





Packaging and Packaging Waste Regulation

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About Cēpi

Represents in Brussels

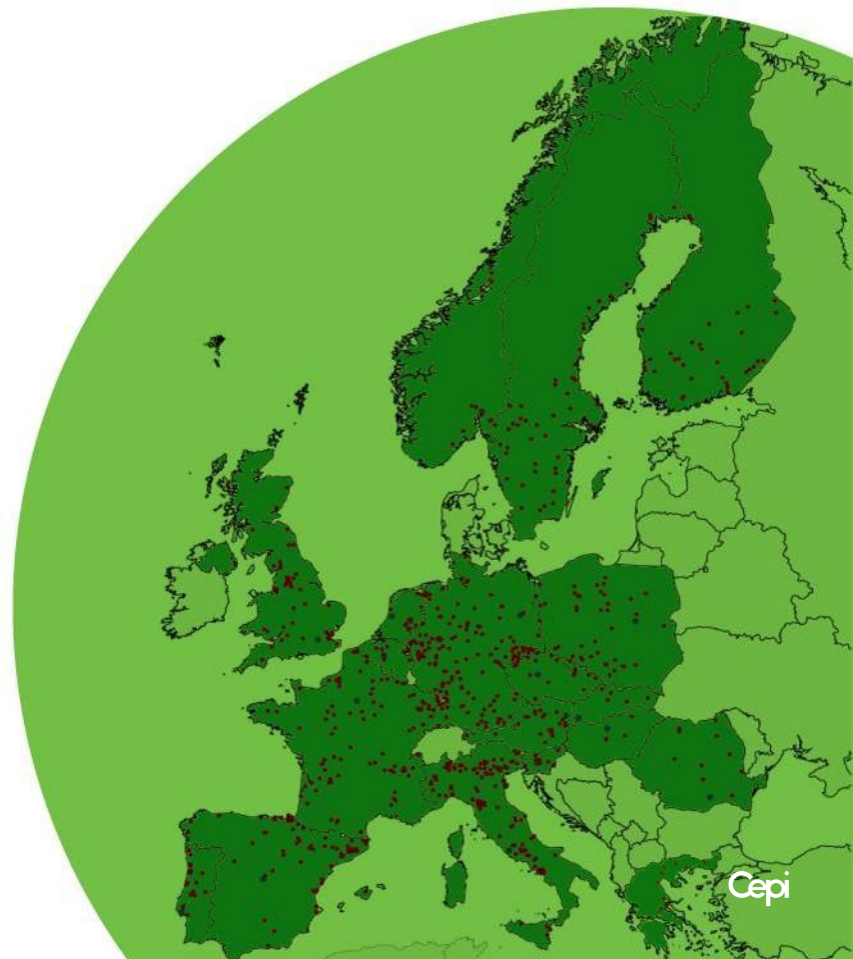
500 pulp, paper and board producing companies
895 mills across Europe of which **141** biorefineries
180000 people employed directly
19 member countries

Engaged in international fora (UN, FAO, WTO)
to defend our **21.7%** share of global production

