

Regulatory Day 2024

Interactive session: The New Packaging & Packaging Waste Regulation – Key challenges

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VP Key Accounts

The draft EU Packaging and Packaging Waste Regulation (PPWR)

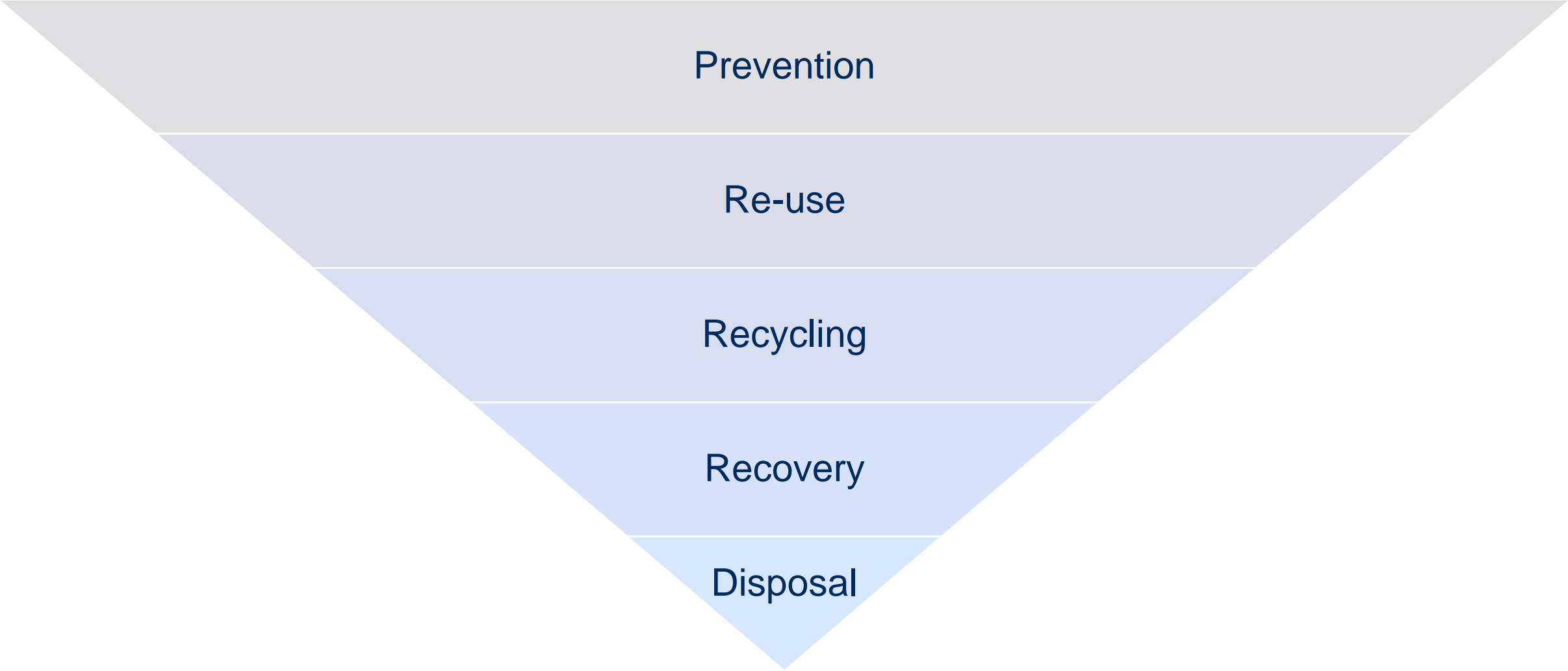
- Background to PPWR
 - Scope and main provisions
 - Examples of packaging & non packaging
 - Packaging bans and restrictions
 - Take-away points
-
- Annex: Proposed transition dates 2026-2030



Background to the PPWR



The waste hierarchy



In the EU which of these materials generates the most packaging waste by weight?

- Plastic (16.1 Million Tonnes)
- Glass (15.6 Million Tonnes)
- Paper / cardboard (34 Million Tonnes)

Source: Eurostat, 2021 figures

Three objectives of the original Packaging and Packaging Waste Directive 94/62/EC

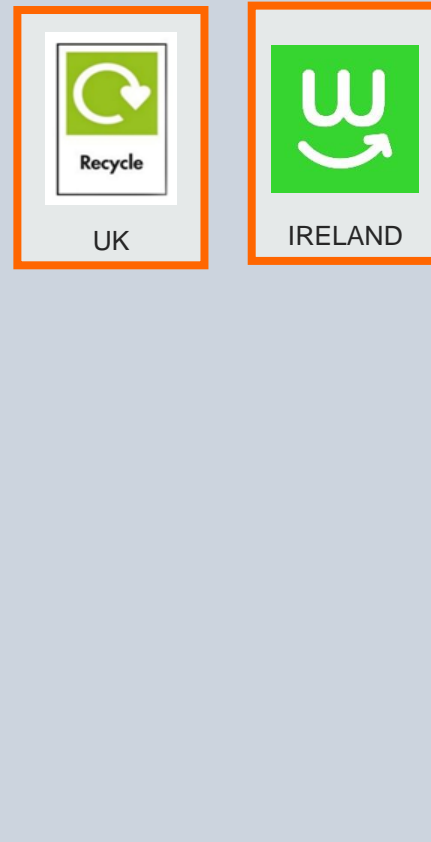
1. **The differing national measures concerning the management of packaging and packaging waste should be harmonised** in order, on the one hand, to prevent any impact thereof on the environment or to reduce such impact, thus providing a high level of environmental protection, and, on the other hand, **to ensure the functioning of the internal market and to avoid obstacles to trade** and distortion and restriction of competition within the community
2. The best means of preventing the creation of packaging waste is to **reduce the overall volume of packaging**
3. Whereas the issue of **community marking of packaging** requires further study, it should be decided by the community in the near future

Harmonisation of national frameworks and community marking of packaging?

