

Better quality of life, through better packaging, for more people



### **PPWR Update: Carbon Footprint & Packaging Minimisation**











ZOOM LIVE

Open webinar. Prior registration required. Webinar Registration - Zoom.



22 February 2024, 9.30am (UTC+01:00 - Central European Time)



Nerida Kelton Vice President Sustainability & Save Food WPO



**Manfred Tacker** Managing Director Circular Analytics



Lina Wimmer Senior Consultant Circular Analytics



**Charlotte Werner** Senior Consultant Circular Analytics



Johanna Mayer Managing Director Unfold

## UNFOLD consulting

## **ESG**

Legislation & Regulatory

February 2024



## Regulation and legislation





## **Sustainability Reporting**

#### **Drivers**

**Regulatory** | With the adoption of the <u>EU Green Deal, the EU Taxonomy Regulation</u> and the <u>CSRD</u>, the topic is moving further to the forefront of entrepreneurial activity.

**Transparency** | Effective sustainability reporting is one of the best for ensuring the increasing demand for transparency.

**Stakeholders** | Institutional investors, in particular, are attaching increasing importance to the topic of sustainability and are basing their investment decisions on the sustainability commitment of organizations.

**Reputation** | Transparency in communication and reporting on sustainability issues increases trust in companies. 46% of Austria's top companies, banks and insurance companies publish a sustainability report.\*

**Employee Retention** | Last but not least, sustainability reports can contribute to employee retention and internal awareness-raising. They are also an advertisement for job, who increasingly attach importance to their employers' commitment to sustainability.





## **CSRD - Corporate Sustainability Reporting Directive**

(Directive published on 16.12.2022 > transposition into national law by 06 June 2024)



#### What's new?

- Extension of the **reporting obligation** (also information according to EU taxonomy mandatory)
- Precise definition of materiality ("double materiality")
- Mandatory disclosure
- External audit (limited assurance)
- Introduction of uniform EU reporting standards ESRS -European Sustainability Reporting Standards



#### How do I have to report?

• Disclosure in the management report of the annual report based on the uniform EU reporting standard.



#### **Period of application**

- from 01.01.2024: Companies that are already subject to reporting obligations under the NaDiVeG 1
- from 01.01.2025: all large companies <sup>2</sup>
- from 01.01.2026: all capital market-oriented SMEs
- from 01.01.2027: Non-EU companies with EU branches or subsidiaries
- Opt-out option for capital market-oriented SMEs: Use of a twoyear transition period, i.e. first application possible in the 2028 financial year

- Total assets > EUR 25 million
- Net revenue > EUR 50 million
- Employees > 250 on an annual average

<sup>&</sup>lt;sup>1</sup> all capital market-oriented companies > 500 employees

<sup>&</sup>lt;sup>2</sup> Large companies (if 2 of the 3 criteria are met):



### **ESRS - European Sustainability Reporting Standards**

Cross-sectoral standards

(Drafts 11/22 released > delegated act COM June 9, 2023)

Cross-section standards

ESRS 1 General Requirements ESRS 2 General Disclosures <sup>1</sup>

#### **Topics-Standards**





Social



Governance

Climate change

Own workforce

**Business Conduct** 

Pollution

Workers in the value chain

Water and marine resources

Affected communities

Biodiversity and ecosystems

Consumers and end-users

Resource Use and Circular Economy



#### Coming later

Sector-specific standards
(Delegated act presumably Q2 2024)

SME-proportionate standards \*

Standards for companies from third countries

- Basic Requirements
- Governance
- Strategy
- Managing impacts, risks and opportunities
- Key Figures & Targets

<sup>\*</sup> Reporting for listed SMEs from 2026 (with opt-out by 2028); proposal for voluntary ESRS developed by EFRAG in Jan 2024.