Working across the value chains –
from forest owners to converters

Chair: **Henrik Sjölund, CEO Holmen**

A staff of **24** industry, policy and public affairs experts

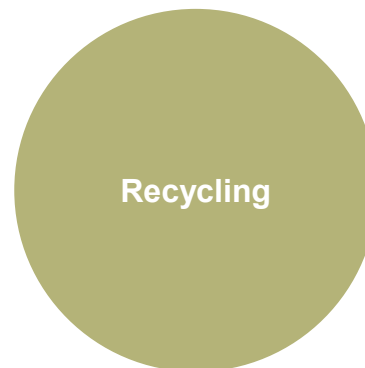


About Cepi

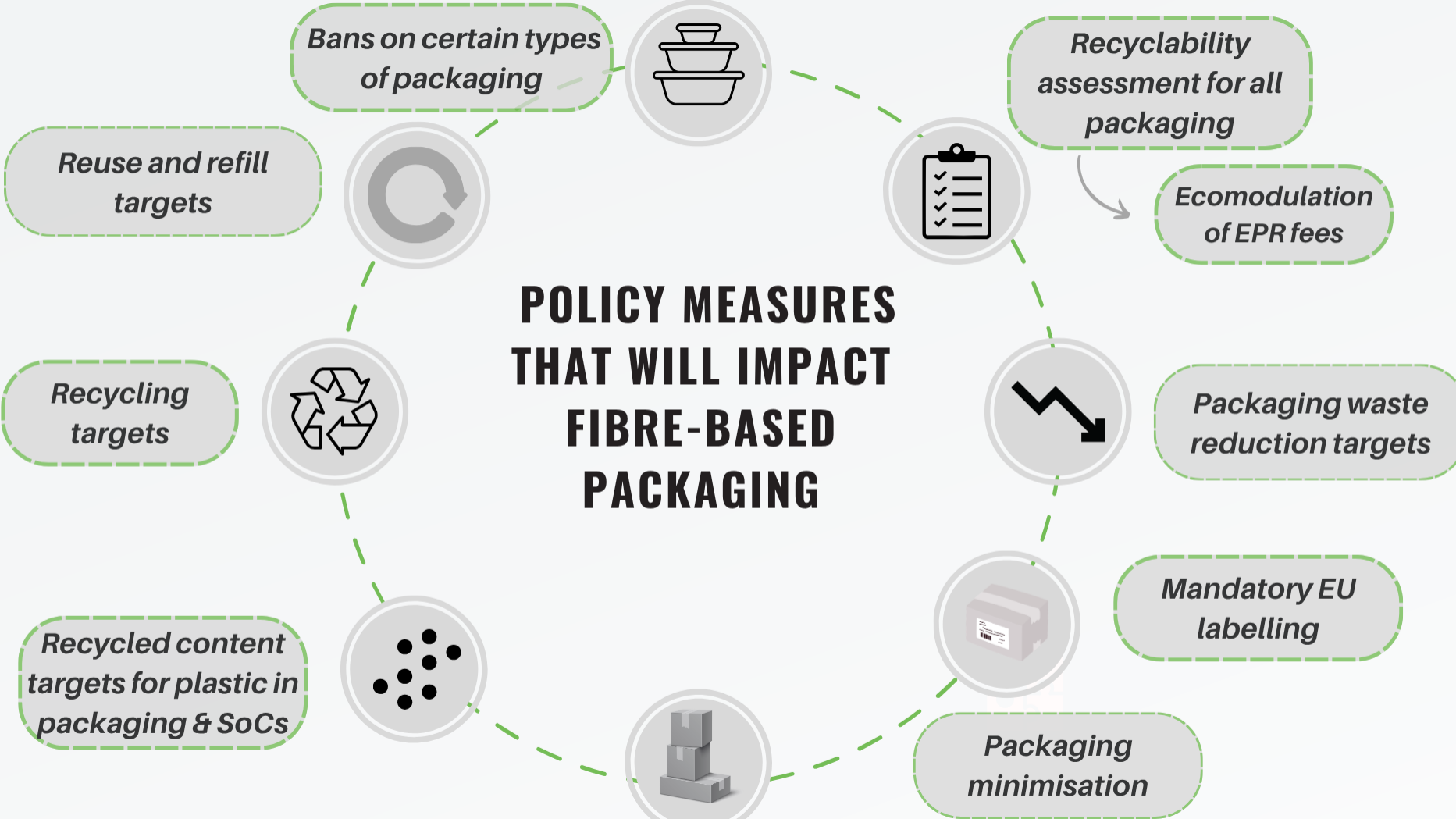
We deploy our agenda in 6 focus areas

Outline of CEPI activity areas
2018-2019

- ETS, energy policy, renewables, 2050 climate strategy
- Food contact, sustainability performance, REACH
- Land use and forestry, certification, forest-based industries joint strategy
- Markets & production reports, Intal trade, industrial policy, transport
- Circular economy, recyclability guidelines, single-use plastics
- Bioeconomy strategy, R&D programmes, funding, skills agenda



POLICY MEASURES THAT WILL IMPACT FIBRE-BASED PACKAGING



Legislative timeline

2022

30 November 2022
Publication of the European
Commission Legislative
Proposal

2024

December 2024
Adopted by Council and
European Parliament

2025

22 January 2025
Publication in the Official
Journal of the EU –
Entry into force 20th day
following publication

2026

12 August 2026
Application of Regulation

What is a Commission Guidance & FAQ?

