

Fee Modulation Plastic 2026 Scheme

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Fee Modulation Plastic 2026 Scheme

The Fee Modulation Plastic 2026 Scheme (hereinafter: the 'Scheme') replaces the Fee Modulation Plastic Scheme 2025 which remained in effect until 31 December 2025. The old scheme therefore has ceased to be valid as of 1 January 2026. Terms that are written with an initial capital letter in the Scheme have the meaning set out in the Packaging Waste Management Contribution Agreement (the 'ABBO') and the Verpact Policy 2026 ('the Policy'), unless explicitly stated otherwise. The ABBO and the Policy continue to apply to the Producer and/or Importer ('the P/I') that are making use of the Scheme.

Purpose of the Fee Modulation Plastic Scheme

The Scheme is intended to encourage the packaging industry to market Packaging that has better recyclability. Better recyclability means that more material can be recycled and that the quality of the recycled material is also improved. This is done in stages, meaning that Packaging does not necessarily have to be 'optimal recyclable' according to the conditions of the KIDV Recycle Check, but that well-defined design changes that make the recycling process more effective will also be rewarded. Better/easier recyclability for Packaging is more beneficial for the environment and leads to lower net processing costs for Verpact. For more information on whether your Packaging is ready for the future click [here](#).

As a complement to the Scheme, an innovation traject has been set up to foster innovations in materials and processes. These innovations are not, or cannot be, yet applied on a large scale in the existing system, but over time they will improve the recyclability, circularity, and sustainability of plastic Packaging.

Annex 7 of the Scheme describes the conditions that innovations must comply with in order to be eligible for the innovation traject.

Principles of the Fee Modulation Plastic 2026 Scheme

Under Article 1.3 of Annex 1 to the ABBO, Verpact may encourage the use of Packaging that is optimal recyclable by applying a reduced rate (hereinafter: fee discount) to the material rate for plastic from the Packaging Waste Management Contribution. The Scheme provides for the application of a fee discount and is based on the following principles:

- The fee discount is determined per disposable unit. It is necessary to determine whether Packaging consists of one or more disposable units.
- If Packaging consists of multiple disposable units, each such unit will be assessed separately;
 - The Scheme distinguishes between rigid and flexible plastic disposable units, as they have different costs and returns in the collection and recycling of packaging waste.
 - Packaging may contain disposable units that are eligible for a fee discount and other units that are not.
- A fee discount only applies to material rates for rigid and flexible plastic, not for other materials. The discount then applies to all plastic components in the disposable unit.
- The fee discount does not apply to deposits or other fee components or discount schemes, as a different rate is applied to that Packaging.
- The fee discount can be applied by a P/I by completing the Packaging Waste Management Contribution Declaration for those disposable units with the properties as described in the Scheme.
- Verpact must be able to verify that the application of the lower rate is justified.
- The evidence for the discount claimed, insofar as it is not available on site, must be submitted to Verpact within a reasonable amount of time. If no evidence is provided, the Scheme cannot be applied.
- The Scheme is reviewed on an annual basis to ensure that it remains up to date as well as to improve its effectiveness.

The maximum discount that a disposable unit can receive for Fee Modulation Plastic for the tax year of 2026 is EUR 0.60 per kg.

Preconditions for applying the fee discount for deployment of post-consumer recycle (PCR)

The fee discount for deployment of PCR applies to all plastic disposable units if all preconditions have been met:

- PCR must be present.
- The discount applies to all plastic components, rigid or flexible, for which a plastic material rate applies.
- All plastic disposable units where > 50% of the weight is plastic.
- There are no restrictions regarding the dimensions of the disposable unit: small disposable units < 3 cm can be eligible for a discount for the deployment of PCR and large as well as rigid disposable units ≥ 5 litres.
- There is no restriction on the contents of the Packaging, such as paint, latex, silicone and cement.
- There is no restriction on the type of rigid or flexible plastic used, such as PVC, PVdC, PETG, silicone or rubbery substances.

The following discounts apply:

- **EUR 0.20 discount on contact sensitive materials with at least 10% PCR.**
- **EUR 0.20 discount on non-contact sensitive materials with at least 20% PCR.**

See [Annex 1](#) for more details on the Scheme.

