

2025

RECYCLIA ENVASES ANNUAL REPORT 2025





RECYCLIA ENVASES
ANNUAL REPORT
2025
SUMMARY

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01 Introduction

Some projects are born out of opportunity. And some are born out of the need to be ready for what is next without disregarding the opportunities that change brings. **Recyclia Envases'** collective system for extended producer responsibility clearly belongs to the latter category.

The entry into force of Royal Decree 1055 of 27 December 2022 regarding packaging and packaging waste was a radical change in extended producer responsibility for thousands of companies as well as for the sector itself. New environmental obligations, flows and operating demands created a completely different landscape, particularly for commercial and industrial packaging.

In this context, **Recyclia decided to take a step forward on its path and implement a system that could offer companies a comprehensive solution for extended producer responsibility**, based on its over 25 years of experience in administering collective extended producer responsibility systems (SCRAP) for electronic waste, batteries and accumulators.

Having been given the green light to operate in October 2024, the launch on 1 January 2025 marked the start of project with a clear purpose: to support companies with new and ever more complex regulations, through a single, integrated solution that funnels the management of an extensive variety of packaging flows into a single point of contact.

Managing this type of waste means dealing

with a wide range of materials, sectors and logistical models. Recyclia Envases provides services to a variety of sectors including health technology, automotive, renewable energy, office technology, electric mobility and distribution to name but a few. Each present specific needs that require technical knowledge, operational capacity and flexible solutions.

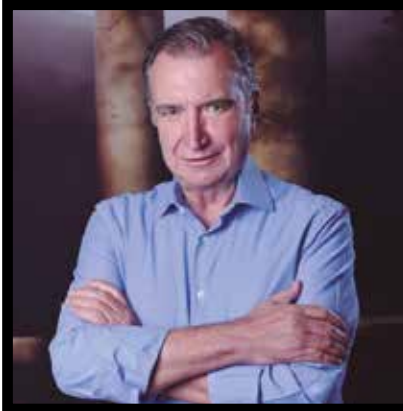
In 2025, in response to this new reality, the managing organisation Recyclia strengthened and trained its teams and incorporated new technical and operational capacities in packaging management, ecodesign, reuse and traceability. At the same time, it pushed for digital and operational tools aimed at simplifying processes and facilitating compliance with environmental obligations.

Over this first year of operations **Recyclia Envases also worked on generating spaces for training and support to help companies to interpret and address the new obligations relating to declaring products, prevention, ecodesign and reuse**. With this in mind, the entity has participated in a number of industry forums and specialist events, as well as developed webinars and information sessions aimed at producers and stakeholders, helping businesses adapt to the new regulatory framework.

In this current context of transformation, complying with regulation is only one part of the journey. The rest is to do so with adaptability, a long-term outlook and the confidence of having a partner who is ready to evolve alongside businesses.

02

02 Letter from the Chair



Luis
Pérez Bermejo
CHAIR OF RECYCLIA ENVASES

*In response
to the new framework*

Not every year brings the opportunity to write the first page of something new. This report is one such opportunity. And so is the project that has made it possible: Recyclia Envases.

Because besides being a new collective system, what we have here is a sea change for thousands of companies that, from 1 January 2025, have to manage the commercial and industrial packaging that they place on the market in line with a very demanding regulatory framework. This shift has introduced not only obligations, but also redefines what is understood by environmental responsibility in this waste flow.

This is where Recyclia Envases has come into being. Not as a one-off response to a new obligation, but as a solution designed to support companies of all sizes and across all sectors in the major change that is integrating packaging management into their sustainability strategy with rigour, efficiency and legal certainty.

In this sense, we are fully aware that compliance is not always easy. The regulations require accurate reporting, differentiating materials and channels, applying sustainability criteria and guaranteeing the proper management of packaging waste. And all within a context in which different levels of development co-exist and where compliance is not always uniform. It is precisely for this reason that having robust collective systems makes all the difference.

Recyclia Envases draws on its experience from over two decades of managing electronic waste, batteries and accumulators through the rest of Recyclia’s collective systems, as well as on a model that has proven its effectiveness in operations, traceability and working together with administrations, businesses and social organisations. On top of this foundation, we have developed a proposal that offers companies comprehensive management, tailored to their needs and aligned with regulatory requirements.

That is why I do not want to sign off my first letter as Chair of Recyclia Envases without acknowledging the companies already involved in this project, as well as the Recyclia team, whose enthusiasm and commitment have been instrumental in getting it off the ground.

As I said, we are facing a significant change. And, like all things we set out to do, what matters is not only reaching our destination, but knowing how to chart the route from the very start of the journey. That is our objective: to offer a solution that responds to companies’ real needs and help consolidate an efficient, transparent and circular system.

We therefore invite any organisations that have not yet embarked on this journey to join us, in the conviction, backed by experience, that only through working together and shared commitment can we stay on course and respond to current and future challenges.

03 About us



RECYCLIA ENVASES



Recyclia Envases is the collective system promoted by Recyclia in response to the new obligations of Royal Decree 1055/2022 regarding packaging and packaging waste, and the rest of European and national rules that apply to commercial and industrial packaging.

The entity was established by building on more than 25 years of experience in administering collective systems for extended producer responsibility (SCRAP) for electronic waste, batteries and accumulators, transferring this knowledge to a new regulatory environment marked by traceability, prevention, ecodesign and the inclusion of circular economy criteria.

The model developed by Recyclia Envases aims to simplify adaptation to an ever more complex regulatory and operational environment for companies, offering flexible and specialised solutions for producers, holders, distributors and managers.

The entity offers a comprehensive solution for the environmental management of commercial and industrial packaging of all materials, whether single-use, reusable, hazardous or non-hazardous. Similarly, it provides producers with a one-stop service for domestic packaging.

