



Webinar

Mastering the New PPWR— Unlocking Opportunities in Sustainable Packaging

15 May 2025

Agenda

1. **The big picture:** Global perspective on PPWR and the new packaging legislation
2. **Double click:** Breaking down the complexity of the PPWR
3. **Best practice:** Learn from the leaders
4. **Taking action:** Recommended first steps
5. **Questions and discussion**

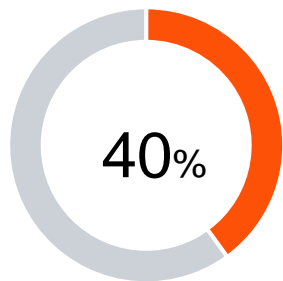


The background of the slide is a photograph of several icebergs floating in dark, deep blue water. The water is very dark, and the icebergs are white and jagged. Some icebergs are large and prominent, while others are smaller and more numerous in the distance. The lighting is dramatic, with some areas of the icebergs appearing to glow with a soft blue light.

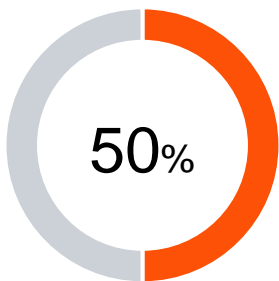
The big picture: Global perspective on new packaging legislation

Packaging is a large consumer of primary raw materials.

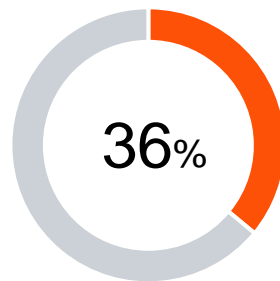
Much of it ends up as waste.



Of plastics are used for packaging



Of paper is used for packaging



Of municipal waste is made up of packaging waste.



“

We are building a whole new economy, a reuse economy.



Franz Timmermans

Former Executive Vice President
European Commission for the European Green Deal

From 2026 the PPWR - part of a set of binding EU legislative directives - will transform the packaging and the entire packaging life cycle

Packaging and Packaging Waste Regulation (PPWR) is part of the EU circular economy action plan

Timeline of entry in force



PPWR Scope & Timeline



The issue is massive: 188 Million tons

of packaging potentially impacted in the EU by PPWR in 2030 under a 'business as usual scenario'¹

- ❑ **Types of packaging impacted:** primary, secondary and tertiary
- ❑ **Impacted sectors:** plastic, paper, wood, glass, steel and aluminum



The clock is ticking: August 2026

The PPWR has entered into force in the EU on 11 February 2025, and its general application is 18 months afterwards, in August 2026.

PPWR shifts from a recyclability-focused perspective to a broader approach, focusing on prevention and reduction of waste generation