Preconditions for applying the fee discount for other 4 fee discounts

To qualify for the remaining fee discounts, a disposable unit must meet all of the following preconditions:

- All disposable units where > 50% of the weight is plastic.
- All materials that the disposable unit is composed of must be described, and the weight of each material must be recorded.
- The disposable unit must consist of at least 70% of one of the following materials (*the target material*):
 - Rigid PET, PE, PP and PE/PP. **
 - Flexible PE, PP and PE/PP. **
 - This applies even if the materials are made of recycled material, e.g. rPET or rLDPE.
 - This also applies to Bio-PE, Bio-PP and Bio-PET, which have the same molecular structure as PE and PET respectively. **
 - Other materials do not receive a discount for other properties;
- Rigid disposable units can only qualify for fee modulation if they are *> 3 cm and ≤ 5 litres*.
- Flexible disposable units can only qualify for fee modulation if they are > 3 cm.
- A rigid disposable unit refers to inflexible packaging that cannot be easily deformed or crumpled (even when empty). Properties:
 - The material of the main component is usually thicker than 180 µm.
 - When empty and before it is filled, the packaging usually has the same shape as when it is filled.
- All disposable units that are not rigid fall into the category of flexible disposable units;
- A disposable unit must not contain interferants: oxo-degradable materials, PVC, PVdC, silicone or rubbery substances.
- The target material must not contain PETG.
- The disposable unit must not have been in direct contact with paint, latex, silicone or cement. These substances complicate or prevent the recycling process for plastics.

**See [Annex 2](#)

If a disposable unit meets the preconditions, it may be eligible for a fee discount. A discount on the plastic rate can be granted for four different properties per disposable unit.

The following discounts apply:

- **EUR 0.10 discount if the disposable unit meets the discount step criteria: Mono-material.**
- **EUR 0.10 discount if the disposable unit meets the discount step criteria: Colour.**
- **EUR 0.10 discount if the disposable unit meets the discount step criteria: Labels, sleeves, in-mould labels and direct printing.**
- **EUR 0.10 discount if the disposable unit meets the discount step criteria: KIDV Recycle Check.**

Conditions for applying the fee discount for mono-material:

The plastic materials in the disposable unit receive the fee discount of EUR 0.10 per kg if the target material consists of mono-material.

- For a **rigid target material**, the mono-material consists of at least 95% PET or PE or PP.
- For a **flexible target material**, the mono-material consists of at least 90% PE or PP.

Further details on the conditions for this discount step are set out in [Annex 3](#) of the Scheme.

Conditions for applying the fee discount for colour:

The plastic materials in the disposable unit receive the fee discount of EUR 0.10 per kg if at least 90% of the target material is colourless, natural or white coloured.

A colourless/natural disposable unit contains target material to which no colourant has been added. A white disposable unit contains white target material (or light-coloured if demonstrably made using recycle). The Scheme also applies to materials to which white colourant has been added.

Further details on the conditions for this step of the discount process are described in [Annex 4](#) of the Scheme.

Conditions for applying the fee discount for labels, sleeves, in-mould labels and direct printing:

The plastic materials in the disposable unit are eligible for the fee discount of EUR 0.10 per kg if they do not have any labels, sleeves, in-mould labels or direct printing, or if they meet the conditions described in [Annex 5](#) of the Scheme.

Conditions for applying the fee discount for the KIDV Recycle Check:

Plastic materials in a disposable unit receive a fee discount of EUR 0.10 per kg if the disposable unit is 'optimal recyclable' according to the KIDV Recycle Check for the current year for which the fee discount is being applied. The KIDV Recycle Check assesses the degree of recyclability based on detailed questions about the composition of a disposable unit.

Further details on the conditions for this step of the discount process are described in [Annex 6](#) of the Scheme.

Participation in the Fee Modulation Plastic 2026 Scheme

In order to participate in the Scheme, the P/I must complete the relevant sections in the Packaging Waste Management Contribution Declaration correctly and in full, sign them digitally, and submit them by 31 March of the following calendar year at the latest. A postponement for the submission of the Declaration is only possible in exceptional circumstances and with the prior written consent of Verpact. A request for postponement must be submitted to Verpact no later than three working days before 1 April. In this case, we adhere to the Verpact Policy 2026.

