

November 2025

PPWR : What will change for you?

By

Floriane de Kerchove - Public & Regulatory Affairs Manager at Fost Plus

Annemarie Abbeel - Senior Expert Design For Recycling at Fost Plus

The PPWR



Recyclability & recycled content



Labelling



Packaging restrictions



Prevention & minimisation of packaging weight

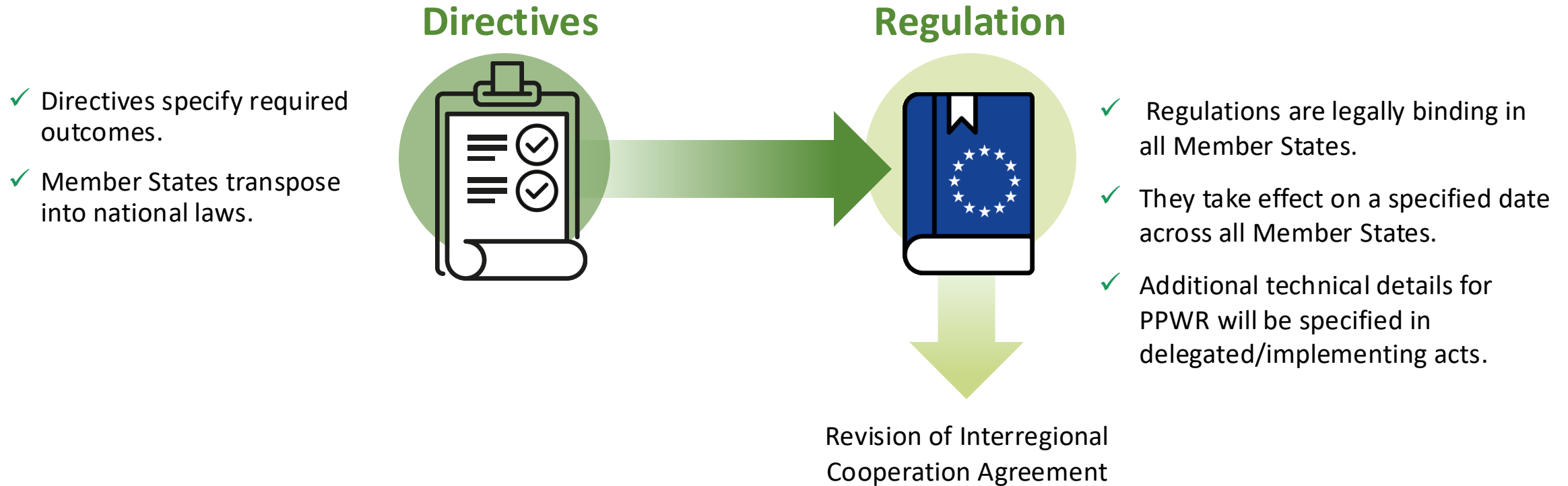


