

TRANSPARENCY REQUIREMENTS FOR THE EXTERNAL COMMUNICATION OF RECYCLED CONTENT

Brussels, September 2026

This document lists the transparency requirements that member organizations of European Aluminium should meet when communicating recycled content values to external stakeholders.

Pre-consumer and post-consumer material contribute to the recycled content.

Organizations should disclose the respective contributions of post-consumer material and pre-consumer material to the total recycled content separately. Where such disclosure is not possible, a clear justification should be provided.

The definitions of pre-consumer material and post-consumer material should be based on ISO 14021:2026.

Whenever an organization communicates a recycled content value to an external stakeholder, it should also make available to the external stakeholder:

- The methodology used to calculate it.
- The interpretation of the definition of pre-consumer material included in ISO 14021:2026, specifying clearly what is included in it.
- The system boundary considered for the calculation, including the point at which the recycled content is referred.
- The reference year, or other applicable reference period, used for the calculation
- The specific product, or list of products, to which the recycled content value applies
- The Chain of Custody model used, as defined in ISO 22095 (i.e. Identity preserved model; segregated model; controlled blending model; mass balance model - rolling average; mass balance model - credit method; book and claim model).

Where the recycled content has been determined using a mass balance model, as defined in ISO 22095, the organization should follow the requirements of ISO 14021:2026, Clause 8.5.3.3:

When using a mass balance chain of custody model, it is not guaranteed that the product contains the exact percentage of recycled content, so the following apply:

- a) It shall be communicated in the explanatory text that the claimed recycled content cannot be guaranteed in any individual product supplied;*
- b) Additional technical information including a description of the chain of custody model shall be included in the supporting information.¹*

Additional and supporting information should be made available through publicly accessible documentation when the recycled content value is publicly available.

If the recycled content value is disclosed only to a selected audience, such additional and supporting information should be made available to the same audience at the same time of the recycled content value with the most appropriate mean.

Verification

Organizations should disclose whether the system used to calculate product-level recycled content has been internally verified or independently verified by a third party and, where applicable, identify the verification scheme or verifier.

This document complements ISO 14021:2026 and does not replace or supersede its requirements.

References

ISO 14021: 2026 - Environmental labels and declarations — Self-declared environmental claims (Type II environmental labelling)

ISO 22095:2020 - Chain of custody — General terminology and models

¹ Text in italics is extracted “as is” from ISO 14021:2026.