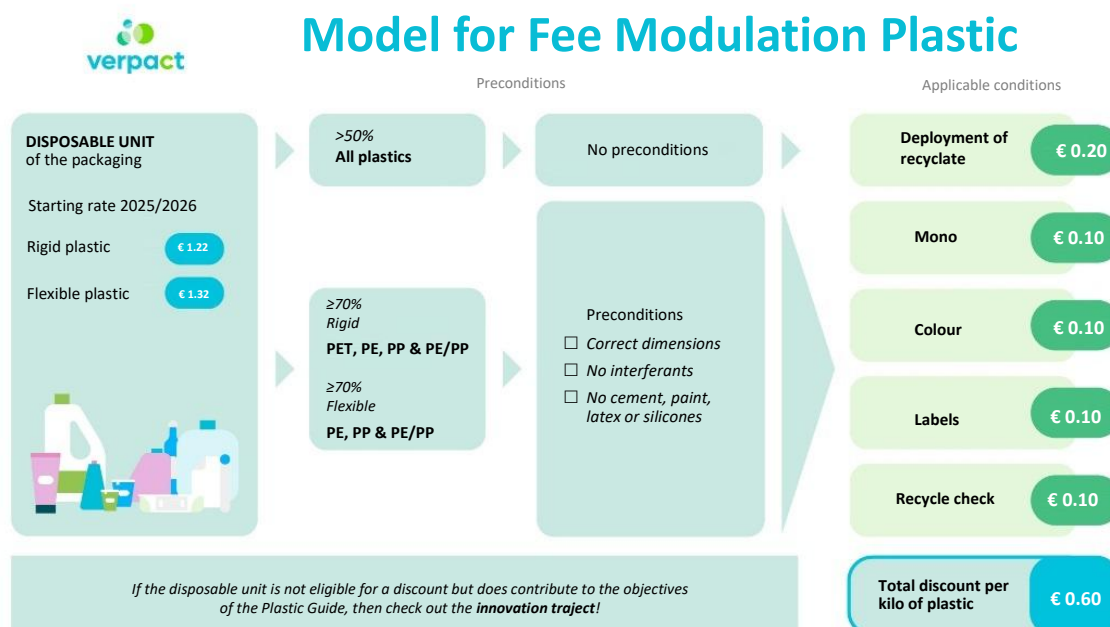
At Verpact's request, the P/I must at all times be able to demonstrate that one or more disposable units for which a discount is applied meet the conditions set out in the Scheme. The P/I is required to keep records for this purpose and to retain them for at least seven calendar years in accordance with the conditions set out in the Policy. See the annexes for the required supporting evidence for each discount step.

Fee discounts apply to material rates for rigid plastics and flexible plastics. This applies to primary, secondary and tertiary Packaging. Click [here](#) for the current rates.

The indirect export declaration does not distinguish between discount steps, but uses a single adjusted rate. No claim can be made for the fee discount.

Model for Fee Modulation Plastic 2026

A visual model has been developed to accompany this Scheme, presenting a clear representation of the system and principles of fee modulation. This model is intended to provide insight into the criteria behind the Scheme.



Annex 1

Conditions for the deployment of post-consumer recycle (PCR)

Explanation of the discount step

The purpose of the discount for using post-consumer recycle is to increase the demand for recycle. Recycle is often more expensive than virgin material, and in some cases more material is needed to achieve comparable properties for packaging. This discount helps to compensate for that. A higher demand for recycle helps to further develop the collection, sorting and recycling chain.

Definitions

Post-Consumer Recycle

Contact sensitive disposable units

Conditions

- Contact sensitive materials contain at least 10% PCR.
- Non-contact sensitive materials contain at least 20% PCR.

Calculating the PCR percentage

To take advantage of the 'Deployment of post-consumer recycle' discount step, the percentage of PCR must be calculated based on the weight of the plastic in the entire disposable unit.

For example: For contact sensitive disposable units, > 10% PCR plastic must be present in the disposable unit in order to make use of the 'Deployment of post-consumer recycle' discount step.

The Packaging is a single disposable unit with a total share of plastic content of 20 grams, as shown below (21 grams including the paper label):

- A 15-gram plastic bottle, of which 1 gram is (contact sensitive) PCR
- A 5-gram plastic closure, of which 5 grams is (contact sensitive) PCR
- A 1-gram paper label.