The European Commission has published official guidance and a FAQ

Purpose:
support stakeholders understand and implement the PPWR

Legal Status - Guidance

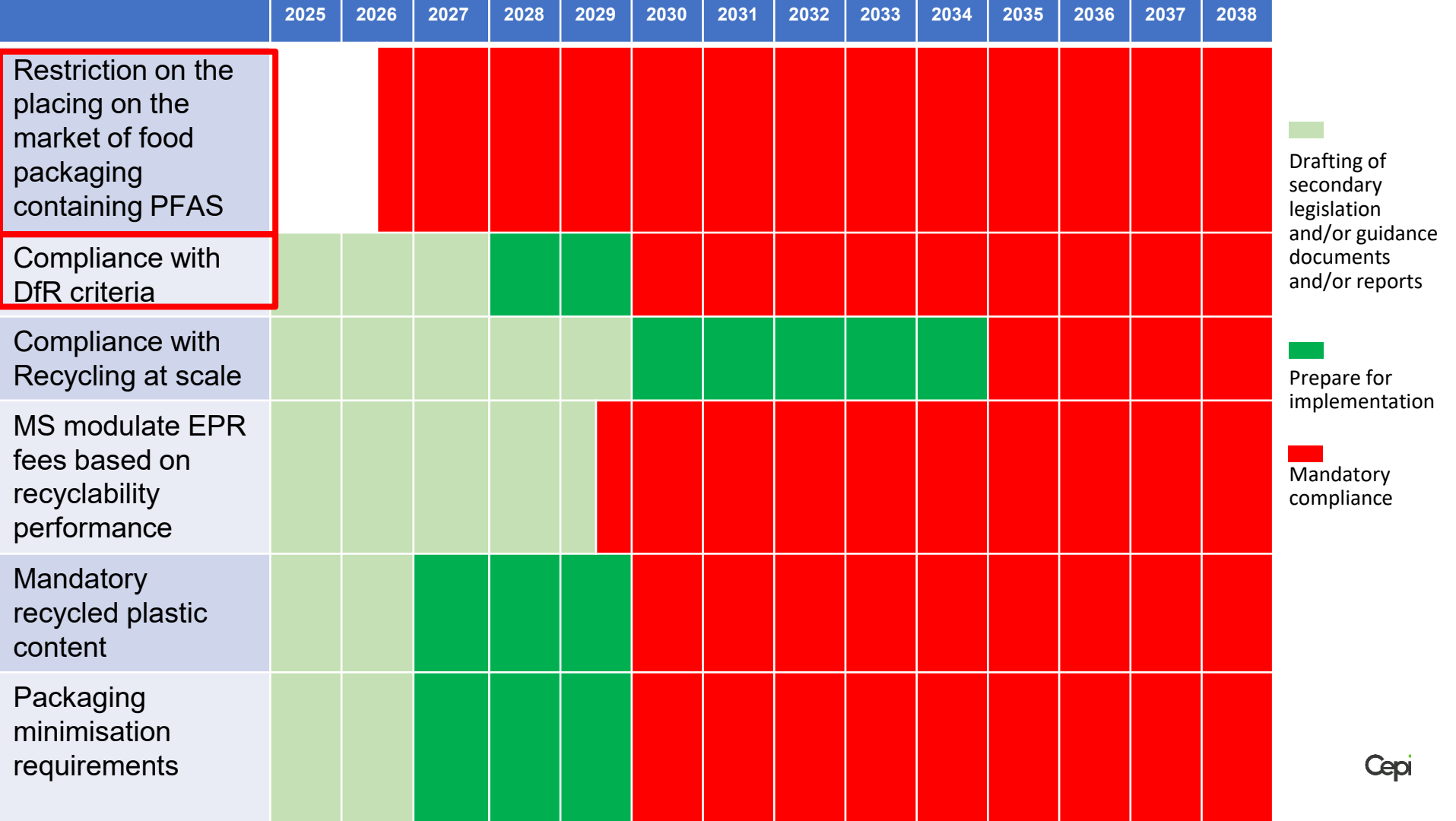
✔ Supports interpretation of the PPWR

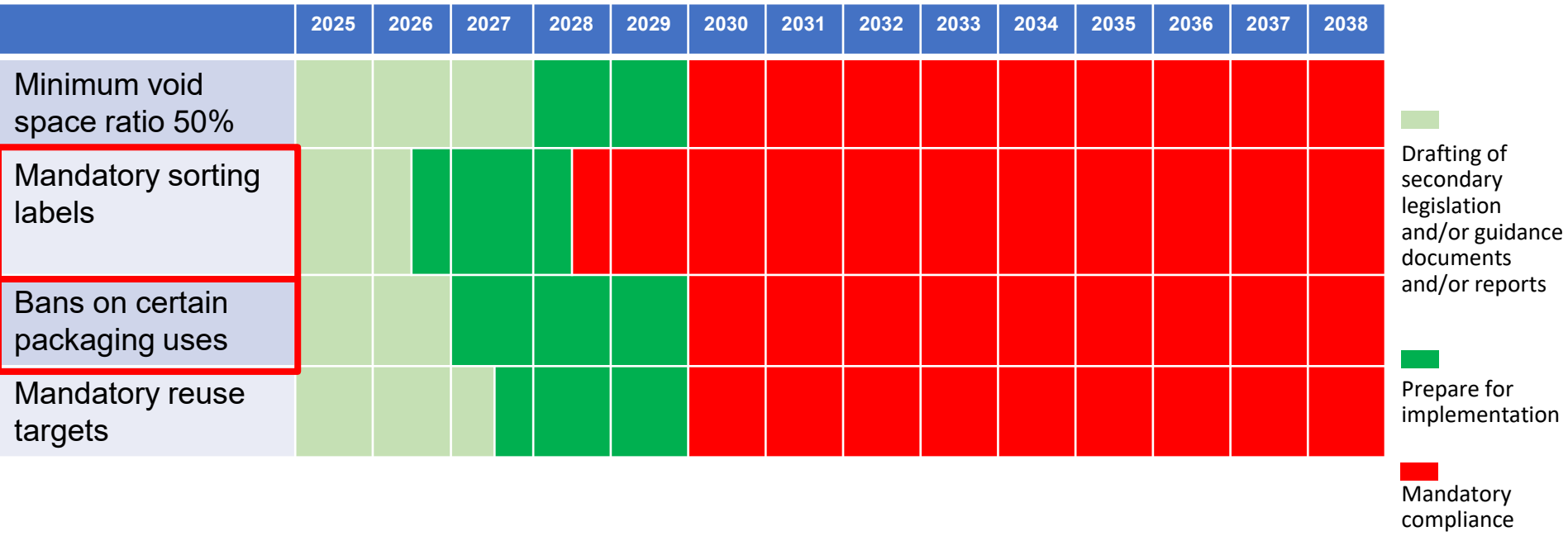
✘ Does not replace or change the PPWR

Guidance must always be read together with the legislation

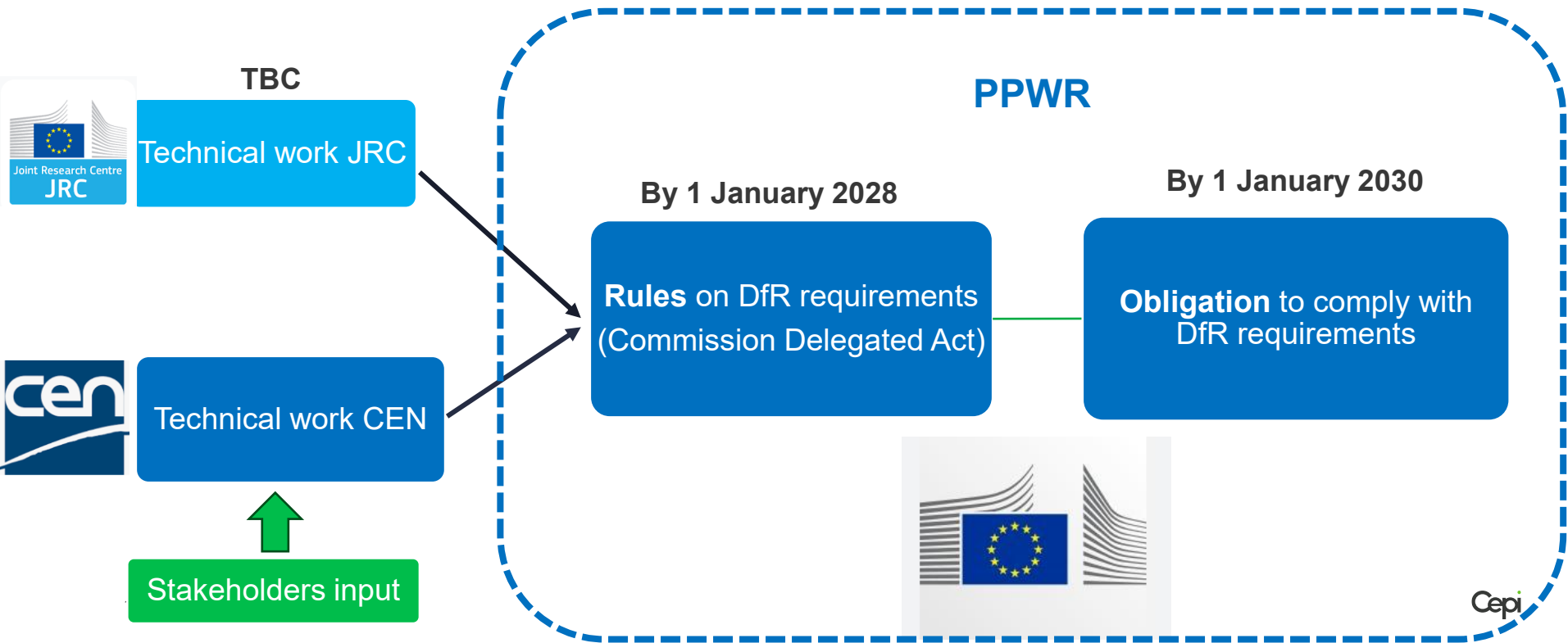
The PPWR remains the only legally binding text

Only the ECJ can provide legal advice





PPWR Design for Recycling criteria - process



Recyclability assessment for all packaging

	Recyclability score	Recyclability grade	
		By 2030	By 2038
Each packaging unit assessed based on design for recycling criteria	Higher or equal to 95%	A	A
The assessment will provide a recyclability score -->	Higher or equal to 80%	B	B
	Higher or equal to 70%	C	Market ban
	Lower than 70%	Market ban	Market ban

Where a unit of packaging includes integrated components, the recyclability assessment shall include all integrated components. In case the integrated components can be separated as a result of mechanical stress during transportation or sorting, a separate recyclability assessment can be carried out.

Where a unit of packaging includes separate components, the recyclability assessment shall be carried out separately for each separate component.