Markets using material identification based on Decision 97/129/EC



Markets with simple disposal advice logo

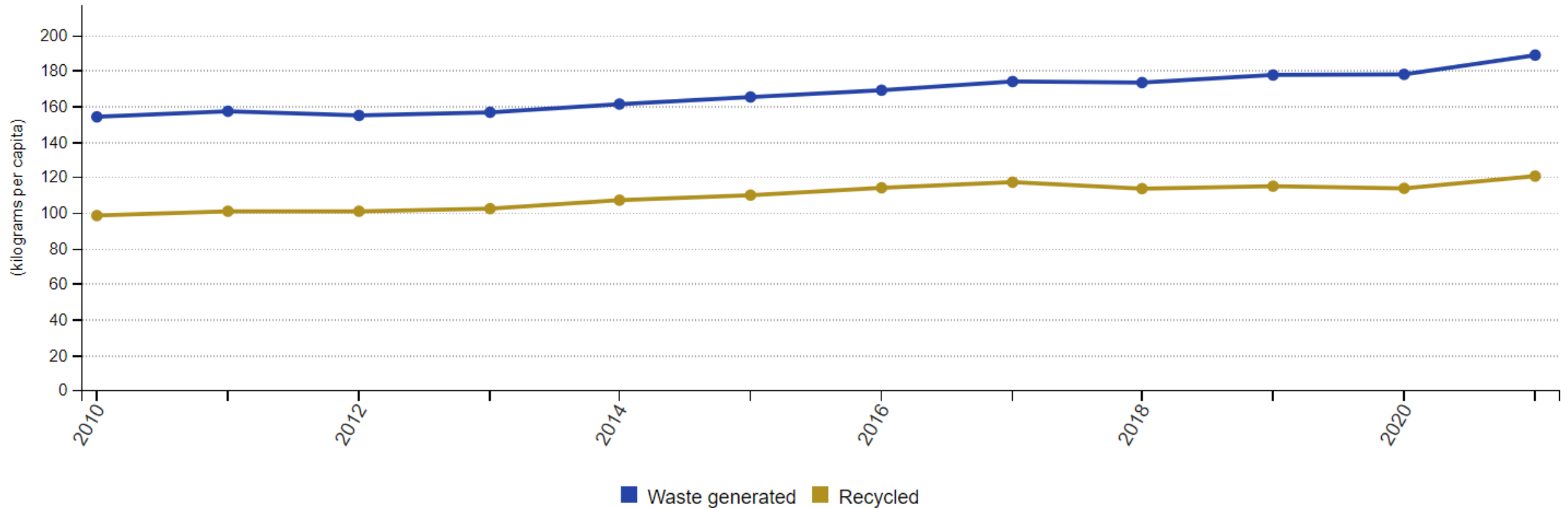


Markets with disposal advice logo based on material type



Packaging waste in the EU per capita (generated vs recycled) 2010-2021

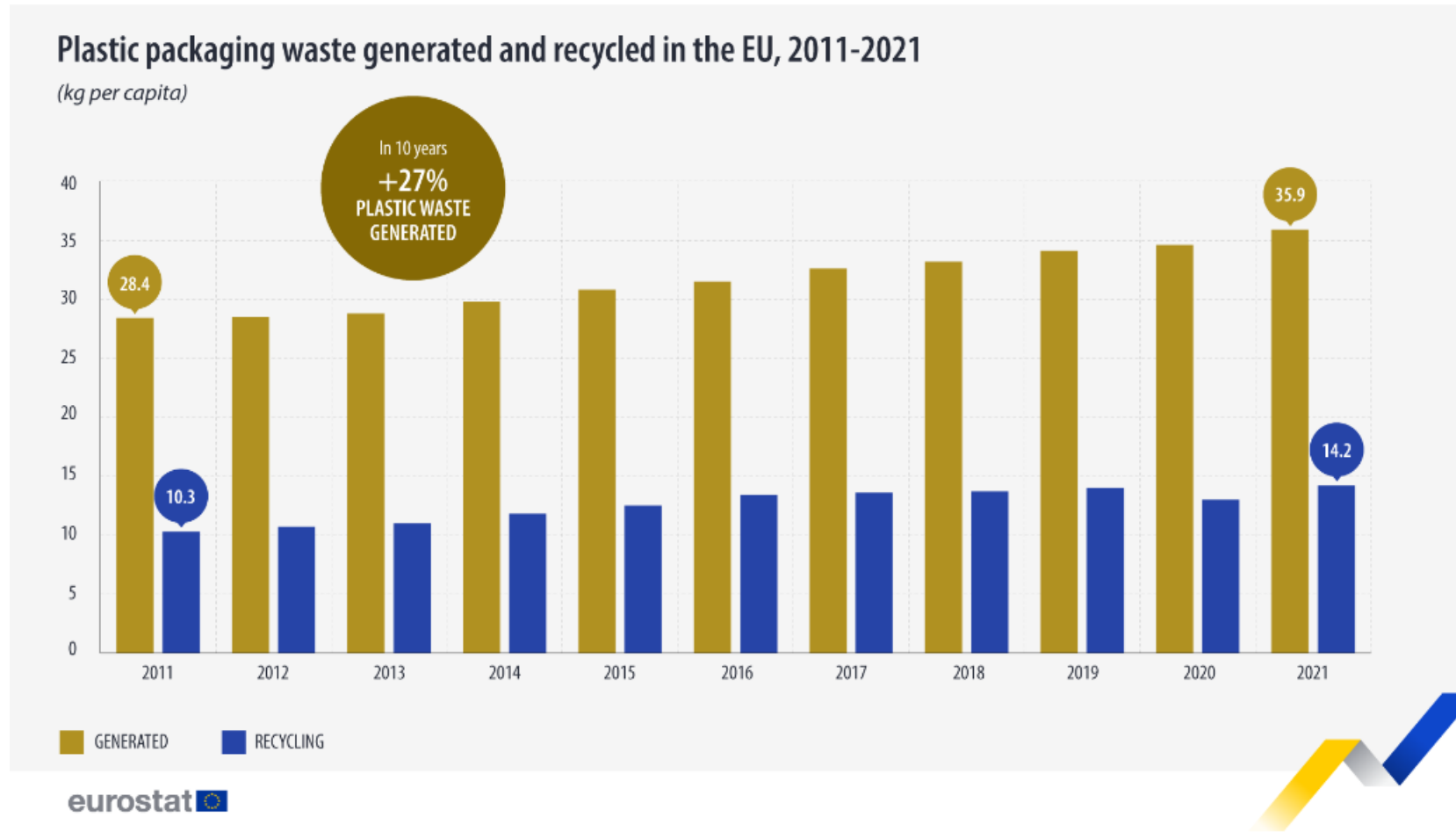
Packaging waste, EU, 2010-2021



Note: estimated data for 2010, 2011, 2021.

Source: Eurostat (online data code: env_waspac)

Plastic packaging waste in the EU (generated vs recycled) 2011-2021



Source dataset: [env_waspac](#)