Of the total 20 grams of plastic in the disposable unit, 6 grams consists of (contact sensitive) PCR. This means that the disposable unit consists of 30% PCR and could therefore be eligible for this discount step. The paper label is not included in this calculation, as the PCR share is calculated based on the plastic weight.

*Minimum % = (weight of PCR in disposable unit / total weight of plastic in disposable unit) * 100%*

- For contact sensitive disposable units, the disposable unit must contain more than 10% PCR.
- For non-contact sensitive disposable units, the disposable unit must contain more than 20% PCR.

Supporting evidence for eligibility for this discount step:

- a. Evidence that the disposable unit meets the conditions must be documented in the supplier's specification for the Packaging or packaging material.
- b. The supporting evidence for the deployment of PCR and its share in the disposable unit must be documented in the specification(s) of the supplier(s) for all elements in the disposable unit:
 - All components of the disposable unit that contain plastic must be included in the analysis, including closures, lids and labels.
 - The weight of the various parts of the disposable unit must be recorded in the specification(s), including the share of PCR by weight.
 - Whether or not the disposable unit is contact sensitive must be documented.
- c. Signed declarations from the supplier stating the share of PCR in the various parts of the disposable unit and substantiating the percentages must only be submitted as an alternative if no specification is available or if the material composition is not, or not fully, described in the specification or material data sheet.

Annex 2

Preconditions for the target material

Explanation of preconditions

When recycling a disposable unit, it is important to know what material will ultimately become the new raw material. This is called the target material. Everything involved in the process of collection, sorting and recycling is aimed at getting the target material to the right place, and ensuring it is processed as purely as possible into the new raw material. Ideally, the target material will be the most prevalent material in the disposable unit. To ensure an effective sorting and recycling process, it is important for there to be enough target material in the disposable unit. Other materials are a limiting factor in the process; they must be separated from the target material and, in many cases, are disposed of as residual waste and not recycled further.

Definitions

Target material

Preconditions

To qualify for a fee discount, the disposable unit must consist of at least 70% of the following target materials.

Rigid Packaging:

- PET (A-PET, rPET, Bio-PET)
- PE (PE, HDPE, MDPE, LDPE, LLDPE, BOPE, rPE, Bio-PE)
- PP (PP, CPP, BOPP, OPP, rPP, Bio-PP)
- Combination of PE and PP (this applies to all variants above)

Flexible Packaging:

- PE (PE, HDPE, MDPE, LDPE, LLDPE, BOPE, rPE, Bio-PE)
- PP (PP, CPP, BOPP, OPP, rPP, Bio-PP)
- Combination of PE and PP (this applies to all variants above)

More information on assigning the target material and calculating the target material can be found [here](#).

Determining the percentage of target material in a disposable unit

To determine whether a disposable unit is eligible for the 'Mono-material', 'Colour', 'Labels, sleeves, in-mould and direct printing' and/or 'Recycle Check' fee discounts, a calculation must be made in order to determine whether the disposable unit consists of at least 70% of the permitted target material.

Example 1:

The disposable unit below consists of 3 components with PET and PP types of rigid plastic.

Disposable unit component	Material rate	Material	Weight (g)	Share of plastic material in disposable unit (%)*	Target material total of at least 70%
Bottle	Rigid plastic	PET	15	71%	Yes
Closure	Rigid plastic	PP	5	24%	No
Label	Flexible plastic	PP	1	5%	No
		<i>Total</i>	<i>21</i>	<i>100%</i>	

A minimum of 70% of the disposable unit must consist of rigid PET, PE, PP and PE/PP. This disposable unit consists of 71% rigid PET plastic and meets the requirement of at least 70% of the permitted target material.

Example 2:

The disposable unit below consists of 3 components with the types PE and PP.

Disposable unit component	Material rate	Material	Weight (g)	Share of plastic material in disposable unit (%)*	Target material total of at least 70%
Bottle	Rigid plastic	PE	19.5	85%	Yes
Closure	Rigid plastic	PE	2.5	11%	Yes
Label	Flexible plastic	PP	1	4%	No
		<i>Total</i>	<i>23</i>	<i>100%</i>	

This disposable unit consists of 96% rigid PE plastic and meets the requirement of at least 70% of the permitted target material.