This is all integrated into Recyclia's model, which allows companies to manage their packaging, electronic waste, battery and accumulator obligations through a single point of contact, making use of operational and management synergies that exist between the various flows.

DID YOU KNOW THAT...?

The Recyclia Envases team is constantly adapting to meet producers' needs and to new developments and updates in packaging regulations.

AIMS

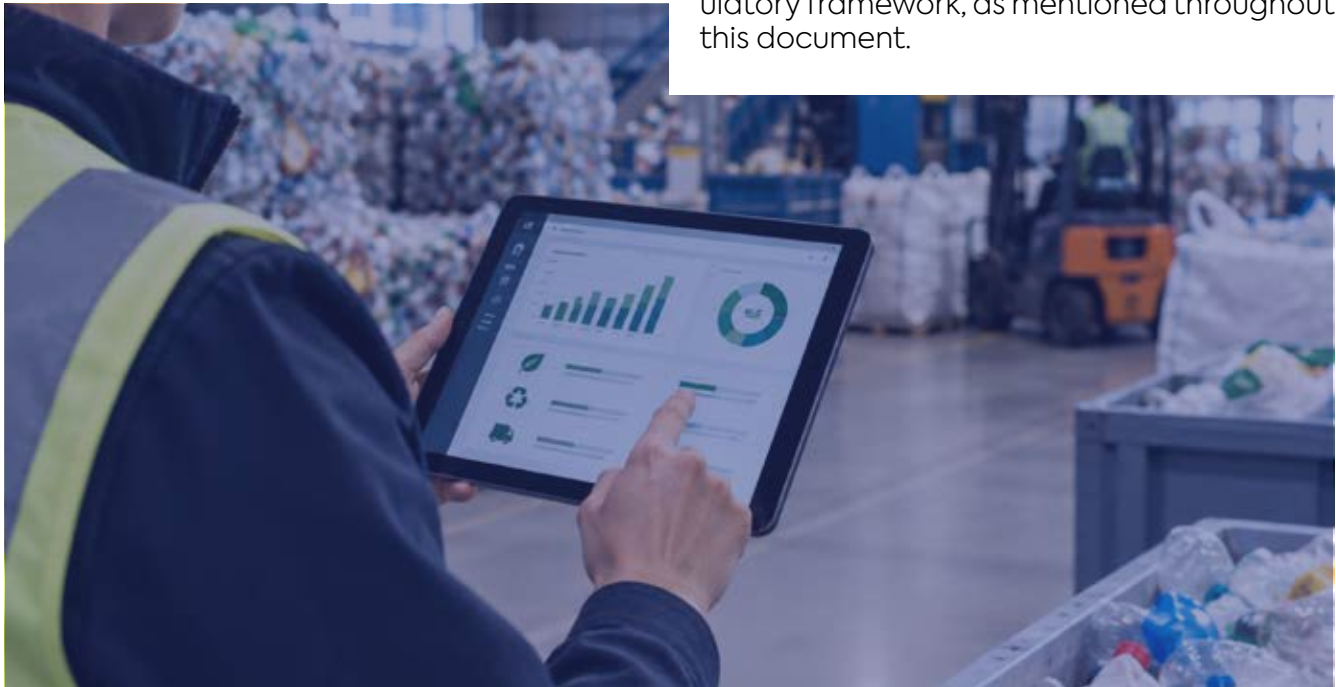
Recyclia Envases focuses on helping companies comply with their environmental obligations through services and solutions based on technical and operational guidance.

To achieve this, the organisation works across a number of areas:

- Designing efficient financing models.
- Guaranteeing traceability and transparency in waste management and the associated information.

- Developing efficient management operations adapted to each company.
- Handling administrative and documentary procedures with the competent authorities.
- Establishing agreements with public authorities and economic operators.
- Developing oversight and control mechanisms.
- Performing communication and awareness-raising actions to guarantee full stakeholder involvement and fair EPR financing.

Recyclia Envases also provides member companies with various services aimed at facilitating their adaptation to the new regulatory framework, as mentioned throughout this document.



COMPOSITION OF THE BOARD OF DIRECTORS

The Board of Directors is the entity's governing body. It is made up of representatives from battery and accumulator manufacturers, as well as manufacturers of electrical and electronic equipment powered by batteries and accumulators and representatives from the distribution sector.

CHAIR

Luis José Pérez Bermejo

RADIOTRANS

TREASURER

Ramón José Campos García

IMPREX EUROPE, S.L,

SECRETARY

Javier Pérez Yela

KYOCERA DOCUMENT SOLUTIONS ESPAÑA, S.A.

BOARD MEMBER

Jesús Ávila

KONICA MINOLTA BUSINESS SOLUTIONS SPAIN, S.A

DIRECTOR GENERAL

Gabriel García Aguado

Independent

04 Results and impact 2025

MEMBER COMPANIES and SECTORS

+600
MEMBER COMPANIES

MAIN SECTORS IN RECYCLIA ENVASES

Commitment of sectors and our companies to sustainability and the solutions provided by Recyclia.



Office technology and I.T.



Automotive



Health technology



Panels



Electrical tools



Batteries

NEW SECTORS

In 2025 Recyclia Envases was joined by companies from the following sectors:



Logistics



Sanitation



Construction



Packaging manufacturers

DID YOU KNOW THAT...?