Draft PPWR *^#
Scope & main provisions

Examples of packaging &
non packaging

Packaging bans and
restrictions

*Regulation is in draft form and may change

^Some wording has been abbreviated

#Consult the full text (Agreement April 2024)
for all the details



Scope: Article 2

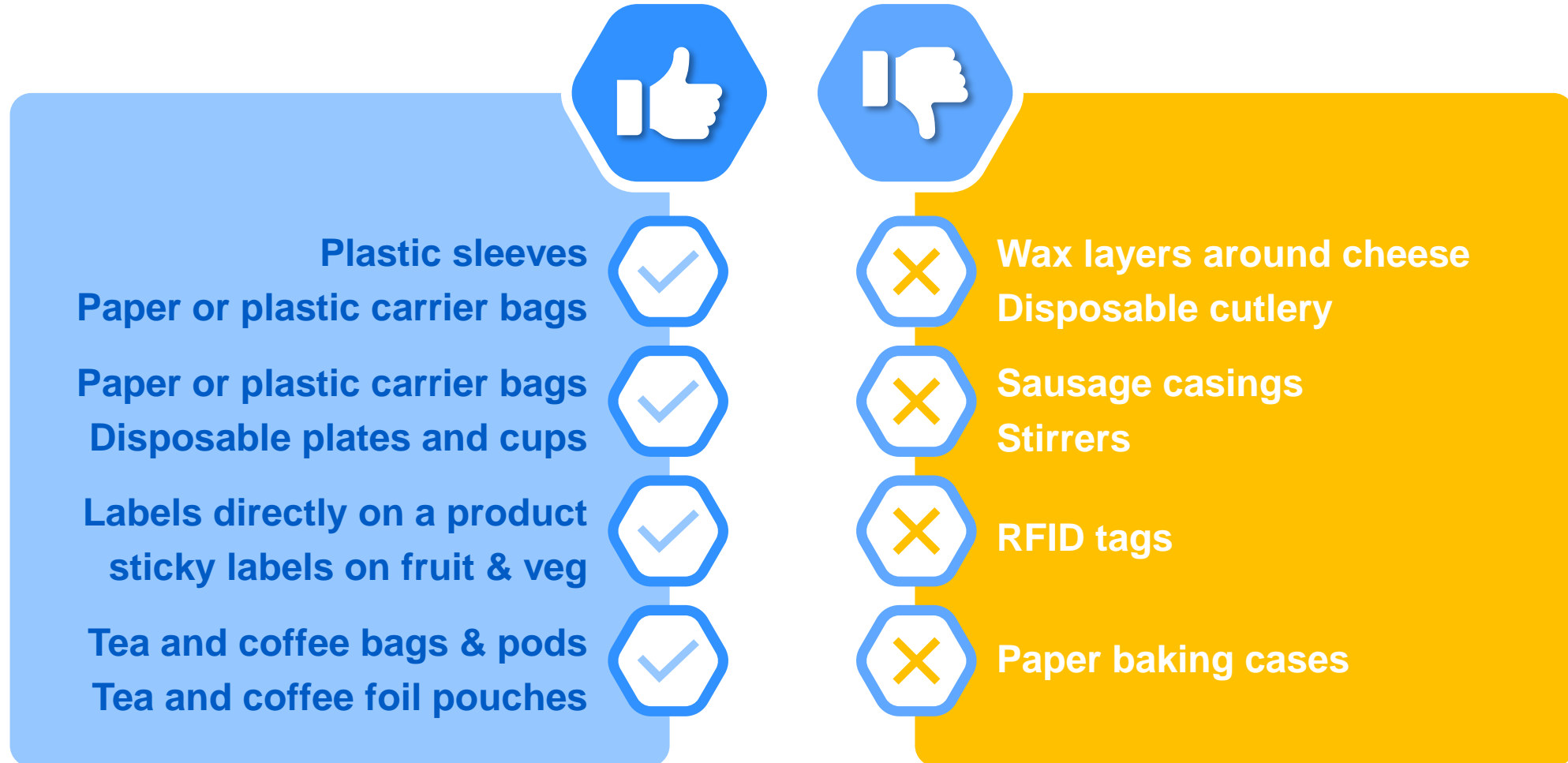
- “**All packaging**, regardless of the material used, and to **all packaging waste**, whether such waste is used in or originates from **industry, other manufacturing, retail or distribution, offices, services or households.**”
- “This Regulation applies without prejudice to the provisions of Directive 2008/98/EC as regards the management of hazardous waste as well as to Union regulatory requirements for packaging such as those for **safety, quality, the protection of health and the hygiene of packed products**, and to transport requirements. *However where this Regulation conflicts with Directive 2008/68/EC, Directive 2008/68/EC shall prevail.*”

Main provisions of PPWR draft

- All packaging must be recyclable (by 2030)
- Extended Producer Responsibility (“EPR”) fees will be based on recyclability grade (A,B,C)
- Packaging waste per capita to be reduced: 5% by 2030, 10% by 2035, 15% by 2040
- Mandatory labelling for recyclable packaging: material composition, sorting instructions
- Mandatory labelling for reusable packaging (various instructions and QR code)
- Re-use and refill targets & bans on certain packaging formats
- Mandatory minimum recycled content (plastics) – exempt if less than 5% (e.g. cup linings)
- Packaging minimisation rules
- Rules on compostable packaging
- Deposit Return Schemes mandatory for single use bottles and cans (mainly soft drinks, beer, cider)
- Obligations for manufacturers, suppliers, importers, distributors and ‘fulfilment service providers’



Packaging & Non-Packaging examples (non-exhaustive list)



Annex V: Restrictions on use of packaging formats (and proposed exemptions)



HORECA = Hotel, Restaurant & Catering sector

Article 67 (5) - Additional bans proposed in 2030 through amendment to SUP directive:

- Expanded polystyrene,
- Chips of polystyrene and other plastics that are used to protect packed goods during transport and handling
- Multi-pack plastic rings used as grouped packaging

Take-aways: draft PPWR

- Regulation not Directive = more uniform implementation (in theory)
- A very technical regulation (~ 80 definitions most of which are new)
- Keep an eye on progress through the [legislative train schedule](#) as timelines may slip. April 2024 version [here](#)
- Proposed **18-month** period after publication before the regulation applies
- After that, **lots** of transitional provisions. These run up to 2040. Many of these deadlines are for the Commission, and national authorities, not industry
- Much of the key detail is not written yet
- This will follow through implementing or delegated acts (e.g. “designed for recycling criteria”, due 2028)

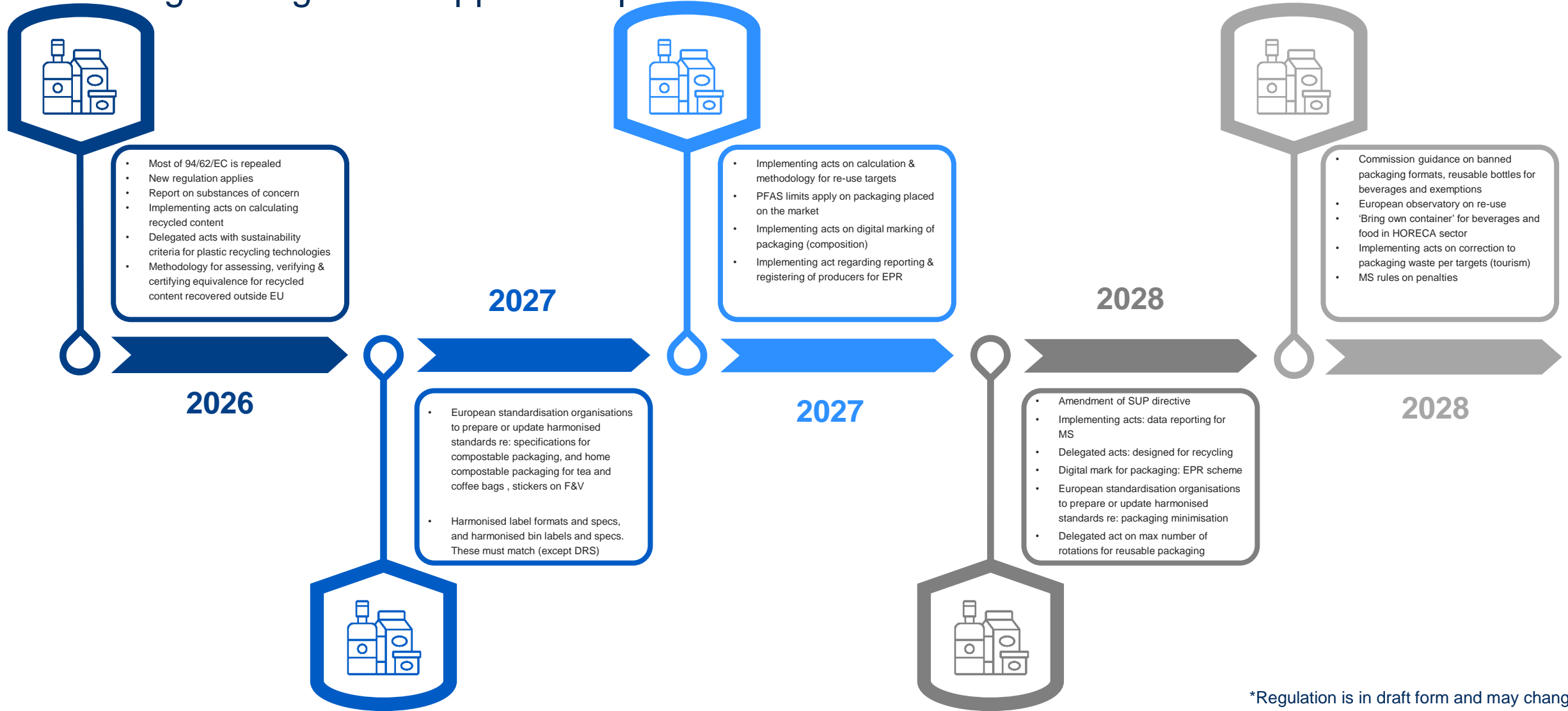


Annex:
Proposed transition dates
2026-2030



EU PPWR: proposed timeline & milestones (2026-2028)*

Assuming the regulation applies ~ April 2026



*Regulation is in draft form and may change

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ones (2026-2028). il 2026

- Most of 94/62/EC is repealed
- New regulation applies
- Implementing acts on calculating recycled content
- Methodology for assessing, verifying & certifying equivalence for recycled content recovered outside EU



