

Facts Matter: Polyamides and Design for Recycling

May 2026

Executive summary

- APA welcomes the publication of the European Design for Recycling EN 18120 standards by the European Committee for Standardisation (CEN) as a first **step towards a harmonised European approach to recyclability assessment**.
- The standards should be seen as a **technical baseline** reflecting current knowledge, intended to inform, not pre-empt, the development of recyclability criteria under the Packaging and Packaging Waste Regulation (PPWR).
- The work on PPWR implementation, including recyclability criteria, must remain **scientifically grounded, material-neutral, and supportive of innovation**.

Introduction

The Advanced Packaging Association ([APA](#)) brings together the key polymer industry players who believe that polyamide (PA) is a sustainable, high-performance material for packaging applications. APA aims to unite stakeholders across the flexible packaging value chain and support the circular economy as part of its long-term strategy, in close alignment with the objectives of the Packaging and Packaging Waste Regulation ([PPWR](#)).

Regulatory Landscape

Article 6 of the Packaging and Packaging Waste Regulation (PPWR)¹ establishes the requirement that all packaging be recyclable by 2030. This entails that packaging must be designed in a manner that ensures its effective management within collection, sorting, and recycling systems. A central element of this framework is **Design for Recycling (DfR)**, which provides the basis for translating this objective into operational criteria. Through forthcoming implementing measures, DfR will define the conditions under which packaging can be considered recyclable, thereby shaping both compliance and market access.

Supporting technical work is therefore being carried out to develop harmonised methodologies for assessing recyclability across the Union.

CEN Design for Recycling Standards

The European Design for **Recycling standard series EN 18120, developed by the European Committee for Standardisation (CEN)**, published in April 2026, provides a structured methodology for evaluating the recyclability of plastic packaging across Europe. Developed through an extensive technical process involving broad stakeholder participation and expert review, the standards offer a common reference point to improve the consistency and comparability of recyclability assessments across the EU.

The EN 18120 series will contribute to the technical methodology underpinning PPWR implementation. However, as a **technical standard rather than a**

*“CEN Standards offer a baseline reflecting the current state of scientific and industrial knowledge, intended to **inform the evolving regulatory framework**”.*

¹ See at the end of the document for an overview of the secondary legislation process at EU level.

legislative text, it does not in itself define legal recyclability criteria or determine market access. It should instead be understood as a baseline reflecting the current state of scientific and industrial knowledge, intended to inform, not pre-empt, the evolving regulatory framework.

APA therefore considers the publication of EN 18120 as a **positive step towards greater European alignment**, provided that its application remains fully consistent with the core principles of PPWR. In particular, recyclability assessments should remain:

- Scientifically evidence-based
- Material-neutral
- Grounded in life cycle thinking and system-level performance

The polyamide-containing packaging perspective

The treatment of polyamide (PA)-containing packaging within the EN 18120 framework should be interpreted in the context of an evolving technical methodology. The absence of specific material classifications in the current version of the standards **does not imply exclusion** from future recyclability assessments under PPWR.

As the framework develops, it is essential that recyclability criteria are based on demonstrated performance within recycling systems, rather than on static or implicit material preferences. This is particularly relevant for high-performance materials such as PA, which contribute to resource efficiency, product protection, and food waste prevention when appropriately designed within packaging structures.

APA has actively contributed to the development of the EN 18120 standards through technical input, data sharing, and participation in CEN-led consultations, supporting the establishment of a first common European reference for recyclability assessment. Building on this experience, we will continue to support the development of the evidence base needed to further refine recyclability criteria, in particular through the generation and consolidation of technical data on material performance within recycling systems.

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This continued evidence-building is essential to ensure that future PPWR recyclability criteria remain aligned with the core principles that APA defends:

- Scientifically evidence-based
- Material-neutral
- Grounded in life cycle thinking and system-level performance

These principles are critical to **ensuring that recyclability frameworks properly reflect real-world recycling system performance and enable innovation in packaging design**.

Conclusion

The EN 18120 standard series marks a significant milestone in the development of a harmonised European framework for Design for Recycling. As PPWR implementation advances, it will be essential to ensure that **recyclability criteria remain scientifically grounded, material-neutral, and supportive of innovation**, enabling packaging solutions that combine functionality with environmental performance.

PPWR Article 6 – Delegated Acts on Recyclability

From legislation to delegated acts

