POSITION PAPER

15 September 2026

JBCE AND JP4EE FEEDBACK ON THE RULES FOR THE CALCULATION AND VERIFICATION OF RECYCLED CONTENT IN PLASTIC PACKAGING

INTRODUCTION

JBCE and the Japanese 4EE industrial associations (JP4EE) support the European Commission's efforts to establish harmonised rules for the calculation and verification of recycled content in plastic packaging in order to ensure the credibility and transparency of recycled content claims. A clear and consistent framework is essential for the effective implementation of the recycled content targets established under the Packaging and Packaging Waste Regulation (PPWR)[1].

At the same time, supply chains for recycled content packaging involve multiple economic operators, each having different roles, responsibilities, and access to information. Packaging users are generally not able to directly control or audit the entire upstream supply chain. The framework should therefore ensure a high level of reliability while reflecting the practical realities of commercial relationships, information flows, and the extent to which each economic operator can reasonably exercise control.

JBCE and JP4EE believe that the framework should provide a clear allocation of responsibilities, practical and internationally aligned calculation methodologies, as well as proportionate verification requirements while remaining workable for economic operators throughout the supply chain.

[1] Regulation (EU) 2025/40 on packaging and packaging waste (PPWR).

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KEY MESSAGES

- **Clarification of Responsibilities**
  Responsibilities should be limited to what each economic operator can reasonably control and verify. Verified information should be transmitted through the supply chain and relied upon by downstream operators.
- **Harmonised and Practical Calculation and Verification Methodologies**
  Calculation and verification methodologies should reflect practical production and procurement management realities, while remaining aligned, where appropriate, with relevant international standards.
- **Proportionate Verification Requirements**
  Verified information and third-party verification results should be capable of being relied upon without duplication. Verification requirements should remain proportionate and avoid unnecessary administrative burdens.

1. Clarification of Responsibilities

Economic operators that purchase and use packaging are usually able to obtain information from their direct suppliers. However, typically, they have neither direct contractual relationships nor audit rights with recyclers, resin manufacturers, compounders, or other upstream operators. As a result, independently verifying the authenticity of information held further upstream in the supply chain is often not realistic.

Different actors in the supply chain perform different functions and should therefore be subject to obligations that reflect those functions. In particular, economic operators that merely store and make materials available on the market without modifying them should be able to rely on information received from their suppliers and should not be required to recreate information or undertake additional verification activities concerning the same materials.

The calculation and verification framework should therefore be based on the principle that each economic operator is responsible only for the part of the supply chain that it can reasonably control and verify. Verified information should be transmitted through the supply chain and relied upon by downstream operators. Packaging users should be able to demonstrate compliance on the basis of information received from their direct suppliers.

Where recycled content information has already been appropriately verified upstream, downstream operators should be able to rely on such information **without being required to obtain separate certification or duplicate verification.**

2. Harmonised and Practical Calculation and Verification Methodologies

Calculation and verification methodologies should reflect practical production and procurement management realities. Excessively fragmented calculation requirements may create significant administrative burdens without providing a corresponding improvement in reliability.

Where packaging for the EU and non-EU markets is produced using common production lines, material supply systems or inventory, physical segregation by destination should not be required, provided that sufficient verifiability can be ensured.

In such cases, compliance should be demonstrated through an auditable allocation methodology or, where appropriate, a mass-balance approach, subject to adequate traceability and safeguards against double counting. **The framework should remain technology-neutral and should not exclude recycled plastic derived from chemical recycling.** Where the same material composition, specification, and management conditions apply, calculation and verification should therefore be permitted at a reasonable level of aggregation, such as by product group or packaging specification, reflecting actual production and procurement management practices. This should include, subject to adequate traceability and safeguards against double counting, averaging or consolidation of data across relevant manufacturing plants at manufacturer or economic-operator level for the same packaging type and format.

Such approaches would help ensure that calculation requirements remain practical and compatible with the realities of global production and procurement systems, while maintaining a high level of confidence in recycled-content claims.

Beyond ensuring consistency across the EU, calculation and verification methodologies should, where appropriate, **be aligned with relevant international and European standards,** such as ISO 22095 standards on chain of custody and EN 15343 on recycled plastics, in order to support globally integrated supply chains.

