



CIRCULAR ANALYTICS

PACKAGING NEWSLETTER



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UPDATE OF THE PACKAGING AND PACKAGING WASTE REGULATION



Provisional agreement:
04.03.2024

Proposal of the Council of the
European Union: 18.12.2023

Proposal of the European
Parliament: 22.11.2023

Proposal of the European
Commission: 30.11.2022

On 4 March 2024, one of the most fiercely contested pieces of EU legislation achieved a crucial milestone, when EU co-legislators reached a political agreement on the Packaging and Packaging Waste Regulation. Containing several wide-ranging elements, this provisional agreement will reshape the packaging sector across the next two decades.

Following the agreement reached by the EU Parliament and EU Council during the trilogue discussions (but not endorsed by the EU Commission), the Committee of the Permanent Representatives of the Governments of the Member States to the European Union endorsed the PPWR on 15 March. On 19 March, the European Parliament Committee on Environment, Public Health and Food Safety (ENVI) advocated for this agreement. On 24 April, the plenary session of the EU Parliament voted in favour of the legislative text.

The regulation is now in its final stages - the provisions under this agreement are introduced on the next pages.

RECYCLABLE PACKAGING

(Article 6 and Annex II)

- All packaging placed on the European market must be recyclable!
- To be classified as recyclable, packaging must be:
 - Designed for recycling
 - Separately collected
 - Sorted in defined waste streams without affecting the recyclability of other waste streams
 - Possible to be recycled so that the resulting secondary raw materials are of sufficient quality to substitute the primary raw material.
- Packaging recyclability performance grades are to be established by packaging category and classified as A, B or C (please see *figure 1*). After 1 January 2030 (or later) any packaging that falls below Grade C will be restricted from sale on the European market. After 1 January 2038 packaging below Grade B will be banned from sale in Europe.
- From 2035 (or later) the requirement “recycled at scale” will be added to the recyclability assessment.

Recyclability Performance Grades	Assessment of recyclability per unit, in weight
Grade A	≥ 95%
Grade B	≥ 80%
Grade C	≥ 70%
Technically non-recyclable	< 70%

Figure 1

REUSE

(Article 10, Article 26 and Article 27)

- Minimum percentage targets for the reuse of several types of packaging by 2030, with indicative targets for 2040. These targets cover certain types of transport packaging, grouped packaging and sales packaging for alcoholic and non-alcoholic beverages (with exemptions for wine, milk and certain other beverage types).
- A requirement for takeaway operators to allow customers to bring their own food and drink containers for refilling at no extra charge.

MINIMUM RECYCLED CONTENT FOR PLASTIC PACKAGING

(Article 7)

- From 1 January 2030 (or three years after the introduction of the related implementing act) all plastic packaging placed on the market in the EU must include a minimum percentage of recycled content from post-consumer waste (please see *figure 2*).
- Calculated per packaging type and format as an average per manufacturing plant and year.

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%	25%
Single-use plastic beverage bottles	30%	65%
other plastic packaging	35%	65%

Figure 2

COMPOSTABLE PACKAGING

(Article 8)

- 3 years after entry into force of PPWR.
- Adhesive labels for fruit and vegetables as well as permeable bags and soft after-use single-serve units for tea, coffee or other beverages have to be compostable under industrially controlled conditions.

WASTE PREVENTION

(Article 38)

- Member States’ packaging waste reduction targets (per capita, base year 2018*):
5% until 2030, 10% until 2035, 15% until 2040
(*Member States can apply to the Commission to use another base year)
- 7 years after entry into force: The need to set specific targets for certain packaging materials will be reviewed.

LABELLING

(Article 11 and Article 12)

- Obligatory label (based on pictograms) containing material composition for packaging placed on the market.
- Harmonised labels for waste receptacles.

PACKAGING MINIMISATION

(Article 9, Article 21 and Annex IV)

- Packaging weight and volume as low as necessary.
- E-commerce, transport, and collective packaging: empty space ratio 50%.

NEXT STEPS TO PPWR



[Further Information](#)

COUNTRY SPECIFIC NEWS



UPDATE PROPOSAL GREEN CLAIMS DIRECTIVE

EUROPEAN UNION - In March 2024, the European Parliament approved the Green Claims Directive by majority.

[Further Information](#)



UPDATE PROPOSAL CSDDD DIRECTIVE

EUROPEAN UNION - In March 2024, the European Council approved the Corporate Sustainability Due Diligence Directive.

[Further Information](#)



EPR POSTPONED

DENMARK - The introduction of the Extended Producer Responsibility has been postponed from 1 January 2025 to 1 July 2025.

[Further Information](#)



EPR: REGISTRATION & NOTIFICATION OF PACKAGING

DENMARK - From 01.04. to 31.08 companies must report their expected packaging volumes to the Danish Producer Responsibility (DPA).

[Further Information](#)



INTRODUCTION OF DEPOSIT RETURN SYSTEM IN 2025

POLAND - A new deposit return system will be introduced in Poland in 2025.

[Further Information](#)



GREEN DOT - NO OBLIGATORY LABELLING FROM 2025 ONWARDS

SPAIN - Labelling with the Green Dot will no longer be mandatory from 2025 onwards.

[Further Information](#)



INCREASE EPR FEE

ITALY - CONAI introduced new fees and levels for licensing on 01 April 2024.

[Further Information](#)



INCREASE PLASTIC TAX

UK - From 1 April 2024, the rate of Plastic Packaging Tax increased to £217.85 per tonne.

[Further Information](#)



UK PLANS ON ECO-MODULATION

UK - Defra aims to introduce eco-modulation, due to be first applied to fees paid across 2026/27, based upon the packaging supplied to the UK market during 2025.