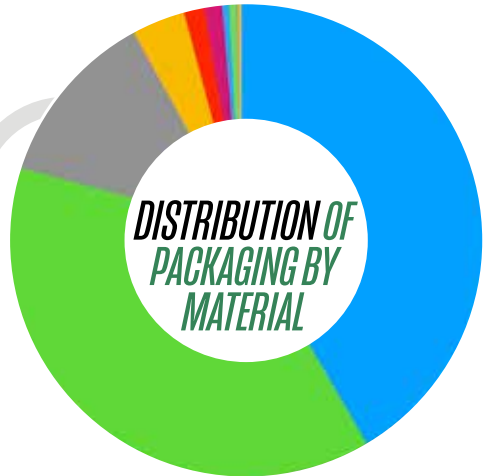
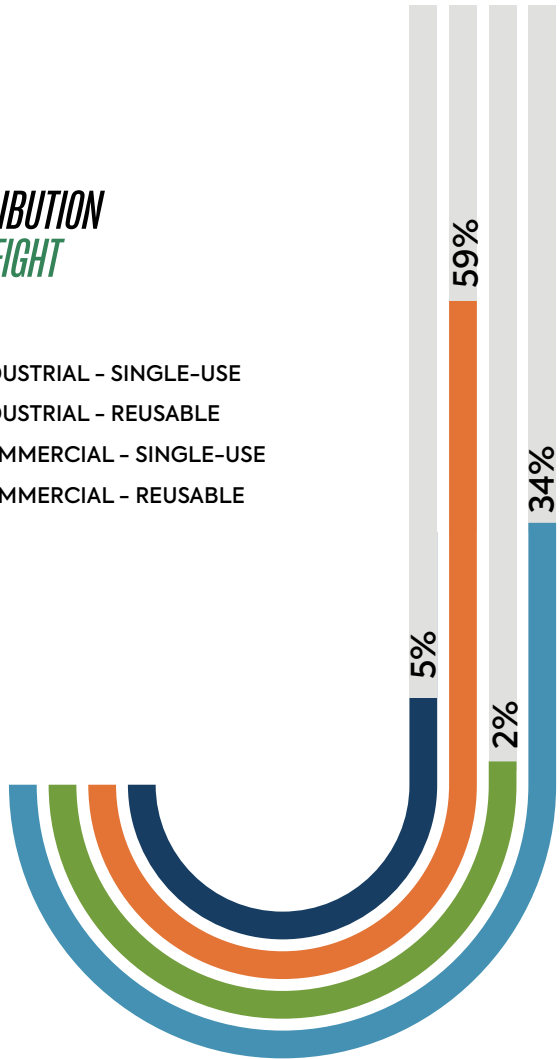
A single point of contact for domestic packaging by working together with other SCRAP.

PACKAGING PLACED ON THE MARKET (POM)

94,148.68 TONNES

DISTRIBUTION BY WEIGHT

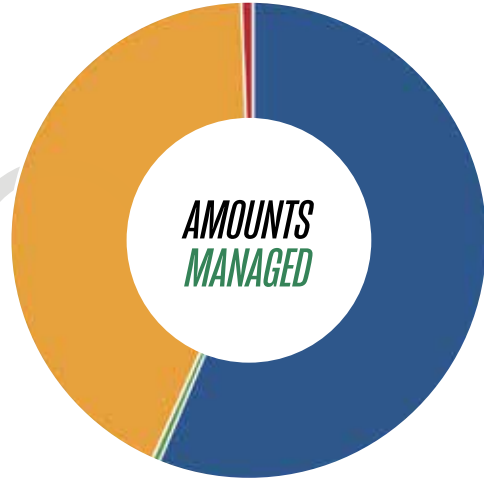
- INDUSTRIAL - SINGLE-USE
- INDUSTRIAL - REUSABLE
- COMMERCIAL - SINGLE-USE
- COMMERCIAL - REUSABLE



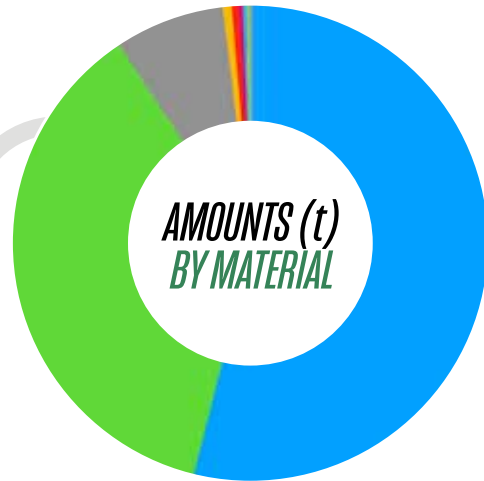
- 41.37% PAPER/CARDBOARD
- 37.26% WOOD
- 12.74% PLASTIC
- 3.84% METALS
- 1.49% CERAMICS
- 1.29% CORK
- 0.50% OTHER MATERIALS
- 0.49% GLASS
- 0.01% TEXTILES (business rule)
- 0.01% RUBBER AND LEATHER

AMOUNTS MANAGED BY RECYCLIA ENVASES

81,565.02 TONNES MANAGED (t) BY CATEGORY



- 58.4% COMMERCIAL - SINGLE-USE
- 0.01% INDUSTRIAL - REUSABLE
- 41.4% INDUSTRIAL - SINGLE-USE
- 0.19% COMMERCIAL - REUSABLE



- 54.5% WOOD
- 37.0% PAPER/CARDBOARD
- 7.2% PLASTIC
- 0.5% ALUMINIUM
- 0.3% FERROUS METALS (tin/steel)
- 0.2% OTHER METALS (non ferrous)
- 0.1% GLASS
- 0.1% TEXTILES
- 0.1% HAZARDOUS METALS

100% 81,565.02 t

COMPLIANCE 2025 TARGETS

In its first year of operation, Recyclia Envases managed 86.63% of the kilograms declared by its producers.