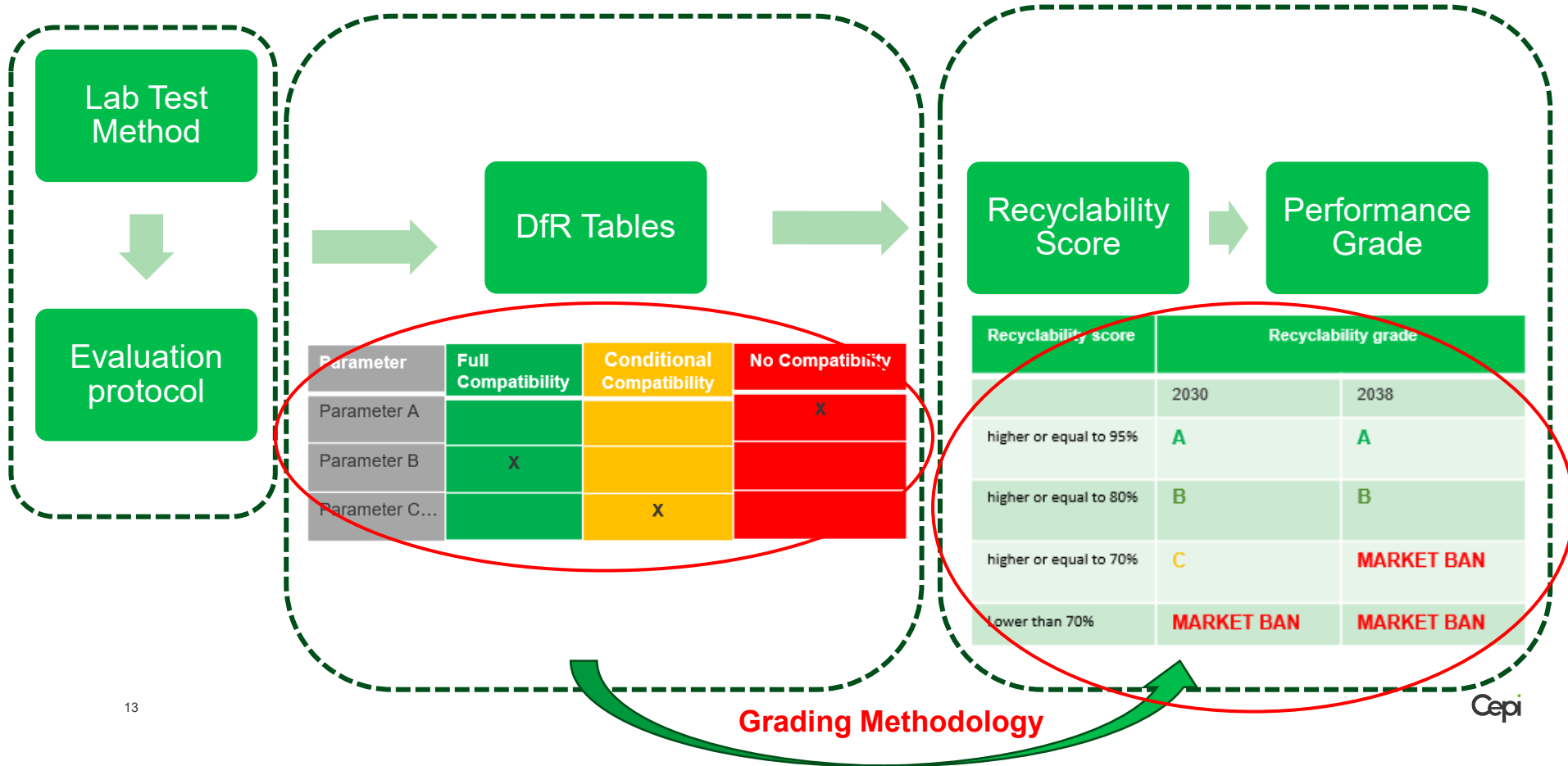
Extended Producer Responsibility fees & recyclability grades

Recyclability score	Recyclability grade	
	By 2030	By 2038
Higher or equal to 95%	A	A
Higher or equal to 80%	B	B
Higher or equal to 70%	C	Market ban
Lower than 70%	Market ban	Market ban



By Q3 2029 EPR fees modulated according to recyclability score and grade

Framework for DfR assessment



RECYCLABLE PACKAGING

Q: What happens between the general application date of the Regulation (12 August 2026) and 1 January 2030?

A: During the European Commission Expert Group meeting of 20 May, DG Environment clarified that until 1 January 2030, the current framework continues to apply.

This means that:

- The essential requirements under Article 9 of the Packaging and Packaging Waste Directive (PPWD) remain applicable.
- National transposition measures adopted by Member States under the Directive continue.

