

Label the future



*Everything you need to know
about the new **PPWR** legislation*

Why is the European Commission introducing the PPWR?

Why is the PPWR legislation being introduced?

The current European packaging directive has, according to the European Commission (EC), failed to effectively address the exponential increase in packaging. The EC aims to decouple economic growth from the use of (fossil) raw materials for packaging and the negative impact on the environment.

Following the directive introduced in 1994, significant differences have also emerged in how it has been implemented by member states, leading to an uneven playing field. Although recycling rates in the European Union have increased, the amount of waste produced is growing faster than actual recycling, according to the European Commission.

The amount of waste - primarily from single-use packaging - has increased by more than 20% over the past decade. In line with the European Green Deal, Europe aims to address packaging and waste management to achieve a clean, sustainable, and ultimately circular economy.





What is the goal of the **PPWR** legislation?

The main goal of the PPWR legislation is to reduce the environmental impact of packaging in Europe, with the ultimate aim of achieving a fully circular packaging stream by 2050. An important aspect of this is creating a level playing field for producers, importers, recycling companies, and local authorities. Therefore, the same packaging requirements, labels, and definitions will apply across all European countries. The general main strategies are: **REDUCE**, **REUSE**, and **RECYCLE**, in that order. So, we must first reduce, then try to reuse, and only then look at optimal recycling.



Some **specific** points:

- From 2030, every packaging unit must be designed in a way that makes it fully recyclable (Design for Recycling).
- Packaging must be as light as possible and should contain no more than 50% space or air.
- The use of recycled materials in packaging will be mandatory from 2030 and will be gradually increased in the following years.
- Every packaging unit must have disposal instructions on how to separate it, and collection methods must be standardized.
- Promote reusable packaging.





“Design for Recycling”

What is **Design for Recycling**?

All packaging placed on the market must be recyclable by 2030. By early 2028 at the latest, the European Commission will publish guidelines for design for recycling, including so-called Recycling Performance Grades (RPGs). These are recyclability scores, expressed as a percentage of the packaging’s weight that is recyclable. These will apply from 2030 onwards.

From 2030, only packaging of class A, B, and C may be placed on the market. This means that packaging with a recyclability of less than 70% may not be marketed. The table on the following page outlines the requirements that packaging must meet according to the current PPWR framework.

The RPGs have **3 classes**:

- Class A: 95% recyclable or more.
- Class B: 80% recyclable or more.
- Class C: 70% recyclable or more.



Years	RPG	Recyclable weight	Recycle at Scale (RaS)	Allowed on the market
2030	A	95%	n/a	✓
	B	80%	n/a	✓
	C	70%	n/a	✓
2035	A	95%	Recycle at scale (RaS) score is A, B of C	✓
	B	80%		✓
	C	70%		✓
2038	A	95%	Recycle at scale (RaS) score is A, B of C	✓
	B	80%		✓
		Considered as non-recyclable	70% <70%	Does not meet the RaS score"

The Design for Recycling principles will be **standardized** across Europe:



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



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



RaS-score (Recycled at Scale score):

From 2035, the RaS score will apply. In 2030, values will be established for each scoring level (A, B, or C) based on the newly defined minimum thresholds for materials.



Packaging Administration Requirements

Another core component of the PPWR is packaging administration. Each company is expected to maintain detailed packaging records to demonstrate compliance with the regulations.

All producers and importers must demonstrate that their packaging complies with all the rules outlined in the PPWR with a declaration of conformity. In the Netherlands, this is referred to as *Uitgebreide Producenten Verantwoordelijkheid* (UPV), and you might also encounter the English variant: Extended Producers Responsibility (EPR).

- The producer or importer assesses whether the packaging complies through a conformity assessment and then drafts a declaration of conformity. This declaration, including a summary of the materials present in the packaging (including weight), must be provided to the Dutch Inspectorate for the Environment and Transport if requested. Suppliers are required to provide this information.
- Distributors and retailers are required to check whether the packaging they import/purchase is accompanied by a conformity declaration.

The rules for conformity assessment are outlined in Annex VII of the PPWR.



Packaging Minimization

From January 1, 2030, every packaging unit must be reduced to its minimum dimensions. The weight, volume, and layers of the packaging must take into account the safety and functionality of the packaging.



This PPWR measure focuses on reducing both the weight and volume of packaging to prevent excessive packaging and eliminate unnecessary empty spaces. Packaging designed solely to increase the perceived volume of the product, such as double walls, double bottoms, or unnecessary layers, is prohibited.

Moreover, the presence of empty space, especially during the transport of goods, must be minimized. Spaces filled with materials such as paper shreds, air cushions, bubble wrap, or other packing materials are categorized as empty space. The ratio of empty space in packaging must not exceed 50%.



Non-binding advice?