- Implementing acts on calculation & methodology for re-use targets
- PFAS limits apply on packaging placed on the market
- implementing acts on digital marking of packaging (composition)
- Implementing act regarding reporting & registering of producers for EPR



- Commission guidance on banned packaging formats, reusable bottles for beverages and exemptions
- European observatory on re-use
- 'Bring own container' for beverages and food in HORECA sector
- Implementing acts on correction to packaging waste per targets (tourism)
- MS rules on penalties

2026

2027

2028

2028

- European standardisation organisations to prepare or update harmonised standards re: specifications for compostable packaging, and home compostable packaging for tea and coffee bags, stickers on F&V
- Harmonised label formats and specs, and harmonized bin labels and specs. These must match (except DRS)

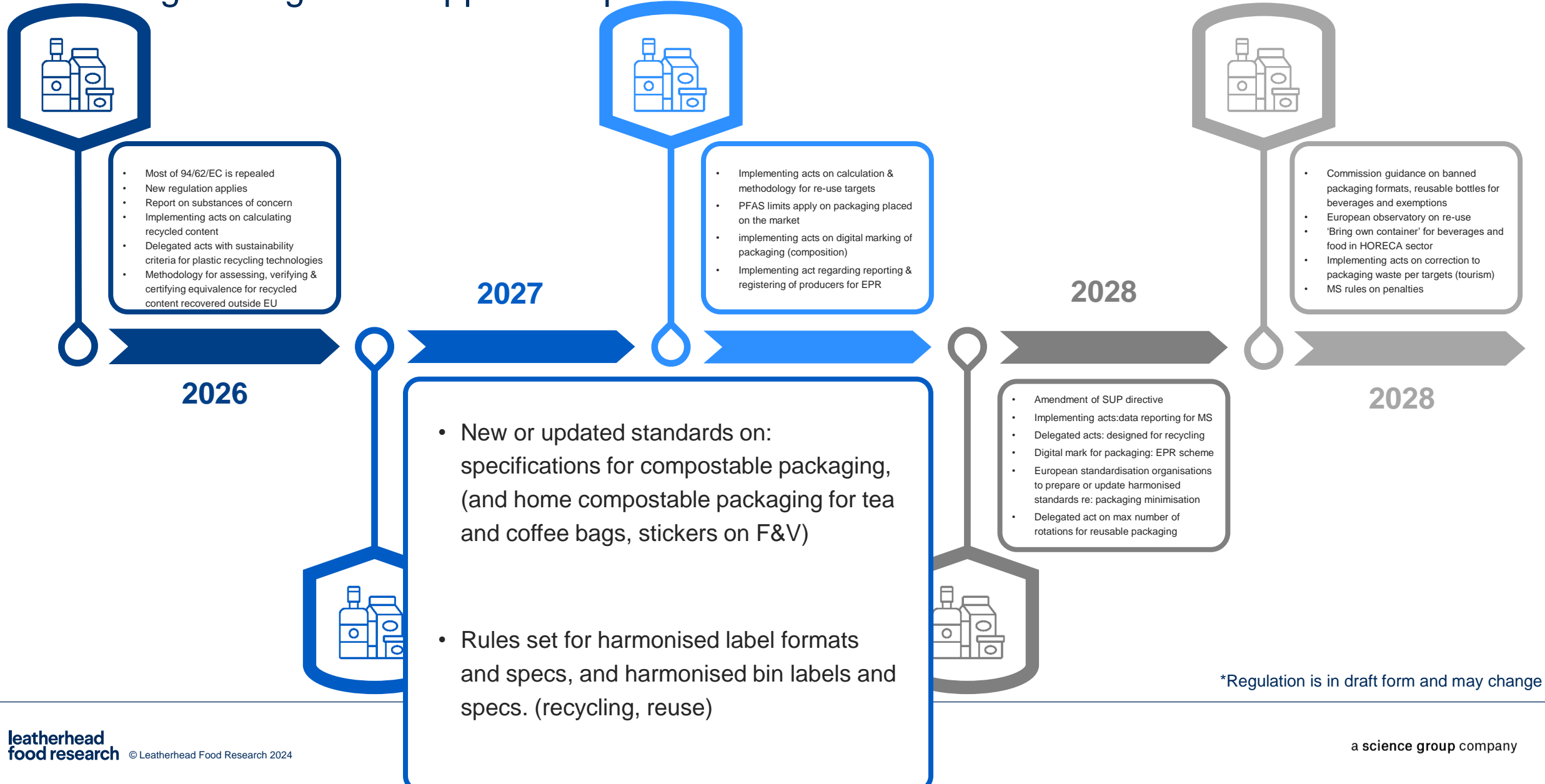
- Amendment of SUP directive
- Implementing acts: data reporting for MS
- Delegated acts: designed for recycling
- Digital mark for packaging: EPR scheme
- European standardisation organisations to prepare or update harmonised standards re: packaging minimisation
- Delegated act on max number of rotations for reusable packaging