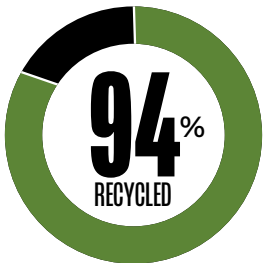


COMPLIANCE OVERVIEW



OVERALL DATA

Amounts declared (t)	Amounts of managed waste (t)	Index of managed waste vs. declared
94,148.68	81.565.02	86.63 %



RECOVERED MATERIALS TARGET

Target % vs. % achieved in 2025 by material

		Target % (Reference Art. 29):	% achieved in 2025
WOOD		30%	EXCEEDING 100 % OF TARGET
PAPER/CARDBOARD		75%	EXCEEDING 100 % OF TARGET
PLASTIC		55%	ACHIEVED 92 % OF ESTABLISHED TARGET

05 Business services



The service provided by Recyclia Envases to its member companies reflects its core role as a **collective system (SCRAP)**: guaranteeing the efficient, transparent and traceable management of obligations arising from extended producer responsibility (EPR) in packaging and packaging waste. Recyclia Envases therefore structures its model around appropriate system financing, working together with administrations, managers and other sector stakeholders, administrative and documentary procedures and the establishment of oversight, control and transparency mechanisms.

Building on this base, in 2025 Recyclia Envases extended the scope of its service offering to support companies beyond complying with their obligations as producers. This support includes specialist technical knowledge, case-specific guidance, digital oversight tools and solutions that allow companies to comply with regulations, anticipate regulatory change and incorporate prevention, reuse, ecodesign and circularity criteria into their packaging.

The service provision is designed to offer comprehensive guidance to member companies, linking the collective activity of SCRAP with their specific needs and providing them with the capacities and solutions to deal with changes in the regulatory and environmental framework for packaging in a more efficient way.

SERVICES

Recyclia Envases provides its member companies with the following services:

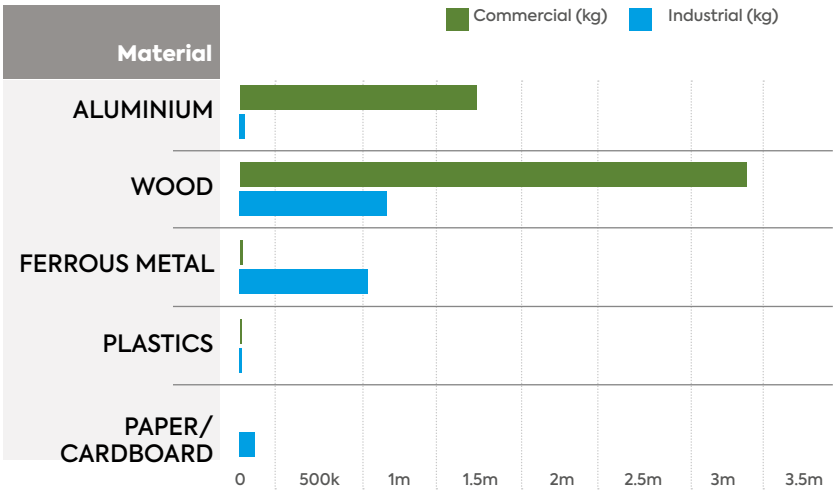
- **Regulatory advice and guidance**, including assessment of adaptation to packaging regulations, support with submissions, records and administrative requirements, including those relating to EPR and guidance in the process of registering as a product producer with the Ministry.
- **Optimisation of information and reporting**, through support with identifying and declaring the packaging placed on the market and digital tools to centralise operations, information and reports.
- **Optimisation of the management of packaging and packaging waste** through solutions tailored to company needs, aimed at improving operational efficiency and guaranteeing traceability of waste and associated information.
- **Ecodesign projects**, through developing projects and tools designed to prevent waste generation, improve recyclability and promote reuse models.
- **Collective Packaging Prevention and Ecodesign Business Plan**, as a means of guiding companies in identifying and applying prevention and ecodesign measures and help them to comply with objectives established in the regulations.
- **Solutions for reusable packaging**, including support in designing and managing closed- and open-loop reuse systems, guidance in designing deposit, return and refund systems (DRS) and traceability solutions along the value chain.
- **Information, training and specialised dissemination**. Webinars, technical sessions, guides, visual resources, documents and other materials designed to facilitate understanding and application of producers' EPR and sustainability obligations relating to their packaging.
- **Working together and knowledge-sharing**, generating spaces and opportunities to share experiences and good practices in prevention, reuse, ecodesign and packaging management.

DEPOSIT, RETURN AND REFUND SCHEMES (DRS)



During Recyclia Envases' first year of operation, producers with reusable packaging and established DRS systems have been supported in complying with the European PPWR and Spanish Royal Decree 1055/2022.

REUSABLE MATERIALS DECLARED



KEY SECTORS

70.6%

DISTRIBUTION
Pallets and wire mesh baskets; flows between stores and logistics centres.

13.2%

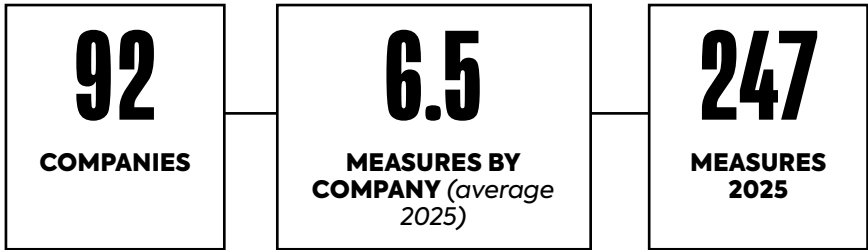
AUTOMOTIVE
Containers for parts; consolidated closed-loop systems.