* Share % = (component weight/total disposable unit weight) * 100%

Annex 3

Conditions for mono-material composition

Explanation of the discount step

The material composition of a disposable unit is important for the quality and homogeneity of the recyclate. The recyclate of a mono-material can often be reused in new Packaging. Several conditions are imposed on rigid and flexible target materials.

Definitions

Polymer

Conditions

Rigid target materials:

For a **rigid target material**, the mono-material consists of at least 95% PET or PE or PP. Therefore, a maximum of 5% additives that are inseparably bonded to the target material may be used, such as layers of materials other than the target material, barriers, coatings and inks. Sub-components such as labels and closures made of materials other than the target material are not included here, as they can be removed during recycling.

Please note: The conditions for mono-PET are stricter than those for mono-PE and mono-PP.

The target material in the rigid disposable unit is made of one dominant polymer, but may consist of multiple layers of the same polymer type. The following conditions apply:

- PET: The target material consists of at least 95% PET, but contains no layers of other materials. A maximum of 5% additives may be used. Examples include coatings (SiOx and AlOx) and inks.*
- PE or PP: The target material consists of at least 95% PE or PP, with no more than 5%* additives. Examples include EVOH (including tie layer) and coatings (SiOx and AlOx) and inks used.*

Flexible target materials:

For a **flexible target material**, the mono-material consists of at least 90% PE or PP.

Therefore, a maximum of 10% additives that are inseparably bonded to the target material may be used, such as layers of materials other than the target material, barriers, adhesive layers between layers (tie layers), coatings and inks. Sub-components such as labels made of materials other than the target material and closures are not included here.

The target material in the flexible disposable unit is made of one dominant polymer, but may consist of multiple layers of the same polymer type. The following conditions apply:

PE or PP: The target material consists of at least 90% PE or PP, with no more than 10%* additives. Examples include EVOH (including tie layer) and coatings (SiOx and AlOx) and inks.*

Calculating the percentage of mono-material in the target material

To determine whether a disposable unit qualifies for the 'Mono-material' discount step, it is necessary to calculate whether the disposable unit meets the correct percentage of target material.

In this example calculation, we first break down the materials used in the disposable unit. For the mono step, the calculations continue using the PE rigid target material.

Disposable unit component	Material rate	Material	Weight (g)	Share of plastic material in disposable unit (%)**	Target material total of at least 70%	Mono target material (rigid/flexible/none)
Bottle	Rigid plastic	PE	19.5	85%	Yes	Rigid
Closure	Rigid plastic	PP	2.5	11%	Yes	None
Label	Flexible plastic	PP	1	4%	No	None
		Total	23	100%		

The target material is further broken down below; in this case, the bottle has 19.5 grams of rigid PE:

Bottle materials	Material type	Weight (g)	Share of bottle material (%)*
Barrier ***	EVOH including connecting layer	0.5	3%
Basic material ***	PE	19	97%
	Total	19.5	100%

This bottle consists of at least 95% rigid PE, has a maximum of 5% additives and therefore meets the conditions for the 'Mono-material' discount step.

* **Maximum % = (weight of additives / total weight of target material) * 100%**

** Share % = (weight component / total weight of disposable unit) * 100%

*** A layer usually has a thickness of more than 1 micrometre (1µm=10⁻⁶m). A coating is usually several nanometres thick (nm=10⁻⁹m).

Supporting evidence for eligibility for this discount step:

- a. Evidence that the disposable unit meets the conditions must be documented in the supplier's specification for the Packaging or packaging material.
- b. Evidence for mono-materials must be documented in the supplier's specification for the Packaging or packaging material:
 - The supporting evidence applies to all parts in the disposable unit that contain the target material, including closures, lids and labels.
- c. Signed declarations from the supplier stating the material structure and substantiating the percentages must only be submitted if no specification is available or if the material structure is not, or not fully, described in the specification or material data sheet.
- d. A photograph of the disposable unit should preferably be included, or a sample should be made available.

Annex 4

Conditions for the target material colour

Explanation of the discount step

The colour of a target material is important in determining the extent to which the recyclate can be used.

Natural/colourless and white recyclate can often be reused for natural/colourless and white material, but it can also be used in coloured recyclate.

