

PACKAGING AND PACKAGING WASTE REGULATION (PPWR)

2024 UPDATE

The main objective of the revised PPWR is to establish a unified legislative framework across all EU member states, to meet packaging waste reduction targets.

The PPWR has far-reaching implications for businesses throughout the entire value chain, and will likely impact the operations of your organisation.

Take a look at the implications of this Regulation, as detailed by Optimum Group:



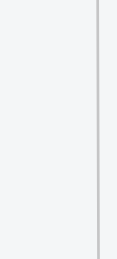
What changes do you need to be aware of?

1 Design for Recycling

The principles of Design for Recycling have been harmonised across Europe:



A **Recycling Performance Grade**, based on the recyclability by weight of a packaging unit.
Scored A, B, C.



A **Recycled at Scale score**, which evaluates the compatibility of packaging with existing recycling streams.
Also scored A, B, C.

Years	Grade	Weight recyclable	Recycled at Scale (RaS)	Allowed on market
2030	A	95%	N/A	✓
	B	80%	N/A	✓
	C	70%	N/A	✓
	Considered non-recyclable	<70%	N/A	✗
2035	A	95%	Recycle at scale (RaS) score is A, B or C	✓
	B	80%		✓
	C	70%		✓
	Considered non-recyclable	<70%	Recycling at Scale score not met	✗
2038	A	95%	Recycle at scale (RaS) score is A, B or C	✓
	B	80%		✓
	Considered non-recyclable	70%	Recycling at Scale score not met	✗
	Considered non-recyclable	<70%	Recycling at Scale score not met	✗

RaS (Recycled at scale Assessment) score:

From 2035, the RaS score will become applicable. It will set thresholds for each scoring level (A, B, or C) based on the newly defined lower bounds for materials.



New definition for recycled at scale:
Packaging waste is collected separately, sorted, and recycled using existing facilities and well-established or already effective methods. The quantity of recycled material must constitute at least 30% of the total wood packaging and 55% of other types of packaging materials annually.

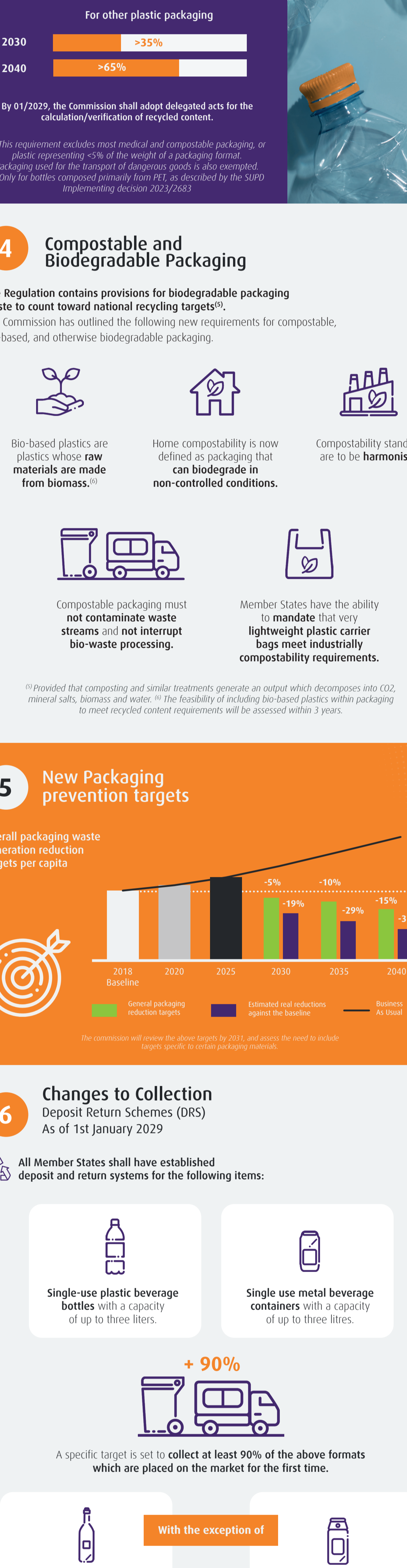
Your packaging will be considered recyclable within Europe if:

- It complies with the above **Design for Recycling** for a packaging category, to which the unit belongs.
- It is effectively and efficiently collected separately in a manner that **preserves its potential for reuse, recycling, or other recovery operations.**
- It is sorted into defined waste streams **without affecting the recyclability of other waste streams.**
- It can be recycled so that the resulting secondary raw materials are of **sufficient quality to substitute primary raw materials.**
- It can be efficiently collected, sorted, and recycled at scale in Member States with **established operational industrial systems for recycling the relevant material⁽¹⁾.**

⁽¹⁾ In essence, where collection, sorting, and recycling routes exist of sufficient capacity, and according to the new RaS methodology from 2035.