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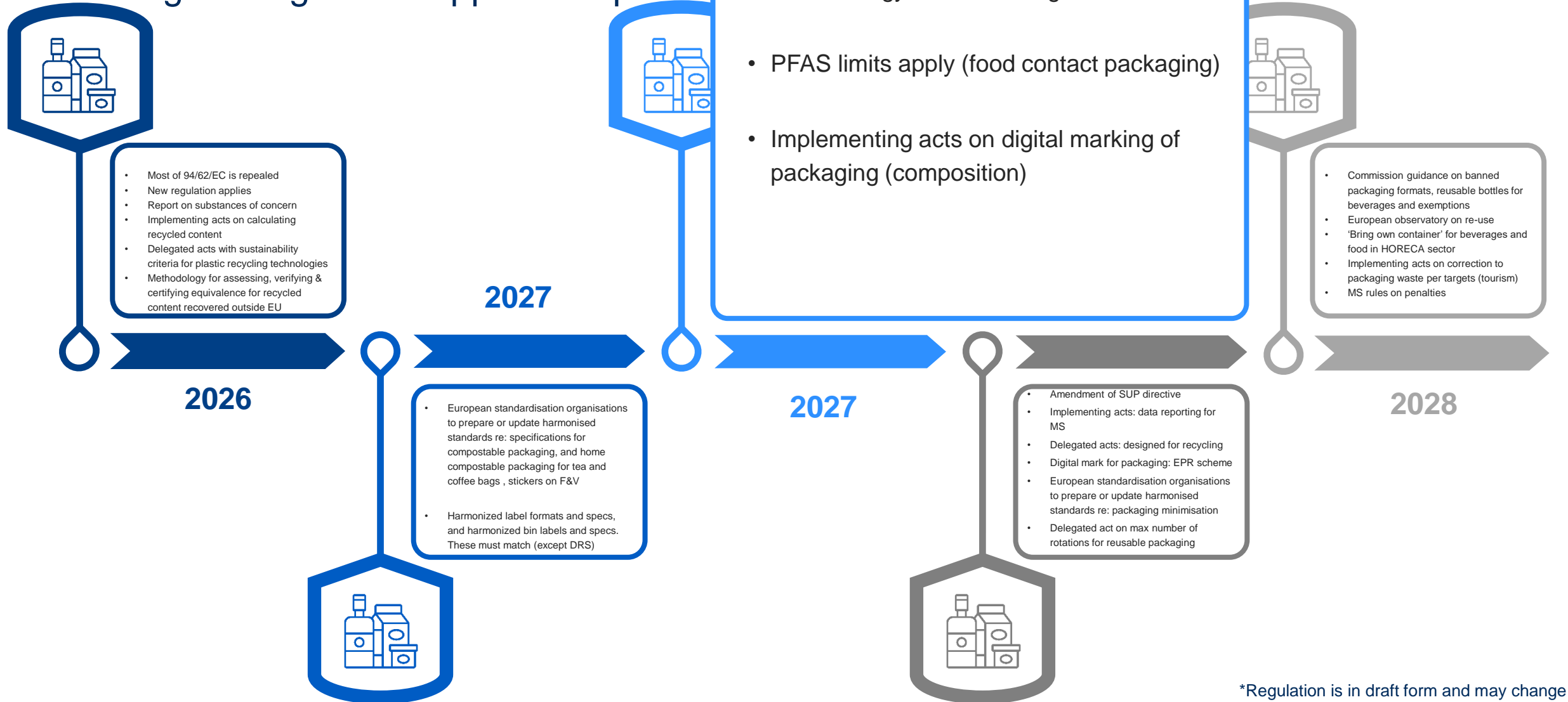
EU PPWR: proposed timeline & milestones (2026-2028).

Assuming the regulation applies ~ April 2026



EU PPWR: proposed timeline & milestone

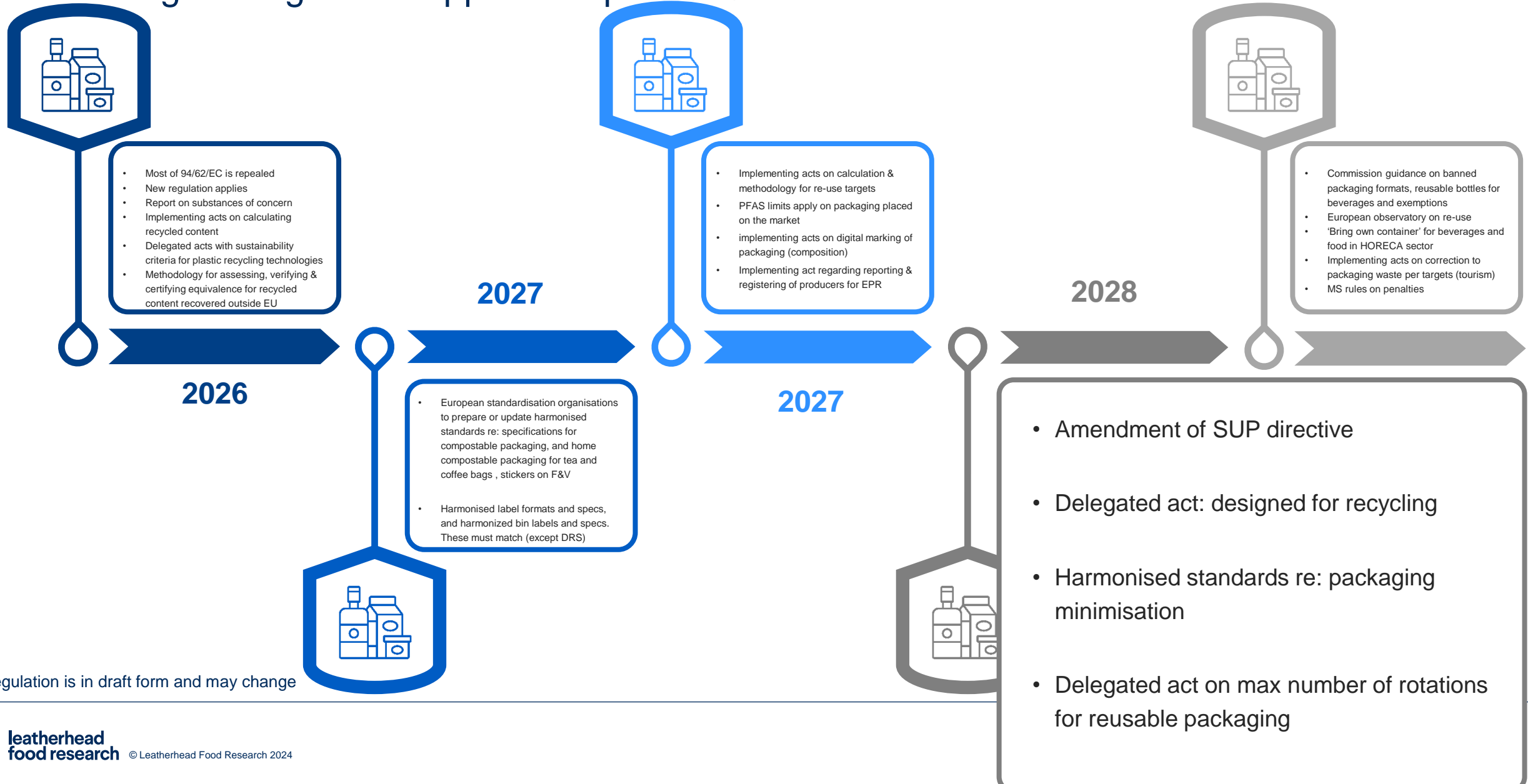
Assuming the regulation applies ~ April 2026



