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Recyclability Test Methods and Grading

Research Signals · October 2026

A Research signal on how packaging recyclability is tested and graded in Europe: the EN 18120 standard series, PFAS test methods for packaging, and RecyClass test protocols. Read for a mid-sized packaging manufacturer that converts film, paper and board for food, beverage and consumer goods brands. Three signals from one cycle.

#	SIGNAL	CONFIDENCE	HORIZON	STATUS
1	Europe's recyclability standard for plastic packaging, EN 18120, was published on April 15, 2026, and CEN approved revisions to it five months later	High	Short-term (3–12 months)	Review
2	The EU's PFAS guidance for packaging sets a three-step test but no harmonized method; a CEN fluorine method for paper and board started on May 21, 2026	Medium	Short-term (3–12 months)	Review
3	RecyClass revised its recyclability guidelines and test protocols in March 2026 and passed 500 lab evaluations in July, re-rating inks, adhesives and sealants	Medium	Short-term (3–12 months)	Review

Every signal rests on two or more dated events. Confidence is published as a band. Where a signal sits below High, the reasoning names the evidence that is missing. Status says where the evidence stands: Verified, Review, or Inconclusive — we looked, and the evidence does not yet support a firmer call.

SIGNAL 1 OF 3

Europe's recyclability standard for plastic packaging, EN 18120, was published on April 15, 2026, and CEN approved revisions to it five months later

HIGH Short-term (3–12 months) · Validation & Technical Milestones · **Review**

CEN/TC 261 published the EN 18120:2026 series on design for recycling of plastic packaging on April 15, 2026, including the protocols for PE and PP flexible packaging, PE and PP rigid packaging, and PS and XPS rigid packaging. On September 24, 2026, CEN approved revision projects for parts 1, 3 and 13, and parts 12 and 14 also show a revision in development. Paper and board methods are in draft; none is published.

REASONING

Dated standards-body records show a series published as one batch and reopened within five months. The parts being reworked include the ones that cover pouches, films and trays. That makes the edition on a test report matter. One EPR scheme view, from a Verpact, Fost Plus and Valipac presentation on June 16, 2026, expects the grade calculation "probably by 2027", with one or two EN 18120 revisions before 2030. That is a scheme's view, not a Commission date. The status is Review because the publication and revision stages are read from a catalogue that reports CEN data, not from CEN's own catalogue.

PATTERN

April 15, 2026: CEN published EN 18120-1 (definitions and principles), EN 18120-12 (PE and PP rigid protocols), EN 18120-13 (PE and PP flexible protocols) and EN 18120-14 (PS and XPS rigid protocols). May 4, 2026: EVS-EN 18120-1 became valid in Estonia. May 18, 2026: the publication date given in Genorma's CEN listing. June 15, 2026: the Austrian draft of CEN/TS 18345-3, a laboratory test method for paper and board recyclability, was dated. June 24, 2026: CEN announced the series, naming Part 3 (sortability by NIR, magnetic and eddy-current separation) and protocols for PET bottles, PET rigid, PE and PP rigid, PE and PP flexible, PS and XPS rigid and EPS. September 24, 2026: CEN approved revision projects for parts 1, 3 and 13. October 15, 2026: the formal vote on FprCEN/TS 18382, for biodegradable rigid plastics, closed and the proof was returned; it is not yet published.

IMPLICATION

A recyclability test report for a pouch, film or tray is tied to one edition of one part. The EU's design-for-recycling delegated act is due by January 1, 2028, and its design condition applies from January 1, 2030 or 24 months after the act, whichever is later. If that act cites a revised edition, reports run against the 2026 edition may need to be repeated. For paper and board formats, no published method exists yet to test against.

RECOMMENDED ACTION

By the end of 2026, record the EN 18120 part and edition, for example EN 18120-13:2026, on every recyclability test report for your pouches, films and trays, and map each format to its part. Plan to retest when the revised edition is cited under the EU's design-for-recycling rules.

SOURCES & WHAT THEY SIGNAL

- [CEN-CENELEC — EN 18120 on recyclable plastic packaging, June 24, 2026](#) — CEN's announcement of the series, its sortability part and stream protocols.

- [Genorma — EN 18120-13:2026](#) — PE and PP flexible protocols; published April 15, 2026.
- [Genorma — prEN 18120-1 rev](#) — Revision project approved September 24, 2026.
- [EVS — EVS-EN 18120-1:2026](#) — National edition valid from May 4, 2026.
- [DIN Media — ONR CEN/TS 18345-3 draft, June 15, 2026](#) — Paper and board laboratory test method, still in draft.

SIGNAL 2 OF 3

The EU's PFAS guidance for packaging sets a three-step test but no harmonized method; a CEN fluorine method for paper and board started on May 21, 2026

MEDIUM Short-term (3–12 months) · Method & Infrastructure Access · **Review**

Commission Notice C/2026/3084, published in the Official Journal on June 10, 2026, sets out a stepwise PFAS test for packaging and states that there is no harmonized EU method. Packaging at or below 50 mg/kg total fluorine can be considered compliant. A CEN project for measuring fluorine in food-contact paper and board, prEN 18472, started on May 21, 2026, with no planned dates listed.

