the name of the **novel technology**, if the manufacture of the recycled plastic uses a novel recycling technology.

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The Union register to be established (Article 24) will include the following information regarding the manufacture of the recycled plastic:

1. Decontamination installations
2. Recycling facilities
3. Recycling companies
4. Recycling schemes
5. Novel technologies
6. Authorised processes

Step 1: Templates to be available via the [FCM page](#)

Step 2: Applicants should use from now on the current templates to apply for any of the six categories

Step 3: Evaluation and publication of new lists per category (06) to be available for the public

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Registration of installations

- recyclers to register 30 working days prior to start date of installation
 - note: for existing installations this is about **3 weeks** after entry into force
 - notify the installation and address and other information to CA and Commission
- Commission to update Register – status ‘newly registered’
- Establish compliance monitoring summary sheet to CA
 - recycler needs to have this at the start date of the installation
 - and submit it within one month from start date (wording in Article 25(1)(c) and 26(2))
- Competent authority to verify correctness
 - notify the reception of the CMSS to Commission upon submission; status to become ‘*being established*’
 - verify the information and perform ‘a control’ (i.e. audit) in accordance with Article 27
 - inform the Commission that compliance is established within one year
 - status to become ‘*active*’ (or ‘*suspended*’)
- It is important that recyclers know to which CA they shall notify
 - Use list on our website? Are they to register more locally?
- SANTE-FCM-RECYCLING-REGISTER@ec.europa.eu

Commission stimulates quick registration, open from next week

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1. Template for recyclers & decontamination installation

Registration of recyclers and decontamination installation (Art. 25)			
Notification information to be provided: Competent Authority (CA) & Commission			
1. Name of authorised recycling processes			
2. Names and addresses of the authorisation holders			
3. Which technology each process is based			
4.1. Authorisation status of each registered recycling processes	1. Suspended	2. Revoked	3. Subject to transitional provisions
4.2. Latest date of change of the authorisation status			
5.1. Company name of recyclers operating a decontamination installation			
5.2. Company address of the head office of recyclers operating a decontamination installation			
6. Addresses of recycling facilities			

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2. Template for recycling facilities

Registration of recycling facility (Art.24)

Notification information to be provided: Competent Authority (CA) & Commission

Step 1: information on the decontamination installation

1. Which is the technology to be used	
2. Address of facility location	
3. Authorised process it applies, if any	
4. Registration status of decontamination installations	1. Newly registered 2. Being established 3. Active or suspended
5. Name (s) of recycling schemes	
6. Name (s) and addresses of the entity managing the scheme	
7.1. Are the materials and articles used subject to a recycling scheme label (as indicated in the markings requirements Article 9(5))	YES NO
7.2. Please include the appropriate marking required in accordance with Article 9(5);	
Where relevant, the information required in accordance with Article 19(2):	

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3. Template for recycling companies

Registration of recycling companies

Notification information to be provided: Competent Authority (CA) & Commission

1. Company Name of the facility	
2. Contact Person (s)	
3. Address of the head office	
4. Business registration number	

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note, if no authorised process is applied because not yet authorised, it won't be in the register

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➔ (b) **the applied authorised recycling process, if the applied suitable recycling technology requires the authorisation of recycling processes;**

(c) the name of the recycling scheme used, the identity of the entity managing it, and the applied markings, if the applied recycling technology requires the use of a recycling scheme;

(d) the name of the novel technology, if the manufacture of the recycled plastic uses a novel recycling technology.