3. Proportionate Verification Requirements

The credibility of recycled content claims depends not only on robust calculation methodologies but also on a verification framework that is practical, proportionate and workable throughout the supply chain. JBCE and JP4EE support a framework in which verified information and third-party verification results can be relied upon without duplication throughout the supply chain. Requiring multiple economic operators to repeatedly verify information that has already been appropriately verified may create significant administrative burdens without providing a corresponding improvement in reliability.

Existing certification and verification systems and chain-of-custody systems should be utilised wherever possible in order to avoid duplicate certification, verification and audit requirements. Such systems may include ISCC PLUS and other equivalent schemes. Such an approach would maintain confidence in the system while avoiding unnecessary duplication of verification activities.

Where verification or certification has already been carried out in accordance with applicable requirements, economic operators should not be required to recreate substantially equivalent evidence or undergo additional verification concerning the same packaging.

Third-party verification should not automatically be required in all cases. Any such requirement should be proportionate to the risks involved and the ability of the relevant economic operator to access and verify information.

In addition, if recycled content were required to be calculated and verified for each individual packaging item, shipment, or transaction, excessive administrative burdens could arise for both suppliers and users of packaging. Particularly where packaging of the same specification is produced, supplied, and purchased on a continuous basis, repeated verification of identical information would provide limited additional value.

Verification requirements should therefore be established at a frequency that is practical and proportionate, favouring periodic verification, such as annual renewal where appropriate, rather than transaction- or lot-based verification.

In addition, **a clear distinction should be maintained between the respective scopes of Article 7(8) and Article 7(9).** Article 7(8) should remain focused on the calculation, allocation and verification of recycled content, while environmental performance aspects should be addressed under Article 7(9) in order to support legal certainty and avoid unnecessary overlap between the two implementing measures.

CONCLUSION

JBCE and JP4EE recognise that the calculation and verification framework under Article 7 of the PPWR will play an important role in strengthening confidence in recycled content claims and supporting the transition towards a circular economy.

At the same time, the framework should reflect the realities of modern supply chains and the extent to which economic operators can reasonably control and verify information. **Clarification of responsibilities, practical and internationally aligned calculation methodologies, and proportionate verification requirements are essential to ensuring both the credibility and the effectiveness of the system.**

JBCE and JP4EE call on the European Commission to develop a harmonised, practical, and proportionate framework that appropriately balances reliability with practical feasibility. **Such an approach would facilitate effective compliance throughout international supply chains, support the wider use of recycled content, and contribute to the achievement of the PPWR's recycled content objectives.**

ABOUT JBCE

Founded in 1999, the Japan Business Council in Europe (JBCE) is a leading European organisation representing the interests of over 110 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceuticals, textiles, and glass products.

For more information: https://www.jbce.org/ / E-mail: info@jbce.org

EU Transparency Register: 68368571120-55

ABOUT JP4EE

JEMA (The Japan Electrical Manufacturers' Association)

The Japan Electrical Manufacturers' Association (JEMA) consists of major Japanese companies in the electrical industry including power & industrial systems, home appliances and related industries. JEMA will contribute to sustainable global development through improvement and enhancement of social and living infrastructures by strengthening international competitiveness of Japanese electrical machinery equipment industry.

https://www.jema-net.or.jp/

http://www.jema-net.or.jp/English/

EU Transparency Register: 871347495386-10

JEITA (Japan Electronics and Information Technology Industries Association)

JEITA aims to create digital technologies, improve the business environment, enhance industrial competitiveness, and, of course, to realize Society 5.0. To that end, we urgently need to accelerate society's digital transformation (DX). JEITA will work closely with member

companies, the government, and related organizations to solve social issues and energize the Japanese economy, contributing to the society and lifestyles of the future.

https://www.jeita.or.jp/japanese/

https://www.jeita.or.jp/english/

JBMIA (Japan Business Machine and Information System Industries Association)

Japan Business Machine and Information System Industries Association (JBMIA) is the industry organization which aims to contribute the development of the Japanese economy and the improvement of the office environment through the comprehensive development of the Japanese business machine and information system industries and rationalization thereof.

https://www.jbmia.or.jp/index.php

https://www.jbmia.or.jp/english/index.php

CIAJ (Communications and Information Network Association of Japan)

With the cooperation of member companies, CIAJ is committed to the healthy development of info-communication network industries through the promotion of info-communication technologies (ICT), and contributes to the realization of more enriched lives in Japan as well as the global community by supporting widespread and advanced uses of information in socio-economic and cultural activities.

https://www.ciaj.or.jp/

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