To assess the level of classification for a packaging unit, Design for Recycling criteria should consider the following components:

Specific criteria is to be confirmed by 1st January 2028. We expect that many of the following characteristics will be assessed which are in line with currently accepted standards.



Design for recycling criteria and recyclability performance grades will be developed on the basis of the predominant material, and will take into account the above requirements, alongside recycling technologies' associated energy use and GIG output.

Coffee Capsules and Tea Bags

In light of consumer disposal behaviour, the European Commission now considers **single-serve coffee and tea units as packaging.**

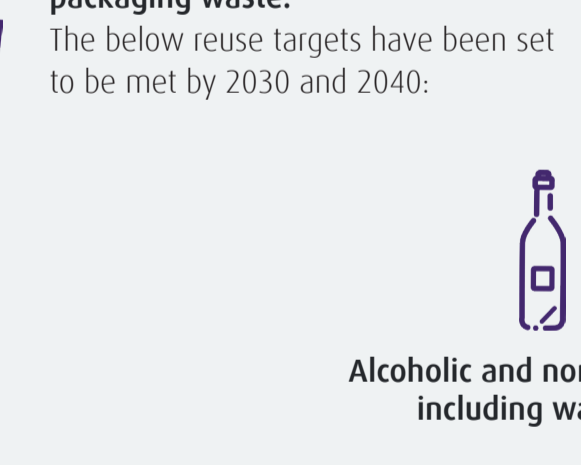


As packaging, single-serve coffee and tea units, including non-permissible capsules are **obligated to meet the above Design for Recycling criteria by 2030.**

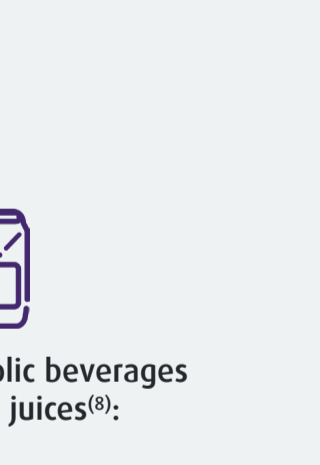
2 Packaging Minimization

As of 1st January 2030

Each unit of packaging should be scaled down to its minimum size. The weight, volume and layers of packaging must take into account the safety and functionality of the package.



Empty space⁽²⁾ ratio of up to 50% for grouped, transport and e-commerce packaging.



Superfluous packaging not fulfilling a defined packaging function should not be placed on the market, including packaging aiming to increase perceived product volume.

⁽²⁾ Space occupied by filling materials, such as air cushions, foam, or paper shall be considered empty space.

3 Minimum Recycled Content

As of 1st January 2030

Plastic packaging must contain a minimum amount of recycled content.

Contact sensitive plastic packaging⁽³⁾ (PET as major component)



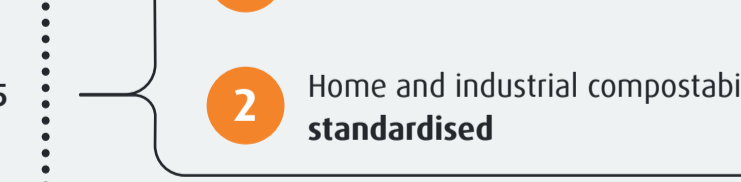
Contact sensitive plastic packaging⁽³⁾ (All other than PET)



Single use plastic beverage bottles



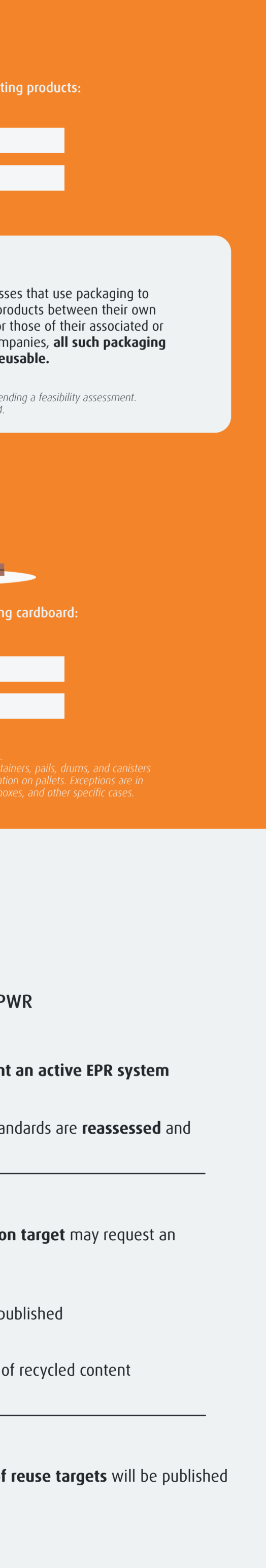
For other plastic packaging



By 01/2029, the Commission shall adopt delegated acts for the calculation/verification of recycled content.