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Recycling Schemes

- 15 days prior to the start of the scheme its manager must inform us
 - for the purpose of the registration of the scheme in the register
 - considered very light, no further delay
- Registration of recycling process as for PET, but no CMSS
 - but these processes, even if they do little, must register!
- Enforcement to focus at food business operators
 - If FBO uses packaging with label, they should be following the rules of the scheme
 - enforcement at the scheme manager/recyclers is of course possible

Article 9

Requirements for the operation of recycling schemes

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.
 At least 15 working days prior to the start of the operation of a recycling scheme the manager of the recycling scheme shall inform the competent authority in the territory where it is established and the Commission for the purpose of its registration in the Union register established in accordance with Article 24.
 The manager shall provide its name, address, contact persons, the name of the scheme, a summary of the scheme not exceeding 300 words, the marking referred to in paragraph 5, a list of Member States where business operators participating in the schemes are located, and references to any decontamination installations used by the scheme. Thereafter, the manager shall ensure this information is kept up to date.
2. A compliance monitoring summary sheet shall not be established, and Article 25(1)(c), and Article 26 shall not apply when recyclers notify the production of recycled plastic as part of a recycling scheme, unless column 8 of Table 1 of Annex I requires to establish it. In case Article 25(1)(c), and Article 26 do not apply, the registration status in accordance with paragraph 2, point (g) of Article 24, as referred to in Article 25(2), shall be 'active'.
3. The manager of the recycling scheme shall provide a single document to all participating business operators and other participating organisations. This document shall set out the objectives of the scheme, explain how it functions, provide instructions, and set out the detailed obligations it places on the participants. The explanation shall include a description of the recycling operations.
4. Recycling schemes shall be set up in accordance with the specific requirements applicable to the applied suitable recycling technology as laid down in table 1 in

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4. Template for recycling schemes

Requirements for the operation of recycling schemes (Art. 9)	
Notification information to be provided: Commission	
1. Name the legal entity managing the recycling scheme	
2. Address of the legal entity	
3 Contact information (also contact person - not public?)	
4. Name of the recycling scheme	
5. Summary of the recycling scheme (not exceeding 300 words)	
6. Are materials and articles labelled with a marking as indicated in Art. 24	symbol
7. List of Member States where business operators participating in the scheme located	
8. References to any decontamination installations used by the scheme	installation number (first register through Article 25)

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(b) the applied authorised recycling process, if the applied suitable recycling technology requires the authorisation of recycling processes;

(c) the name of the recycling scheme used, the identity of the entity managing it, and the applied markings, if the applied recycling technology requires the use of a recycling scheme;

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Novel Technology (in general)

- 6 months before the start of the operation developer to notify competent authority (Article 10(2))
 - to include the information referred to in Article 10(3)
- Competent Authority to check compliance with requirements in Article 10 within 5 months
 - See Article 10(8) (which has an annoying mistake)
 - CA may delay the start of the first recycling installation
 - CA shall inform the Commission of serious concerns
- Transition for **existing** technologies:
 - time-limit in Article 10(2) applies (6 months before the start of the operation)
 - but, 6 months after entry into force developer to comply with Article 10(3) and 10(4)
 - the start of the operation is 8 months after entry into force
 - i.e. to developer to notify novel technology before $8-6=2$ months after entry into force (but additional 4 months for Article 10(3) and (4))
 - **recyclers** to notify **installations** 8 months – 30 working days= about 6.5 months
 - 5 months after CA received info under 10(3) to check compliance (i.e. 11 months after entry into force)
 - start of installations cannot be delayed (they are on the market already)

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5. Template for Novel Technologies

Notification information to be provided: Competent Authority

Step 1 - Preliminary information

1. Name of the developer of the novel technology	
2. Address of the facility	
3. Contact (s) Person	
4. Name of the novel technology	
5. Summary of the Novel Technology (up to 300 words)	
6. URL locating the reports to be published in accordance with paragraph 5 and Article 13 (4) .	
7. Names and addresses or numbers of any recycling facilities at which the development of the technology is foreseen to take place	
8. Characterisation of the novel technology based on the properties of recycling technologies set out in Article 3(2)	
9. Explanation of any applied deviations from the requirements set out in Articles 6, 7 and 8, or whether the novel technology applies a recycling scheme:	

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5. Template for Novel Technologies