- Natural/colourless and white for PE and PP have a wider range of applications than coloured PE and PP.
- Natural/colourless PET has a wider range of applications than coloured and white PET.

Conditions

- PE and PP = natural/colourless or white
- PET = natural/colourless
- For a multi-layer target material, this condition applies to all material layers and coatings. The target material must be natural/colourless or white throughout. The use of, for example, dark recyclate as an intermediate layer also causes discolouration during the recycling process and is not eligible for a fee discount. The same applies to plastic laminates with an aluminium layer created using vapour deposition.
- The requirement is that at least 90% of the weight of the target material complies with the colour criterion. In the case of a small coloured PP cap on a colourless PP bottle, the cap must weigh less than 10% of the target material:
For example, if a coloured PP cap is used on a colourless PP bottle, both the bottle and the cap are target materials, and the coloured cap may constitute a maximum of 10% of the weight of the target material.

Calculating the percentage of colour in the target material

To determine whether a disposable unit that contains a coloured component is eligible for the 'Colour' discount step, a calculation must be carried out to determine whether at least 90% of the target material of the disposable unit meets the colour preconditions.

In the example below, the total weight of the target material PE (rigid plastic) is 22 grams. Of the target material, only the bottle, weighing 19.5 grams, meets the conditions for the 'Colour' discount step, which is 89% of the target material. This disposable unit does not meet the conditions for colour.

Disposable unit component	Material rate	Colour	Material	Weight (g)	Share of plastic material in disposable unit (%)*	Target material total of at least 70%	Colour % **
Bottle	Rigid plastic	natural	PE	19.5	85%	Yes	89%
Closure	Rigid plastic	blue	PE	2.5	11%	Yes	x
Label	Flexible plastic	White printed	PP	1	4%	No	x
			Total	23	100%		

* Share % = (component weight/total disposable unit weight) * 100%

** Share % of colour = (weight component of correct colour/total weight target material) *100%

Supporting evidence for eligibility for this discount step:

- Evidence that the disposable unit meets the conditions must be documented in the supplier's specification for the Packaging or packaging material.
- The supporting evidence for the target material colour must be set out in the specification from the supplier for the disposable unit or packaging material:
 - All components containing target material must be included in the analysis.
 - In the case of PE and PP, the material must be classified as colourless, natural and/or white, including any additives. Only white may be added as a colourant.
 - For PET, the material, must be classified as colourless/natural and transparent, including any additives. There is an exception in the case of colourants, where a very small amount of blue colourant may be added to camouflage yellowing of the material. The material must retain a colourless transparent or light blue appearance.
- Signed declarations from the supplier stating the colour must only be submitted if no specification is available or if the colour is not described in the specification.
- A photograph of the disposable unit should preferably be included, or a sample should be made available.

TIP A [guide](#) on providing supporting evidence for the target material colour has been written for reference purposes, indicating how to demonstrate whether the material is natural/colourless or white.

Annex 5

Conditions for labels, sleeves, in-mould labels and direct printing

Explanation of the discount step

For recycling packaging, it is important for the target material to be recognisable, sorted into the proper material stream, and recycled as effectively as possible.

Disposable units with labels, sleeves, in-mould labels or direct printing can affect the recycling process in two ways:

1. The degree of coverage of labels, sleeves, in-mould labels and direct printing can interfere with the sorting process for the disposable unit. Large labels and printed surfaces can block the infrared rays of an NIR scanner, preventing it from determining the type of target material and sorting the material into the appropriate material stream.
2. The choice of material for labels, sleeves and in-mould labels affects the quality of recycling because they must be easy to remove and they also need to be processable once separated from the target material itself.
3. Inks used in direct printing affect the recyclability of the target material and should therefore be avoided as much as possible

Definitions

Carbon black

NIR (near-infrared)

Degree of coverage

Conditions

Disposable units without labels, sleeves, in-mould labels or direct printing are ideal for recycling. They are therefore eligible for a fee discount.

Rigid and/or flexible disposable units that use labels, sleeves or direct printing are only eligible if all conditions have been met.

Rigid

Material:

- Labels, sleeves and/or in-mould labels are made of PE and/or PP.
- They also do not contain layers of other materials such as PET, paper or aluminium.

Printing:

Printing is only permitted on the label, in-mould label or sleeve. There is no direct printing on the target material, except for a possible date code, batch code and batch number.