12.1%

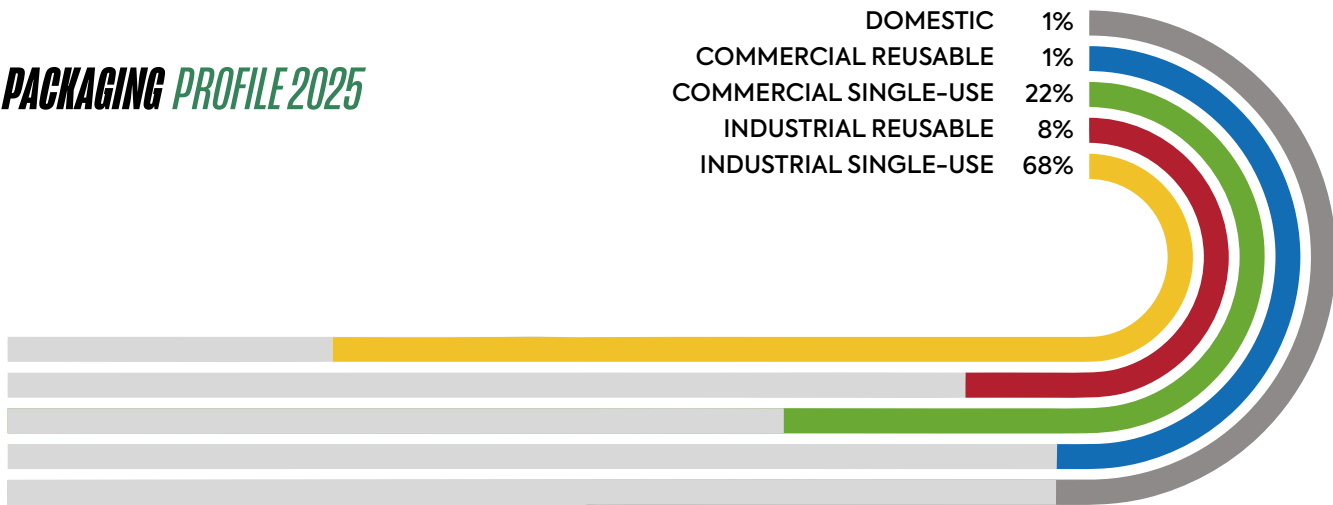
HEALTH TECHNOLOGY
Technical packaging and controlled loops for traceability.

COLLECTIVE PACKAGING PREVENTION AND ECODESIGN BUSINESS PLAN (PEPE)

KEY FIGURES FOR 2025



PACKAGING PROFILE 2025



Recyclia Envases' Collective Packaging Prevention and Ecodesign Business Plan for 2025-2029 was created in response to the obligations established in Spanish Royal Decree 1055/2022 and aligns with the new requirements outlined in EU Regulation 2025/40 on packaging and packaging waste, which establish a regulatory framework aimed at ensuring that packaging placed on the European market will be increasingly recyclable, reusable and sustainable throughout its life cycle.