10. tensive reasoning, and scientific evidence and studies, compiled by the developer, demonstrating that the novel technology can manufacture recycled plastic materials and articles that meet the requirements of Article 3 of Regulation (EC) No 1935/2004 ensuring also their microbiological safety, including a characterisation of contaminant levels in the plastic input and in the recycled plastic, a determination of the decontamination efficiency, and of the transfer of these contaminants from the recycled plastic materials and articles to the food, and reasoning on why the applied concepts, principles, and practices are sufficient for meeting those requirements;	
11. Description of one or more typical recycling processes using the technology, including a block diagram of the main manufacturing stages, and, if relevant, an explanation of the used recycling scheme and of the rules governing its functioning;	
12. Explanation based on point (a) describing why the technology is to be considered different from existing technologies and is to be considered novel;	
13. a summary proposing evaluation criteria to the Authority for its potential future evaluation of recycling processes that apply the novel technology on which the installation is based as required in Article 20(2);	
14. an estimate of the expected number of decontamination installations that will be operated to develop the novel technology, and the foreseen addresses of the recycling facilities where they will be located.	

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Authorisation of Processes

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Authorisation of mechanical PET processes

- **What:** approx. 234 mechanical PET processes need Authorisation
- **Actors:** the Commission and the Member States
 - the Commission prepares the draft Decisions
 - the Member States (i) check the draft Decisions, (ii) vote the draft Decisions
- **When:**
 - Commission in verification process of main applicants data
 - we will provide you with count and addresses in your territory as soon as possible
 - check of draft Decisions expected late October/Early November
 - vote – aim is 2022, high workload on procedures, likely by written procedure

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Compliance monitoring Summary Sheet

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Procedure to establish CMSS

- **What:** recycler and competent authority to agree CMSS
- **Actors:** competent authorities and recyclers
 - Commission has minor role in management of status on the register
 - CMSS not shared beyond CA – CMSS can be in local language
- **When:**
 - **Main objective:** within one year following start of production compliance to be established
 - Recyclers to submit it within one month from the start date of the installation
 - start date of present installations is 2 months after entry into force – i.e. mid-December

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Article 26

Compliance monitoring summary sheet and verification of the operation of a decontamination installation

1. **Recyclers shall draw up the compliance monitoring summary sheet for each decontamination installation** under their control using the template provided in Annex II, or in case of a novel technology, the template provided by the developer, if different.

The compliance monitoring summary sheet shall provide a summary clearly describing the recycling installation, its operation, the relevant procedures and documents in a way demonstrating compliance with this Regulation.

Recyclers shall take into account the applicable guidelines published by the Commission concerning the compliance monitoring summary sheet, as well as the particular situation at the concerned recycling facility where the installation is located.

2. **Recyclers shall submit the compliance monitoring summary sheet to the competent authority** in the territory where the decontamination installation is located **within one month from the start date of the production** of recycled plastic with that installation. **The competent authority shall notify the reception of the compliance monitoring summary sheet without delay to the Commission.** The status of the registration in accordance with Article 24(2), point (g), shall change to 'being established'.

3. **The competent authority shall verify whether the information provided in the compliance monitoring summary sheet complies with this Regulation and perform a control of the recycling installation** to this purpose in accordance with Article 27.

When compliance cannot be established, the competent authority shall request the recycler to update the information in the compliance monitoring summary sheet, the operation of the recycling installation, or both, as appropriate.

When compliance is established, the competent authority shall inform the Commission thereof. The status of the registration in accordance with Article 24(2), point (g), shall change to 'active'.

4. If the competent authority does not inform the Commission that compliance is established **within one year from the start date** of the production of recycled plastic in the decontamination installation, the status of the registration in accordance with Article 24(2), point (g), shall be changed to 'suspended'.

If the status of a decontamination installation is 'suspended' for one year, the entry concerning the installation shall be removed from the Register.

