



Version 1.0

Summary of the proposed
Packaging and Packaging
Waste Regulation [PPWR]

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Introduction into the PPWR

What is the PPWR?

The [PPWR](#) is a proposed European Union (EU) regulation to reduce packaging pollution and create a circular economy for packaging. If adopted, it will apply across all of the EU countries for any packaging, including imported packaging. It sets targets to reduce packaging waste overall, mandates specific requirements for packaging sustainability (recyclability, recycled content, reuse, packaging minimisation etc.), and ensures that Extended Producer Responsibility [EPR] schemes are rolled out across Europe.

Where do we stand?

On 30 November 2022 the European Commission [published](#) a proposal for a new regulation on Packaging and Packaging Waste. After wide consultation, the European Parliament Environmental Committee [ENVI] adopted a [compromise position](#). On 22 November 2023, the European Parliament plenary [voted](#) on its [overall position](#) on the PPWR. Although the parliament passed the PPWR and maintained the overall ambition of reducing packaging waste in line with the waste hierarchy (reduce, reuse, recycle), observers are [disappointed](#) that many of the key provisions have been weakened and far-reaching exemptions are introduced.

What comes next?

Now that the [European Commission](#) and [European Parliament](#) have come to a position, it is the turn of the [European Council](#), currently under the [Spanish Presidency](#). A proposed position paper is currently under discussion and is expected to be voted on by the 27 EU Member States on 18 December 2023.

Once the Council has adopted its position a [‘trilogue’](#) is conducted between the Commission, Parliament and Council to try to find a shared compromise. This has a very ambitious timeline to be completed before the European Parliament elections in June 2024. Realistically it would need to be completed by March in order to have time for translation and adoption.

IMPORTANT NOTE: The PPWR adoption is not yet finalised and the final text may differ from this summary. This summary is made available by LC Packaging for educational purposes and to give general information and the current status.

Key highlights of the PPWR for LC Packaging

Extended Producer Responsibility (EPR)

EPR obligations are currently different across the European Union. This has led to significant differences in the approach and scope. The PPWR would harmonise this by setting common responsibilities for companies and producer responsibility organisations including:

- public reporting and a database of all participating companies;
- common packaging categories;
- and shared criteria for eco-modulation (fee increases/decreases for recyclability and recycled content).

The PPWR also reinforces the existing directive [2008/98/EC](#), stating that EPR systems must at least cover the costs of the waste collection, infrastructure, operation, transport and treatment of waste in public collection systems, as well as litter clean-up costs. It can be expected that the EPR fees payable by packaging users will increase substantially in most countries. This will incentivise reduction and reuse of packaging. As the PPWR will introduce discounts for recyclable packaging and packaging including recycled content this will also be promoted.

Hazardous materials

The PPWR would reinforce the existing limitations on heavy metals to be present in packaging. Furthermore the PPWR would ban the use of intentionally added PFAS and BPA in any packaging within 18 months from adoption. A wider ban of PFAS and PFOA materials is also under consideration by the European Chemicals Agency (ECHA), including for non-intentionally added substances (NIAS).

Recyclability

The PPWR aims towards all packaging being recyclable. Specifically the PPWR requires the European Commission to develop recyclability criteria for all different packaging categories by 2027 (Grade A to E). By 2030 non-recyclable packaging (grade E) would be banned from the EU market, and by 2035 packaging with a very low recyclability (Grade D) would be banned.

There are separate packaging categories applicable to LC Packaging's products :

- Industrial flexible plastic (FIBCs, WPP bags, and Net bags);
- Flexible PP (flexible PP B2C packaging);
- Textile (including Jute);
- and Others (see [Annex II of the PPWR](#) for a full list of packaging categories).

The criteria for defining recyclability should take into account the main material type and any extras (laminations, components, accessories, labels, coatings, additives etc.) that impact on the recyclability, and are expected to draw from the [RecyClass Design for Recycling guidelines](#). Important is that separate components of a packaging unit that must be detached to access the product are assessed separately (e.g. fully detached plastic label from cardboard box).