<sup>&</sup>lt;sup>1</sup> Reporting areas in general disclosures:



## Roadmap for CSRD Reporting

Example of the roadmap to the ESG Report 2026





2025

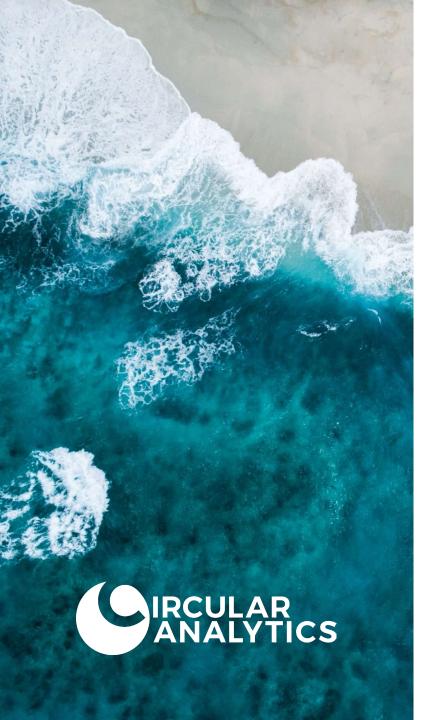


2026

- Setting the level of ambition
- Creating awareness
  - Building a team
  - Involving relevant people
- Materiality analysis
  - High-level
  - Inside-out & outside-in impacts
- · Gap analysis & readiness check
  - Collect available data and compare with CSRD requirements
  - Procedure for data preparation Prioritization of requirements

- Double materiality analysis
  - Detailed analysis along the value chain
  - · Identification of IROs
- Developing a CSRD-compliant strategy
  - Establish targets and KPIs
- Establish organization & processes
  - Roles and responsibilities
  - Adapt internal systems (data management software)
- Governance
  - Involve supervisory board
  - Set up internal control system

- Reporting with the annual report
  - Implementing ESRS requirements
  - Implementation of formal requirements (digital tagging)
- Monitoring and continuous improvement
  - Improvement of data & information
  - Review reporting process & learnings

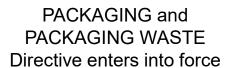


# Navigating the Landscape: General Requirements of PPWR with a Focus on Packaging Minimization

Lina Wimmer

### PACKAGING AND PACKAGING WASTE

LEGISLATION IN EUROPE



Amendment to reinforce prevention and to promote reuse and recycling of packaging waste

European Parliament and the Council of the EU published their positions



2015

2018

2022

2023

Amendment to reduce lightweight plastic carrier bags

Adoption of revision → draft of PACKAGING AND PACKAGING WASTE REGULATION

(draft of European Commission)



## Recyclable Packaging (Art. 6)

- All packaging has to be recyclable by 2030.
- 2-stage approach:
  - from 2030 packaging must meet
     Design for Recycling criteria
  - from 2035 packaging must be additionally effectively collected, sorted and recovered ("recycled at scale")
- Excemptions: until 2035 special packaging from 2030 innovative packaging

(max. 5 years)

Recyclability Performance Grades	Assessment of recyclability per unit, in weight	
Grade A	≥ 95%	
Grade B	≥ 90%	
Grade C	≥ 80%	
Grade D	≥ 70%	
Grade E	< 70%	

Annex II, Table 2



## Minimum Recycled Content in Plastic Packaging (Art. 7)

- Plastic packaging must contain a minimum recycled content (PCR) starting in 2030
- Per packaging unit (EC)
- Planned: Implementing act for the methodology of calculation and verification of percentage PCR recyclate.

Packaging Type	2030	2040
Contact sensitive packaging with PET as main component	30%	50%
Contact sensitive packaging (except for PET and single-use plastic beverage bottles)	10%	
Single-use plastic beverage bottles	30%	65%
other plastic packaging	35%	65%



## Reuse and Refill (Art. 10, Art. 26 und Art. 27)

- reusable packaging must be conceived, designed and placed on the market in such a way that it can be reused or refilled
- has to be part of a reuse system

