



**EUROPEAN
CARTON MAKERS
ASSOCIATION**

STARTING SOON

ECMA WEBINAR

Revision of the Packaging &
Packaging Waste Regulation

Supported by:

**HOLMEN
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Agenda

1. Welcome and Introduction

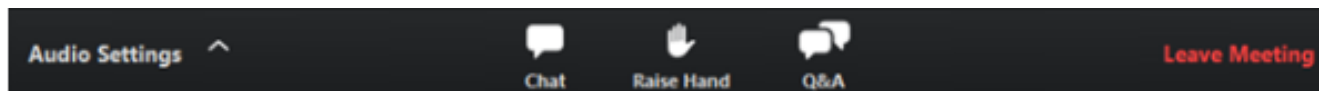
2. ECMA Antitrust Guidelines

Some useful tips before we start:

- You have a control panel at the bottom of your Zoom screen.
- Questions can be asked by clicking on the 'Q&A' or 'Raise Hand' button during the webinar. Your question will be answered at the end of the presentation.
- Make sure to mute your audio line in case this has not been done automatically by the host.



Your Presenter:
Mike Turner
ECMA Managing Director



ECMA Antitrust Reminder



DOs


- **Vigilance**
- **Procedure**



DON'Ts

- **Pricing information**
- **Cost & Production**
- **Market information**
- **Investment, divestment plans**
- **Strategy**



The background of the entire slide is a close-up, top-down view of a stack of cut logs. The logs are of various diameters and are arranged in a somewhat regular but natural-looking pattern. The wood grain is clearly visible on the circular ends of the logs, showing concentric growth rings. The colors range from light tan to a darker, more aged brown. Some logs have small cracks or imperfections on their surfaces.

Revision of the Packaging & Packaging Waste Regulation ...and folding carton touchpoints



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What is the Packaging & Packaging Waste Regulation?

- **Objective:**
 - reduce packaging production & waste
 - improve the recyclability of any packaging
 - grow the market for recycled content & reusable packaging
- **Tools:**
 - Packaging reduction
 - Recycling targets
 - Mandated reuse targets
 - Bans
 - Design for recycling
- Enforceable in law...all packaging must comply, but packaging that meets these requirements is guaranteed free circulation in the EU27.
- Upgraded from a Directive to Regulation – EU Member States are mandated to act ...same time/same manner

