



Packaging and Packaging Waste Regulation: Adoption and Next Steps

FEFPEB Congress

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PPWR: State of Play

PPWR: State of Play

22 January
2025

- ▶ PPWR publication in the Official Journal

12 February
2025

- ▶ Entry into force

12 August
2026

- ▶ Entry into application

Secondary Legislation

12 August
2026

- ▶ Adoption of harmonised labelling requirements for packaging (IA)

30 June
2027

- ▶ Establishment of min. no. of rotations to be considered reusable and the methodology for calculation of reuse

1 January
2028

- ▶ Adoption of Design for Recycling (DfR) criteria and recyclability performance grades (A to D)

1 January
2030

- ▶ Adoption of recyclability at scale methodology



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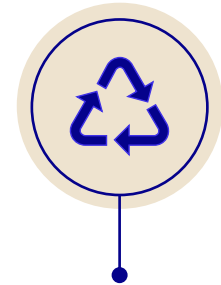
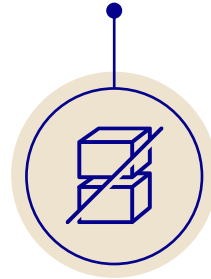
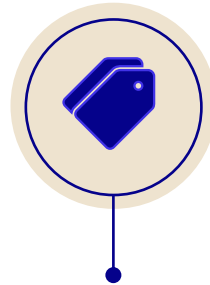
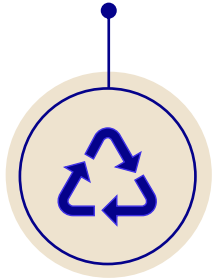


Key PPWR developments for FEFPEB

PPWR Key Obligations

RECYCLABILITY

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



REUSABLE PACKAGING

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

PACKAGING MINIMISATION

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

LEGAL TITLE

Protection of legal title and ownership of pallets

LABELLING

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

RECYCLING TARGETS

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

Recap: 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 ratio in a packaging should not be more than 50%

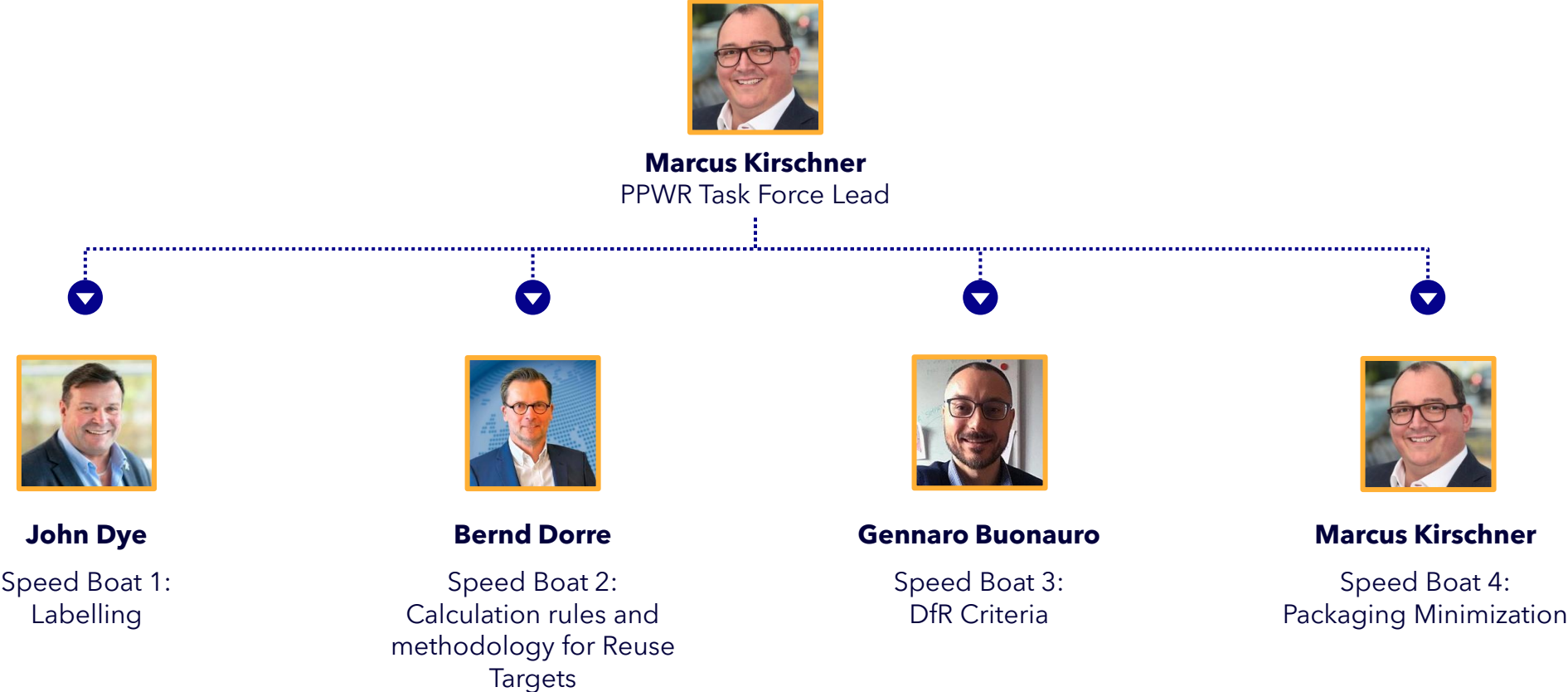


LABELLING

- 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



FEFPEB PPWR Task Force



Recyclability of Packaging: DfR Criteria

CONTEXT:

- The Commission has mandated CEN (European Standardisation Organisation) to develop Design for Recycling (DfR) guidelines for all packaging materials including wood
- A sub group (SG 6 in TC 261 / SC 4 / WG 3) has been created in CEN which will develop DfR guidelines for wood and cork
- The SG is supposed to submit its recommendations to the Commission by December 2025



FEFPEB OBJECTIVE:

- Ensure wood is recognised in the “**green/ A** category” which will identify wood as a highly recyclable material

KEY TACTICS:

- ✓ • Created internal task force to develop FEFPEB recommendations on the topic
- ✓ • Held discussions with EPF, EFIC, CEI Bois to present a unified voice of the whole wood sector
 - Participate in CEN SG discussions to provide technical input:
- 🕒 • FEFPEB members are active participants in the sub group
- 🕒 • Support FEFPEB to obtain a liaison organisation in the sub group
- 🕒 • Build alliance with like minded associations from the wood industry
- 🔴 • Develop a FEFPEB position paper summarising key recommendations/ key asks with the input of like minded stakeholders
- 🔴 • Participation in stakeholder consultation before the publication of the draft act



Completed



Ongoing



Upcoming

Reusability of Packaging

CONTEXT:

- The Commission mandated Deloitte to conduct a feasibility study on the 100% reuse target of plastic pallet wraps and straps
- Deloitte conducted targeted stakeholder consultation and compiled its preliminary findings in May 2025
- Commission announced the draft Delegated Act will be published by Q4 2025



FEFPEB OBJECTIVE:

- Exemption from mandatory reuse target for plastic pallet wraps and straps

KEY TACTICS:

- ✓ • Create internal task force to develop FEFPEB recommendations on the topic
- ✓ • FEFPEB was identified as key stakeholders to provide input on the topic
- ✓ • Participated in stakeholder consultation: FEFPEB members were interviewed to provide expert input on the topic
- ✓ • Developed a FEFPEB position paper summarising key recommendations/ key asks
- ✓ • Provided input/ comments on preliminary findings after stakeholder interviews
- • Participation in stakeholder consultation before the publication of the draft act



Completed



Ongoing



Upcoming



CONTEXT:

- Labelling rules for packaging format is one of the first PPWR secondary legislations that the Commission will draft
- The Joint Research Committee has started its work on labelling of waste receptacles to provide input for the Commission



FEFPEB OBJECTIVE:

- Achieve exemption for wooden pallets from physical labelling on the pallet, rather via QR code on accompanying documents

KEY TACTICS:

- ✓ • Created internal task force to develop FEFPEB recommendations on the topic
- ✓ • Met with Commission officials to raise FEFPEB concerns on labelling for wooden packaging and pallets
- ✓ • Developed FEFPEB recommendation on practical solutions to prepare labelling requirements for wooden pallets and packaging
- ✓ • Submitted FEFPEB recommendations to the DG ENV, Unit B3 in the Commission which is responsible for developing secondary legislation on Labelling
- • Participation in stakeholder consultation before the publication of the draft act