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Minimum Amount of Recycled Material

Plastic packaging must contain a minimum amount of recycled material. This measure aims to encourage reuse and promote a circular economy. To be classified as reusable, a packaging must be deliberately designed, manufactured, and marketed with the explicit intention of being used multiple times (or refilled) for a purpose similar to the original design.

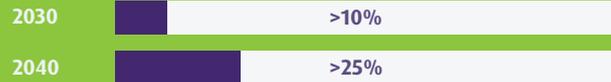
The responsibility for planning and organizing the reuse lies with the producer, who is also required to inform the end-user about the possibilities for reusing the specific packaging.



Contact-sensitive plastic packaging (PET as the main component)



Contact-sensitive plastic packaging (Everything except PET)



Single-use plastic drink bottles



Other plastic packaging



100% of the packaging must be **recyclable**



The first crucial measure of the PPWR states that from January 1, 2030, all packaging, regardless of the materials used, must be specifically designed with recyclability in mind.

According to the PPWR, packaging must meet the following criteria to be considered recyclable:

- The packaging must be designed to be recyclable.
- The packaging can be collected separately in an effective and efficient manner.
- The packaging must be able to be directed to a well-defined waste stream without compromising the recyclability of other waste streams.
- The packaging must be recyclable to the extent that the resulting secondary raw materials are of high enough quality to replace primary raw materials.
- Possibility for large-scale recycling (from 2035).



Uniform Labeling and Symbols

The PPWR stipulates that consumers must be able to sort packaging more easily, aiming to reduce contamination in material streams. The following rules have been established for this purpose:

The use of pictograms to indicate material composition will become mandatory by 2028 (with the exception of transport packaging and deposit-return packaging). These pictograms may be supplemented with QR codes. These symbols correspond to symbols that will be placed on collection containers. Universal pictograms will be introduced for deposit-return packaging and reusable packaging. The form of the label for these pictograms will be determined by an implementing act (expected in 2026).

Furthermore, each member state must implement deposit and return systems by January 1, 2029, for the separate collection of plastic beverage bottles and metal beverage containers for single use with a capacity of up to three liters. These deposit and return systems must ensure the separate collection of at least 90% by weight of the respective packaging per year.



- Disposal instructions will be standardized on both the packaging and collection tools (at the material level).

- Deposit return packaging will receive uniform labels.

- Labels/coding will indicate the reusability of the packaging.

- Specifications for labeling regarding claims about 'recycled content' and 'biobased content'.

- Labels must be clear and not misleading.



Compostable and Biodegradable Packaging

The PPWR includes provisions to count biodegradable packaging waste towards national recycling targets. The Commission has introduced the following new requirements for compostable, bio-based, and otherwise biodegradable packaging.



Biobased plastics are plastics made from biomass.



Home compostability is now defined as packaging that can be biologically broken down in uncontrolled conditions.



Compostability standards need to be harmonized.



Compostable packaging must not contaminate waste streams or disrupt the processing of organic waste.



Member states have the option to require that very light plastic carrier bags meet industrial compostability standards.

Timeline of the PPWR

- All EU member states must have an active EPR system.
- Standards for home and industrial compostability will be reassessed and standardized.

2025

2026

2027

- A method for calculating reuse targets will be published.

- Deposit return schemes must be implemented in all member states for specific types of packaging.
- Delegated acts for the calculation/verification of recycled material will be adopted.

2028

2029

- Countries that exceed the collection target of 80% can apply for an exemption from implementing the deposit return scheme.
- Guidelines for reuse targets will be published.
- A method will be developed to certify the validity of labels for recycled content.

- Criteria for the Design for Recycling guidelines will be established.
- A model for differentiating the fees to be paid by producers, linked to the new performance classes, will be established: 'The polluter pays'.

- The Recycle at Scale (RaS) scores for grades A, B, and C will be introduced.
- Member states must reduce packaging waste by 10%.

- Stricter targets for the reuse of both beverage containers and other transport and sales packaging.
- Member states must reduce packaging waste by 15%.
- Higher requirements for recycled materials for relevant types of packaging.

- The member states' goals for reducing packaging waste must be reassessed.

- Recycling Performance Grade (RPG) C is prohibited on the market due to stricter recyclability standards.