Problem areas for packaging



High and growing levels of packaging waste

High levels of avoidable packaging

Increase in the proportion of single-use packaging

Barriers to packaging circularity

Increased use of packaging design features that inhibit recycling

Cross-contamination of conventional and compostable recycling streams

Presence of hazardous substances

Waste management and reuse are not cost efficient

Inconsistent and confusing labelling

Downcycling

Low levels of recycled content in plastic packaging

Context

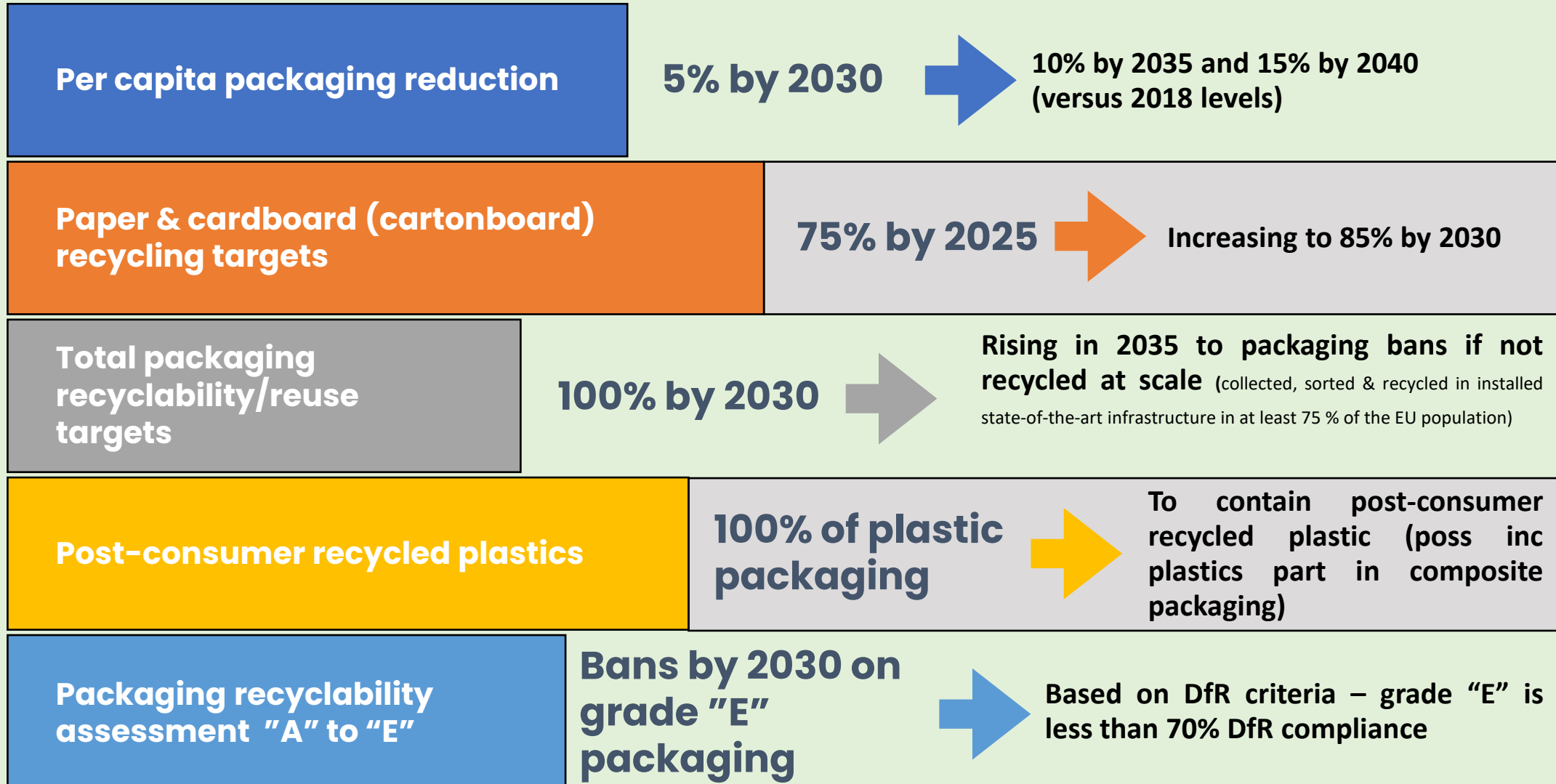
- European Parliament elections – summer 2024
- European Commission term ends October 2024
- Farm to fork strategy (central to European Green Deal) is faltering
- Energy crisis creating obstacles to green agenda
- Political pressure to achieve the PPWR...popular support??



European Parliament



PPWR – summary



(1) Waste Reduction – article 38

Member States shall reduce total packaging waste generated per capita, compared to 2018 by:

- 5% by 2030 = absolute reduction vs baseline of 19%
- 10% by 2035 = absolute reduction vs baseline of 29%
- 15% by 2040 = absolute reduction vs baseline of 37%

(2) Recyclable packaging – article 6



- **Defines ‘packaging’ & ‘recycling’**
- All packaging shall be recyclable – **from 2030** – and will be considered recyclable when:
 - (a) it is designed for recycling
 - (b) it is effectively and efficiently separately collected
 - (c) it is sorted into defined waste streams without affecting the recyclability of other waste streams
 - (d) the resulting secondary raw materials are of sufficient quality to substitute the primary raw materials
 - (e) it must be recycled at scale – **from 2035**

Design for Recycling (DfR) – article 6 & annex II



- Harmonised European DfR principles -

Recyclability Performance Grade	Assessment of recyclability per unit, in weight
Grade A	higher or equal to 95 %
Grade B	higher or equal to 90 %
Grade C	higher or equal to 80 %
Grade D	higher or equal to 70 %
* Grade E	lower than 70 % ***** BANNED *****

EPR fees to be based on performance Grades A to D

* Less than 70% compliance is considered not recyclable

Design for Recycling principles

- Specific DfR criteria has not yet been confirmed, but is expected to include
 - ✓ Closure systems / small parts
 - ✓ Colours (plastic)
 - ✓ Additives
 - ✓ Adhesives
 - ✓ Barriers & coating
 - ✓ Labels & sleeves
 - ✓ Material composition
 - ✓ Inks & printing
 - ✓ Ease of dismantling
 - ✓ Ease of emptying

(3) Reusable packaging – article 10



Packaging shall be considered reusable where it fulfils the following conditions:

- (a) it has been **conceived, designed and placed on the market** with the objective to be re-used or refilled;
- (b) it has been conceived and designed to **accomplish as many trips or rotations as possible** in normally predictable conditions of use;
- (c) it can be **emptied or unloaded without damage** to the packaging, which prevents its re-use;
- (d) it is capable of being emptied, unloaded, refilled or reloaded while **ensuring compliance with the applicable safety and hygiene requirements**;
- (e) it is capable of being reconditioned in accordance with Part B of Annex VI, whilst maintaining its ability to perform its intended function;
- (f) it can be emptied, unloaded, refilled or reloaded while **maintaining the quality and safety of the packaged product and allowing for the attachment of labelling**, and the provision of information on the properties of that product and on the packaging itself, including any relevant instructions and information for ensuring safety, adequate use, traceability and shelf-life of the product;
- (g) it can be emptied, unloaded, refilled or reloaded **without risk to the health and safety** of those responsible for doing so; EN 62 EN
- (h) it fulfils the **requirements specific to recyclable packaging when it becomes waste** set out in Article 6.

Reuse / refill targets by sector – article 27



Sector	Product	2030	2040
Food & beverage (Horeca)	Hot & cold takeaway	20%	80%
	Prepared takeaway food	10%	40%
Food & beverage (Retail)	Alcoholic beverages (excl wine & spirits) and non-alcoholic (excl milk)	10%	25%
	Alcoholic beverages (inc wine & spirits)	5%	15%
* Transport packaging	Transport packaging (pallets, plastic crates, foldable plastic boxes, pails and drums)	30%	90%
	Transport packaging (e-commerce)	10%	50%
	Transport packaging (pallet wrapping & strapping)	10%	30%
	Grouped packaging to create a SKU (multipacks) but excluding cardboard	10%	25%
	Transport packaging used by an economic operator between sites	100%	100%

* Excluding cardboard

(4) Recycled content in plastic packaging

1. Definition of plastic (as used with the SUPD)...functioning as a main structural component
2. Risk that fibre-based packaging with small amounts of polymer are within scope
3. Timeline
 - 2026: Implementing act to determine methodology for calculation
 - 2030: modulate EPR fees based on amount of recycled content
 - 2030: The plastic part in packaging shall contain a **minimum percentage of recycled content** recovered from post-consumer plastic waste
 - 2040: Increases in mandated recycled content
4. Excludes compostables

(5) Recycling targets – article 46



By 2025: a minimum of 65% by weight of all packaging will be recycled
a minimum of 75% for paper & cardboard will be recycled

By 2030: a minimum of 70% by weight of all packaging will be recycled
a minimum of 85% for paper & cardboard will be recycled

(6) Restricted items - bans – article 22 / annex V

Entry into force >

Entry into force >

2030

Entry into force >

Entry into force >

	Packaging format	Restricted use	Illustrative example
1.	Single-use plastic grouped packaging	Plastic packaging used at retail level to group goods sold in cans, tins, pots, tubs, and packets designed as convenience packaging to enable or encourage end users to purchase more than one product. This excludes grouped packaging necessary to facilitate handling in distribution.	Collation films, shrink wrap
2.	Single use plastic packaging, single use composite packaging or other single use packaging for fresh fruit and vegetables	Single use packaging for less than 1.5 kg fresh fruit and vegetables, unless there is a demonstrated need to avoid water loss or turgidity loss, microbiological hazards or physical shocks.	Nets, bags, trays, containers
3.	Single use plastic, single use composite packaging or other single use packaging	Single use packaging for foods and beverages filled and consumed within the premises in the HORECA sector, which include all eating area inside and outside a place of business, covered with tables and stools, standing areas, and eating areas offered to the end users jointly by several economic operators or third party for the purpose of food and drinks consumption	Trays, disposable plates and cups, bags, foil, boxes
4.	Single use packaging for condiments, preserves, sauces, coffee creamer, sugar, and seasoning in HORECA sector	Single use packaging in the HORECA sector, containing individual portions or servings, used for condiments, preserves, sauces, coffee creamer, sugar and seasoning, except such packaging provided together with take-away ready-prepared food intended for immediate consumption without the need of any further preparation	Sachets, tubs, trays, boxes
5.	Single use hotel miniature packaging	For cosmetics, hygiene and toiletry products of less than 50 ml for liquid products or less than 100 g for non-liquid products	Shampoo bottles, hand and body lotion bottles, sachets around

(7) Labelling – article 11

- Packaging is marked with a label containing information on its material composition in order to facilitate consumer sorting. The same labels shall be placed on waste receptacles for the consumer to easily identify the appropriate disposal route – likely to be the Nordic pictograms
- Plastic packaging to show recycled content (voluntary)