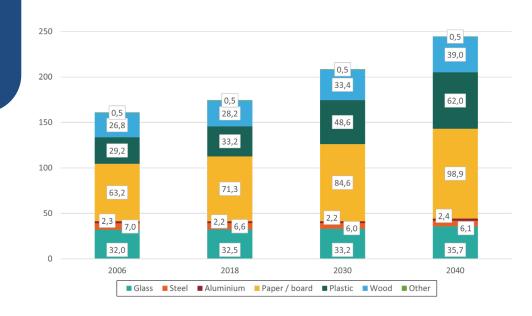
Product	2030	2040
Cold and Hot beverages	20%	80%
Take-away ready-prepared meals	10%	40%
Non-alcoholic beverages (excl. milk)	10%	25%
alcoholic beverages (excl. wine and spirits)	10%	25%
Transport and grouped packaging	10-30%	25-90%
Transport packaging for transport between different sites/ the same Member State	100%	



## Waste Prevention (Art. 38)

Member States' packaging waste reduction targets (per capita, base year 2018):

- 5% until 2030 (→ effective reduction by **19%**)
- 10% until 2035 (→ effective reduction by **29%**)
- 15% until 2040 (→ effective reduction by **37%**)





## Packaging Minimisation (Art. 9/ Art. 21/ Annex IV)

#### **By 01 January 2030**

- Packaging weight and volume as low as necessary
- The safety and functionality of the packaging must continue to be guaranteed
- Empty space must be reduced to the necessary minimum (empty space ratio 40% - per packaging unit)
- **Prohibition** of misleading packaging (double walls, double bottoms...)
- Reusability of the packaging must be considered
- Applies also to e-commerce, transport and collective packaging



## Packaging Minimisation (Annex IV part 1 and part 2)

#### **PART 1 – Performance Criteria**

- Product Protection
- Packaging manufacturing processes
- Logistics
- Information requirements
- Hygiene and safety
- Legal Requirements
- Recycled content, recyclability and re-use

## PART 2 – Assessment methodology and determination of the minimum packaging volume and weight

- Must be explained in technical documentation
- Must include at least the following:
  - For each performance criterion, a list of design requirements → method of determination
  - Description of the results of the assessment
  - Any test results, market studies or investigations



## Packaging Minimisation (Annex IV part 1 and part 2)

## PART 1 – Performance Criteria

- Product Protection
- Packaging manufacturing processes
- Logistics
- Information requirements
- Hygiene and safety
- Legal Requirements
- Recycled content, recyclability and re-use

PART 2 – Assessment methodology and determination of the minimum packaging volume and weight

- Must be explained in technical documentation
- Must include at least the following:
  - For each performance criterion, a list of design requirements → method of determination
  - Description of the results of the assessment
  - Any test results, market studies or investigations



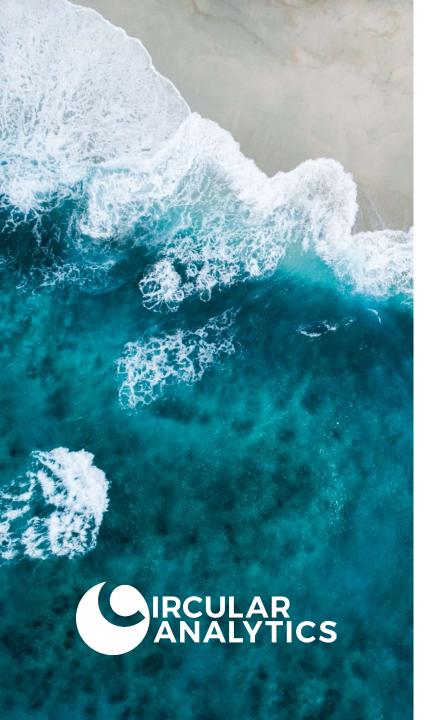
MINIMISATION
METHODOLOGY:

lowest weight, lowest CO2 footprint, etc.