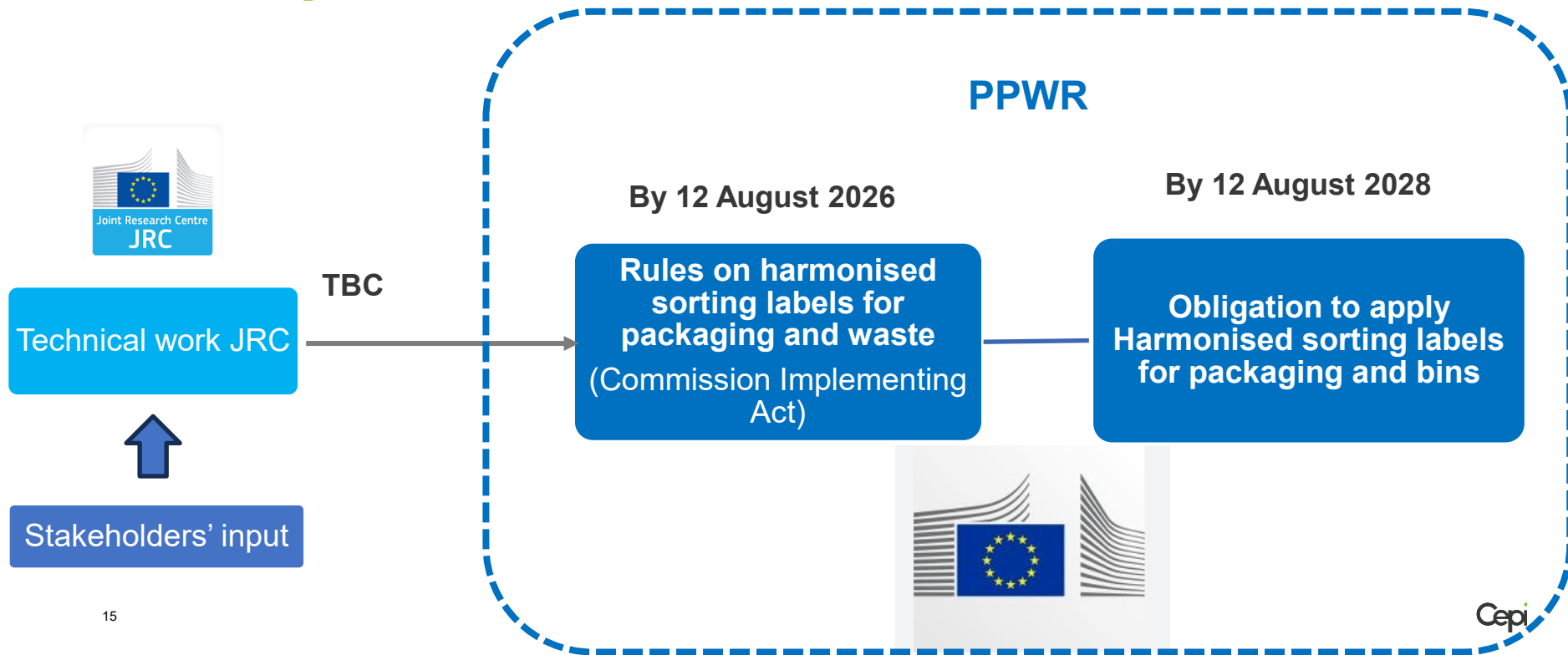
In practical terms:

- Packaging must still comply with the recoverability requirement set out in Annex II, point 3 of the PPWD.
- Packaging must be designed so that it is recoverable through at least one of the following routes:
 - Material recycling
 - Energy recovery
 - Composting
 - Biodegradability

In short, despite the Regulation becoming generally applicable on 12 August 2026, there is no immediate change to the recyclability/recoverability technical requirements, and companies should continue complying with the existing rules until 1 January 2030.