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Compliance monitoring summary sheet

- See guidance

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Recycling Schemes

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Recycling schemes

- **What:** Some business operators need to register recycling scheme (Article 9(1))
 - managers of closed and controlled product loops, i.e. suitable technology 2

The manager shall provide its name, address, contact persons, the name of the scheme, a summary of the scheme not exceeding 300 words, the marking referred to in paragraph 5, a list of Member States where business operators participating in the schemes are located, and references to any decontamination installations used by the scheme. Thereafter, the manager shall ensure this information is kept up to date.
- **Actors:** Competent Authorities and managers of recycling scheme
 - Commission has also role in management of status on the register, receives the above data
- **When:**
 - 15 working days prior to the start of the operation of the scheme

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Recycling schemes

- Study text

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Compliance Documentation

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Compliance Documentation

- **What:** Recyclers and Converters to provide a declaration of compliance
 - Form to be submitted with each batch of recycled plastic and plastic with recycled content
- **Actors:** Recyclers and Converters
- **When:**
 - As of entry into force

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Compliance documentation

Article 29

Specific requirements for declarations of compliance for recyclers and converters

1. Recyclers shall provide a declaration of compliance in accordance with the description and template set out in Part A of Annex III.
2. The declaration of compliance shall include instructions to converters that are sufficient for ensuring that converters can further process the recycled plastic into recycled plastic materials and articles that are in compliance with Article 3 of Regulation (EC) 1935/2004. These instructions shall be based on the specifications, requirements or restrictions set out for the recycling technology applied and, where applicable, the recycling process used.
3. Converters shall provide a declaration of compliance in accordance with the description and the template set out in Part B of Annex III;

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Official Controls Compliance of Plastics

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Official Controls

- **What:** Competent authorities need to do official controls (Article 27)
 - of recyclers and recycling installations
 - particularly by means of audits
- **Actors:** Recyclers and Converters
- **When:**
 - OCR applies – frequency is not defined, except for initial control under Article 26

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Official controls

Article 27

Official controls of recycling installations

Official controls of recycling installations and recyclers shall include in particular audits in accordance with Article 14, point (i), of Regulation (EU) 2017/625.

These audits shall be complemented by:

- (a) an assessment of procedures on good manufacturing practices in accordance with Article 14, point (d), of Regulation (EU) 2017/625;
- (b) an examination in accordance with Article 14, points (a) and (e), of Regulation (EU) 2017/625, of the compliance monitoring summary sheet established in accordance with Article 26, and, on the basis of that summary sheet, of the controls that operators have put in place and of documents and records referred to in that summary sheet.

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Compliance of Recycled Plastic

- **What:** Article 28 defines when a competent authority shall consider a batch of plastic non-compliant
 - and it defines the consequences and what to do
 - particularly by means of audits
- **Actors:** mostly competent authorities
- **When:**
 - when recycled plastic, or recycled plastic materials and articles are being controlled
 - OCR applies – frequency not defined

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Novel Technologies (Chapter IV)

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Novel Technologies – Chapter IV

- **What:** Article 10 requires
 - developers to notify of the start of the operation of the first decontamination installation
 - notification to include detailed information Article 10(3)
 - a detailed safety report to be published on the website of the developer
- **What more:** Article 11
 - to register installations in accordance with Article 25
 - allows deviation from Article 6-8, or use recycling scheme
- **Actors:** mostly developers and recyclers, also competent authorities and Commission
 - competent authorities and Commission receive the information
 - competent authority to verify whether Article 10 is met, in case of serious concern to notify the Commission
- **When:**
 - developer to notify 6 month prior to the operation of the first installation

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Timeline entry into force for novel technologies

- Plastic may be manufactured with technology that is not suitable until 10 July 2023
 - unless chapter IV is followed
- Transition, Article 31(4)
 - start date of decontamination installation is 8 months after entry into force (10 June 2023)
 - notification of first installation 6 months prior to start (January 2023) (Article 10(3))
 - verification by competent authority within 5 months thereafter (May 2023) (Article 10(8))
 - recycler to notify installation 30 working days prior to start (late April 2023) (Article 25)
- Longer term – operation
 - Competent authorities to verify compliance as normal – focus at installations
 - when auditing installation attention to deviations (Article 6-8, CMSS) and additional documentation required
- To watch developments under Article 32 (barrier layers)
 - Obligatory organisation of recyclers and developers to avoid too many applications
 - requirements on test