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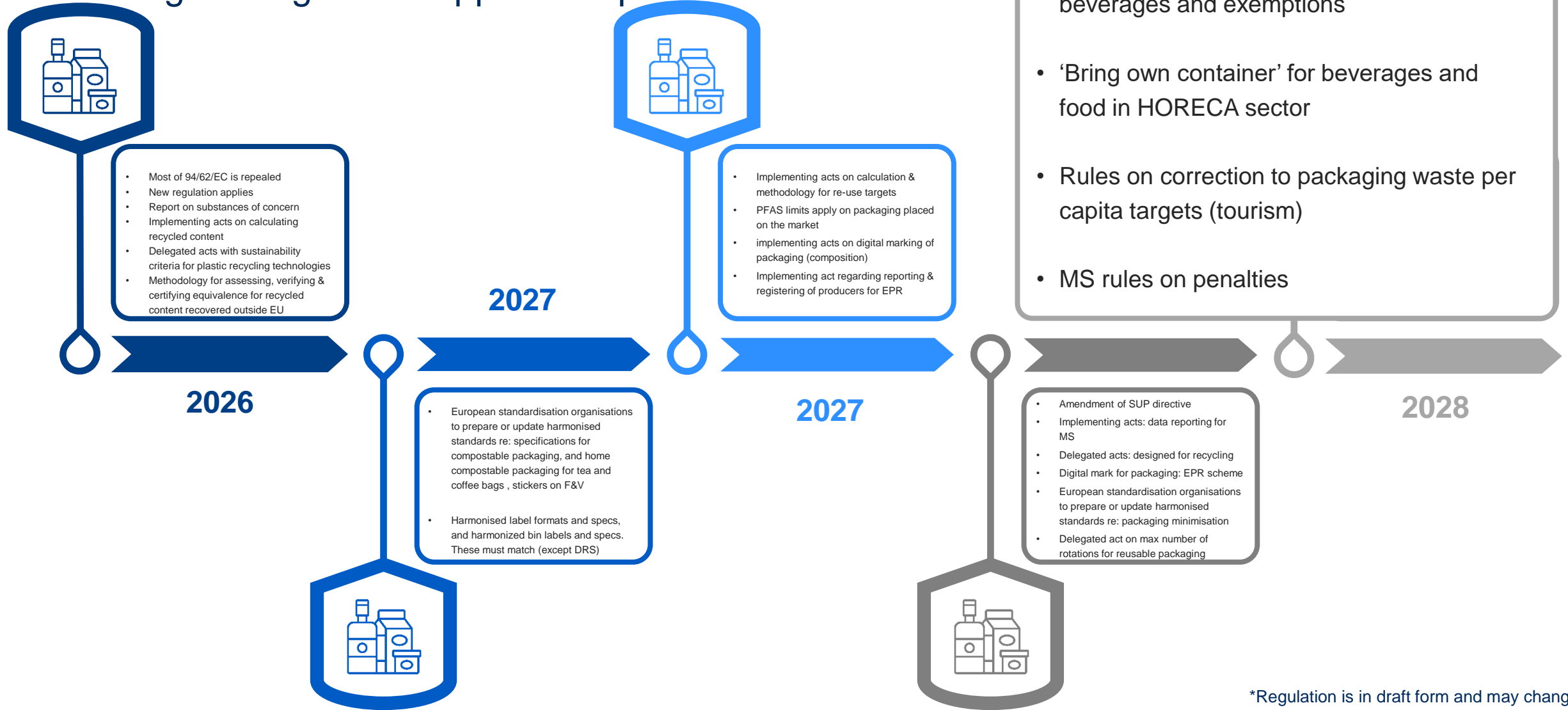
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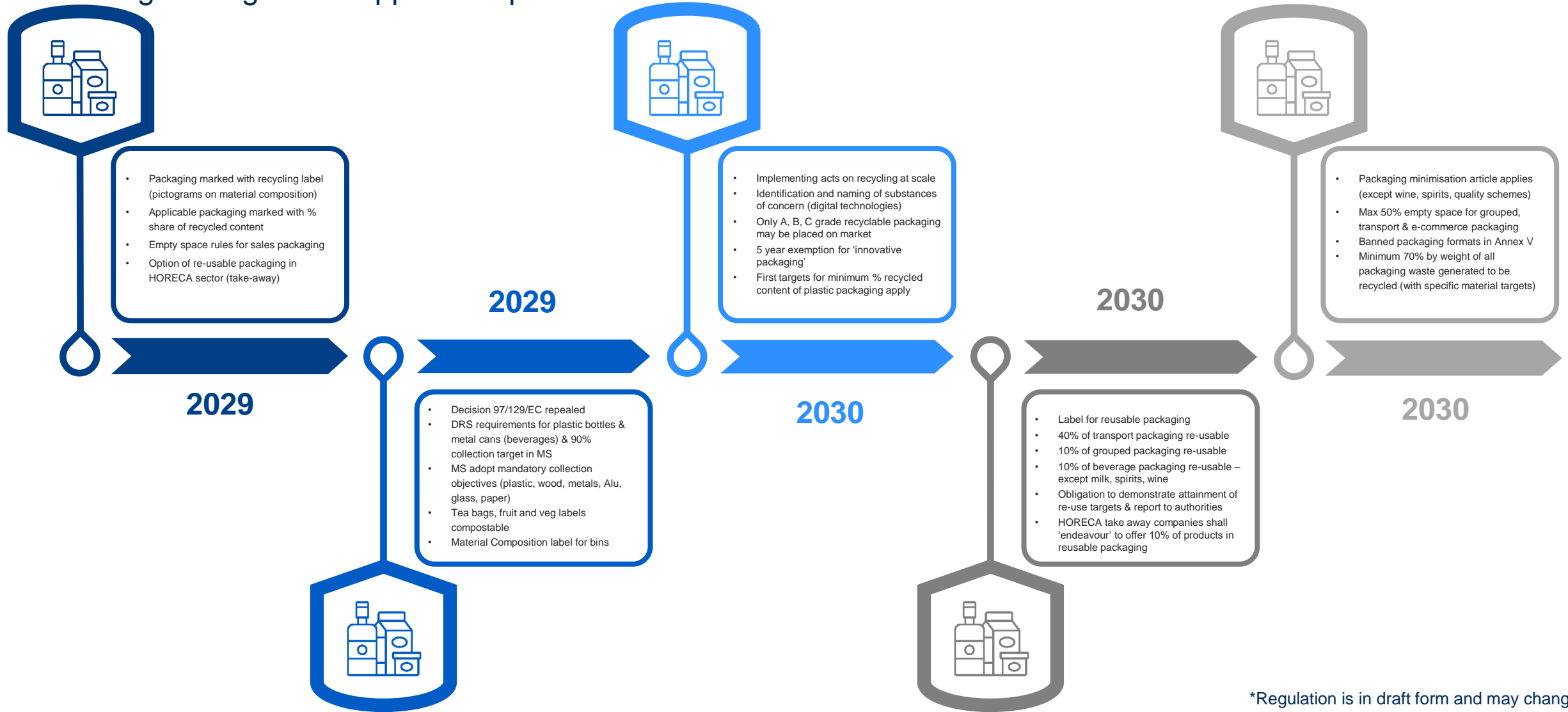
Assuming the regulation applies ~ April 2026



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EU PPWR: Proposed timeline & milestones (2026-2028)

Assuming the regulation applies ~ April 2026



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ones (2026-2028). I 2026

- Packaging marked with label (pictograms on material composition) – recyclable, compostable
- Label for applicable packaging % recycled content
- Option of re-usable packaging in HORECA sector (take-away)
- Empty space rules for sales packaging (minimum possible)



- Implementing acts on recycling at scale
- Identification and naming of substances of concern (digital technologies)
- Only A, B, C grade recyclable packaging may be placed on market
- 5 year exemption for 'innovative packaging'
- First targets for minimum % recycled content of plastic packaging apply

- Packaging minimisation article applies (except wine, spirits, quality schemes)
- Max 50% empty space for grouped, transport & e-commerce packaging
- Banned packaging formats in Annex V
- Minimum 70% by weight of all packaging waste generated to be recycled (with specific material targets)

2029

2030

2030

2030

- Decision 97/129/EC repealed
- DRS requirements for plastic bottles & metal cans (beverages) & 90% collection target in MS
- MS adopt mandatory collection objectives (plastic, wood, metals, Alu, glass, paper)
- Tea bags, fruit and veg labels compostable
- Material Composition label for bins

