

Guide to the PPWR

June 2024



**ROUNDTABLE FOR REUSABLE
CONTAINERS TRAYS
AND PALLETS**
COMMITTED TO CIRCULAR PLASTICS



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Disclaimer:

The PPWR is not yet finalised. A legal revision by lawyer-linguists remains to be completed.

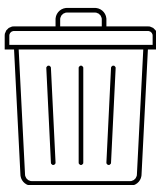
This document is based on the version of the PPWR that was adopted as the European Parliament's 1st reading position on 24 April 2024 [accessible [here](#)].

This document represents the RCTP Secretariat's understanding of the provisional agreement and should not be relied upon as legally binding or for compliance with the Regulation (please refer to the full text of the Regulation).

Summary: What the PPWR means for you

What is the PPWR?

The PPWR is the EU regulation setting out the rules on packaging. Its goal is to reduce packaging waste.



From when will the PPWR apply?

The review of the PPWR began in 2021. A compromise was agreed upon by the Parliament and Council on 4 March 2024. There remains to be a final vote to approve the text in the autumn.

We can therefore expect the publication of the PPWR in Q4 2024. It will enter into force 20 days later. The PPWR will apply from 18 months after its entry into force, i.e. from approximately **mid-2026**.

Key general provisions in the PPWR

- **Reuse** has been defined and mandated in a legally binding EU text that will directly apply in all EU member states from mid-2026 onwards
- Packaging reduction targets will be in place for EU member states
- Mandatory design for recycling by 2030
- Most plastic packaging will have to contain a minimum percentage of recycled materials
- Wide limitations and bans on single-use packaging for foods, beverages and in the HORECA sector
- Bans on PFAS in food contact packaging.

Reuse Targets

- Reuse targets set for transport packaging for 2030 (40%) and 2040 (70%)
- All B2B transport packaging in one country and between sites is to be 100% reusable

Recycled Content

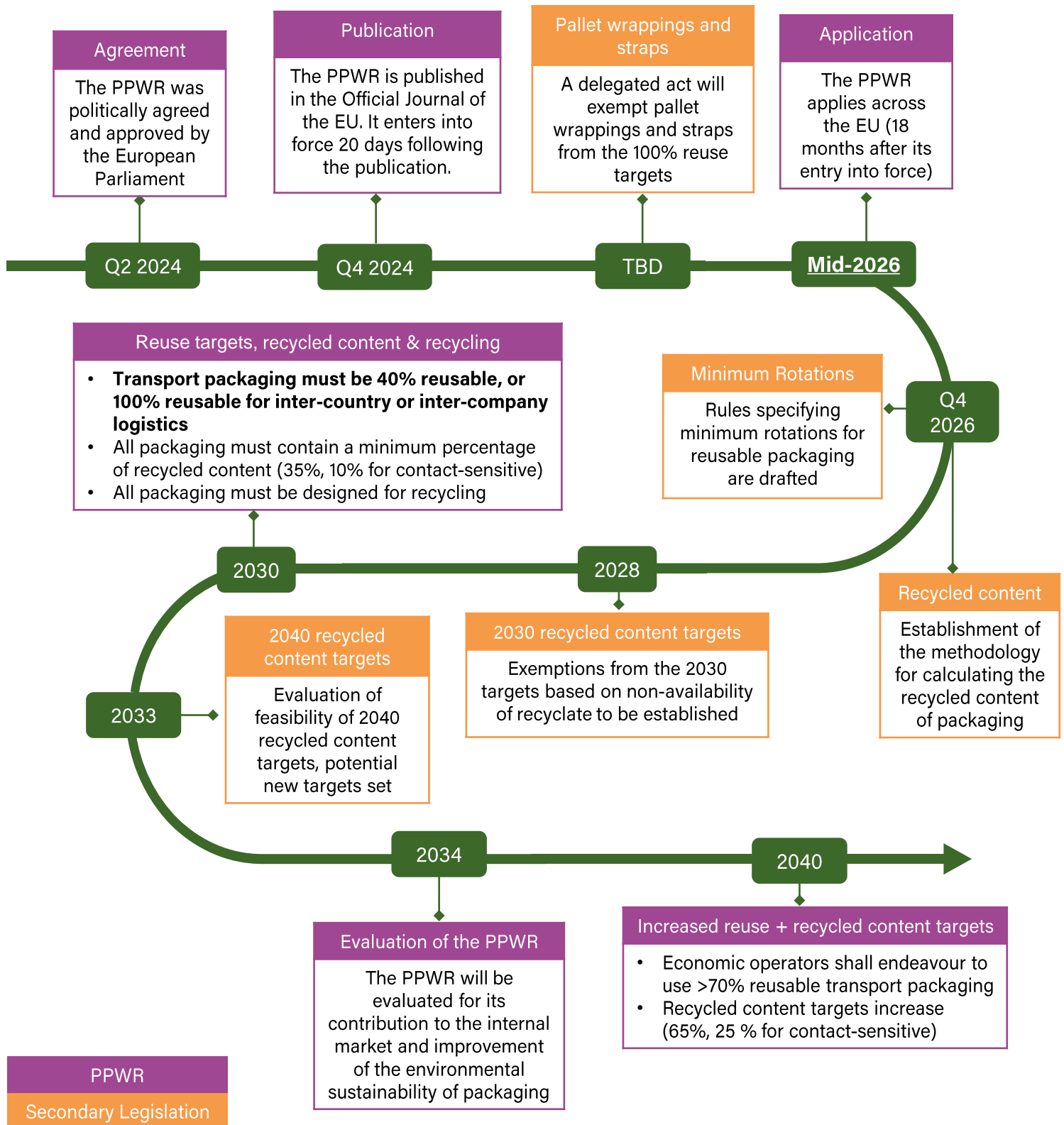
- By 2030 plastic packaging must contain a minimum percentage of recycled content
- There are 2030 and 2040 targets
- Different targets apply to PET and non-PET contact-sensitive packaging, and other types.