## Sustainable Packaging: Sustainability Indicators and Packaging Design

Manfred Tacker

## Packaging and Packaging Waste Regulation

#### **Packaging minimisation**

- Weight and volume
- Empty space
- Ensure safety and functionality

#### **Packaging waste reduction**

- Reduction target (per capita, vs. 2018):
  - 5% till 2030
  - 10% till 2035
  - 15% till 2040



## PPWR - KPIs & Design

## **NEW SET OF KPIs**

- ✓ Weight
- ✓ Recyclability (70% min)
- ✓ DfR criteria fulfilled -> exact composition
- ✓ Carbon footprint
- ✓ Recyclate quality (circularity vs. recyclability)
- ✓ Recyclate content
- ✓ Emptiability



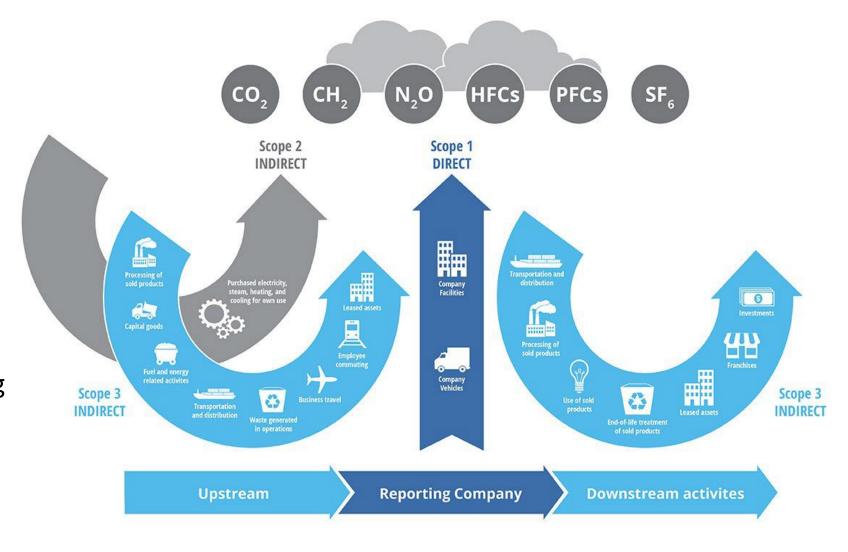
## CSRD - Impact

- Corporate Sustainability Reporting Guideline
  - Requirements
    - Carbon Footprint ("cradle to gate" scope 1,2,3)
    - Waste reduction Development of a packaging strategy
    - Set sustainability goals (emission and waste reduction) and communication
- Part of EU Green Deal
- Publication of sustainability information required with management report
- Timescale:
  - 2024: Large companies (> 500 MA)
  - 2025: Companies > 250 Employees / Sales > 40 Mio EUR



## **Scope 1-2-3**

- Scope 1: Emissions that occur within the company's system boundaries.
- Scope 2: Indirect emissions from purchased energy produced outside the system boundary.
- Scope 3: Indirect emissions that occur along the value chain: From facilities not owned or directly controlled by the company - upstream and downstream.





## **CSRD - Strategie**

- 1. Impact assessment (materiality assessment)
  - Identify impacts, risks and opportunities
- 2. Define strategy, targets, KPIs
  - Reduction of GHG-emissions
  - Waste reduction
  - Reduction of water consumption...
- 3. Measure and report