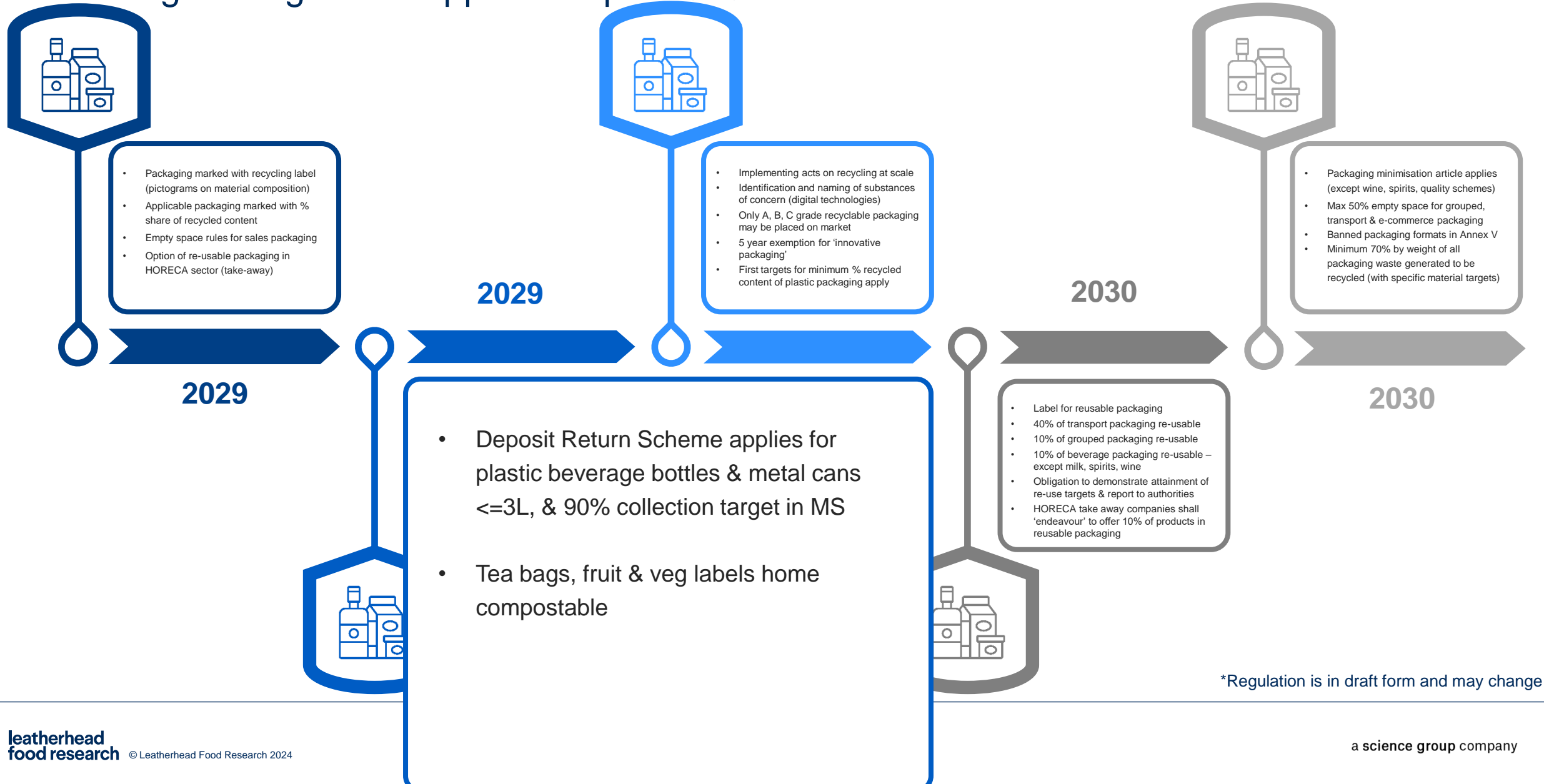
- Label for reusable packaging
- 40% of transport packaging re-usable
- 10% of grouped packaging re-usable
- 10% of beverage packaging re-usable – except milk, spirits, wine
- Obligation to demonstrate attainment of re-use targets & report to authorities
- HORECA take away companies shall 'endeavour' to offer 10% of products in reusable packaging



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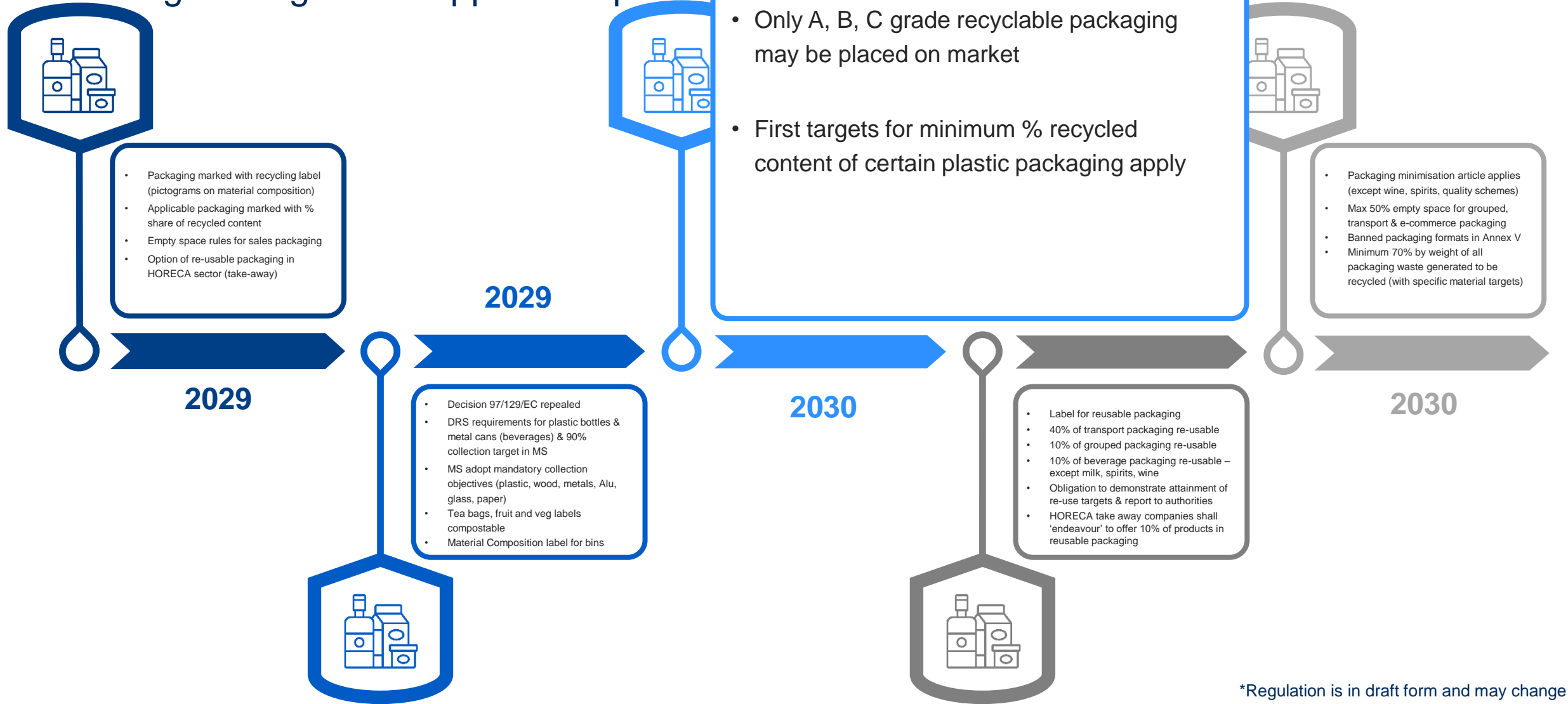
EU PPWR: proposed timeline & milestones (2026-2028).