Others

- A maximum empty space ratio of 50% in grouped, transport, and e-commerce packaging
- Member states must meet packaging reduction targets of 5% by 2030, 10% by 2035, and 15% by 2040

Implementation Timeline

Dates are indicative and calculated based on an assumption of the PPWR's entry into force in Q4 2024. The exact timing of the application of certain measures therefore remains to be confirmed. In cases where the provisional agreement did not provide a clear date of application, the date of application is assumed to be that of the PPWR, i.e. 18 months following the entry into force of the Regulation.



Scope

Reuse targets will apply to transport packaging or sales packaging used for transporting products in the EU. This includes via e-commerce.

***Loophole**
Reuse targets do not apply to cardboard boxes*

Packaging types:

- pallets
- foldable-plastic boxes
- boxes
- trays
- plastic crates
- intermediate bulk containers
- pails
- drums and canisters of all sizes and materials, including flexible formats
- pallet wrappings or straps for stabilisation and protection of products put on pallets during transport*

**will be exempted from the 100% reuse target in a delegated act*

Targets

Transport packaging or sales packaging used for transport

used within one member state or to deliver goods between sites of the same operator in different member states

by 2030

40% must be reusable packaging

by 2040

70% should be reusable packaging

must be **100% reusable** by 2030

Definition of reuse:

're-use' means any operation by which reusable packaging is used again **multiple times** for the same purpose for which it was conceived;

Interesting for bottle-crate manufacturers

Reuse targets for sales packaging for alcoholic and non-alcoholic beverages:

- 10% by 2030
- 40% by 2040 (non-binding)



National deviations

- Individual member states **can** set **higher** reuse targets than those set out in the PPWR
- A member state that recycles >55% of its plastic packaging **and** prevents 3% waste by 2028 (compared to 2018 levels) **can** also **exempt** its economic operators from the reuse targets
 - *Recycling statistics can be found on [Eurostat](#) (most recent available data is from 2021)*

Recycled Content Targets

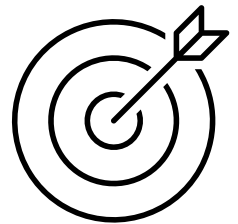
Overview

Recycled content targets have been set for plastic packaging. These targets lay out the minimum percentage of post-consumer plastic that must be included in packaging.

any plastic part of packaging

by **2030**
must contain **35%** recycled content

by **2040**
must contain **65%** recycled content



non-PET contact-sensitive packaging

by **2030**
must contain **10%** recycled content

by **2040**
must contain **25%** recycled content

calculation method

per packaging type and format

calculated as an average per manufacturing plant, per year

Example packaging type and format (PPWR Annexe II):

- *Type: HDPE and PP – rigid*
- *Format: Crates and pallets, corrugated board plastic*

Definition of post-consumer plastic waste:

Covers plastic waste generated from plastic products that have been supplied for distribution, or use and placed on the market

Therefore, we believe that own re-grind is covered in the definition.

Still to come: Secondary Legislation

The PPWR still needs to be fleshed out in certain areas. The tool used for expanding primary legislation (i.e. the PPWR) in more technical areas is **secondary legislation**.



This is drafted by the European Commission. Secondary legislation will be key in determining many important areas. The devil is in the detail.

Key decisions via secondary legislation

- Number of rotations for reuse
- Recycled content targets
- Recyclability of packaging
- Reuse target exemptions and assessment of 2040 targets

Rotations

- The Commission will set out the number of rotations packaging must be capable of making in order to be considered reusable

Recycled Content

- Elaboration of the methodology for calculating recycled content

Reuse targets

- Exemptions from the targets will be set out
- The feasibility of the 2040 targets will be assessed