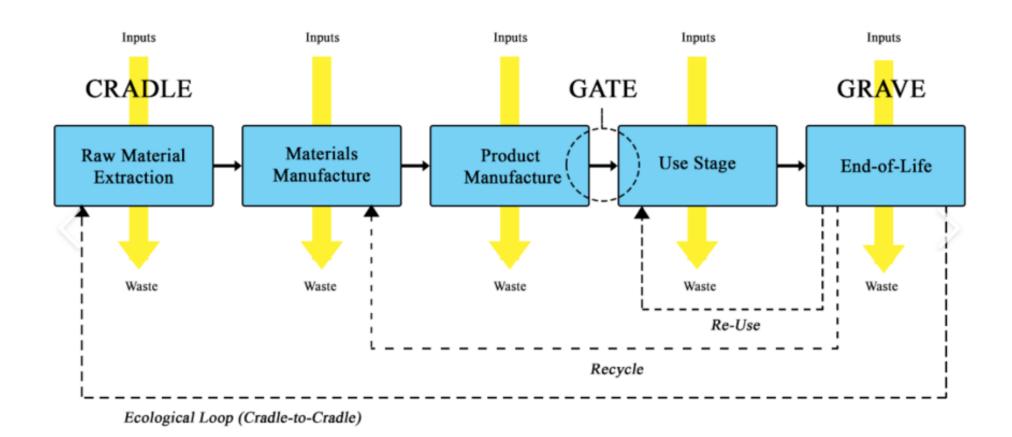




# Process optimisation: Streamlined cradle-to-gate LCA

**Manfred Tacker** 

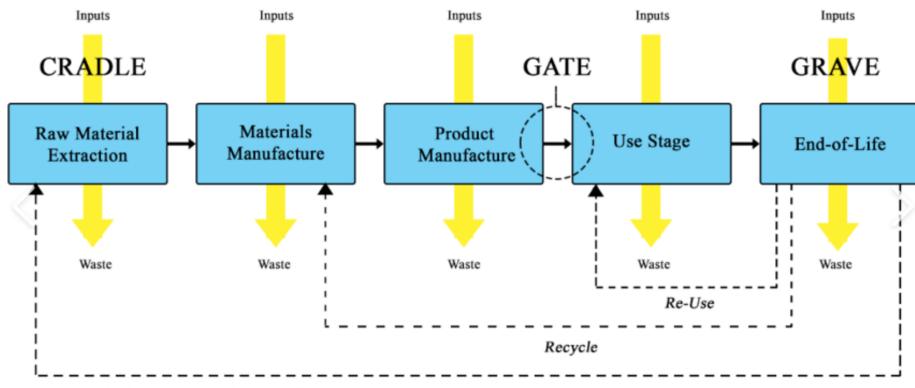
### Cradle-to-Gate vs. Cradle-to-Grave





### Cradle-to-Gate vs. Cradle-to-Grave

## Company specific Cradle-to-Gate-Tool



Ecological Loop (Cradle-to-Cradle)

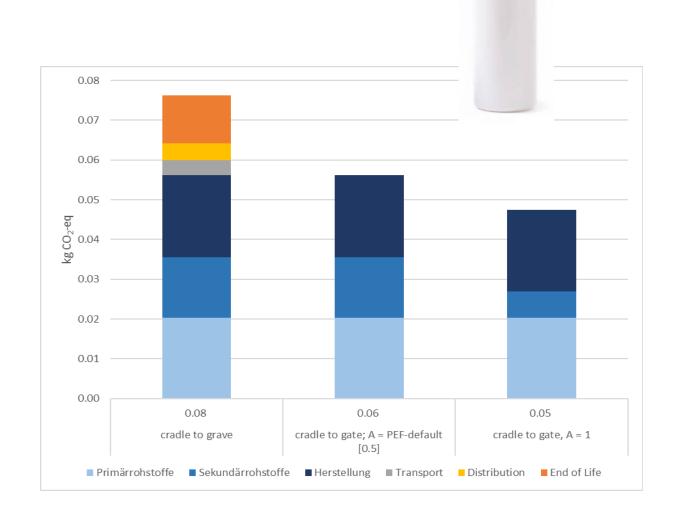
**Packaging Cockpit** 



## **HDPE-bottle with PP closure**

- 70% recyclate content HDPE
- 2 possiblities for A-faktor in CFF (PEF)
  - A = default
  - A = 1 (for hotspot-analysis)

PEF-method and A-Faktor have to be provided



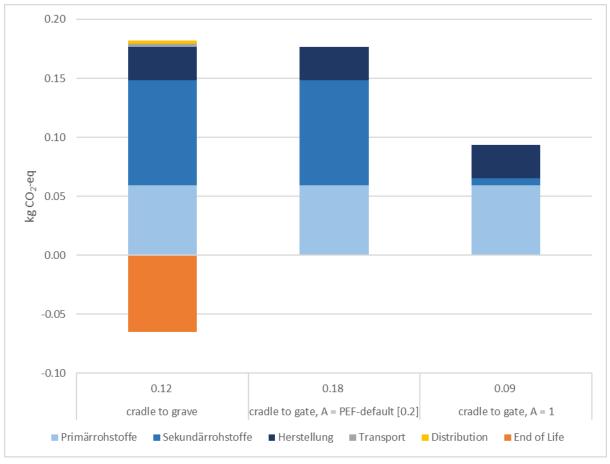


## Aluminium tray

- 70% recyclate content
- 2 possiblities for A-faktor in CFF (PEF)
  - A = default
  - A = 1 (for hotspot-analysis)