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Guidance



Guidance

- Official Commission guidance
 - to be adopted by the Commission
- Drafting in progress ~60% ready
 - however, certain issues require input from others
 - difficult to commit to a timeline, aim is for December
- Purpose
 - to explain the basic principles behind plastic recycling
 - to provide guidance on provisions that may be more difficult to interpret
 - to provide information resources

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COMMUNICATION FROM THE COMMISSION
 – COMMISSION NOTICE –
 Providing Information and Guidance to Member States and stakeholders concerning
 COMMISSION REGULATION (EU) .../... of XXX on recycled plastic materials and
 articles intended to come into contact with foods

Table of contents

- Principles of safe plastic recycling for FCM
 - what are safe FCM
 - how do we ensure safe plastic FCM
 - how to ensure safe recycled plastic FCM
- Guidance to the legislative text
 - general regulatory principles
 - chapter-by-chapter guidance
- Guidance to the Annexes of the Regulation
 - includes the CMSS and DoC guidance
- Annexes to the guidance

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1. Principles of Safe FCM

- Provides detail on Regulation 1935/2004 and explains the consequences
 - Article 1 – ‘reasonably expected to transfer constituents under foreseeable conditions’
 - Article 3 – ‘may not migrate to food in amounts that can endanger human health’
 - Links to good manufacturing practices
 - Article 5 – differences authorisation procedure for recycled plastic
 - Article 15 – labelling
- How to establish safety of recycled plastic in view of Article 3
 - establishes EFSA guidance as main source of criteria
- Principles of safe plastic FCM – differences with recycled plastics
 - ‘all substances in plastic FCMs require identification and risk assessment’
- Principles of ensuring safe recycled plastic FCMs
 - concluding section – it is all about contaminants
 - important section for novel technologies

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2. Guidance to the Regulation

- General Regulatory Principles
 - Recycling always implies decontamination
 - Management of safety by managing quality of production
 - Hierarchy of technology – process – installation
 - provides an example
- Chapter by chapter guidance
 - covers only relevant provisions

2.3. Chapter III

This Chapter lays down the general requirements for plastic recycling and the use of recycled plastic. Chapter II requires that these requirements must be met; Article 4(4)(b) states:

(b) ...the recycling and use of recycled plastic to manufacture the recycled plastic materials and articles complies with the general requirements laid down in Articles 6, 7 and 8, as supplemented by the specifications and requirements for the technology set out in column 8 of Table 1 of Annex I and those laid down in the authorisation, and subject to the specific derogations specified in column 9 of Table 1 of Annex I, and in the authorisation.

Consequently, the following rules apply to the recycling and use of recycled plastic, with the exception of suitable technologies that apply a recycling scheme:

- The general requirements set out applicable to all forms of recycling in Articles 6, 7 and 8;
- The specifications, requirements and derogations applicable to a suitable technology set out in column 8 of Table 1 of Annex I;
- The specifications, requirements and derogations laid down in an individual authorisation of a recycling process

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3. Guidance to the Annexes

- Explains the tables used to lay down novel technologies
 - important function in defining and communicating how novel technologies are to be defined
- Guidance to the CMSS and DoC
 - will take the form of prefilled forms, with some explanations

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Annexes to the guidance

- Annex A: Contact information of the competent Authorities
 - **IMPORTANT:** this may only needed if at local level you have different contacts!
- Annex B: procedures regarding the register
- Annex C: Enforcement Checklists
 - This annex is to lay down common enforcement checklists
 - We may be able to provide a starting point
 - **IMPORTANT:** this can only be drawn up with significant input from the Member States

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Thank you

Happy to receive questions/discuss...

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