Completed



Ongoing



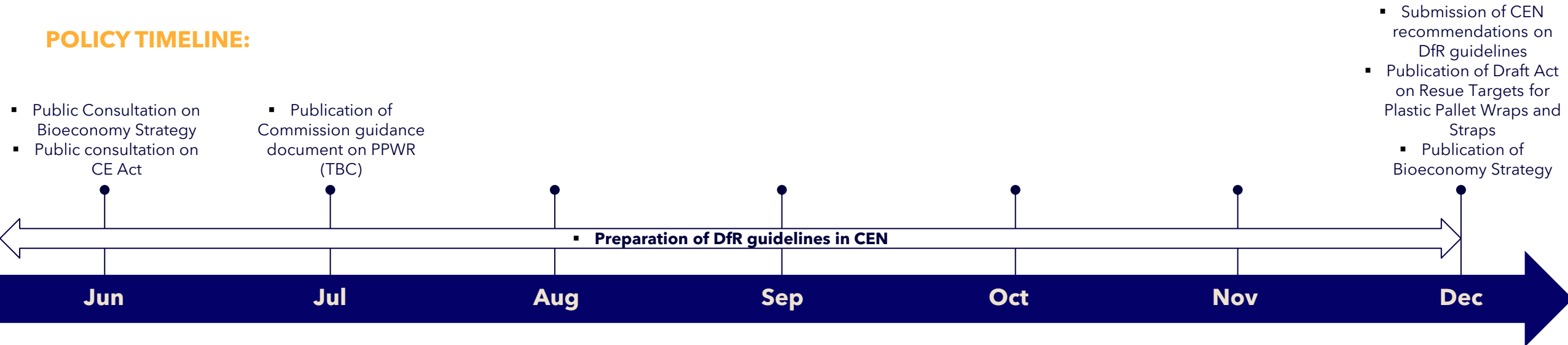
Upcoming



Next Steps

Next Steps

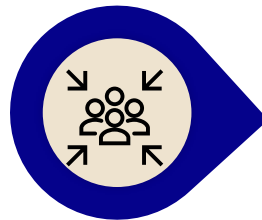
POLICY TIMELINE:



FEFPEB ADVOCACY ACTIONS:

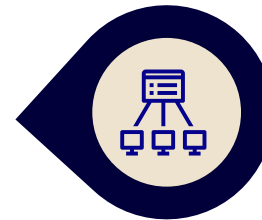
Key stakeholder engagement

- Continued interaction with Commission officials and expert groups to provide input on PPWR secondary legislation
- Engage with relevant Commission DGs and MEPs in context of the Bioeconomy Strategy and CE Act
- Build coalition with other association and industry stakeholders to prepare joint positions



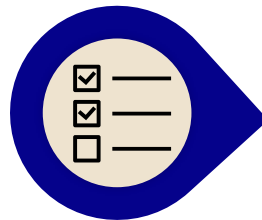
Participation in stakeholder consultations

- Participate in consultations and Q&A sessions on upcoming policy files as well as PPWR secondary legislation

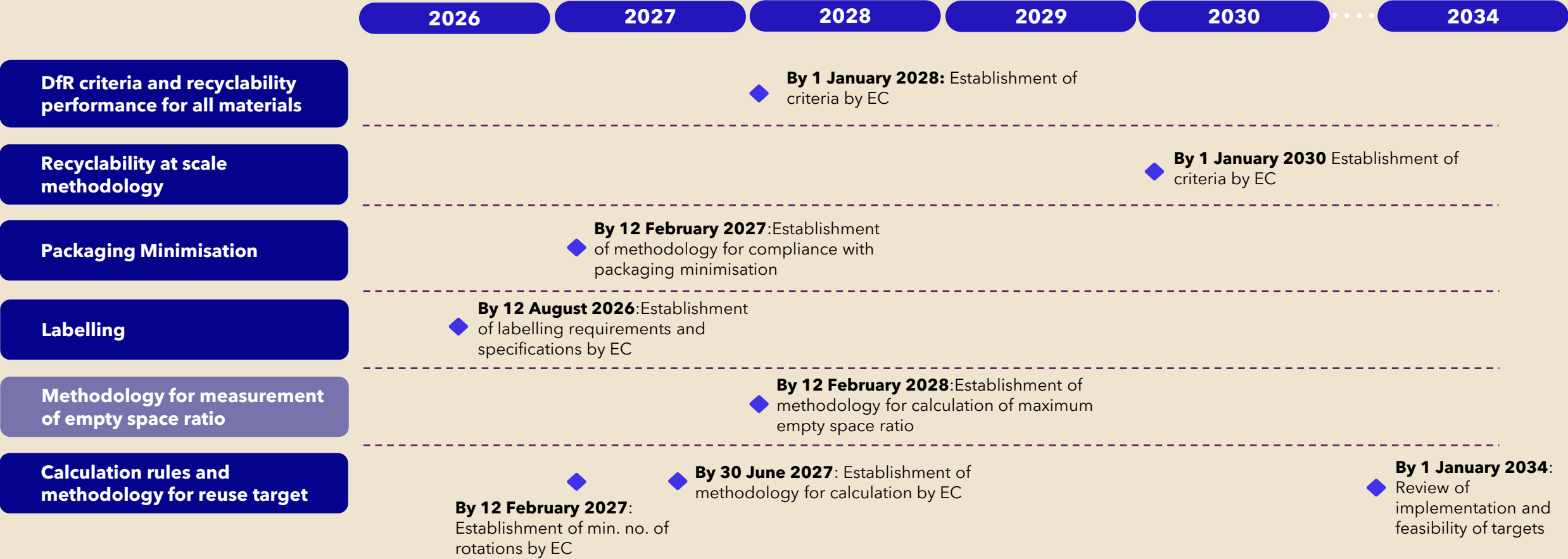


Continue the work of speed boats per priority topic

- Follow the discussions in expert groups and provide FEFPEB inputs where relevant
 - Prepare FEFPEB recommendation for priority topics



PPWR secondary legislation timeline



Thank you

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The background of the slide is a dark blue-tinted photograph of the European Parliament building in Brussels. A large European Union flag is prominently displayed in the center, waving. The building's curved facade and many windows are visible in the background.

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) |