ABMA
Aseptic Bag Manufacturers Association

Navigating Food Packaging and Recycling Mandates: Challenges and Potential Solutions

“The case of aseptic bags for tomato and other fruits”

Guido Aufdemkamp, ABMA Executive Director

WPTC 2026 in Monterey

The Aseptic Bag Manufacturers Association (ABMA) *

Members:

- Aran
- BIPP
- Goglio
- Goodseal Packaging
- Hansin
- Sealed Air (Liquibox)
- SIG (Scholle IPN)
- Smurfit Westrock
- Tesseraux (Ringmetall Group)

Products represented (global representation):

- Aseptic bags (~ 90%)
- Bags for bag-in-box (~65%)

* ABMA joined Flexible Packaging Europe (FPE) as “Market Group” in June 2019

What’s special about Industrial Aseptic Bags?

Aseptic bags provide a shelf life of up to 24 months enabling transport and storage in ambient conditions to mitigate seasonal and harvest-related variability

220l (55 gallon) bags used in steel drums

1000l (300 gallon) bags used in IBCs

Tomato processing is global business

=~ 10 million tonnes processed tomatoes produced in Europe

=~ 15-20% processed tomatoes are **imported** from outside of Europe

=~ 20-25% Europe's production is **exported** outside of Europe

- Processed tomatoes are packed in the location where they are processed
- A specific packaging structure for the European market only will complexify the filler's operations
- This may reduce sourcing availability for the European manufacturers of the final product

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OVERVIEW OF NEW EUROPEAN PACKAGING LEGISLATION

Motives for Revision of EU Packaging Legislation

Observation/Perception

- **Too much packaging (=resources) used**
  - Packaging consumption rose from 66 million in 2009 to over 84 million tonnes in 2021 (+27%)
  - Decrease in reusable packaging and increase in single use has worsen the situation
- **Low recycling in practice**
  - Low collection and recycling of many packaging has led to an increase in packaging waste and litter
- **Low use of recycled materials**
  - Plastics secondary raw material is not sufficiently used to ensure circularity
  - Other materials are also being challenged

General approach

Reduce the generation of packaging and packaging waste

Promote a circular economy

Promote/increase the use of recycled content

From a Directive to a Regulation

PPWDirective

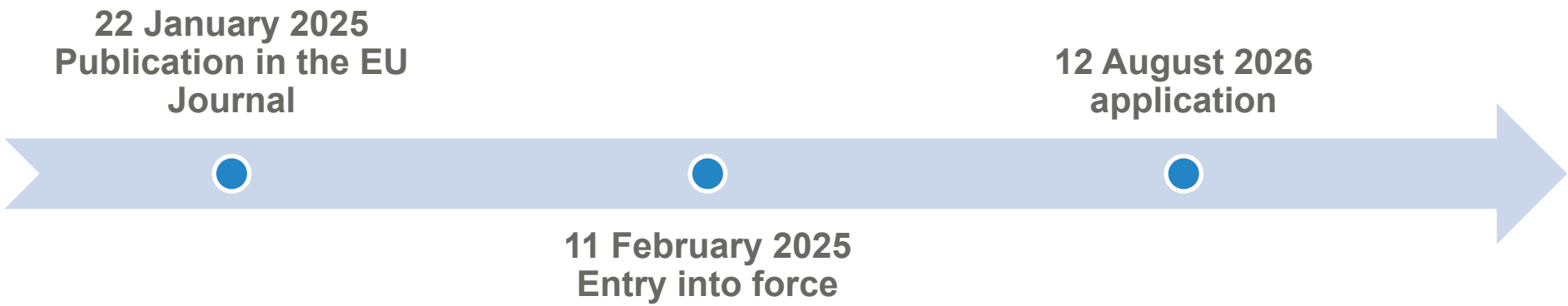
- **EU27 countries need to present national legislation to transpose the Directive** in the respective countries (like for the SUPD)
- This gives **more flexibility** to countries
- But it also **opens the doors to heterogeneous implementation** of EU rules

PPWRegulation

- **EU rules are directly applicable** at national level, without the need of national implementing law
- This gives **less flexibility** to countries
- But **ensures homogeneity of implementation** at national level and **more legal certainty**

PPWR: timeline

- The main text of the PPWR has been approved....



- … But this is only the first milestone. Around **20 pieces of secondary legislation** will have to establish the details of the vast majority of the measures included in the main text
  Even if there are many unknowns, **it is already possible, and recommended, to innovate packaging in the direction of PPWR requirements**.

