



dga

Unpacking the Packaging and Packaging Waste Regulation (PPWR)

FEFPEB Congress 2024

PPWR: A quick overview

PPWR: Background

In November 2022, the European Commission published a proposal for Packaging and Packaging Waste Regulation (PPWR) which will repeal the Directive on Packaging and Packaging Waste

FEFPEB members were concerned about the following aspects in the Commission Proposal for the regulation:

- Reuse targets for industrial packaging
- Strict recyclability requirements for wooden lightweight packaging (LWP)
- Restriction for fresh fruits and vegetables (below 1.5kg)
- Empty space ratio for industrial packaging
- No obligation to return reusable assets in closed loop system

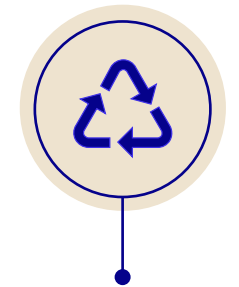
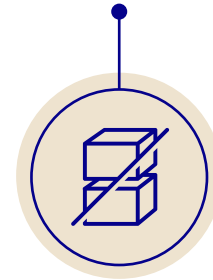
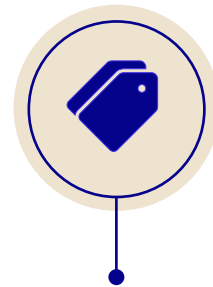
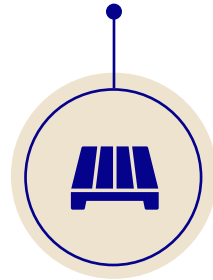
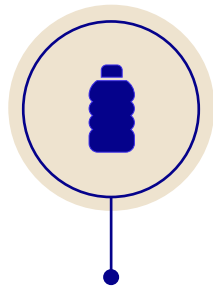
DGA started working on PPWR advocacy in May 2023



PPWR Obligations: An Overview

RECYCLABILITY

All packaging should be recyclable based on sustainability criteria that will be established by the Commission



RECYCLED CONTENT TARGET

Plastic packaging to have mandatory recycled content targets

REUSABLE PACKAGING

Transport packaging, stabilisation packaging and beverage packaging to achieve mandatory reuse targets

LABELLING

From ca. Q1 2029, Packaging to bear label on reusability with additional information on rotations made available via QR code

PACKAGING MINIMISATION

Establishes maximum empty space that can be included in a packaging (50% max.)

RECYCLING TARGETS

25% and 30% recycling targets for wood packaging by 2025 and 2030 respectively

Key PPWR Obligations for FEFPEB

RECYCLABILITY

- All packaging should be recyclable by 2030
- By 2030, packaging should follow design for recycling criteria
- By 2035, packaging should follow design for recycling criteria as well as recycled at scale criteria
- Criteria defined later in secondary legislation dividing packaging into different grades (A, B, C) based on its recyclability per unit



REUSE

- By 2030, 40% of transport packaging and stabilisation packaging should be reusable
- By 2040, 70% of transport packaging and stabilisation packaging to be reusable
- By ca. Q2 2026 100% of transport and stabilisation packaging used between sites of the same economic operator and their partner/ linked enterprise should be reusable
- 100% of transport and stabilisation packaging used within the same MS should be reusable



MINIMISATION

- By 2030, packaging should be designed to reduce the volume to the minimum necessary to ensure its functionality
- By 2030, the maximum empty space ration in a packaging should not be more than 50%



LABELLING

- By ca. 2029, reusable packaging within a system of reuse should bear a label indicating the same
- Information on tracking and trip calculation should be provided via QR code or other digital means
- By ca. 2028, packaging that are a part of EPR system should bear a symbol or QR code



PPWR Advocacy

What have we achieved in the last year?

Key issues in PPWR text before its approval



Closed loop recycling: Obligation to recycle packaging products into packaging via definitions of high-quality recycling and recycled at scale



Transport packaging

- Reuse targets for all transport packaging including industrial packaging
- Mandatory empty space ratio limitation of 40%



Light-weight packaging

- Recyclability requirements difficult to meet in some countries
- Restriction on use for fresh fruits and vegetables



No obligation to **return reusable assets** when used in closed loop systems

What we achieved in the latest version of PPWR



Open loop recycling: High-quality recycling and recycling at scale is not mandating that packaging should be recycled to packaging itself



- Exemption from reuse targets for customer-designed and large-scale machinery packaging
- Empty space ratio calculation will take into consideration the shape and protection of products



- **Exemption** for LWP from recyclability requirements
- Restriction on use for fresh fruits and vegetables applies only to **Single use plastic packaging**



Economic operators are obliged to **return reusable assets** when used in closed loop systems

How did we achieve it?