The PPWR has three main objectives

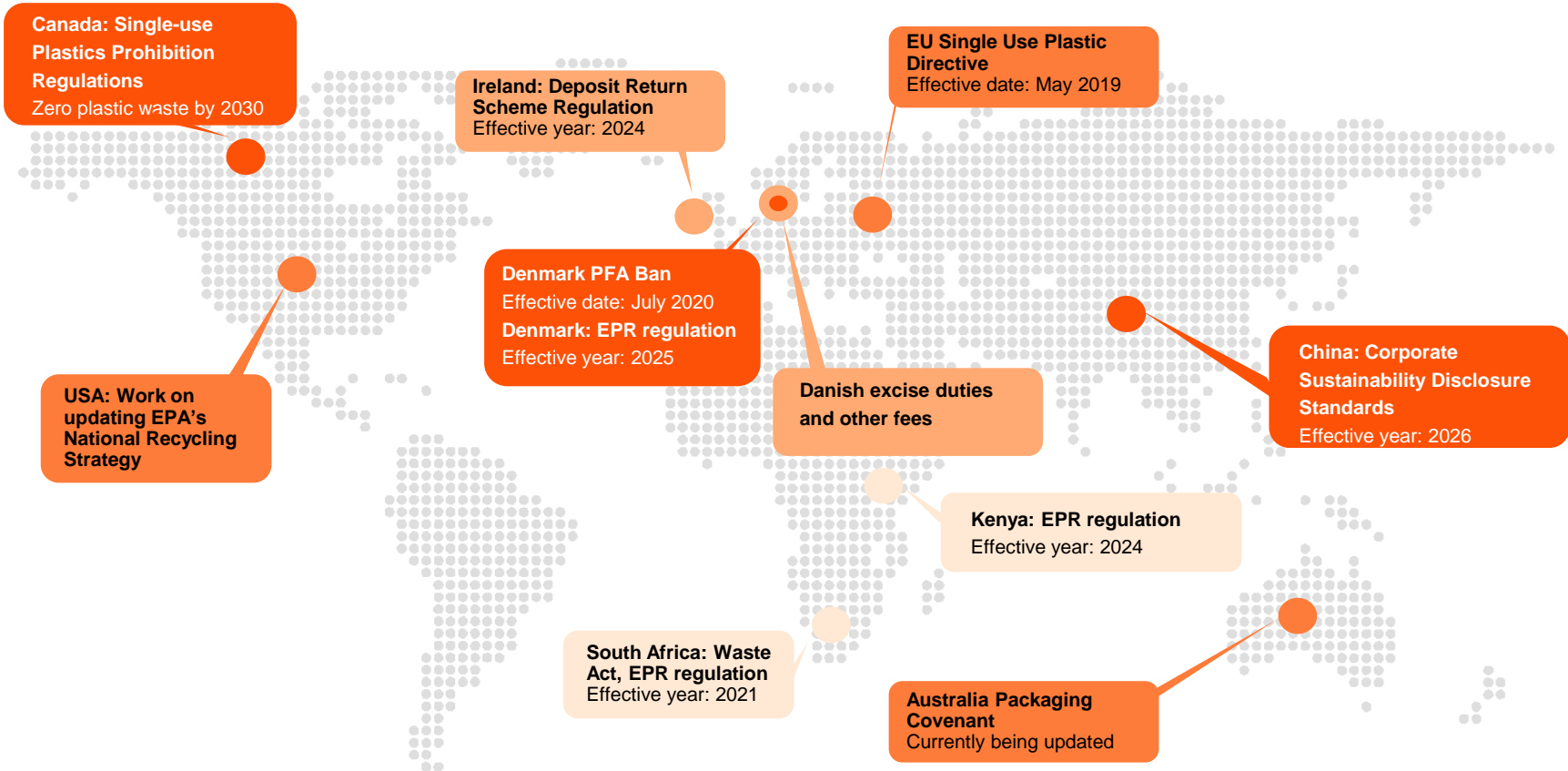


PPWR will have financial impacts the entire packaging value chain, with effects on all economic operators - and in the market.

PPWR is expected to impact different actors across the packaging life cycle

Economic Operators	PREVENT			REDUCE	RECYCLE	
	1 Packaging minimization	2 Packaging restriction	3 Re-use targets	4 Recycled content targets	5 Design for recycling	6 Recycling targets
Providers of packaging technologies		<ul style="list-style-type: none"> Need to invest in R&D and produce new technologies to match PPWR criteria in a relatively short-time 		<ul style="list-style-type: none"> Higher revenues for new technologies implementation for packaging redesign 		
Manufacturers of material / packaging	<ul style="list-style-type: none"> Revenues impacted by reduction of packaging demand 		<ul style="list-style-type: none"> Product mix redesign with significant CapEx deployment to replace banned products Explore new customers, products, segments for new market opportunities 			<ul style="list-style-type: none"> Higher revenues for the increase demand of secondary raw material
Users / Distributors of packaging			<ul style="list-style-type: none"> Change in supply chain for the design of packaging for products Lower costs for change the selling mode of packaged products 			
End-of-life packaging / waste managers <i>(collection, logistic, treatment)</i>	<ul style="list-style-type: none"> Lower revenues due to lower quantity of waste to manage (collection, selection and treatment) leading to higher operational costs 		<ul style="list-style-type: none"> Higher costs for new technologies for reused packaging 	<ul style="list-style-type: none"> Higher revenues for go-to-market with an increased demand for secondary raw material Higher revenues for the increased handling of packaging (logistic, treaters, collector for reusable packaging) 		