EU Sorting labels for packaging and waste bins - process



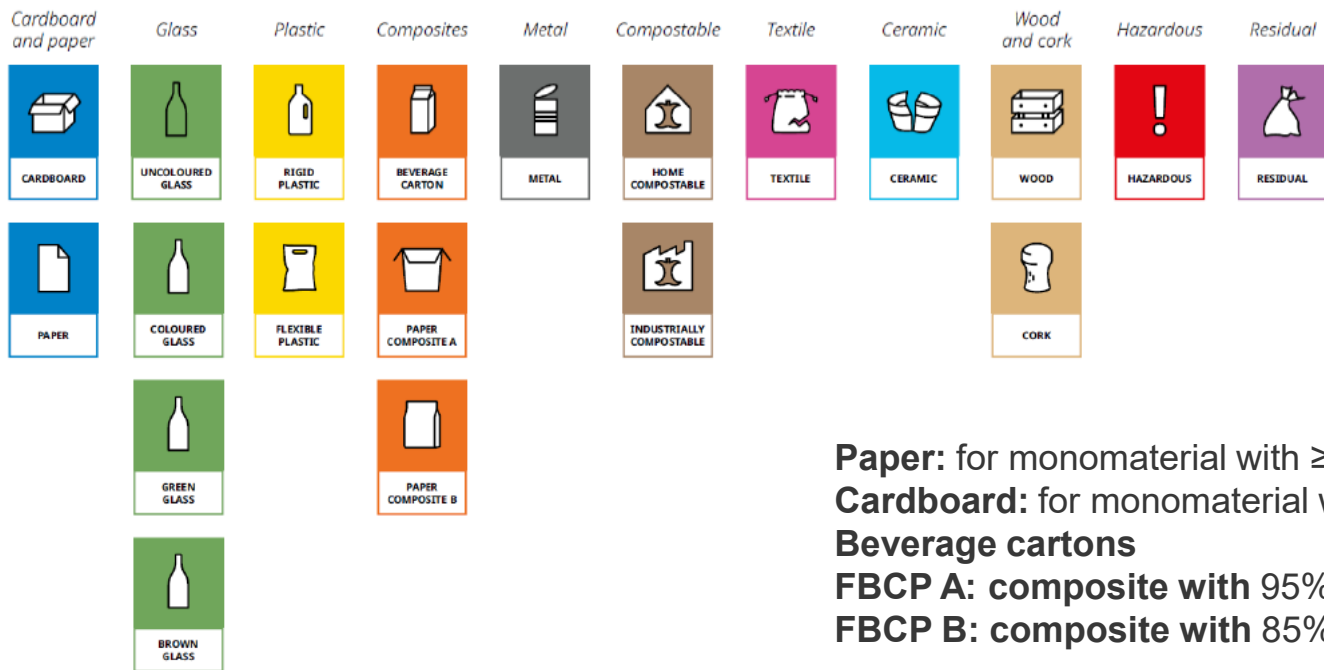
Sorting Labels

- JRC presented their **report on harmonised sorting labels for packaging and waste receptacles**, issued on **30 January 2026**.

Clarifications provided by JRC:

- **Text and colours will not be mandatory** for on-pack labels. JRC proposes flexible options for producers but recommends using colour and text where feasible.
- **Meta-labels** will not be applied to packaging (only to waste receptacles) to avoid confusing consumers.
- Packaging containing **≥95% paper** is considered **monomaterial**.

Figure 13. Pictograms and materials as used in the proposed EU harmonised waste sorting labelling scheme.



Paper: for monomaterial with $\geq 95\%$ paper
Cardboard: for monomaterial with $\geq 95\%$ paper
Beverage cartons
FBCP A: composite with $95\% > - 85\%$ paper
FBCP B: composite with $85\% > - 50\%$ paper

Meta-labels
(for receptacles only)



Cepi comments on JRC report

- Use the term “**paper-based composite packaging**” instead of “**fibre-based composite packaging**”.
- **Monochrome labels** are the only technically feasible solution due to cost and operational constraints. Colour and text on labels should be optional only.
- **The paper label should only be applied on waste bins** to help consumer sort graphic paper. Cardboard and paper packaging are always collected together and should carry the cardboard label.
- Beverage cartons should always carry their **dedicated label** on both packaging and waste bins, even when collected with paper-based composites.
- Future review clause to **align labels with DfR assessment**

Way forward

- Many measures remain unclear – Commission is asked to provide legal clarity and predictability:
- namely on rules regarding PFAS restriction for food contact packaging, definitions of “producer”, “manufacturer” and obligations, scope of Annex V bans, etc.

→ Cefi supports the timely implementation of the PPWR. The value chain needs to remain aligned and united – working with the Commission to ensure timely compliance.



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