

# Unwrapping PPWR

Parliament & Council  
positions



europen

SHAPING A SUSTAINABLE  
FUTURE FOR PACKAGING



# Internal market & Labelling

(Articles 4 & 11)

## Parliament position

- Possibility for Member States to adopt unilateral sustainability or information requirements
- DRS labels established before Regulation's entry into force can be maintained until 36 months after adoption of the implementing act establishing the EU harmonised DRS label
- Possibility to provide EU harmonised labels via a single e-code where physical labelling is not possible

## Council position

- Possibility for Member States to adopt unilateral sustainability or information requirements
- Understanding of “placing on the market” as “making available on the market for the first time within the territory of a Member States” instead of the Union market
- Packaging subject to DRS exempted from the material composition label requirement

# Recyclability

(Article 6)

## Parliament position

- Timing of application of requirements clarified
- Derogations under Article 6.10 extended and possibility for Commission to propose more
- EPR fees to be earmarked to finance net cost of collection, sorting and recycling
- Ban of recycling grade D packaging from 96 months after publication of delegated acts establishing recycling performance grades
- Additional derogations for certain contact sensitive packaging

## Council position

- Definition of “packaging waste recycled at scale” linked to annual quantity of recycled materials
- Commission to develop design for recycling criteria and performance grades by 2028
- Possibility for application of requirements to be linked to entry into force of implementing acts
- Reduced granularity of recycling performance grades (A, B and C)
- Derogation from requirements for innovative packaging reduced to 3 years

# Recycled content

(Article 7)

## Parliament position

- Recycled content targets set on plastic part in packaging, per format, calculated as yearly average per manufacturing plant
- Recycled content target 2030 for contact sensitive packaging made from plastic other than PET lowered to 7,5%
- New 2040 25% recycled content target for contact sensitive packaging made from plastic other than PET
- Additional exemptions for packaging of specific products, and for any plastic part representing less than 5% of total weight

## Council position

- Recycled content targets set on plastic part of packaging, per packaging type and format, per manufacturing plant and year
- Recycled content targets to apply by, and not from, 2030
- Commission to present report by 1 January 2034 reviewing 2030 recycled content targets, assessing feasibility of achieving 2040 targets, the relevance of maintaining derogations, and need to revise targets (via a legislative proposal)



# Minimisation & prevention

(Articles 9, 21 & 38)

## Parliament position

- Minimisation and empty space requirements to apply by 1 January 2030
- Packaging weight and volume to be reduced to the minimum necessary
- Possible derogations when design is protected by geographical indications of origin or Community designs
- Deletion of reference to 40% empty space ratio
- National plastic-specific packaging waste generation reduction targets to be achieved by 2030, 2035, & 2040

## Council position

- Some derogations for packaging protected by Community designs, design rights, intl. agreements, trademarks or geographical indications
- Commission to request harmonised standards setting methodology to measure compliance with minimisation rules
- Timing of application of empty space requirements clarified
- Max. empty space ratio increased to 50%
- Possibility for Member States to go beyond PPWR waste prevention measures

# Packaging restrictions

(Article 22, Annex V)

## Parliament position

- Timing of application clarified (from 1 January 2030)
- Derogation from the Article based on Waste Framework Directive and 85% collection for recycling rate
- Derogation from Annex V, point 3, based on minimum 85% rate of separate collection for recycling
- Commission to review restrictions within 5 years after entry into force of Regulation
- Deletion of Annex V, rows 2, 3, 4
- Additional bans: shrink wrap for suitcases in airports; secondary packaging for cosmetics

## Council position

- Article 22 to apply by three years from date of entry into force of Regulation
- Possibility for Member States to maintain national restrictions adopted before 1 January 2024 in the formats and for the purposes listed in Annex V but made from materials not listed in Annex V.
- Commission to review Annex V within 8 years after date of entry into force of Regulation and present a legislative proposal, where necessary, to establish new packaging restrictions



# Reuse pt. 1

(Article 26)

## Parliament position

- Reference to “at least” making some of the targets minimum ones
- Deletion of 2040 targets set in paragraphs 7, 8, 9 and 10
- Derogation from obligation under paragraphs 3a and 3b, points (a), when rate of recycling is above 85 % by weight of a packaging material placed on market of Member State in 2026 and 2027
- Horizontal derogation from all targets when reuse doesn't deliver best overall environmental outcome

## Council position

- Reference to “at least” making some of the targets minimum ones
- Introduction of a provision allowing Member States to introduce higher reuse targets than those set in the Regulation
- Possibility for Member States to allow economic operators to form pools to meet the Regulation's reuse obligations

# Reuse pt. 2

(Article 26)

## Parliament position

- Horizontal derogations from all targets based on minimum 85% separate collection/recycling rates
- Derogation from paragraphs 7, 12 & 13 for all transport packaging in direct contact with food and feed
- Derogation for packaging of highly perishable drinks and beverages, wine, sparkling wine, wine products, spirituous beverages, and products subject to geographical indications
- By 8 years after entry into force of Regulation, Commission to review Article 26 and present legislative proposal

## Council position

- Possibility for Member States to request Commission to assess unforeseen circumstances preventing an economic operator to comply with some of the reuse targets
- By 1 January 2034, Commission to present report reviewing the implementation of the 2030 reuse targets and assessing the feasibility of achieving the 2040 targets