Degree of coverage by labels or sleeves:

Disposable units can be properly sorted if labels, sleeves and direct printing cover only a small area of the target material (low degree of coverage). They must remain below the following degree of coverage:

- For disposable units with a volume < 500 ml, the degree of coverage may be a maximum of 50%*.
- For disposable units with a volume $\geq$ 500 ml, the degree of coverage may be a maximum of 70%*.

If the degree of coverage is higher and one or more of the following factors apply, then the disposable unit cannot be properly sorted and is not eligible for a fee discount:

- The material (i.e. the entire surface) used for labels, sleeves or in-mould labels is coloured with pigments that contain carbon black.
- Labels, sleeves or in-mould labels are printed with a colour that contains carbon black, with a higher degree of coverage than indicated above. This does not apply to text (tables, numbers and letters). Carbon black is often used in inks for text, but the degree of coverage is usually lower because text is not a solid coloured area, but thin lines between which the NIR can still recognise the background.
- Labels, sleeves or in-mould labels are visibly metallised over an area greater than the permitted degree of coverage.
- If the material of the labels, sleeves or in-mould labels is not the same as the target material and the material is not light-permeable, such as an intermediate layer coloured with carbon black or a metallised layer.
- If the material of the labels, sleeves or in-mould labels is not the same as the target material and the labels, sleeves or in-mould labels do not meet the material thickness requirement of > 120 μm .

In-mould labels

In-mould labels must meet the same conditions as all other labels and sleeves with regard to degree of coverage and choice of material. There are two types of in-mould labels. The two types are subject to different conditions:

- In-mould labels where the material is permanently fused with the target material.
For this variant, the material used to make the in-mould label must be colourless or white. This is because a permanent in-mould label cannot be separated and is a part of the target material.
- In-mould labels that use a technique that allows them to be removed during recycling, as with removable labels. For this variant, there are no restrictions on the colour of the material used for the in-mould label, as it will be separated from the target material.

Flexible

Label material:

- Labels are made from the same material as the target material (PE or PP),
- A PE label is applied to PP packaging
- Labels do not contain layers of other materials such as PET, paper or aluminium

Printing:

- Direct printing is allowed.

Degree of coverage

Disposable units can be properly sorted if labels and printing cover only a small area of the target material (low degree of coverage). They must remain below the following degree of coverage:

- For all sizes of disposable units, the label or printing must cover < 30% of the surface area of the disposable unit.

If the degree of coverage is higher and one or more of the following factors apply, then the disposable unit cannot be properly sorted and is not eligible for a fee discount:

- The label material (i.e. the entire surface) is coloured with pigments that contain carbon black.
- Labels or sleeves contain a layer that is impervious to light, such as an intermediate layer that contains carbon black or a metallised layer.
- Labels or sleeves are printed with a colour that contains carbon black, with a higher degree of coverage than indicated above.
- Labels or sleeves are visibly metallised on the outside over an area greater than the permitted degree of coverage.

Calculating the degree of coverage of discard unit label

Click [here](#) for an explanation of how the degree of coverage of labels and sleeves is determined and [here](#) for the NTCP Label Calculator.

Supporting evidence for eligibility for this discount step:

- a. Evidence that the disposable unit meets the starting conditions must be documented in the supplier's specification for the packaging or packaging material.
- b. When applying large areas of black or dark colours to labels, in-mould labels, sleeves and direct printing, the use of carbon black must be excluded. If this is not evident from the specifications, a declaration signed by the supplier must be submitted stating that the use of carbon black is excluded.
- c. A photograph with an overview of the disposable unit, showing all labels and sleeves, should preferably be included.
- d. If applicable, a description demonstrating the degree of coverage is required. If necessary, a screen print of the NTCP tool.
- e. When using removable in-mould labels, a declaration from the supplier must be added, stating that the labels can be removed from the target material during recycling.

Annex 6

Determining recyclability using the KIDV Recycle Check

Explanation of the discount step

Determining the recyclability of a disposable unit depends on a large number of factors, all of which can influence each other. This makes the analysis relatively complex. The KIDV Recycle Check is the right tool here. This tool works with a checklist and is supported by a comprehensive explanation in a background document.