AREAS OF ACTION

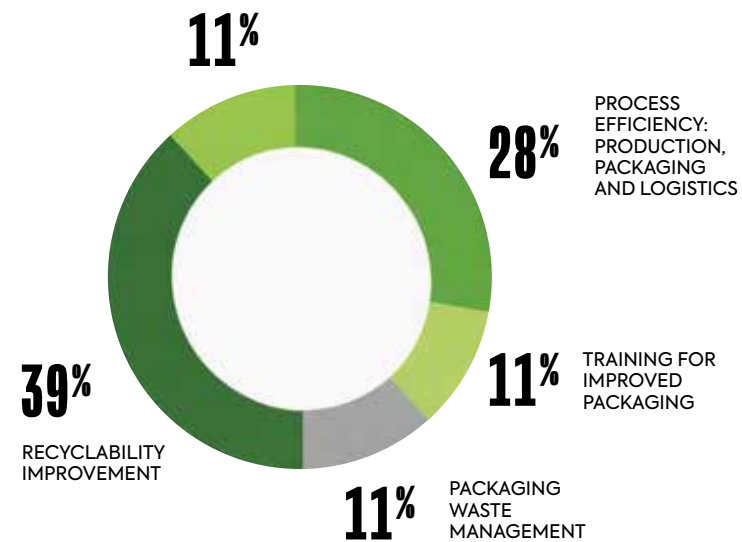
ENVIRONMENTAL IMPACT REDUCTION



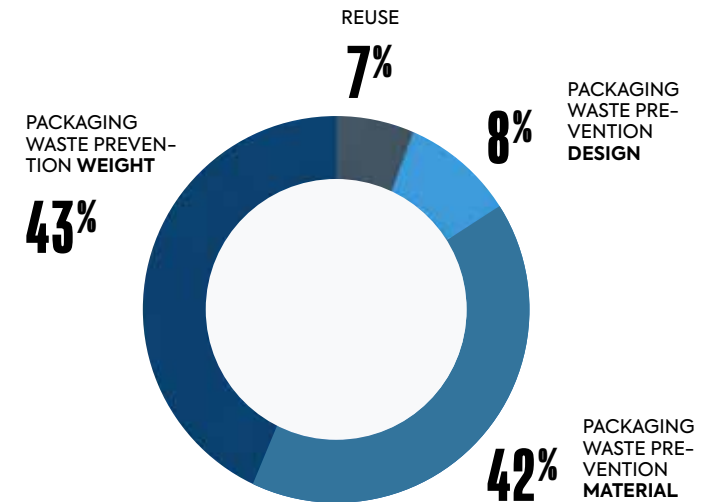
PACKAGING OPTIMISATION

REDUCTION OF ENVIRONMENTAL IMPACT

USE AND CONSUMPTION



PACKAGING OPTIMISATION



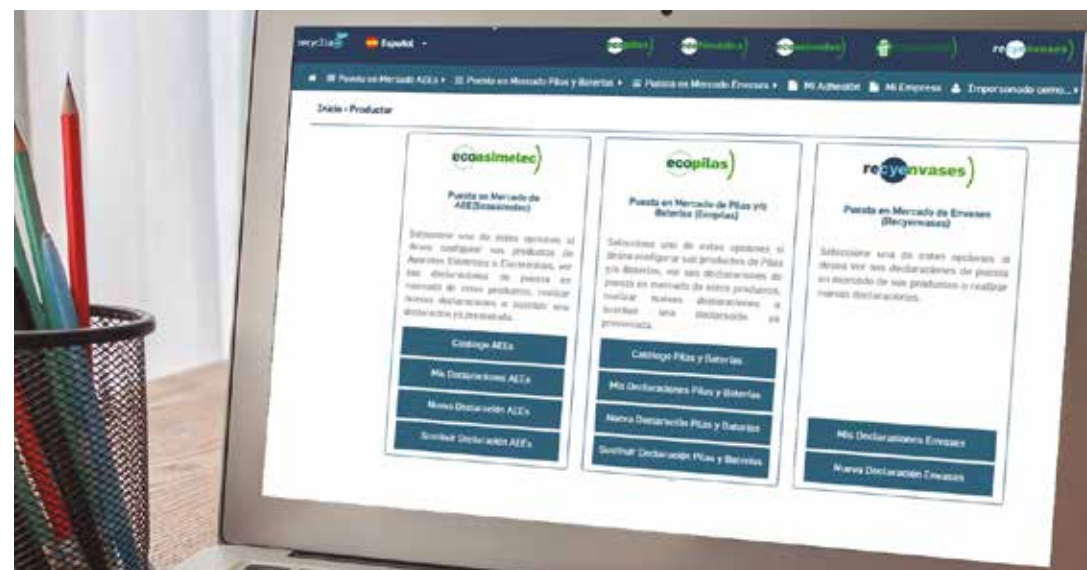
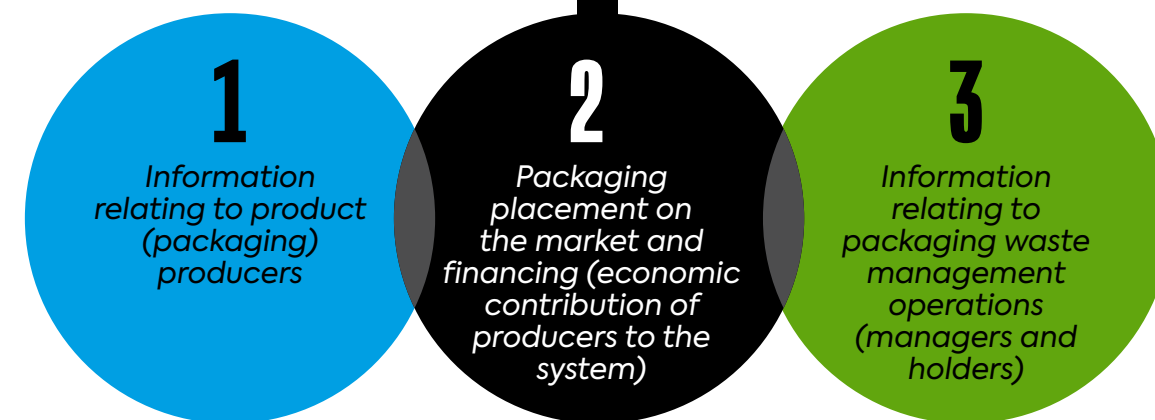
DIGITAL TRANSFORMATION

Digital transformation is proposed as a strategic tool to improve and facilitate producer activity, simplifying management, completing formalities and optimising the various processes associated with their activity. Similarly, digitalisation also coordinates a comprehensive information and control system that strengthens operational traceability and reliability of information, as well as compliance with regulatory requirements throughout the packaging value chain. As such, the equity of the system is reinforced, the quality of sector-based information is improved and extended producer responsibility obligations are effectively complied with.



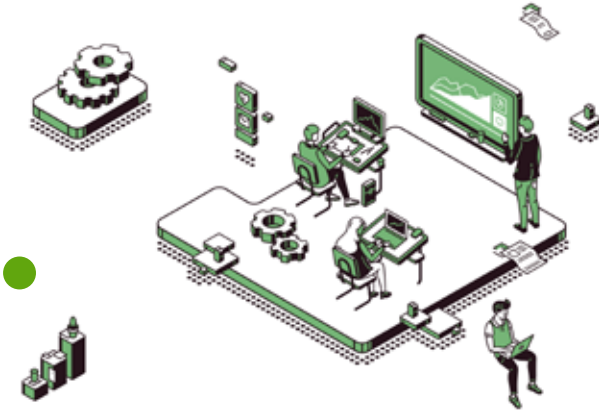
MANAGEMENT PLATFORM

Recyclia Envases has implemented an electronic platform for managing packaging waste to guarantee system functioning and compliance with its related information and control requirements. This information is divided into three main activity sections:

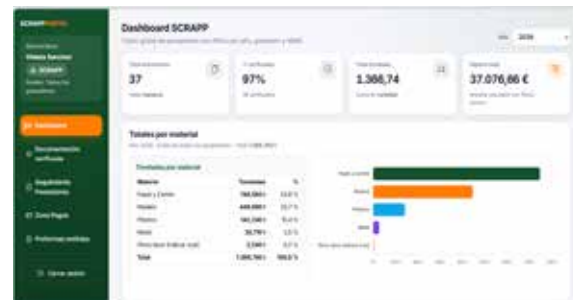


Recyclia Envases has drafted a series of guides and forms to help packaging producers participating in the system complete the annual information regarding the packaging placed on the market in the packaging section of the MITECO Register, while also providing Recyclia Envases with the information required to meet their system financing obligations.