Additional information

1. Packaging to be scaled down to its minimum size – no double walls, false bottoms, and unnecessary layers
2. Packaging not fulfilling a defined function shall be banned (marketing / shelf appeal is not a defined function)

Concerns

1. The **PPWR** will involve a number of **delegated acts** – reuse/refill (calculation), methodology for ‘Design for Recycling’, recycling at scale - these are developed behind closed doors with limited or no involvement from stakeholders
2. If plastic coatings are determined to be a ‘main structural element’ (as with the SUPD), it will give challenges with recycled content – some coatings cannot be made with post-consumer recycled waste
3. Definition of recyclable (article 6 point d) includes – “it can be recycled so that the resulting secondary raw materials are of sufficient quality to substitute the primary raw materials”...equates to closed loop & discriminates against fibre packaging

ADVOCACY ROUTES



DIRECT ECMA

Consultation responses, impact assessments, position papers, low level commission & consultant outreach, member state contact, alignment with other industry efforts (e.g European)

FIBRE PACKAGING EUROPE

Position papers, high level commission outreach

CITPA

Consultation responses, impact assessments

4EVERGREEN ALLIANCE

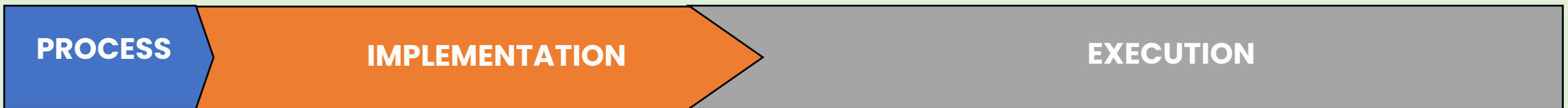
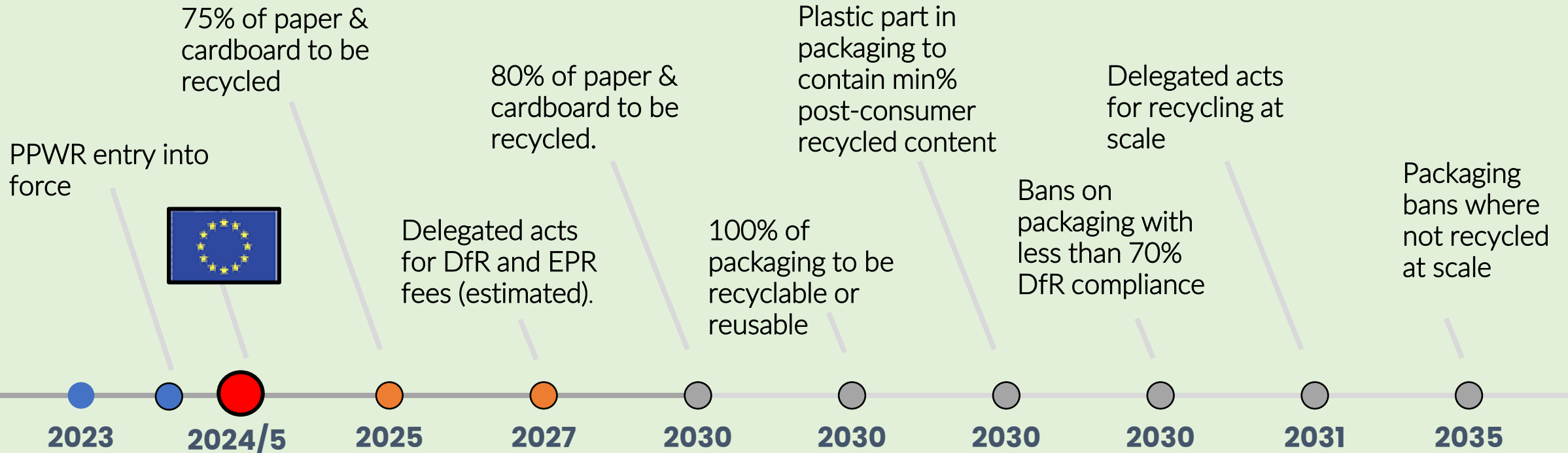
Demonstrating the efforts of the fibre sector to increase circularity / recycling rates to 90% by 2030

Policy asks / outreach focus



- Evidence based policy making - use of science in determining single-use or reusable packaging formats
- Link recycling at scale to collection targets (not included in PPWR) – recycling starts with great collection
- Reuse/refill targets – exemptions for highly recycled packaging
- Food safety
- Annex V - exemptions

PPWR implementation timeline





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THANK YOU

- For any questions please contact mail@ecma.org

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