Reuse & Refill

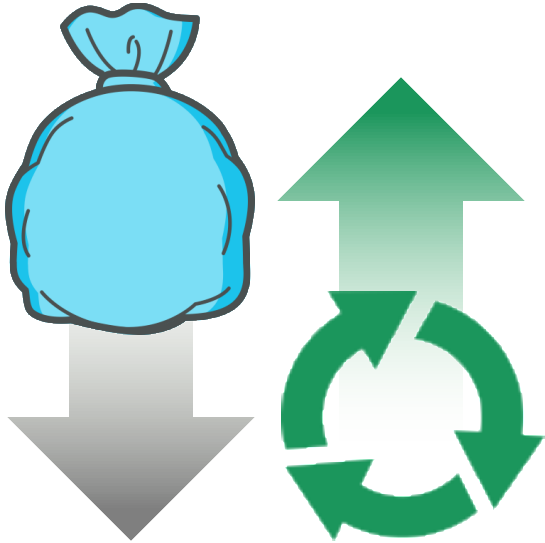


Deposit Return Systems

From Directive to Regulation



Objectives of the PPWR



1

Reduce generation of packaging waste/foster reuse



2

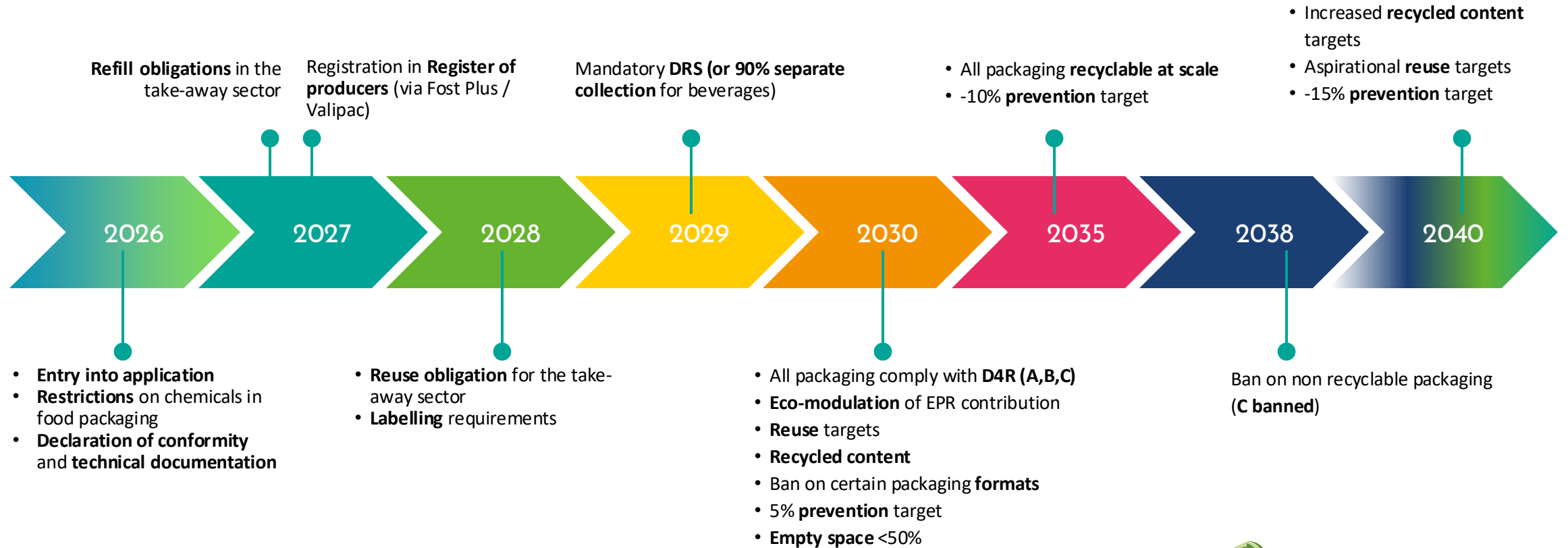
All packaging on the EU market to be **reusable or recyclable** in an economically viable way **by 2030**