Outreach with EU Institutions

- Meeting with EP Rapporteur's Office and other rapporteurs
- Meeting with several Council representatives
 - Contact European Commission DG ENVI



Outreach with like-minded organisations

- Joint statement with wood and paper industry - FPE, EFIC, EPF, GROW, CEI Bois
- Met with EPF and CEI bois
 - Met with wood recycling associations from UK, DE and PL



Tabling of amendments and voting recommendations in Parliament & Council

- Several MEPs across political tabling amendments in favor
- Targeted outreach to ENVI, ITRE and IMCO Committees
 - Sent voting recommendations to get favourable AMs passed in the Plenary

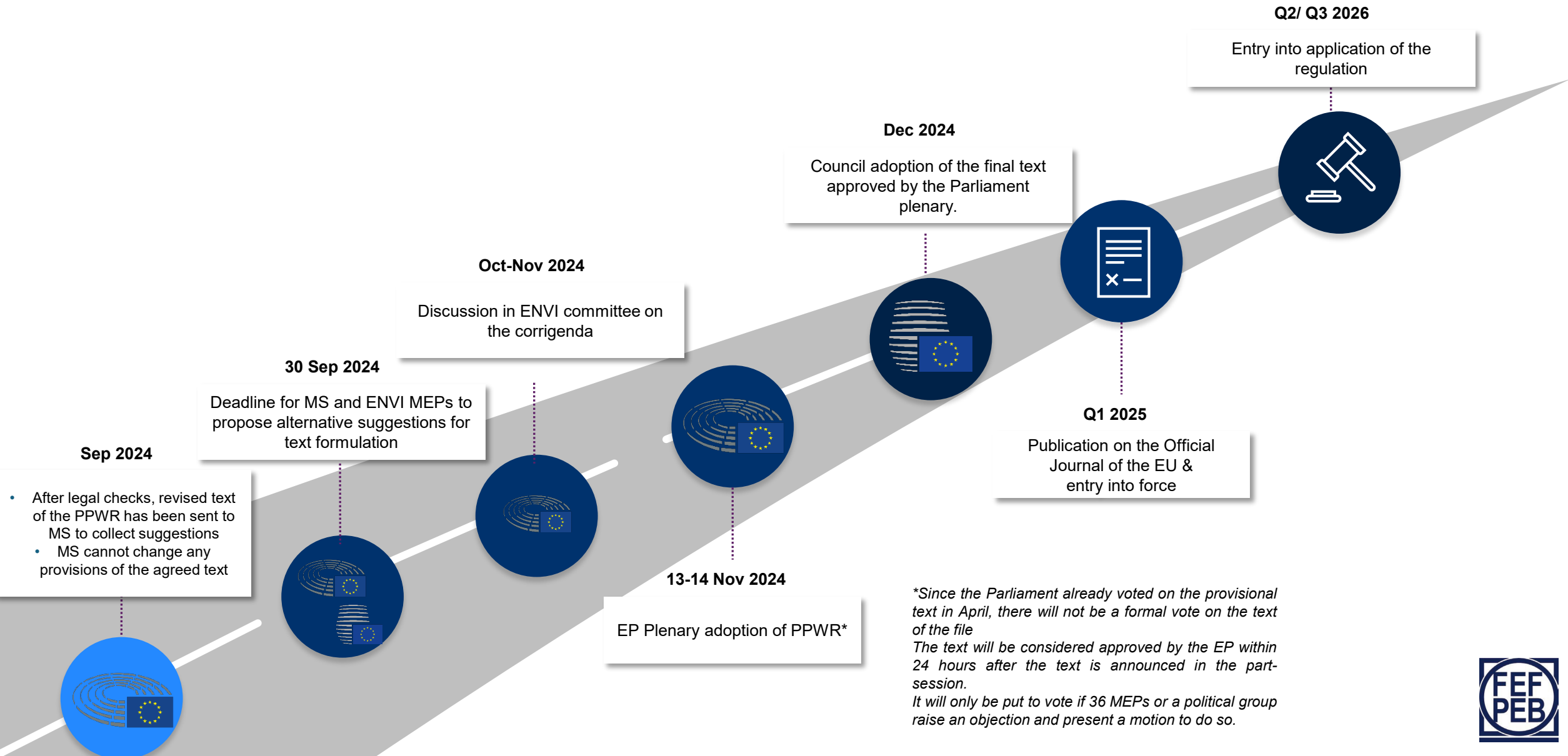


Written Statements

- Prepared position papers and several reaction statements at EP Committee & Plenary level and Council
 - Co-ordinating advocacy efforts of FEFPEB Members in EP and Council

What's coming next?

PPWR adoption: provisional timeline



**Since the Parliament already voted on the provisional text in April, there will not be a formal vote on the text of the file
The text will be considered approved by the EP within 24 hours after the text is announced in the part-session.
It will only be put to vote if 36 MEPs or a political group raise an objection and present a motion to do so.*

PPWR secondary legislation timeline*



DfR criteria and recyclability performance for all materials

◆ **1st January 2028:** Establishment of criteria by EC

Recyclability at scale methodology

◆ **1. January 2030** Establishment of criteria by EC

Packaging minimisation targets

◆ **Q1 2027:** Establishment of methodology for compliance with packaging minimisation

Labelling

◆ **Q2 2026:** Establishment of labelling requirements and specifications by EC

Methodology for measurement of empty space ratio

◆ **Q1 2028:** Establishment of methodology for calculation of maximum empty space ratio

Calculation rules and methodology for reuse target

◆ **Q1 2027:** Establishment of min. no. of rotations by EC

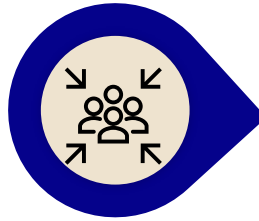