- The KIDV Recycle Check for Rigid Plastic Packaging and the KIDV Recycle Check for Flexible Plastic Packaging are available on the [KIDV website](#).

Definitions

Optimal recyclable

Conditions

Rigid or flexible disposable units that receive a final rating of 'optimal recyclable' in the KIDV Recycle Check can receive a EUR 0.10 fee discount.

Supporting evidence for eligibility for this discount step:

- a. Download the KIDV Recycle Check for disposable units with a final score of 'optimal recyclable'
- b. The following documents are required to provide evidence for the assessment in the Recycle Check:
 - General specifications (disposable units made of PET, PE and PP).
 - o Specification of the material composition of all components in the disposable unit.
 - Calculation of the percentage share of the material composition of all components of the disposable unit
 - o (for example: 75% virgin PET, 24.87% recycled PET and 0.13% optical brightener). This specification should also preferably indicate what colourant has been added, if any, and in what quantities.
 - Specification showing the dimensions of the disposable unit.
 - Declaration or specification from the manufacturer that no coating is present *.
 - Declaration showing that the adhesive used complies with the conditions of the [protocols on the KIDV website](#).
 - Optionally, a photograph of the front view of the disposable unit and a photograph with a visual overview all the parts and disposable units of the Packaging.
 - Where necessary, a screen print of the label degree of coverage determination from the NTCF tool.

** Verpact requests this type of declaration separately as coatings are not always added to the Packaging by the packaging manufacturer. For example, coatings can be added to PET preforms after the bottle has been blown. A declaration from the manufacturer of the packaged product is therefore important.*

Annex 7

Innovation traject for the plastics chain

Verpact fosters innovation in the field of plastic Packaging through a special programme within the Fee Modulation Plastic Scheme, which provides scope for new materials or production processes/techniques. The aim of this programme is to improve the recyclability, circularity and sustainability of plastic Packaging, thereby contributing to the objectives of [*The Plastic Guide from Verpact*](#).

Target group innovation traject

The innovation traject is open to all producers and importers of plastic Packaging who are subject to the contribution obligation. They can apply for the programme if they (intend to) market innovative Packaging that meets the following criteria:

- The innovation concerns a new plastic material or a production process/technique for the plastic chain.
- The innovation delivers demonstrable environmental benefits, such as higher recyclability, lower material use, longer service life or lower CO2 emissions.
- The innovation is accessible to everyone, i.e. the Packaging does not have any exclusive rights or patents that hinder its distribution or application.

Applying for the innovation traject

In order to participate in the innovation traject, producers and importers must submit a comprehensive action plan to Verpact. This plan must include the following information:

- A description of the innovation, including the new material or production process/technique, the functions and properties of the Packaging, and the expected environmental benefits.
- Evidence for the innovation of the Packaging, for example by providing a comparison with existing Packaging or a reference to scientific literature or research reports.
- An analysis of the effect of the innovation on the collection, sorting and recycling systems, including the costs, quantity and quality of the collected and recycled material.
- A schedule and budget for the development, testing and implementation of the innovation, including the expected market introduction and market penetration.

Verpact will assess the submitted plans on the basis of the criteria set and provide feedback to the applicants within a reasonable period of time. If the plan is approved, the Packaging in question may be eligible for remuneration in the form of a reduced rate for the Packaging Waste Management Contribution from the start of the following calendar year. Verpact may also impose additional conditions on participation in the programme, such as providing periodic progress reports or participating in evaluations or pilots.

Innovation trajet

An approved innovative process can follow two routes:

1. An innovative process can be added as part of a fee discount (e.g. labelling expansion with coding)
 - Mono-material
 - White/transparent
 - Correct labelling/printing/+ innovative process
 - Optimal recyclable
 - Deployment of post-consumer recycle
2. An innovative process will receive project-based support from Verpact:
 - On request and after approval:
 - X hours of lab testing
 - Project support

Benefits of the innovation trajet

The innovation trajet offers various advantages for producers and importers of plastic Packaging, such as:

- A financial incentive to invest in innovation and sustainability.
- Recognition and visibility for innovative and environmentally friendly Packaging.
- Access to a network and platform for knowledge sharing and collaboration with other parties in the plastic chain.
- A contribution to the transition to a circular economy and a reduction in the environmental impact of plastic Packaging.