Assuming the regulation applies ~ April 2026



EU PPWR: proposed timeline & milestones

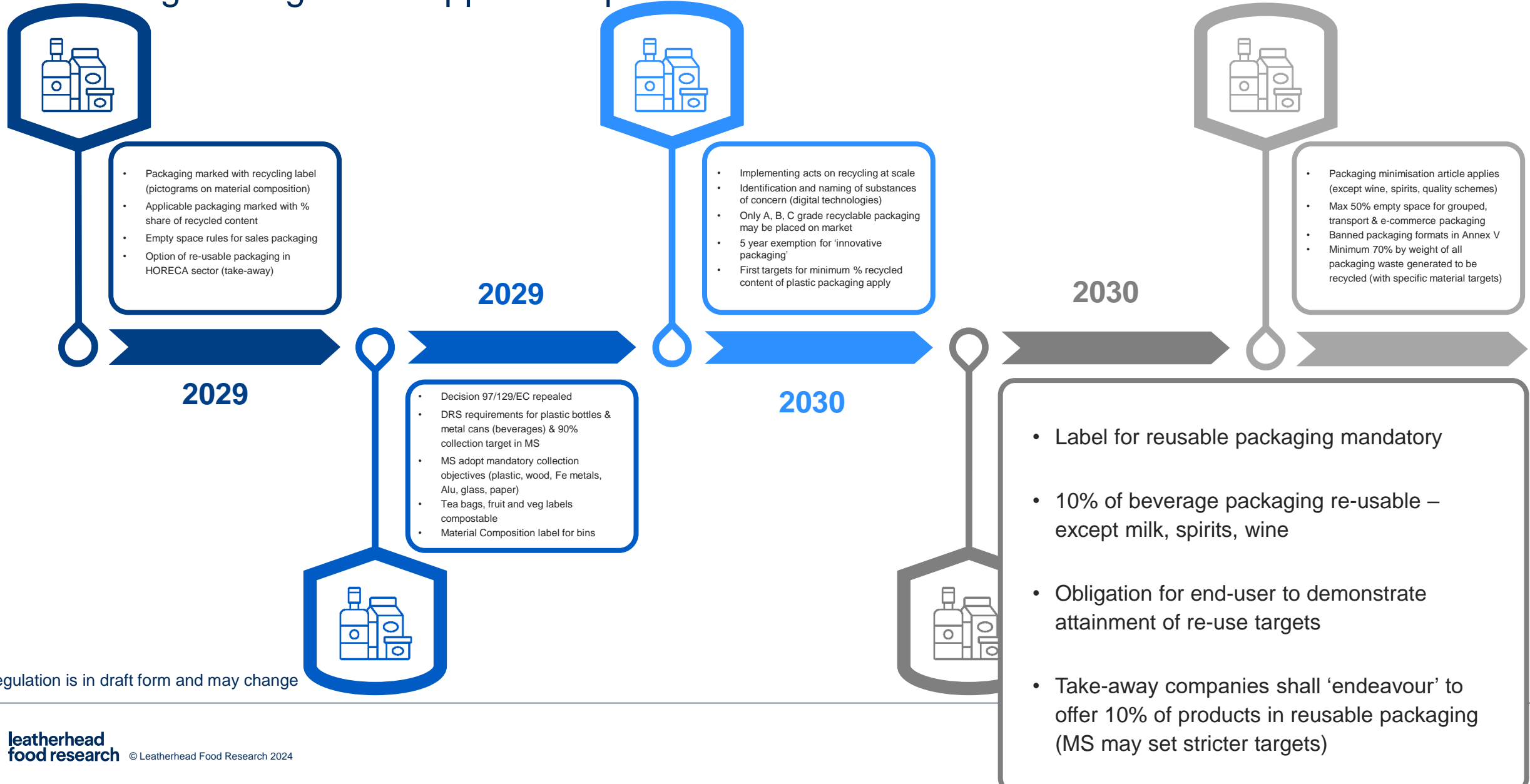
Assuming the regulation applies ~ April 2029



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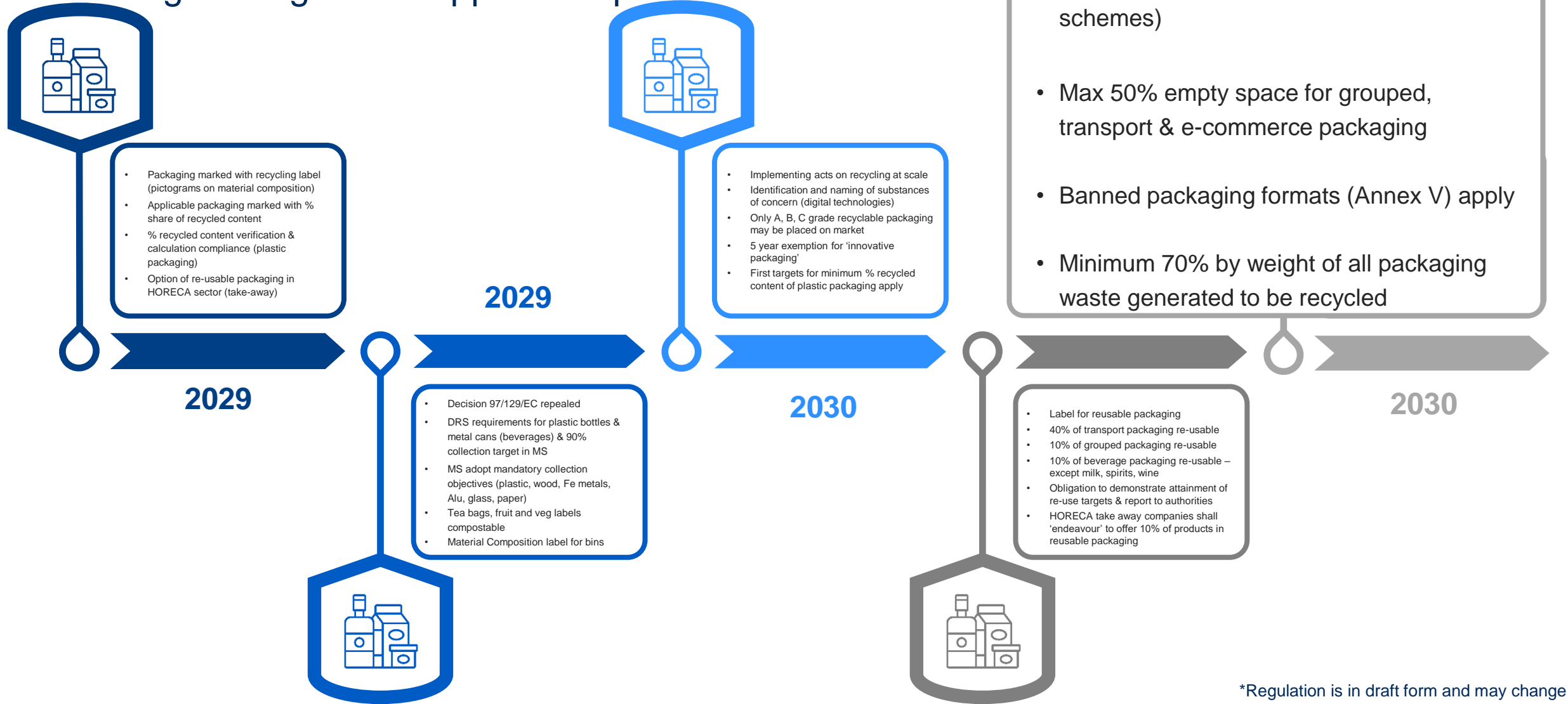
Assuming the regulation applies ~ April 2026



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EU PPWR: proposed timeline & milestones (2026-2028).

Assuming the regulation applies ~ April 2026



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Questions?



Thanks for listening!

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