3

Increase the use of recycled plastics in packaging

Timeline PPWR

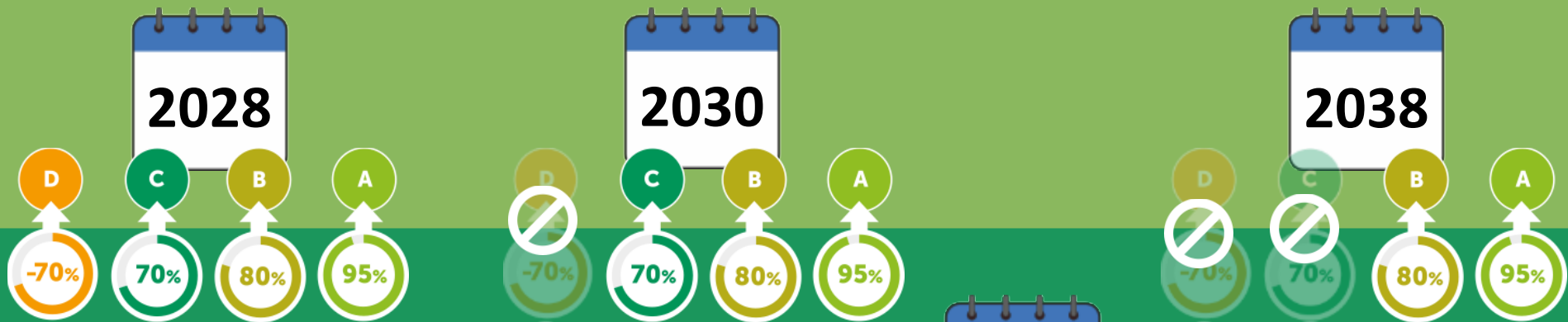




Recyclability

Delegated act for design for recycling criteria

Performance



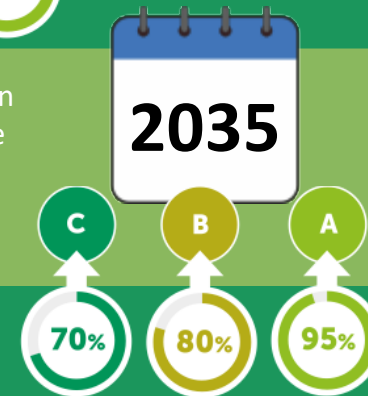
Delegated Acts for recyclability and for EPR fees modulation based on recyclability

Packaging will not be allowed on the EU market unless recyclable within grades A, B or C
EPR fees modulation based on recyclability

Packaging shall **not** be placed on the EU market if falling in **grade C**

At scale

refers to an annual quantity of recycled material of at least 55%



Packaging to be recycled at scale, if not: downgrade of recyclability performance grade.



Update CEN WG 10 & WG 3 (CEN/ TC 261/ SC4/ WG10) D4R guidelines for the Delegated Act for PPWR

By **Annemarie Abbeel**

Senior Expert Design for Recycling at Fostplus
25/11/25



Recyclability

PPWR: CEN - plastics D4R guidelines (CEN/ TC 261/ SC4/ WG10)



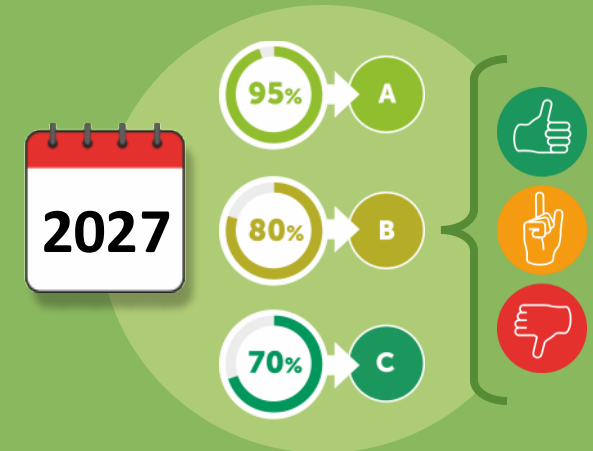
Technical content will be ready by end of May '25



Foreseen date:
November 2025: CEN D4R guidelines to be ready
(deadline delayed to **January '26**)



Traffic light tables green/ yellow/red per material stream
Based on 'state of the art' principle collection, sorting and recycling
1 or 2 Revision periods before 2030



Recyclability performance grade calculation (A ,B,C) calculation based on traffic light table - By JRC probably by 2027 - > 1 calculation system for simplification



Recyclability

PPWR - CEN - other materials D4R guidelines (CEN/ TC 261/ SC4/ WG3)



Foreseen date
by end of 2025:
finalize technical
specifications - > April '26



WG3 umbrella:
fibre based,
steel,
aluminium,
glass,
wood,
other materials



encourage

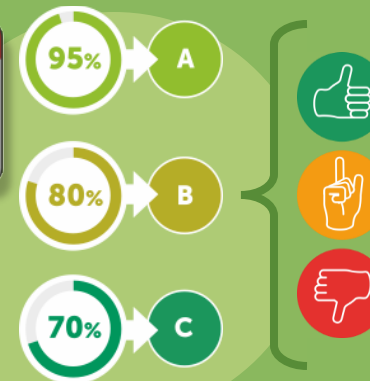


tolerate



ban

Traffic light tables green/
yellow/red per material stream
Based on 'state of the art'
principle collection, sorting
and recycling
1 or 2 Revision periods before
2030