Recycled content

The PPWR proposes to introduce mandatory targets for post-consumer recycle (PCR) content in *plastic* packaging:

	2030	2040
Contact-sensitive packaging with PET as major component (except single-use beverage bottles)	30%	50%
Contact-sensitive packaging made from plastic materials other than PET (except single-use plastic beverage bottles)	7.5%	25%
Single-use beverage bottles (PET and other materials)	30%	65%
All other plastic packaging not covered by above categories	35%	65%

Contact-sensitive packaging is all packaging for food and food ingredients, animal feed and feed additives, medicines and medical products, veterinary medicinal products, cosmetics and dangerous goods (full definition page 25-26 of [original PPWR proposal](#)).

These targets apply for all packaging types where plastic is present, however packaging with <5% plastic content is exempted for the recycled content requirements. In the proposal approved by the European Parliament the recycled content target would have to be met as an average per manufacturing plant, per packaging type, per year, giving flexibility to the exact application of recycled content. The European Commission is also required to develop a methodology for tracing a verification of PCR content by end-2025 to enforce these targets.

Companies are exempted from meeting these targets if they are a [micro enterprise](#). It also does not apply to [baby & infant food](#), the immediate packaging of [medicinal products](#), [medical devices](#),

or [veterinary medical products](#), their outer packaging where needed for quality purposes, or the packaging of supplies, components, and immediate packaging of such products. Finally, compostable plastic is exempted, as are the inks, adhesives, paints, varnishes and lacquers that may be used on packaging.

Bio-based plastic

The PPWR would require the European Commission to publish a report on the possibility of using bio-based plastic feedstock for packaging by end-2025, define sustainability criteria for bio-based feedstock (e.g. avoiding deforestation and land-use competition), and allowing companies to meet up to 50% of the recycled content requirement with bio-based plastic instead.

Compostability

The PPWR gives a limited scope to (industrially) compostable plastics, mandating compostable packaging to be used for a small number of products (e.g. tea and coffee bags). Other packaging can be compostable, but must allow recycling without affecting other waste streams, meaning it should be allowed to be processed in existing biowaste streams. The European Commission is requested to update the norm EN13432 to define explicitly the criteria for compostability to limit current confusion.

Labelling

Consumer packaging should be clearly labelled with the material composition and where applicable with information regarding reusability and collection points with a QR code. This obligation is not proposed to apply to industrial packaging. However, as material composition will still be a critical input to assess the exact recyclability of packaging products, it will be required in product information.

Packaging minimisation

All packaging must be optimised to reduce the packaging to what is required for functionality. Applicable immediately, for single-use grouped, e-commerce and transport packaging, a maximum 40% of the packaging may be empty space, where the empty space is defined as the difference between the total volume of the packaging, and the volume of the sales packaging contained therein. Filling material such as bubble wrap, paper cuttings, foam etc. are counted as part of the empty space.

Reuse

In order to promote reuse of packaging, the PPWR proposes mandatory reuse targets for a number of packaging categories. Among LC Packaging products the main requirement is for industrial packaging (including FIBCs) to be reused.

	2030
Intra-company transport (between site A and site B of a company or within group of linked enterprises)	95%
Domestic sales	100%

There is an exemption for packaging of food and animal feed. In the future, further exemptions can be granted:

- where full Lifecycle assessments (LCA) can demonstrate the sustainability of single-use packaging;
- if the recycling rate for the packaging category is >85% already;
- and for micro-enterprises.

Cardboard is excluded from the requirement for reuse of transport packaging. However, e-commerce packaging (often cardboard) must ensure that 10% of packaging used is within a system for reuse by 2030.

Hazardous Goods

All packaging for hazardous goods are exempted from all the requirements in the PPWR.

Restrictions of the use of certain types of packaging

Initial versions of the PPWR proposed to prohibit the use and sale of certain types of packaging, including retail packaging for less than 1.5kg of product, such as net bags used for retail, or cardboard punnets. This restriction has been removed in the proposal approved by parliament, together with several others.