In addition to PPWR, many companies will be impacted by national and regional packaging regulations in other markets outside of EU



The background of the slide is a photograph of several icebergs floating in dark, deep water. A bright teal or cyan light emanates from beneath the water's surface, creating a glowing effect around the icebergs. The icebergs are white and jagged, with some smaller fragments visible in the foreground.

Double click:
Breaking down the
complexity of the PPWR

All packaging shall be designed for recycling (DfR) as per criteria in the delegated acts by 1 January 2030, and in addition, by 2035 all packaging shall be collected, sorted and recycled-at-scale.

Scope

The Regulation aims to apply to all packaging (B2C and B2B) and packaging materials (with some exemptions), as well as to all packaging waste

Labelling

The regulation requires harmonized labels on material composition to facilitate consumer sorting and labelling of waste receptacles

SoC

Overall packaging placed on the EU market shall be manufactured minimizing the presence and concentration of substances of concern

Food contact

Food contact packaging will be banned, by August 2026, if containing PFASs in a concentration equal to or above the limit specified in the regulation (chapter II, article 5)

PPWR will be directly applicable in all EU Member States, fostering the adoption of harmonized rules on packaging and contributing to the functioning of an internal market for packaged goods

Minimum recycled content

By 2030 and 2040, any plastic part of packaging will have to contain a minimum percentage of post-consumer recycled content

Compostable packaging

By 3 years after the entry into force of PPWR, several packaging formats will have to be compostable i.e. permeable tea bags

Minimisation & prevention

By 1 January 2030, packaging placed on the EU market shall be designed so that its weight and volume is reduced to the minimum necessary for ensuring its functionality, considering its shape and material










Reuse and refill

The PPWR will introduce reuse targets for packaging such as for take-away, transport and beverages starting from 2030

To meet packaging waste reduction targets set for 2030, 2035 and 2040, the PPWR imposes three measures and restrictions...

Packaging waste prevention measures

PPWR key transformation elements to prevent

- 
Packaging minimization
 **50% maximum empty space ratio**
(by 3 years from entry into force delegated acts will establish the methodology)
 **By 2030**
- 
Packaging restriction
 **Restrictions on certain single-use plastic packaging formats**
(listed in Annex V)
 **By 2030**
- 
Re-use targets
 **Percentage of reusable packaging for certain packaging**
(10-40% in 2030 and 25-70% in 2040)
 **By 2030 and 2040**

Packaging in scope

- Grouped
 - Transport
 - E-commerce
-
- Grouped
 - Unprocessed fresh fruit and vegetables
 - Accommodation sector
 - Very lightweight plastic bags
-
- Grouped
 - Transport & E-commerce
 - Beverage
 - Take-away

Waste prevention targets

Packaging waste generated per capita vs 2018 by:

- 5% in 2030

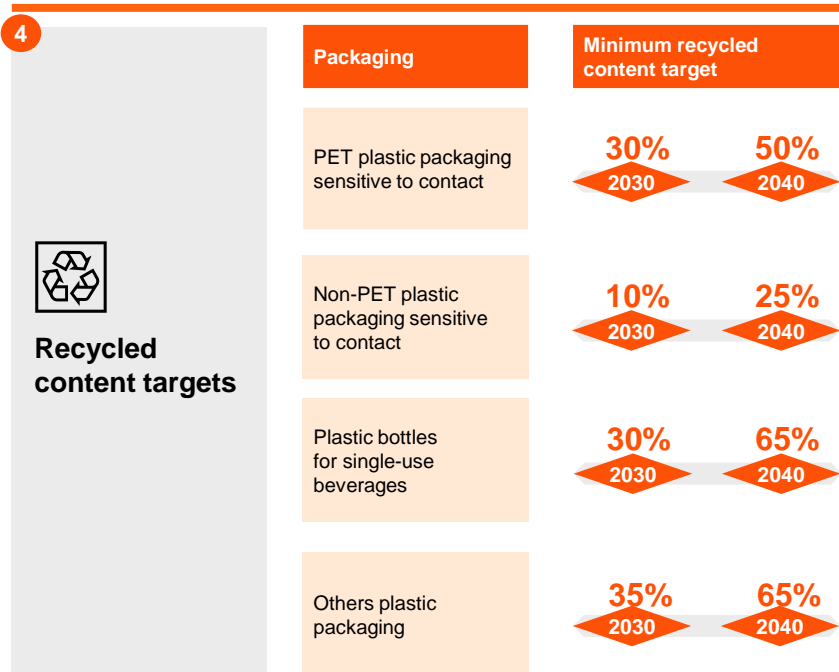
- 10% in 2035

- 15% in 2040

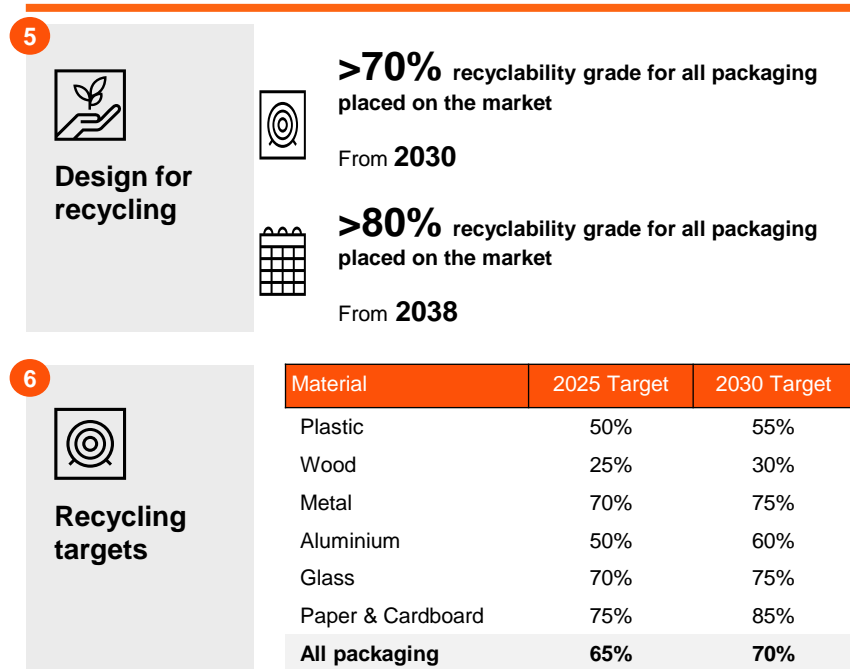
... as well as post-consumer recycled material and increase of the recycling rates

Recyclability will be expressed in performance grades A (higher or equal to 95%), B (higher or equal to 80%) or C (higher or equal to 70%). EPR fees will be modulated based on packaging recyclability