Main Measures (relevant for flexible packaging)

SUSTAINABILITY REQUIREMENTS

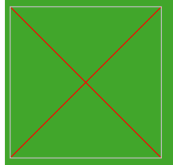
- Recyclability requirements
- Recycled content targets for plastics packaging
- Packaging minimization
- Substances of concern (incl.PFAS)

PACKAGING REDUCTION MEASURES

- Bans
- Reuse and refill targets
- Waste reduction targets

What is a mandatory "Sustainability Requirement"?

- To address the lack of effectiveness of the old Packaging Directive (PPWD), the **sustainability requirements** set out in the PPWR will be an **essential requirement for market access** and will have to be **demonstrated by the manufacturer through a conformity assessment**
  The sustainability requirements are:
  - Substances contained in packaging
    Recyclable packaging
    Minimal recycled material content in plastic packaging
    Compostable packaging
    Packaging minimization
    Reusable packaging



Important details of these requirements will be developed through secondary legislative acts

Manufacturer vs Supplier

- '**Manufacturer**' means any natural or legal person that manufactures packaging or a packaged product; however […] where a natural or legal person has packaging or a packaged product designed or manufactured under its own name or trademark, regardless of whether any other trademark is visible on the packaging or on the packaged product, 'manufacturer' means that natural or legal person;

→ The **food producer** (filler or brand owner) or **importer**

"bag only becomes packaging when filled with product"

- '**Supplier**' means any natural or legal person that supplies packaging materials to a manufacturer;

→ The **producer of bags**

"empty bag is still a product"

Compliance – Supplier vs Manufacturer

- The **manufacturer** must carry out the following obligations:
  - **Carry out the conformity assessment**;
  - Draw up the technical documentation referred to in Annex VII;
  - Draw up the EU Declaration of Conformity under Article 39; and
  - Keep the technical documentation and the Declaration of Conformity available for the required period.
- The **supplier** of packaging or packaging materials must provide the manufacturer with all the **information and documentation necessary for the manufacturer to demonstrate the conformity** of the packaging and the packaging materials with the Regulation

Mandatory Recyclability Requirements

Packaging is defined as recyclable if:

1. **is <u>designed for material recycling from 2030</u>** or 2 years after adoption of design for recycling (DfR) criteria scheduled by 2028.

DfR criteria will be developed by the European Commission **through secondary legislation for each packaging category** (e.g. flexible PE and PP)

Exemption for contact sensitive packaging for pharmaceuticals, medical devices, infant formula and follow-on formula, processes cereal-based food and baby food and food for special medical purposes.

Mandatory Recyclability Requirements

Recyclability performance grade	Design for recycling (DfR) assessment of recyclability per unit, in terms of weighting	Access to market
Grade A	Higher of equal to 95%	Can be placed on the market until 2035 and then assessed for “recycled at scale”
Grade B	Higher or equal to 80%	Can be placed on the market until 2035 and then assessed for “recycled at scale”
Grade C	Higher or equal to 70%	Banned as of 2038
Technically non-recyclable	Lower than 70%	Banned as of 2030 or 2 years after the entry into force of the DfR criteria

Mandatory Recyclability Requirements

Packaging is defined as recyclable if:

1. is **designed for material recycling from 2030** or 2 years after adoption of design for recycling (DfR) criteria scheduled by 2028.

DfR criteria will be developed by the European Commission through secondary legislation for each packaging category (e.g. flexible PE and PP)

2. **is recycled at scale from 2035** or 5 years after adopting the recycling at scale assessment method scheduled by 2030.

Each packaging category (e.g. flexible plastic packaging) **has to reach a minimum of 55% recycling rate at EU level on an annual basis** to be defined as "recycled at scale"

Exemption for contact sensitive packaging for pharmaceuticals, medical devices, infant formula and follow-on formula, processes cereal-based food and baby food and food for special medical purposes.

Mandatory Recycled Content Targets for Plastic Parts in Packaging

Except if representing less than 5% of the total weight of the whole packaging unit.