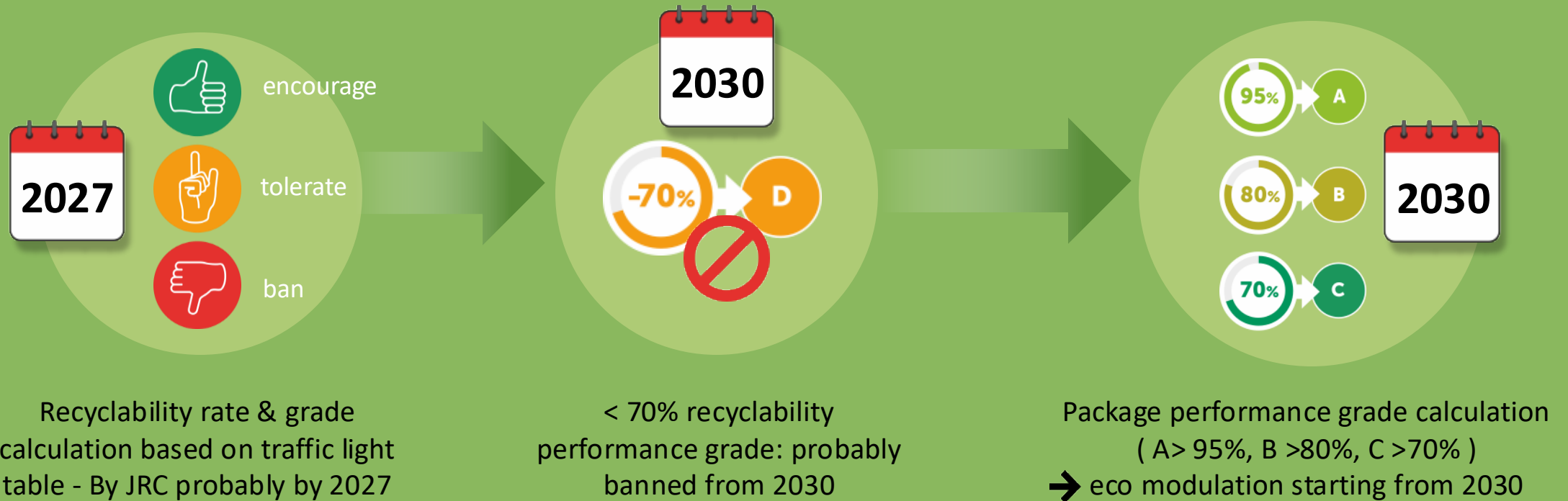


Recyclability performance
grade calculation (A ,B,C)
calculation based on traffic
light table –
By JRC probably by 2027



Recyclability

From traffic light tables to rates and grades

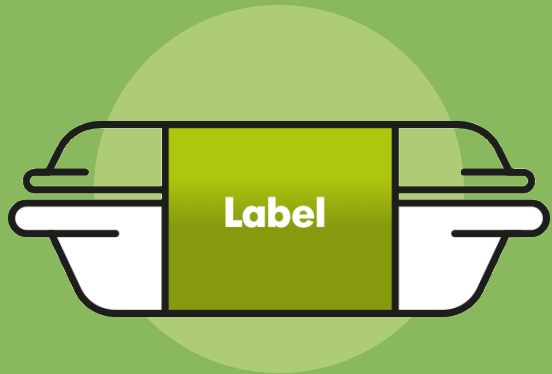




Recyclability

Assessment of the packaging

Packaging component and packaging constituent (WG10)



Packaging component

Part of packaging that **can be separated** by hand or by using simple physical means

ISO 21067-2

Ex: a lid, a label, a pad, a spout ...



Packaging constituent

Part from which packaging or its components are made and which **cannot be separated** by hand or by using simple physical means

ISO 21067-2

Ex: a barrier, a tie layer, an adhesive, an ink ...

Separate Components

- Annex C in part 3 is a waste characterisation test to be performed at an MRF
- A component is separate only if over 70% of the packaging items are found at the MRF without this component (for green and yellow components) and 90% if this component is classified in red in the traffic light tables.
- The test, which requires a sample of at least 100 packaging items, might be challenging in practice for innovative packaging and niche packaging (these are not easily found back in sorting factories)



Recyclability

Assessment of Recyclability

WG 10 key principles since the beginning

Is my packaging recyclable?



All integrated components and constituent are classified in **green** and/or **yellow**



No test. I use the table to evaluate the packaging rate then the packaging grade



One integrated component or one constituent in **red**



Recyclability score = 0%



I don't find my answer in the standards



CEN shares protocols to test packaging. I conduct the trials and come back to the wG10 to Improve the traffic light tables.