PEF-method and A-Faktor have to be provided



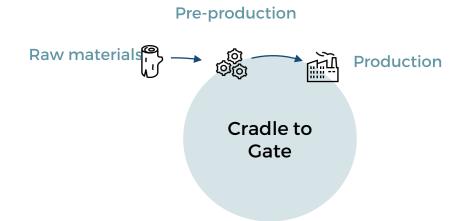




## Cradle-to-Gate LCA for Packaging Manufacturers

Streamlined **cradle-to-gate** LCAs for packaging- and label manufacturers and printers – company specific

- 1. stage: Streamlined LCA with published data(ecoinvent)
- 2. stage: Refinement with company-specific data
  - Energie mix (green electricity ...)
  - Reduced energy consumption
  - Low carbon materials
  - Reduced scrap-rate
  - Increased recycling rate ...



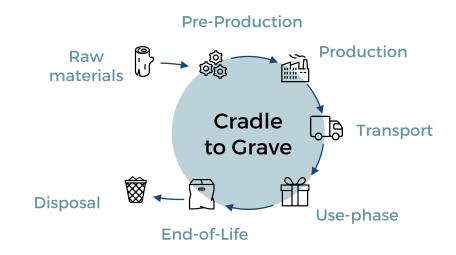
Improved efficiency / carbon footprint reduction made visible



## Cradle-to-Grave LCA for Brand Owners & Retailer

#### Streamlined cradle-to-grave LCAs

- 1. stage: Streamlined LCA with Packaging Cockpit (ecoinvent based)
- 2. stage: Refinement with company-specific data
  - Energy mix (green energy ...)
  - Reduced energy consumption
  - Low carbon raw materials
  - Reduced scrap rate
  - Increased recycling rate...



Improved efficiency / carbon footprint reduction made visible



## Design for Sustainability - Rules

- 1. Ensure product protection
- 2. Calculate packaging KPIs for packaging (holistic sustainability assessment)
  - Recyclability
  - Packaging weight
  - Carbon Footprint
  - Emptiability
  - Others: recyclate content, renewables content ...
- 3. Benchmark calculate against competetive packaging
- 4. Optimize packaging against KPIs



### Conclusion

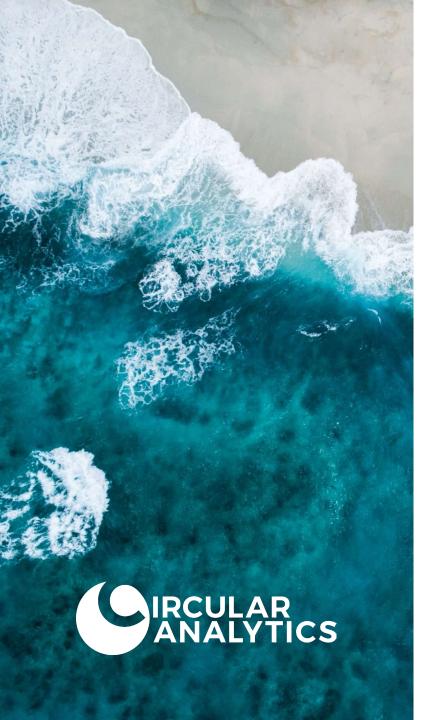
#### PPWR – requires set of sustainability indicators

- Sustainable packaging holistic concept
  - Recyclability + Minimisation of environmental footprint (LCA)
- Packaging minimisation
- Harmonisation of recyclability assessment (CEN)
- Data flow along the whole supply chain

#### CSRD – new requirements for sustainability reporting

- Cradle-to-gate carbon-footprint for packaging manufacturers
- Cradle-to-grave carbon-footprint for brand owner / retailer
- Sustainability strategy reduction of carbon-footprint / waste / water ...
- LCA-methodology must be clearly defined!