REASONING

The Notice and the CEN project are dated, primary records, and they show the gap between the test the guidance describes and the method a lab can cite. The Notice is one document at two stages: a draft approved in March and the final text published in June. Its three steps are total fluorine first; above 50 mg/kg, a method such as pyrolysis-GC/MS to confirm whether the fluorine is organic; then direct analysis of targeted PFAS. The Commission says, on current evidence, that samples that pass step 1 also pass steps 2 and 3. The CEN project covers combustion ion chromatography, with guidance on estimating total, inorganic and organic fluorine.

PATTERN

March 30, 2026: the Commission approved the draft guidance Notice (reported April 1, 2026). May 21, 2026: CEN/TC 172/WG 3 started project prEN 18472, fluorine in food-contact paper and board by combustion ion chromatography. June 5, 2026: Commission Notice C/2026/3084 was dated. June 10, 2026: the Notice was published in the Official Journal.

IMPLICATION

Until a harmonized method is published, results can differ between labs. A total fluorine result above 50 mg/kg does not on its own show that PFAS are present, because inorganic fluorine also counts in the screen. For coated paper and board with mineral fillers, reporting a screen failure to a customer before the organic fluorine step is done could raise a false compliance issue.

RECOMMENDED ACTION

Before your next round of PFAS testing, ask each lab which fluorine method it uses, how it separates inorganic fluorine from the total, and what its measurement uncertainty is. For coated paper and board with mineral fillers, ask for the step 2 organic fluorine result before you report a screen failure to a customer.

SOURCES & WHAT THEY SIGNAL

- [EUR-Lex — Commission Notice C/2026/3084, June 10, 2026](#) — The three-step PFAS test, the 50 mg/kg screen and no harmonized EU method.
- [Packaging Law — European Commission publishes final PPWR guidance in advance of August 2026 application date, April 1, 2026](#) — Draft Notice approved by the Commission on March 30, 2026.
- [Food Packaging Forum — PPWR PFAS limits apply from August 12, August 12, 2026](#) — Dates the Notice to June 5, 2026.

- [DIN — prEN 18472 project page](#) — CEN fluorine method for paper and board; project start May 21, 2026.

SIGNAL 3 OF 3

RecyClass revised its recyclability guidelines and test protocols in March 2026 and passed 500 lab evaluations in July, re-rating inks, adhesives and sealants

MEDIUM Short-term (3–12 months) · Validation & Technical Milestones · **Review**

On March 11, 2026, RecyClass updated its Design for Recycling Guidelines after more than 20 testing campaigns in 2025 and revised its evaluation protocols. On July 6, 2026, it reported more than 500 recyclability evaluations, all run by independent third-party labs. The changes reach inks, laminating adhesives and sealants.

REASONING

Two dated announcements from the protocol owner show the ratings for common pack components changing in 2026. The March update changed the printing limit for transparent film and re-rated PVB-based inks and sealants on PET thermoforms. The July evaluations covered laminating adhesives for flexibles, alternatives to nitrocellulose inks and label adhesives on PET and HDPE bottles. RecyClass says its tools are compatible with EN 13430 and EN 18120. Its protocols page states the tests replicate European recycling "at laboratory scale", so a lab result is not proof at plant scale.

PATTERN

March 11, 2026: RecyClass updated its Design for Recycling Guidelines and revised its evaluation protocols. The transparent-film printing limit is now ink as a share of packaging weight, not print coverage. PVB-based inks are fully compatible with PE and PP films. EVA sealants on clear PET thermoforms are fully compatible, and copolyester sealants are not compatible. July 6, 2026: RecyClass announced more than 500 recyclability evaluations, including laminating adhesives for flexibles, alternatives to nitrocellulose inks and label adhesives on PET and HDPE bottles (reported July 21, 2026).

IMPLICATION

Inks, adhesives and sealants are being re-rated. A converter's existing RecyClass letter may rest on an older protocol version, and a format that passed before may rate differently under the current one. Formats with print on transparent film or copolyester sealants on PET trays are the most exposed to the March changes.

RECOMMENDED ACTION

Within the next quarter, list each format's RecyClass letter with the protocol version it was tested under. Recheck first any format that uses nitrocellulose inks, prints on transparent film or has a copolyester sealant on a PET tray.

SOURCES & WHAT THEY SIGNAL

- [RecyClass — RecyClass updates packaging recyclability recommendations following extensive testing in 2025, March 11, 2026](#) — Printing limit, PVB inks and PET thermoform sealant ratings.
- [RecyClass — RecyClass surpasses 500 recyclability tests supporting industry readiness for PPWR, July 6, 2026](#) — More than 500 third-party lab evaluations; adhesives and inks covered.
- [RecyClass — Testing protocols](#) — States the protocols replicate European recycling at laboratory scale.

SET UP A SIGNAL ON YOUR QUESTION

Your question, checked every cycle.

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