2030

2031

2035

2038

2040

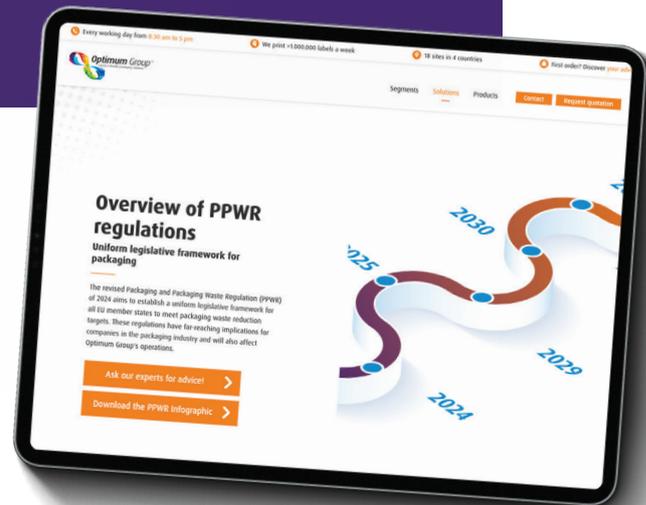
- Basic recycling scores (A, B, C) will be implemented without RaS scores.
- A methodology for the Recycle at Scale (RaS) score will be developed.
- Minimum standards for packaging dimensions and empty space ratios will come into effect.
- Initial requirements for recycled material will be established for various types of packaging.

- Targets for the reuse of alcoholic and non-alcoholic beverages and other reusable packaging will come into effect.
- Packaging icons and labels with digital data will be mandatory.
- Coffee capsules and tea bags for single use must comply with Design for Recycling guidelines.
- All member states must reduce packaging waste by 5%.

Stay informed about all developments regarding the PPWR regulations

Follow us on social media, visit our website regularly, and consult our experts to stay up-to-date with the latest trends and developments in sustainable packaging and recycling.

Scan the QR code for the latest updates



Our headquarters

OG Benelux

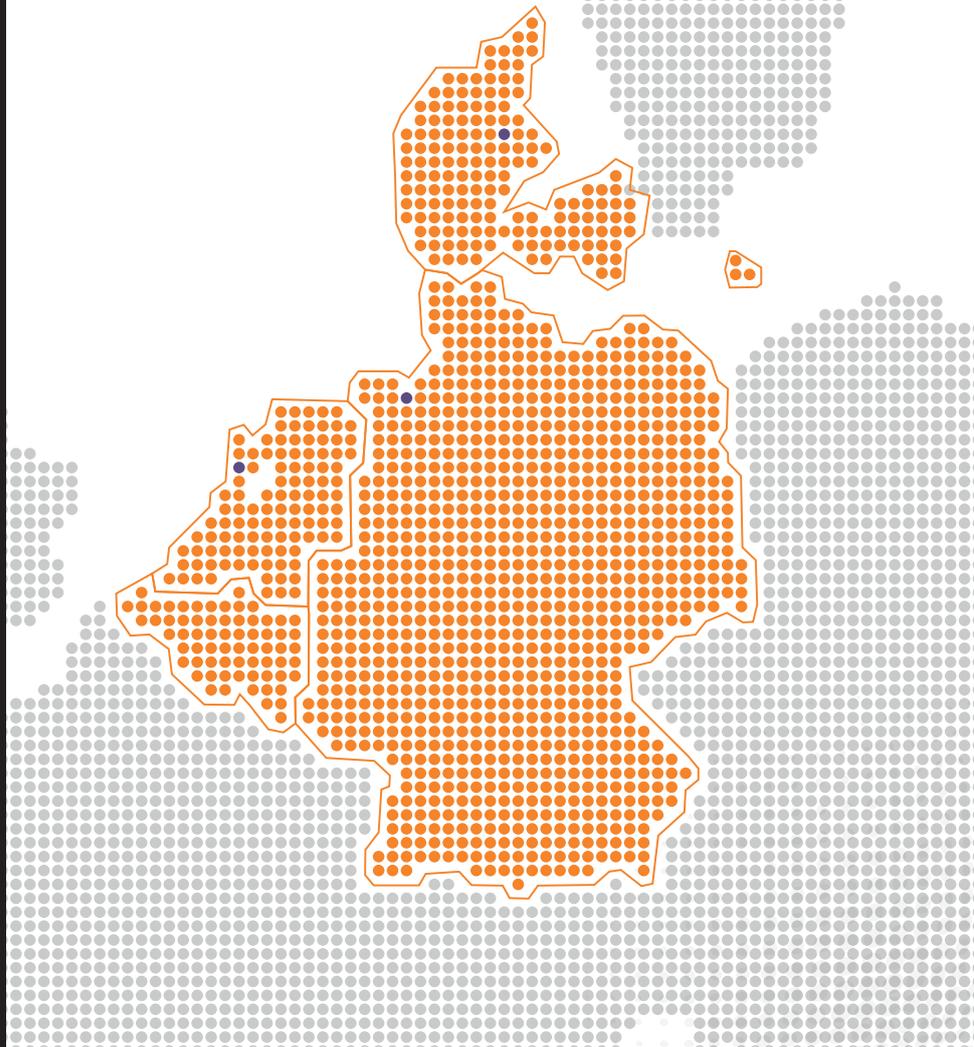
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