# A Roadmap to Compliance Guidance on ensuring fitness for PPWR and CSRD

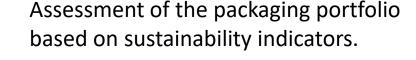
**Charlotte Werner** 

## New legal requirements: challenges for the European industry

Expanision of sustainability reporting to a wider range of companies

- Sustainable corporate management
- Environmental aspects
- Social issues
- Double materiality and due diligence

Data collection and reporting becomes mandatory and extends beyond the boundaries of your own company.

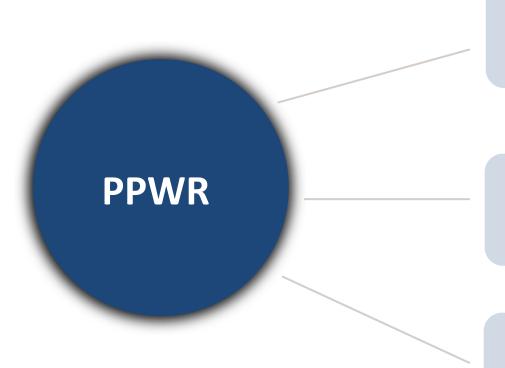


- Recyclability
- Recyclate content
- Minimisation requirement
- Reuse/-filling

Revision of the packaging strategy and actualization of targets in accordance with the PPWR



## **Compliance with PPWR**



Evaluation of the **performance of packaging** based on the required sustainability indicators.

#### Comprehensive optimisation of packaging

- Minimisation of resource consumption
- Improvement of emptiability

Continuous monitoring of sustainability parameters will become essential.

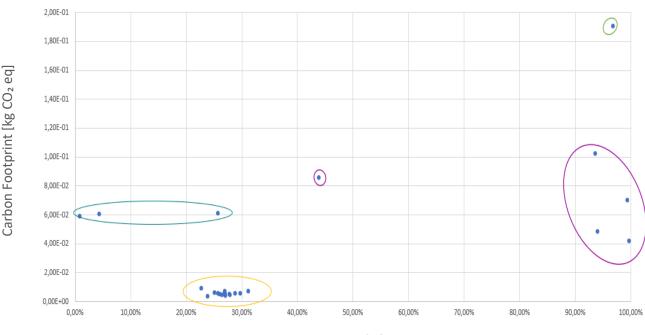
# **Packaging Benchmarking**

# Environment Direct impact Indirect Impact Certified materials Packaging Efficiency Consumer action Recyclability Recycling content Rewenable materials

#### PACKAGING BENCHMARKING APPROACH

By implementing this benchmarking approach, the industry can gain insights into its sustainability performance, facilitating compliance with the new regulation and contributing to a circular future.

#### **Butter-packaging: juxtaposition Recyclability / Carbon Footprint**



Recyclability [%]

Benchmarking Study for Dairy Products, 2023
© Circular Analytics

Fibre-based aluminium compounds

Rigid PP-Trays

Glass

Rigid plastic trays with cardboard decoration



# **Actions CSRD**

Large companies that fulfil 2 of the following 3 criteria:

- 40 million euros in net sales
- More than 20 million euros balance sheet total
- More than 250 employees

Evaluation of the environmental impact of suppliers' products.

Attention! Cradle-to-gate approach

П

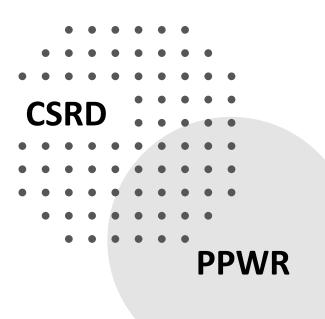
Evaluation of the carbon footprint of the entire company including the product portfolio (Scope 1-3)



Development of a sustainability strategy based on the CSRD requirements



# How to act?



#### Unveiling and analyzing data

- Assessing the current status of packaging using sustainability KPIS for benchmarking
- Evaluating environmental impacts of supplier products

#### Reporting

- Calculating and interpreting key sustainability parameters (recyclability, carbon footprint)
- Conducting cradle-to-gate life cycle assessments (LCA) for supplier products

#### **Strategy formation**

Crafting a Sustainability Strategy Aligned with current European requirements

#### Monitoring

- Continuous evaluation of sustainability parameters
- Ensuring alignment with regulatory demands



# Take Home Message



Transparency of environmental impacts is essential throughout the entire supply chain.