What can you do already?

- Work on design for recycling – using current guidelines e.g. Recyclclass, EPBP, 4evergreen, ..
- Purchase drafts of WG 10 plastics when published -> EN 18120
- Attend our webinar on CEN update and Pack for the future event together with Verpact in 2026
- Follow Fost Plus PPWR webpage + newsletter



Recycled content

Minimum recycled content targets

Any plastic part of packaging will have to contain a minimum percentage of recycled content.



Exemptions

- for compostable plastic packaging
- packaging whose plastic component represents less than 5% of the packaging's total weight
- for infant food, medicinal products and medical devices.

→ The targets are set per packaging type and format and will be calculated as an **average per manufacturing plant** and year.

Mirror clause

Safeguard clause



SUP bottles



Contact Sensitive Plastic
(PET as major component)



Contact Sensitive Plastic
(PET not as major component)



All other Plastic Packaging

Harmonised labelling



Sorting instructions

Financial contributions paid by producer shall cover the cost of labelling of waste receptacles



Information on plastic recycled content

Voluntary



Reusability of packaging

Including digital data carrier with information on reusability





Packaging restrictions

Packaging formats that may not be placed on the market:



Single-use plastic grouped packaging.



Single-use plastic packaging for foods and beverages consumed within the premises in the HORECA sector.



Very lightweight plastic carrier bags.



Single-use plastic packaging for <1,5kg pre-packed fresh fruit & vegetables.



Single-use accommodation packaging intended for an individual booking.



Prevention & minimisation of packaging weight

Targets for reducing the generation of packaging waste per inhabitant



-5%

waste per capita vs 2018.



-10%

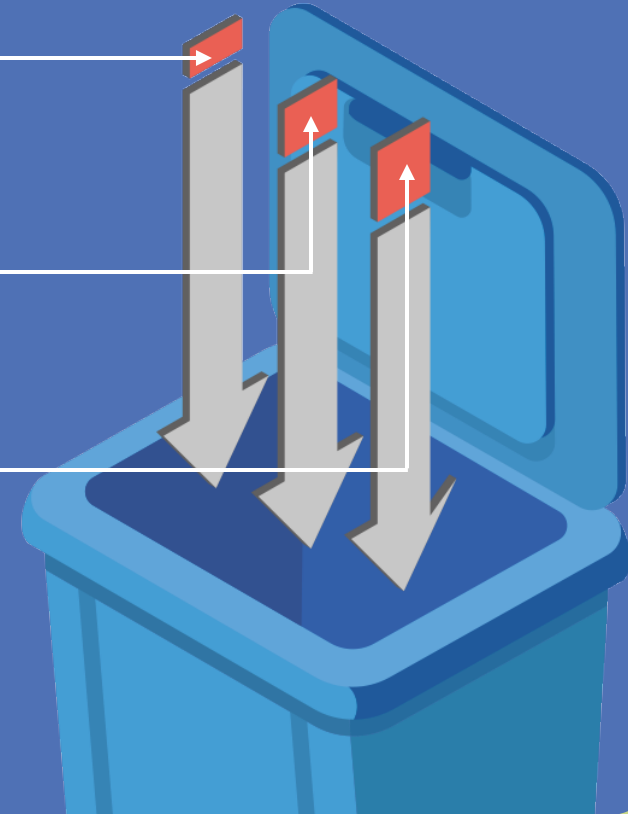
waste per capita vs 2018.



-15%

waste per capita vs 2018.

MS shall ensure that EPR and DRS schemes dedicate a minimum share of their budget to financing reduction and prevention actions.