PPWR key transformation elements to reduce



PPWR key transformation elements to recycle

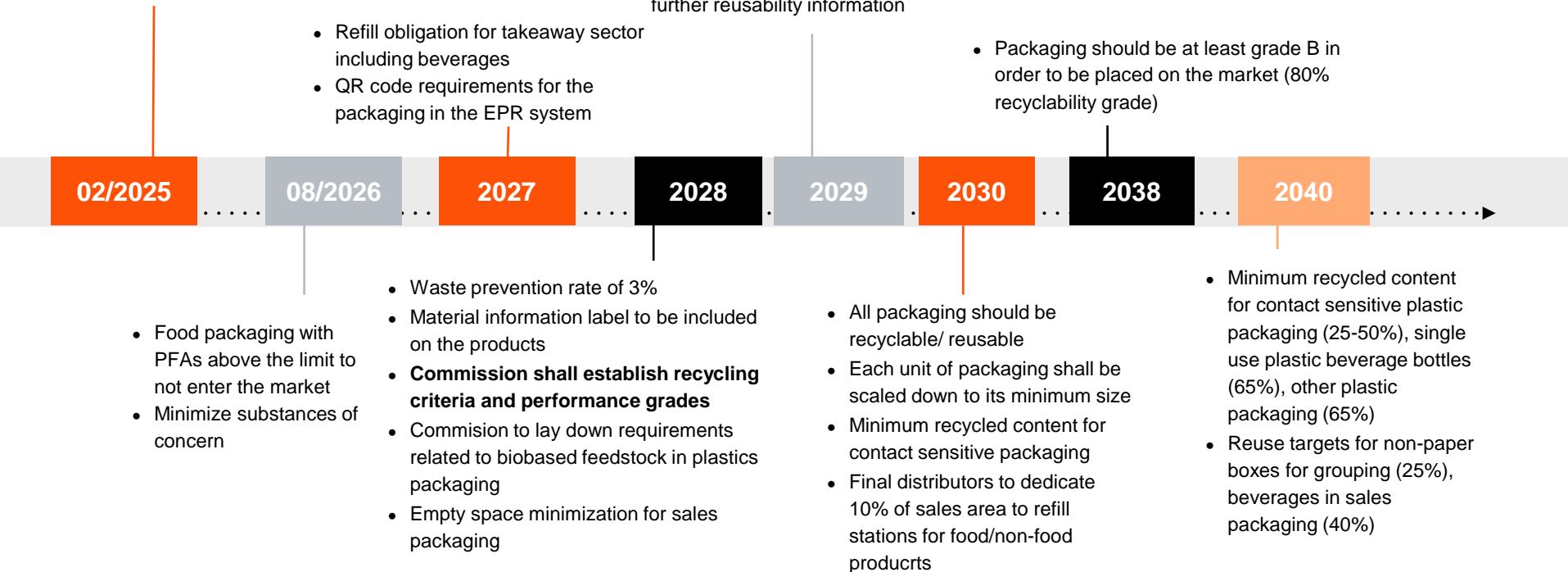



The PPWR timeline

PPWR

PPWR entered into force which is an amendment of the 1994 Packaging Directive, lastly amended in 2018

- Member states to set collection objectives
- **Compliance with the calculator and verification of the % recycled content as per the rules laid down in the implementing act**
- Label for reusable packaging and QR code with further reusability information



A photograph of several icebergs floating in dark, deep blue water. The icebergs are white and jagged, with some showing signs of melting. The water is very dark, creating a high contrast with the white ice. The scene is captured from a slightly elevated angle, showing the tops of the icebergs and the surrounding water.

Best practice:
Learn from the leaders

Transitioning to sustainable packaging is not without its pitfalls and many companies are currently revising their packaging targets

Focus on circularity in leading companies do continue despite changing sustainability landscape



Article

Unilever's reduced and extended plastic reduction target causes controversy

29 April 2024

Unilever has revised its goal to halve virgin plastic consumption by 2025, shifting the target to one-third by 2026. This is feared to result in a further 100,000 tons of fresh plastic being produced every year and has sparked backlash – yet others have defended the

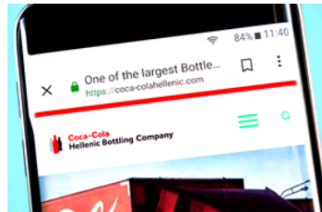


Article

Mondelez may fall short on virgin plastic and design-for-recycling targets for 2025

24 April 2025

In its 2024 Report, Mondelez reveals stalling progress in reducing its virgin rigid plastics in line with its targets for 2025, and a complete stagnation in designed-for-recycling packaging since 2022; yet it