[Further Information](#)



GERMAN ENVIRONMENT AGENCY LAUNCHED DIVID-REGISTRATION

GERMANY - Producers with an establishment in Germany can register from 01 April 2024 onwards at the German Environment Agency's Single-Use Plastics Fund platform DIVID.

[Further Information](#)



INTRODUCTION NEW EPR SYSTEM FOR B2B

FRANCE - Mandatory EPR system for B2B packaging from 2025 onwards.

[Further Information](#)

JOIN OUR BENCHMARKING PROJECT FOR CONVENIENCE PRODUCTS

As part of European initiatives to promote circularity within the packaging industry, companies are faced with the challenge of aligning their packaging systems with EU regulations, advocating recyclable packaging and ambitious recycling targets. This has significantly increased the demand for environmentally friendly packaging solutions, particularly for convenience products.

For navigating these evolving regulatory landscape and market demands, the evaluation of packaging based on ecological criteria is as essential as knowing the benchmark for the industry. Therefore, we invite you to take part in our benchmarking study for convenience products. Please find more details below:

Project initiators / co-operation partners

- Circular Analytics
- University of Applied Sciences Vienna
- ECR Austria

Project timeline

- April – October 2024

Product categories

- Ready-meal trays (chilled)
- Ready-meal trays/ tinned food (non-refrigerated)
- Frozen ready-meals

Project content and objectives

- Evaluation of packaging based on ecological criteria using the holistic sustainability assessment method (circularity and environment parameters).
- Development of a benchmarking database for the DACH region.

Participation

- Participating companies have the opportunity to have 5 packaging systems per product category assessed. The packaging will be compared to the market average/ benchmarks.

Conditions of participation

- Specifications and test samples of the packaging are required for the evaluation.
- These must be made available.

Result

- Categorisation of the results based on the selected parameters.
- Comparison of sent-in samples with the benchmarks collected in the project for each category.

For further information please contact:
charlotte.werner@circularanalytics.com / lina.wimmer@circularanalytics.com



Packaging Cockpit GmbH offers a packaging management software for fact-based decisions based on transparent criteria for sustainable packaging. The results can be communicated to customers, authorities and consumers quickly and always up to date. The Packaging Cockpit enables digitalisation and data flow in the supply chain as well as the calculation of recyclability and streamlined life cycle assessment in one tool. The Packaging Cockpit software is available as a web application and managed service version.

NEWEST FEATURES OF THE PACKAGING COCKPIT

The Packaging Cockpit Team consistently conducts research and updates the tool to incorporate the latest regulatory insights, developments specific to countries and materials, and technical enhancements. This ensures the most intuitive and current user experience. Notably, the following features were, among others, recently introduced:

- Integration of the newest version of the German Minimum Standard 2023
- New functionalities: cost calculation for packaging licencing fees and plastic taxes
- Enhanced usability features
- User manual in German
- E-learning platform
- Legislative changes related to the PPWR are closely monitored

For further information please contact: office@packaging-cockpit.com

NEWEST PACKAGING COCKPIT PARTNERSHIPS

Emmi launches future project for sustainable packaging with the Packaging Cockpit

The partnership between Packaging Cockpit and EMMI, Switzerland's largest dairy company, started towards the end of last year. EMMI has decided to digitize its entire packaging portfolio and to enable itself to know scientific key figures such as the recyclability or the life cycle assessment of its packaging with the Packaging Cockpit Online tool. EMMI supports its packaging suppliers to collaborate in packaging management on the technology used by EMMI. EMMI is thus setting a new standard in the supply chain in order to optimize its packaging more effectively and quickly.

ARA and Packaging Cockpit make packaging “recyclingfit”

With the imminent adoption of the European Packaging Regulation, ecomodulation is also approaching. With the Packaging Cockpit, Altstoff Recycling Austria (ARA) customers can prepare themselves timely for the planned tariff improvement for recyclable packaging.

For more information:

<https://www.ara.at/news/ara-und-packaging-cockpit-machen-verpackungen-recyclingfit>

PreZero and Packaging Cockpit - Smart digital analysis meets operational packaging expertise

Any waste that is not recycled is a wasted raw material. With this motto in mind, PreZero is constantly optimizing its processes - from logistics to waste handling. As part of Schwarz Group, which also includes the retail divisions Lidl and Kaufland, the companies of Schwarz Produktion and the IT and digital division Schwarz Digits, the environmental service provider focuses on the entire loop: from collection, sorting and reprocessing of supposed waste to recycling in order to produce new, recyclable products and packaging, which are then sold again. PreZero's team of experts supports and advises all stakeholders in the circular design process, i.e. in the design of recyclable packaging.

The EU Packaging and Packaging Waste Regulation (PPWR) once becoming law makes the use of recyclable packaging legally binding. PreZero offers all market participants the Packaging Cockpit functionality integrated in a free online tool called PreZero SPOT in cooperation with Packaging Cockpit for a detailed review and evaluation of their own packaging portfolio.



Strategies for a Transition to Circular Economy

We specialize in assessing and comprehensively optimizing the sustainability of packaging – our goal is to develop circular and sustainable solutions for our clients.

We are internationally oriented and offer the following range of services:

[Packaging Assessment](#)
[Regulatory Research](#)
[Life Cycle Assessment](#)
[Packaging Strategy](#)
[Circular Packaging Training](#)
[Research and Industry Projects](#)

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Circular Analytics TK GmbH
Canovagasse 7/1/14
A-1010 Vienna
+43 1 997 4332 – 20
office@circularanalytics.com

Authors:

[Lina Maria Wimmer,](#)
[Antonia Maria Bierleutgeb &](#)
[Charlotte Werner](#)



*In collaboration with our partner
Packaging Cockpit GmbH*.*



**Responsible for texts related to Packaging Cockpit.*