Packaging shall be designed so that its weight and volume is reduced to the minimum



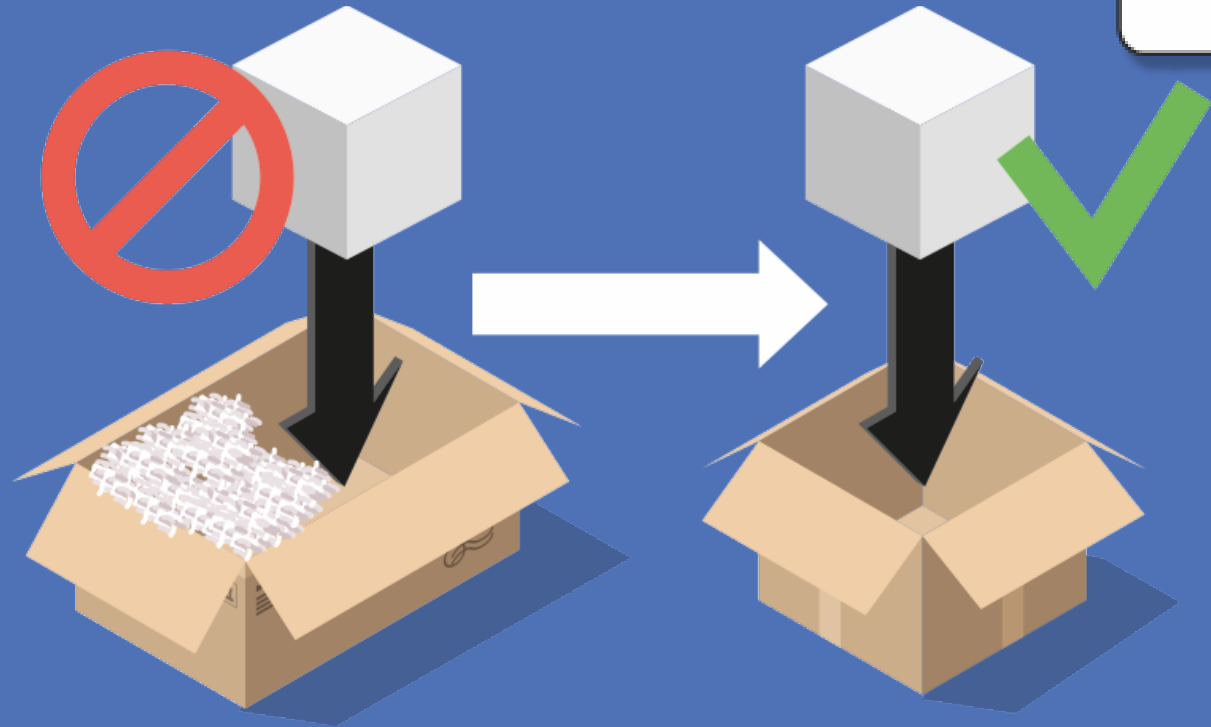


Prevention & minimisation of packaging weight

Empty space should be $< 50\%$

in grouped packaging, transport packaging or e-commerce packaging.

Space filled by filling materials shall be considered as empty space.



2030



Exemption

Economic operators using sales packaging as e-commerce packaging or using reusable packaging within a system of re-use shall be exempt.