⁽³⁾ This requirement excludes most medical and compostable packaging, or plastic representing <5% of the weight of a packaging format. Packaging used for the transport of dangerous goods is also exempted.

⁽⁴⁾ Only for bottles composed primarily from PET, as described by the SUPD Implementing decision 2023/2683



4 Compostable and Biodegradable Packaging

The Regulation contains provisions for biodegradable packaging waste to count toward national recycling targets⁽⁵⁾. The Commission has outlined the following new requirements for compostable, bio-based, and otherwise biodegradable packaging.

- Bio-based plastics whose **raw materials are made from biomass⁽⁶⁾**
- Home compostability is now defined as packaging that **can biodegrade in non-controlled conditions.**
- Compostability are to be **harmonised.**

- Compostable packaging must **not contaminate waste streams and not interrupt bio-waste processing.**
- Member States have the ability to **mandate that very lightweight plastic carrier bags meet industrially compostability requirements.**

⁽⁵⁾ Provided that composting and similar treatments generate an output which decomposes into CO₂, mineral salts, biomass and water. ⁽⁶⁾ The feasibility of including bio-based plastics within packaging to meet recycled content requirements will be assessed within 3 years.

5 New Packaging Targets

Overall packaging waste generation reduction targets per capita



The commission will review the above targets by 2021, and assess the need to include targets specific to certain packaging materials.

6 Deposit Return Schemes (DRS)

As of 1st January 2029

All Member States shall have established deposit and return systems for the following items:

- Single-use plastic beverage bottles with a capacity of up to three liters.**
- Single use metal beverage containers with a capacity of up to three litres.**

+ 90%

A specific target is set to **collect at least 90% of the above formats which are placed on the market for the first time.**

- Wine, aromatised wine products, and spirits**
- With the exception of**
- Most milk and milk product containers**

As listed in Annex I of EU Regulation 13108/2013

+ 80%

Countries **exceeding an 80% collection target of the above materials** may request an **exemption from establishing a DRS**, including a strategy to achieve rates **above 90%.**

Separate Collection:

The PPWR will introduce a harmonised system of labelling packaging for disposal before 2030.

On-pack pictogram and digital data carrying labels showing packaging composition will become mandatory in 2030 for all types of packaging, including e-commerce and compostable.⁽⁷⁾

Bins and other waste receptacles will be required to match the newly harmonised on-pack labels.

Reusable packaging placed on the market will need to bear a label informing users that it is reusable.

A harmonised DRS label will be developed and applied to packaging formats where appropriate.

⁽⁷⁾ Including transport packaging, as defined by the PPWR.

7 Reuse and Refill

As of 1st January 2030

Reuse and refill obligations are key components of the European Commission's plan to reduce packaging waste. The below reuse targets have been set to be met by 2030 and 2040:

Alcoholic and non-alcoholic beverages including water and juices⁽⁸⁾:

Various exemptions are provided for businesses based on size, location, and compliance with environmental targets.

Final distributors in the HORECA sector must be able to offer limited food and beverage products with the option of reusable takeaway packaging.

⁽⁸⁾ These targets do not apply to highly perishable beverages, milk products, dairy alternatives under CN codes 2202 9911 and 2202 9915, as well as wine, aromatised wine products, and spirits as outlined in EU Regulations No 1380/2013, No 251/2014, No 2658/02, and CN code 2206 00.

The below reuse targets have been set for transport packaging⁽⁹⁾:

Transport and sales packaging⁽¹⁰⁾ used for transporting products:

Exception

For businesses that use packaging to transport products between their own locations or those of their associated or partner companies, **all such packaging must be reusable.**

Pallet wraps have been excluded from reuse requirements via delegated act pending a feasibility assessment. A final determination is expected before Q4 2024.

Grouped packaging in the form of boxes, excluding cardboard:

⁽¹⁰⁾ Reusable packaging within a system for reuse.

⁽⁹⁾ In the form of pallets, bubble wrap and other fillers, large plastic crates, containers, pallets, drums, and containers of all sizes and materials, as well as straps for product protection and/or stabilisation on pallets. Exceptions are in place for packaging used for dangerous goods, direct food contact, cardboard boxes, and other specific cases.

8 Timeline of changes

Assumed year of entry into force: 2025

This timeline has been created based on the most recent available information in April of 2024. Some deadlines are subject to change according to the date of enactment of Delegated Acts and other legislative tools.