#### Holistic packaging optimization

- Minimizing ressources
- Enhancing circular eocnomy principals and easy of recyclability

Continuous monitoring of sustainability parameters will become essential over time.



Better quality of life, through better packaging, for more people





https://worldpackaging.org/Uploads/2023-02/ResourcePDF51 1675967696.pdf



# Global Packaging Design for Recycling Guide

- Increase recyclability and recycling rate of packaging
- Create a common understanding of Circular Packaging Design
- Provide a practical design tool easy to use and understand
- International harmonisation of design standards
- Stimulate global education and training in Circular Packaging Design







# **Material-Specific recommendations**

#### 2.3.1

#### **Plastics**





- Use materials that are as widely available as possible (PP, PE, PET).
- Recyclable material combinations (ideally mono-materials).
- The surface area of the base material should, at best, be covered to a max. 50 %² with the sleeve/label/banderole.
- Easy mechanical separability of the individual components in the sorting process.
- If possible, use transparent materials.
- As few additives as possible.
- Adhesives recyclable or washable under certain conditions.
- No barrier layers, but if necessary: carbon plasma coating<sup>3</sup>,
   SiOx- or Al<sup>2</sup>O<sup>3</sup> barrier.



- Avoid small parts that can be separated by the last consumer (Littering).
- Non-recyclable material composites (see specific design recommendations).
- Density-changing additives (for example, density-increasing additives in PE and PP packaging lead to problems in sorting).
- Use of Carbon black -based inks



Czech



Hungarian

Georgian





#### WASTE STREAM MAPPING TOOLS





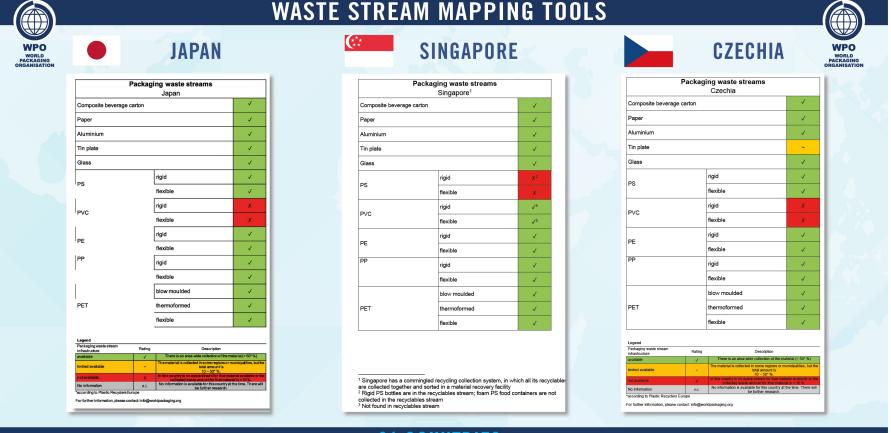








# Waste Stream Mapping Guides Available





https://worldpackaging.org/wpo/45/

31 COUNTRIES

Australia • Austria • Belgium • Brazil • China • Cote d'Ivoire • Czechia • Denmark • Finland • France • Germany • Greece • Hungary • Ireland • Israel • Italy • Japan • Kenya • Kenya • Latvia Netherlands • New Zealand • Russia • Singapore • Slovakia • Spain • Sweden • Switzerland • United Kingdom • United States of America • Vanuatu



# Sustainable Packaging Special Award







# PACKAGING THAT SAVES FOOD SPECIAL AWARD







# **NEW Sustainability & Save Food Case Studies**



















**(3)** 

PAPACKS® Fiber Bottle

PAPACKS® Sales GmbH.









# **WPO Sustainability Global Survey**





# Thank You



Better quality of life, through better packaging, for more people