HOLDER PLATFORM



This platform centralises the exchange of information with managers and holders, ensuring traceability and documentary evidence of the packaging management operations in the HOLDER agreement.



ACCREDITATION AND MANAGER MONITORING PLATFORM

Accreditation and monitoring platform for logistics, sorting and waste handling managers. Subscription is a pre-requisite of service provision.

- Supporting documentation.
- Continuous monitoring.
- Active validation.

PRODUCERS



At Recyclia Envases we seek to facilitate the work of producers and therefore have developed a series of technical tools, including:

An automated procedure for reconciling SCRAP submissions and those for the Registry of Product Producers (RPP) of the Spanish Ministry for the Ecological Transition and the Demographic Challenge (MITERD)

AUTOMATED AUDIT

Systematic cross-checking of data by category, material and declared amounts.

EARLY DETECTION

Identification of classification errors, differences in amounts and discrepancies between sources.

MONITORING AND CORRECTION

Incidents are reviewed with the companies concerned so that the data can be corrected and updated.

Recybot is a bot that acts as a website assistant to answer the queries that arise.



RECYBOT

- Since the bot went live on the website in mid-December, it has been used in **2,734 sessions**.
- It was able to answer **98%** of questions.

06 Communication

COMMUNICATION

Communication is an essential tool for Recyclia Envases, both for **strengthening relations and sharing knowledge within the system itself** and for bringing its activity closer to different packaging and extended producer responsibility stakeholders.

In 2025, Recyclia Envases carried out communication and institutional relations activities to **make sectors and companies, public administrations, organisations and other stakeholders in the value chain more aware of the system**, participating in forums, events, governance bodies, industry meet-ups and

activities promoted by public and private entities. These spaces have enabled knowledge-sharing, trend and need analyses, contributing to the debate on the changes in the regulatory framework and encouraging different agents to work together.

As such, Recyclia Envases continues to make progress with building an ever-closer relationship with its stakeholders, progressively extending its business and institutional communication to the general public to shine a spotlight on collective systems and the importance of packaging prevention, reuse, recycling and circularity.



COMMUNICATION AND SOCIAL MEDIA

Figures as at 31 December 2025

12,970

Visits to the website
www.recyenvases.es in 2025



In 2025, the www.recyenvases.es website recorded a total of **12,970 visits**, which reflects the general activity of over 2,100 web users, **2,000 of which were new users**.

In December the Recybot iframe was integrated into the website homepage. The aim is for it to improve user experiences and be able to answer queries around the clock.

The organisation's main news and updates were also published in the blog section throughout the year.

Recyenvases does not yet have its own social media accounts, but its news and announcements are regularly published on Recyclia's LinkedIn, Instagram, Facebook and X accounts.

RECYCLIA
FOLLOWERS
ON SOCIAL
MEDIA
at the end of
2025



3,183



7,049



4,118



20,500



2,440

2,100

user visits
to the website
www.recyenvases.es

COMPANY TRAINING

260

AVERAGE ATTENDEES
PER WEBINAR

In 2025 training was delivered through webinars structured around three main themes: **packaging obligations, prevention and ecode-sign, and submissions**. These sessions have mainly been delivered by our specialist team with occasional contributions from external speakers who have shared their perspective and experience on the different topics.

The training sessions have been organised both on an individual basis

for each company and collectively for all of our members, adapting them to the specific needs of each organisation. We have also taken part in joint webinars organised with industry associations and federations, strengthening collaboration and knowledge-sharing across the sector.



COMMUNICATION AND AWARENESS- RAISING ACTIVITIES



To meet our producers' needs, we develop awareness-raising and communication materials designed to make terminology easier to understand and to simplify the processes and procedures they need to carry out.

Examples of
brochures and
communications
for companies



We also offer ongoing support to resolve any queries that may arise during the process, with a dedicated channel staffed by a Recyclia Envases specialist who is in charge of answering any questions.



SECTOR AND REGIONAL COLLABORATION FORUMS



• Sustainability Forum

1st Sustainability Forum in Valencia, gathering of leaders and experts from the sector to debate key ideas in moving towards greener and more responsible logistics. Recyclia Envases participated in one of the round table debates on 'The Circular Economy: Redefining the Value of Waste'.



• Mobile World Congress

A congress that brings together the most eagerly anticipated thought leadership in connectivity in one place.



• Spanish Centre for Logistics event

Recyclia Envases gave a talk at the Spanish Centre of Logistics (CEL) event, explaining how logistics and transport are linked to sustainable development.

• **SCRAP Meeting**

Recyclia Envases took part in the SCRAP business meeting held in October in Madrid, led by IndustriAmbiente. Ideas were exchanged, together with problems and trends regarding the advances and changes in waste management.



• **AMBE General Meeting**

In a show of its commitment to the cycling sector, Recyclia Envases attended the Spanish Bicycle Industry Association (AMBE) Alliance Meeting and its General Meeting as a speaker explaining packaging EPR to associated companies.



• **EMPACK Fair**

Recyclia Envases was present at the Empack Fair, the largest professional event in Spain on packaging, logistics and sustainability in Bilbao and Madrid.