- **Any plastic part of packaging** placed on the market must contain **minimum percentages of recycled content** coming from **post-consumer plastic waste**.
- This is **calculated per packaging type and format and as an average per manufacturing plant and year.**

Packaging	2030 target	2040 target
Contact sensitive packaging made from PET as the major component (except bottles)	30%	50%
Contact sensitive packaging made from plastic materials other than PET, except plastic beverage bottles	**10%**	**25%**
All other plastic packaging (i.e. non-contact sensitive)	35%	65%

- **Methodology for calculation** and **sustainability criteria for recycling technologies** expected to be set up by **31 Dec 2026** (both covering chemical and mechanical recycling)
- Companies will have to **comply with methodology** for calculation already in **2029**

FPE favours the integrity of Packaging and Packaging Waste Regulation (PPWR)

- Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR) is a core pillar of European packaging and sustainability policy
- **FPE rejects any attempt to reopen or delay the PPWR**
- **The industry urgently needs clear, practical secondary legislation to ensure homogeneous implementation**
- Without urgent intervention and legal certainty, our competitiveness, innovation, and future, is at stake

MEDIA RELEASE

FLEXIBLE PACKAGING EUROPE

13 April 2026

Flexible packaging suppliers need urgent, workable and homogeneous implementation guidance to ensure PPWR integrity

Flexible Packaging Europe (FPE) reiterates its **strong opposition to any attempt to reopen or delay Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR)**, following recent calls from parts of industry to postpone its application and review key provisions.

FPE acknowledges that several implementation challenges remain and are limiting the ability of the supply chain to comply with upcoming requirements. However, these should be addressed through clear, practical and timely secondary legislation ensuring homogeneous implementation, not through reopening the primary legislative framework.

Industry needs urgent support for implementation, not reopening

The publication of PPWR Commission Notice and FAQs is a first step. However, this will not be sufficient on its own. FPE calls on the European Commission to **urgently step up its efforts** and provide the necessary support to the entire packaging value chain through:

- Clear and practical rules enabling compliance with upcoming requirements applying as of August 2026, including **realistic compliance pathways, agreed with national authorities, to ensure homogenous implementation for provisions such as PFAS targets**; and,
- Timely **adoption of fair and workable secondary legislation** on key areas such as recyclability, recycled content for plastic packaging, minimisation and market restrictions to ensure those measures can be implemented in 2030.

Providing this clarity is essential to ensure that companies can comply in **a practical, enforceable and fair manner**, while continuing to innovate.

Flexible Packaging Europe stands ready to support decision-makers to ensure a workable way to implement PPWR. This can be achieved through an urgent high-level dialogue with stakeholders to provide the clarity required for flexible packaging supply chain to ensure PPWR implementation and compliance.

Regulatory stability is key to the Single Market, investment predictability, and competitiveness

The PPWR finally provides a long-awaited harmonised framework on packaging legislation that is essential for the functioning of the Single Market. **Reopening the Regulation risks triggering fragmentation, as Member States may introduce diverging national measures if the European framework is weakened or delayed.**

"The flexible packaging sector is **ready to deliver on the PPWR's objectives**," says Kari Koskela, Chair of Flexible Packaging Europe, "Over the past years, converters across Europe have made significant investments to redesign packaging in line with recyclability, minimisation [illegible] content requirements. It is estimated that the sector has invested more [illegible] **years** in research and development to meet PPWR [illegible]

Further information in FPE press release

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THE SPECIFIC CASE OF INDUSTRIAL ASEPTIC BAGS UNDER PPWR PERSPECTIVE

Is multi-material flexible packaging recyclable or not?

Any product or packaging can be recycled! It is “just“ a matter of efforts!

- In case of multi-material flexible packaging such as wet pet food pouches (PE-ALU-PET), sorting is the issue! For homogenous streams with limited volumes, a dedicated fraction with own sorting technology (e.g. robots) does not make sense.
- Multi-material beverage cartons (Paper-PE-Alu) can be and are recycled as those are sorted in a separate homogenous fraction which is treated in dedicated paper mills and Poly-Al is also separated and threated afterwards.

Recyclability of Industrial Aseptic Bags

CEN methodology to assess packaging recyclability

Green category – full compatibility	Yellow category – limited compatibility	Red category – no compatibility

- Most common structures (PE/mPET, PE/alu/PA, …) are considered **as not recyclable** according to the CEN Flexible PE or PP DfR criteria because **aluminium and PET are in red category**
- **From 2030** products filled (in or outside of Europe) in these structures **will not be allowed to be placed on the market in the EU**

Exemption from Recyclability Requirement as Solution ?

- Some tomato (processing) companies are asking for an exemption from recyclability requirement in PPWR *:

- In order to exempt industrial aseptic bags from recyclability, the main text of PPWR would have to be reopened with risks for stricter measurements and/or diverging national legislations

* Source: “CEO Letter” from 29 April 2026 to EU Commission

Recyclability Requirement vs Extended Producer Responsibility

- Exemption from recyclability requirement **DOES NOT** mean an exemption from the Extended Producer Responsibility (EPR), hence EPR fees will remain applicable to packaging for packaged products (incl. industrial products)
- If a packaging is considered not recyclable, the Producer Responsibility Organisations (PROs) are forced to set the highest fee due to the eco-modulation mandate (in PPWR)

* Source: “CEO Letter” from 29 April 2026 to EU Commission

Closing the gap: How to make aseptic bags circular?