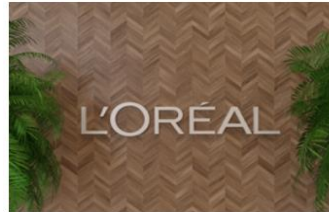


Article

Coca-Cola HBC meets design for recycling goal early, but not other 2025 targets

18 March 2025

Reflecting on its sustainability targets for 2025, Coca-Cola HBC says it already designs all its packaging for recycling, but may still have progress to make with recovering materials and implementing recycled



Article

Where L'Oréal stands after missing sustainable packaging goals for 2025

17 April 2025

L'Oréal Groupe has failed to meet several of its sustainability targets for 2025, missing its 100% recyclable, reusable, refillable, or compostable plastic packaging goal by 51%. We take a deeper dive into its

PPWR will reshape recycling in Europe and the market for recycled materials globally

- We will see an increase in **recycling capacity** (including Deposit Return Scheme implementations) as well as an improvement in recycling technology (**chemical recycling**)
- Leading Brand-owners & converters are securing **access to recycled content** and it can be a crucial advantage to be 2 steps ahead of the competition
- Players contributing to EPR schemes should be given **priority access** at market prices to recycled material. How this will operate in practice and what 'priority access' means **remains to be seen**
- There will be a **restriction on sending packaging waste that can be recycled to landfill or incineration**, which could result in a higher sorting requirements and costs for waste managers