◆ **30 June 2027:** Establishment of methodology for calculation by EC

◆ **1 January 34:** Review of implementation and feasibility of targets

Planned activities for further engagement on PPWR

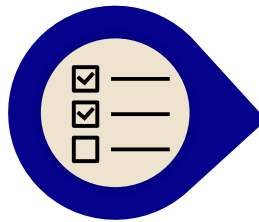
Key stakeholder engagement

- Prepared a list of key MEPs relevant for FEFPEB
- Outreach to be conducted by members in their native language
 - Follow-the formation of new Commission
- Organise meeting with relevant Commission officials



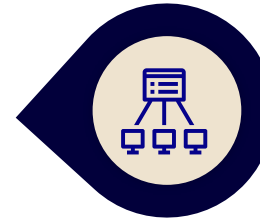
Organization of speed boats per priority topic

- Prepare for work on priority secondary legislation
- Analysis of expert group positions and documents
 - Prepare guidance documents for priority topics
- Build coalition with other association and industry stakeholders to prepare joint positions



Participation in stakeholder consultation

- Gather intelligence on stakeholder consultation and expert group meetings
- Participate in consultations and Q&A sessions



Advocacy campaign and messaging

- Participate in conferences and webinars to share insights and advocate for wooden packaging and pallets
- Build alliances with industry bodies, other associations and NGOs on common policy issues



Key Institutional Stakeholders to engage



Commission



Teresa Ribera

Executive Vice President for Clean, Just and Competitive Transition



Jessika Roswall

Commissioner for Environment, Water and Circular Economy



Wopke Hoekstra

Commissioner for Climate, Net Zero, and Clean Growth



Christophe Hansen

Commissioner for Agriculture and Food



Aurel CIOBANU-DORDEA
Director, CE (ENV.B)
DG ENV



Mattia PELLEGRINI
Head of Unit ENV.B.3
From Waste to Resources



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Tiemo Wölken
S&D, Germany
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Peter Liese
Germany, EPP
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Alexandr Vondra
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Massimiliano Salini
EPP, Italy
S.Rapporteur PPWR