- **Improve the packaging structures** (e.g. mono where appropriate/feasible accelerated evolution) **but acknowledge situations where performance and/or commercially not favourable/feasible** (e.g. not sufficient shelf life)
- **Improve recycling infrastructures** (the focus is not necessarily new but increase quickly the capacity of existing technologies) or **establish dedicated schemes** to create homogenous streams

Initiative to make Industrial Aseptic Bags recyclable

Objective:

- Ensure industrial aseptic bags are **recognized as recyclable under the EU PPWR by 2030**, enabling their continued placement on the EU market

by:

- Establishing an **EU scheme** to **collect and recycle industrial aseptic bags**
- With a dedicated **Extended Producer Responsibility (EPR) scheme** partnering with national **Producer Responsibility Organizations (PROs)**
- A **DfR guideline** compatible with the recycling process established
- (Assess potential of **food grade rPE)**

Initiative should take max **2-3 years** to provide value chain sufficient time for preparation for first harvests effected in Q4 2028

What are the benefits of creating a dedicated system?

- Compliance with the PPWR and ability to place packaged product on the EU market **= continue to operate within the EU**
- **Companies importing in the EU** will not need to pack (or re-pack) their products in a specific packaging
- **Keep shelf life and product quality** as it is
- **Reduce investments** in packaging R&D and CAPEX to adapt machines to new packaging materials
- Keep **control** on how the used multi-material industrial flexible packaging will be recycled and how the EPR fees are defined

Practical and Financial Benefits of a Dedicated Scheme

	Filler (or importer)	**Food processor** (bag becomes ‘waste‘)	
Current situation			
	EPR fee for industrial packaging is only applicable in some EU Member States	Pays disposal costs	Both parties pay
PPWR‘s recyclability requirement			
Mandatory to be recyclable	**EPR fee is reasonable because material is recyclable**	**No disposal costs as waste management is covered by dedicated scheme**	**One party pays**
Exempted from recyclability *	EPR fee is the highest because material is NOT recyclable	Continues paying disposal costs (no scheme willing to take the waste)	Both parties pay

* Requested by the tomato and fruit processing chain on 29 April 2026

Aseptic bags are not the only ones with recyclability issues

Joining forces with other types of multi-material industrial flexible packaging could mean three separate schemes for

- **Aseptic bags for fruits (incl. tomatoes)**
- Large protein packaging for meat, fish and cheese
- Bags for chemical applications (incl. adhesives, personal care, etc.)

with synergies in administration and operations BUT separate logistics and recycling processes

Initiative should take max **3 years** to provide value chain sufficient time for preparation for first harvests effected in Q4 2028

For whom this initiative might be relevant

Companies involved in the following activities:

Packaging material suppliers

- **Packaging material suppliers and converters**

Processing and filling

- **Tomato and fruit processors**
- Meat, fish and cheese producers
- Chemical producers

Manufacturing industry / Brands

- **Tomato- and fruit-based products: ketchup, sauces, fruit juices, …**
- Meat, fish and cheese processers
- Automotive, furniture, packaging, textiles, …

Contributions required

For more information, please contact us:
recycling@aseptic-packaging.org

Contribution based on turnover in this field (proposal):

Category	Turnover	Per year
small	≤ €50M	10.000 €
medium	between €50M and €200M	15.000 €
large	> €200M	25.000 €

- 3 years of commitment (2026 – 2028)
- Total budget required: 500k€ per stream or 1m€ for all 3 streams together
- ABMA members with discounted fee (25% of total)
- 30% of income reserved for coordination issues (staff, communication, travel, others)
- **70% of income available for projects**
- **Early Supporters (= companies joining before 30 June 2026) with potential benefits (e.g. rebate on future EPR fees, refund of membership fees, priority access to recyclates, …)**

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CONCLUSIONS

Future license to operate for the tomato value chain depends on the recyclability of aseptic bags

- **EU's PPWR is only the first legislation implemented in a major region:** Other regions are already following, e.g. California, China, …
  Dedicated scheme enables access to food grade recyclates
- Any exemption from recyclability is just delaying the process and creating more costs PLUS neglecting any responsibility

Collection □ Sorting □ Recycling □ Circularity

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