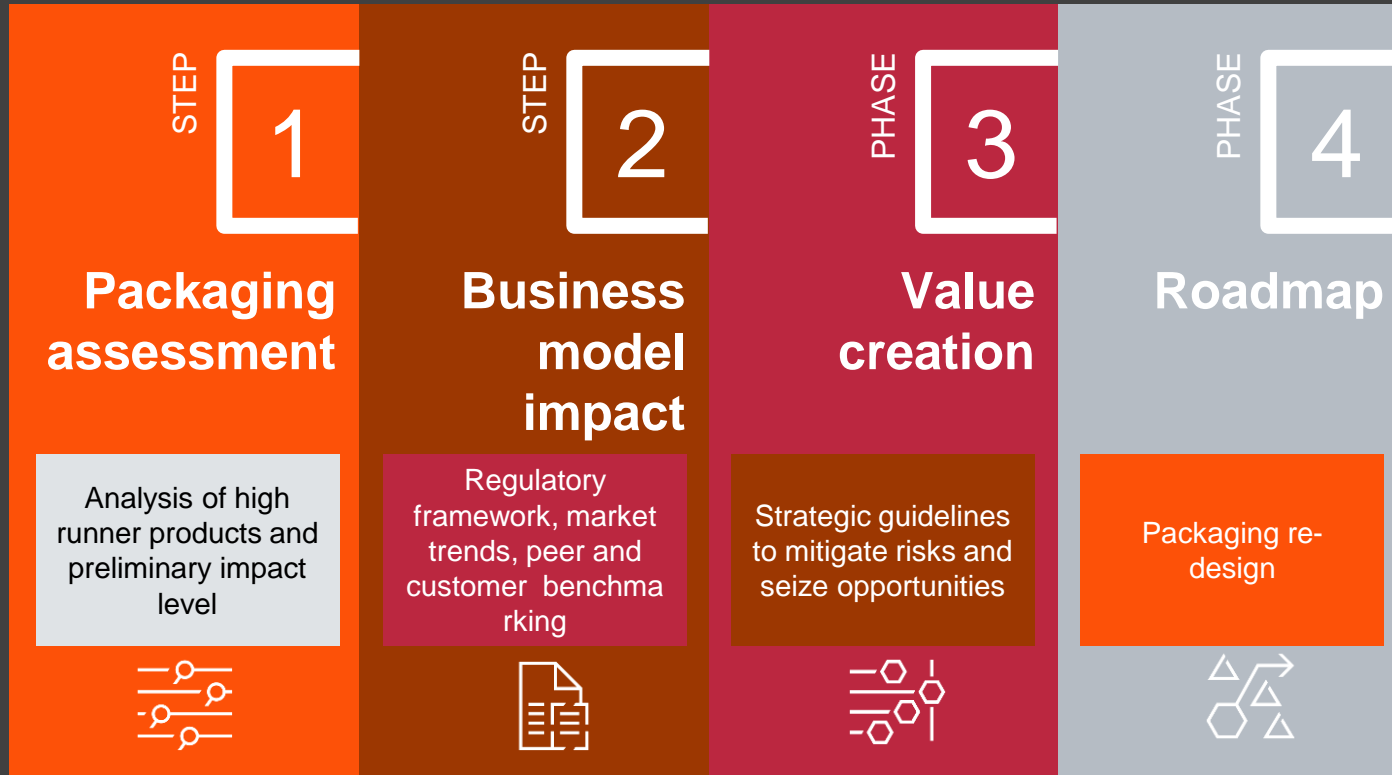


The background of the slide is a photograph of several icebergs floating in dark, deep blue water. A prominent greenish-blue glow emanates from beneath the water's surface, highlighting the icebergs. The text is overlaid on a semi-transparent dark rectangle in the center-left.

Taking action:
Recommended first steps

A four-step process will provide the solid foundation for creating value with your future packaging strategy and its implementation

Compliance



Future-proof

PPWR aims to strengthen the Extended Producer Responsibility (EPR) through more stringent waste reduction targets and increasing packaging producer accountability



Although EPR is not new, with PPWR we now have a much sharper compass for where we are heading.

It's no longer just about doing something – it's about achieving concrete results that everyone can see and feel.



PPWR defines specific targets for collection and recycling.

EU countries must meet these targets through their EPR.



Some companies fear that EPR may negatively impact their products

This is partly intentional: EPR is meant to promote sustainable choices and penalize less sustainable solutions

This is comparable to existing Danish taxes that guide consumption and production

“

EPR is a policy approach under which **operational and or financial responsibility** for treatment or disposal of the products they place in the market after use is transferred to the Producers.

”

EPR regulations are implemented & expanded across the EU

- EPR aims to **reduce waste and promote recycling** by shifting **the responsibility to ensure effective waste management, to Producers**
- **EPR fees** are paid by producers based on the **quantities of packaging** they put on the market.
- The EU are at the forefront of implementing EPR policies, with **mandatory regulation** in place and future initiatives in proposal stages **across numerous industries.**

Example regulations with EPR components



Packaging

Packaging and Packaging Waste Regulation (PPWR, formerly PPWD)



Textiles

EU Strategy for Sustainable and Circular Textiles



Consumer Electronics

Waste from Electrical and Electronic Equipment Directive (WEEE)

Navigating the PPWR requires looking beyond excise duties and fees to consider the different impacts on the business

Regulations are just one - important - component of your packaging strategy

Small steps

- Break down all the information you already know about your business and go from there.
- Navigating EPR etc. is not just about managing taxes and fees. Companies must also address changing requirements for packaging design, reporting, material selection, and collaboration within the value chain.
- But you cannot do it all at once. You need to prioritize.



Commitments

- EPR and PPWR go beyond merely regulating behavior through economic incentives. These regulations impose extended responsibility on producers for the entire lifecycle of packaging. The goal is to promote a circular economy, increase recycling.
- Many companies already have public packaging sustainability commitments: recyclability, plastic reduction, reuse etc.



Economics


- Often brand-owner commitments are more ambitious in both target and timing than regulations.
- Excise duties on packaging and products have traditionally aimed to influence consumer and producer behavior. This incentive is a direct tool to promote sustainable choices and reduce environmental impact.
- By waiting the risks can become very costly



The importance of cross-organisational collaboration

Q&A

...and yes, we'll post the slides after the webinar!



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at **pwc.dk/sustainability-2025**

Transition Plan for Climate Change Mitigation - How to Go About it?

- Tuesday 17 June 2025 at 09:00-10:00 AM



Thank you for your attendance



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