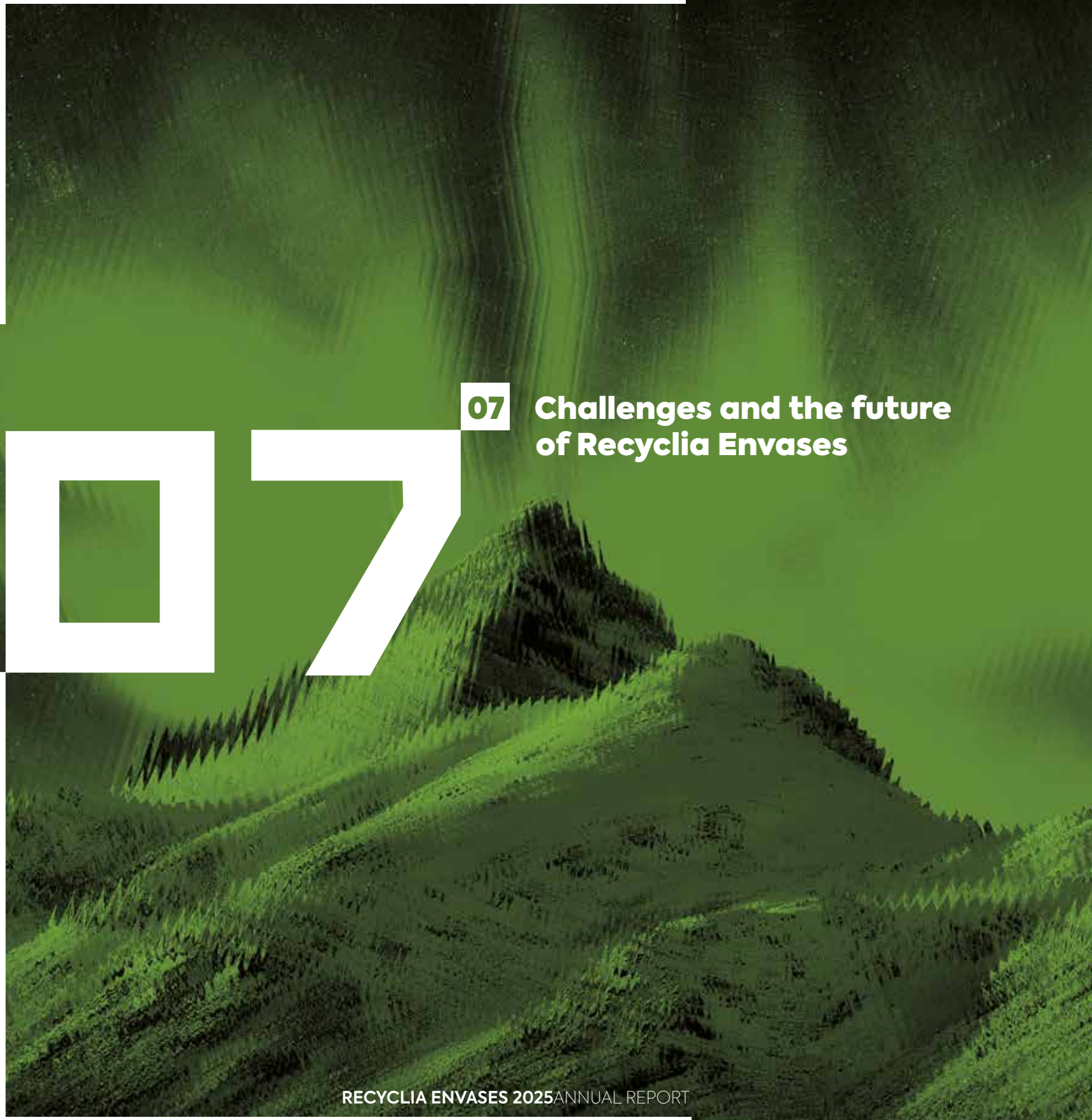


• **Andalusian Federation for Electrical and Household Appliances event**

A technical meeting regarding the management of packaging waste was held as part of a technical advisory campaign promoted by the Andalusian Federation for Electrical and Household Appliances (FAEL) together with Seville City Council for SMEs in the electrical and household sector in Seville.



07



07 Challenges and the future
of Recyclia Envases

RECYCLIA ENVASES 2025 ANNUAL REPORT

CHALLENGES AND THE FUTURE OF DEVOVIA



Looking ahead, **the main challenge for producers in coming years will be adapting to a constantly-evolving regulatory framework**, complying with current obligations while simultaneously preparing for further significant changes coming from Europe. This dual challenge — complying with requirements already in force while anticipating what lies ahead — requires companies to keep a constant watch on regulatory developments. The circular economy for packaging is therefore entering a new phase, marked by more demanding requirements and the need to anticipate changes affecting the design, marketing and management of products and their packaging once they reach the end of their useful life.

In this context, **Recyclia Envases'** strategy involves continuing to raise awareness among **companies** in order to facilitate their adaptation to the new regulatory framework, prevent non-compliance and guarantee, at the same time, a fair distribution of the obligations among all of the agents involved in the process. This awareness-raising work is understood as a way for companies to address regulatory changes with greater confidence and a lower risk of non-compliance. In this sense, strengthening awareness-raising efforts by collective systems, as well as inspections and market oversight, becomes as relevant as adapting to the regulations themselves.

The European regulation on packaging and packaging waste (PPWR) represents a wide-reaching change, as it introduces new design and recyclability requirements, sets targets for recycled content, proposes measures to promote reuse and incorporates new demands for information,

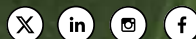
labelling and traceability, including the future digital passport. Furthermore, the development of corresponding European implementing regulations, together with the necessary adaptation of the national regulatory framework pose significant operational challenges for companies that are in very different situations and have varying levels of experience. This disparity at the very start means that the efforts to adapt will not be the same for all companies.

Faced with this scenario, **Recyclia Envases aims to establish itself as a trusted partner for companies, supporting them throughout the entire regulatory adaptation process** and helping to transform new regulatory requirements into a real opportunity to integrate the circular economy into their own business strategy, from product and packaging design to their proper management once they reach the end of their useful lives.



ANNUAL REPORT

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