

Traceability in consumer products

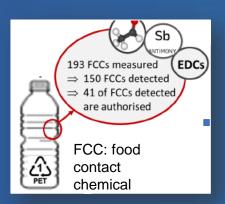
Example of food & beverage packaging

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What we like



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Regulation 10/2011 on plastic food contact materials and articles

- 'Declaration of Compliance' (DoC)
- Must be provided to enforcement Authorities on their request

PPWR

- Identical definition of SoC as in ESPR
- By 2030, SoC must be identified by means of digital technologies (information shall include at least the name and concentration of the substance of concern present in each material in a packaging unit).

SUPD

 Calculation, verification and reporting of data on recycled plastic content in single-use plastic beverage bottles

Regulation 2022/1616 on recycled plastics for materials and articles

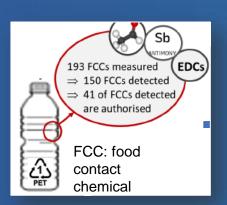
'Declaration of Compliance' (DoC)

SCIP database

o Information requirements on SVHCs



What we are missing



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FCM Framework Regulation

- No specific requirements and DoC for other materials than plastics
- No specific rules for recycled materials other than plastics

Regulation 10/2011 on plastic food contact materials and articles

DoC often incorrectly filled and incomplete (confidentiality)

SCIP database

Does not enhance transparency

SUPD

- Verification and reporting of data on recycled plastic content?
- A definition of 'chemical traceability' as "the ability to prove that it is feasible that chemical building blocks of specific outputs can come from the used input material stemming from post-consumer plastic waste"
- Mass balance (allocation rules)





Thank you

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