Anna Zalewska
ECR, Poland
Rapporteur WFD



Pietro Fiocchi
ECR, Italy
S.Rapporteur PPWR



Council



Hungary
Jul - Dec 2024



Poland
Jan - Jun 2026



Denmark
July - Dec 2025



Cyprus
Jan - Jun 2026



Ireland
July - Dec 2026

Annex: Main compliance provision for FEFPEB



Main provisions

- From 1 January 2030 all packaging shall be recyclable, in line with the design for recycling criteria
- From 1 January 2035 packaging will also have to be recycled at scale
- By 1 January 2030, packaging will not be allowed on the EU market unless recyclable within grades A, B or C
- By 1 January 2038, packaging shall not be placed on the EU market if it falls below grades A and B

Recyclability grades	Percentage
A	$\geq 95\%$
B	$\geq 80\%$
C	$\geq 70\%$
<D	$< 70\%$



Relevant exemptions for wood packaging

- Packaging used to transport dangerous goods
- Sales packaging made from lightweight wood



Main provisions

- From 1 January 2030, 40% of transport packaging should be reusable
- From 1 January 2040, operators should endeavor to use at least 70% reusable transport packaging (non-mandatory)
- Economic operators using transport packaging between different sites, or between any of the sites and other linked enterprise or partner enterprise, shall ensure that such packaging is reusable within a system for re-use (100%)
- From ca. Q1 2029, packaging must bear a label indicating it is reusable, with additional reusability information available via a QR code or digital carrier, facilitating tracking and trip calculations.



Relevant exemptions for wood packaging

- Packaging used for dangerous goods
- Packaging used for large-scale machinery, equipment and commodities for which packaging are customised-designed

Conditions for exemption for Member States

- Member State reaches 5 percentage points above the 2025 targets for recycling of packaging waste per material and is expected to reach 5 percentage points above the 2030 target
- Member State is on track to fulfil the respective waste prevention targets and can demonstrate to have reached at least 3% waste prevention by 2028 compared to the 2018 baseline



Main provisions

- By 1 January 2030, the packaging placed on the market is designed so that its weight and volume is reduced to the minimum necessary for ensuring its functionality including the shape and material that the packaging is made of
- By 1 January 2030, packaging in grouped packaging, transport packaging or e-commerce packaging, shall ensure that the empty space ratio is maximum 50 %



Relevant exemptions for wood packaging

- The methodology for the calculation of the empty space ratio will consider special packaging characteristics, among others, irregular shapes, packaging containing more than one sales unit, or liquid products, possible damage and space needed to attach shipment labels
- Reusable packaging within a system for reuse are exempted from complying with the max. 50% empty space ratio. They should however comply with minimisation requirements



Main provisions

- From ca. Q1 2029, packaging must bear a label indicating it is reusable, with additional reusability information available via a QR code or digital carrier, facilitating tracking and trip calculations.
- The manufacturer has the option to decide whether the label should be **placed, printed or engraved visibly, clearly legibly and firmly** on the packaging, so that it cannot be easily erased.
- By mid-2026, the Commission will adopt implementing acts to establish a harmonised label and specifications for each labelling requirements.
- Economic operators are prohibited from using labels, marks, symbols or inscriptions that will mislead or confuse consumers with respect to the sustainability requirements for packaging



Impact on wood packaging

- The manufacturer will have to label wood packaging with details on reusability
- Packaging that are a part of EPR system should also bear a label indicating the same (details in next slide)



Relevant exemptions for wood packaging

- Wooden packaging that is reusable within a system of reuse is exempted from labelling requirements on its material composition

Labelling : Mandatory information to be included

Information	Type of packaging	Content	Entry into force
Material composition	All packaging except: <ul style="list-style-type: none">• Transport packaging (except e-commerce packaging)• Packaging part of a DRS	<ul style="list-style-type: none">• The label shall be based on pictograms and be easily understandable.• Option to use a digital labelling containing information on sorting.	From mid 2028 (42 months from the date of the entry into force of this Regulation or 24 months from the date of entry into force of the implementing act on harmonised requirements for labelling)
Reuse	Reusable packaging	<ul style="list-style-type: none">• The label shall inform users that the packaging is reusable.• A digital label shall be used to provide more information on reusability.	By 2029 (48 months from the date of the entry into force of this Regulation or 30 months from the date of entry into force of the implementing act on harmonised requirements for labelling).
EPR	Packaging included in an EPR scheme	Symbol or digital label	By Q1 2027 (2 years from the entry into force of PPWR)

Thank you

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