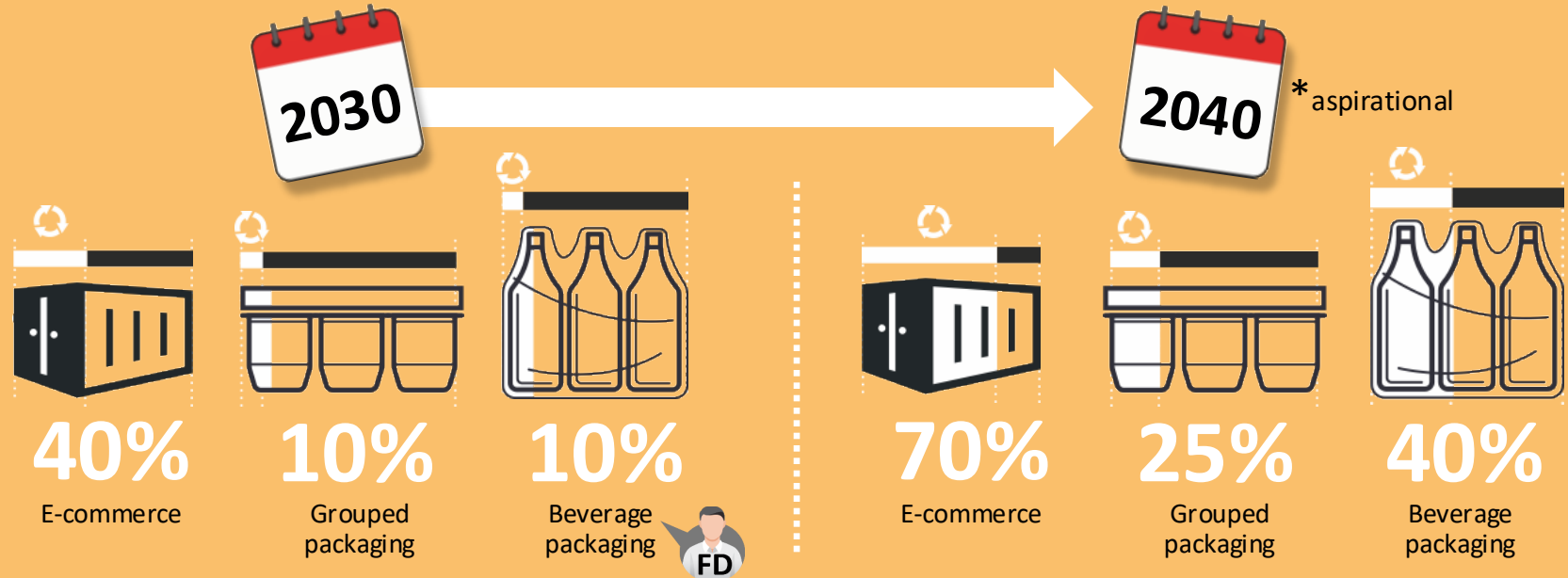




Reuse & Refill

= key elements of the European Commission's plan to reduce packaging waste

- Horizontal exemption for cardboard boxes
- System for re-use required, including incentive to ensure collection.
- Minimum number of rotations set by delegated act (02/2027)
- Member States may impose higher/additional targets.



From 01/01/2030, **final distributors** with a sales area of more than **400 m²** shall endeavour to dedicate 10% of that sales area to **refill stations** for both food and non-food products.

HORECA - Takeaway

- By 12/02/2027: option for consumers to bring their own container to be filled
- By 12/02/2028: option of packaging within a system of reuse





Deposit

MS to set up a deposit and return system (or ensure 90% separate collection)

single use **plastic beverage bottles** with the capacity of up to three litres



Single use **metal beverage containers** with a capacity of up to three litres



Exemptions

- Collection rate above 80% in 2026 and after submission of implementation plan by MS to achieve 90% by 1/1/2029.
- Does not apply to packaging for wines, spirits, milk and milk products.
- MS may exempt HORECA sector.



Calculation methods to be established by delegated acts.



Main economic operators and producer

First placing on the EU market

Manufacturer



- Manufactures packaging or a packaged product
- Conformity assessment, DoC & technical documentation (incl. for D4R, reusability, recycled content, substances of concern)

Importer



- Places packaging from a third country on the market
- Uses packaging with DoC and technical documentation

Distributor



- Makes packaging available on the market (other than the manufacturer or importer)
- Uses packaging with DoC and technical documentation

Final Distributor



- Delivers packaged products, including through re-use, or products that can be purchased through refill to the end use
- Retailer & HORECA

P

Producer : makes a packaging available for the first time in a MS (ex: BE) and may be the manufacturer, importer or distributor (authorised representative for EPR in case the producer is not established in the MS).

➤ Additional obligations: EPR obligations and register of producers.

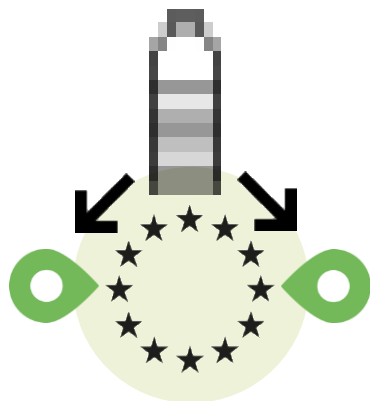
Register of producers



MS to establish **Register of producers** by 12/08/2027.

Producer **obliged to register in each MS**.

→ If not registered in MS, no packaging shall be made available on that market.
Impact on De Minimis (300kg)



Producer shall appoint an **authorised representative for EPR** in each MS other than the MS where it is established where it makes packaging available for the first time **directly to consumers**.

MS may also require an **authorised representative for third country producers**.



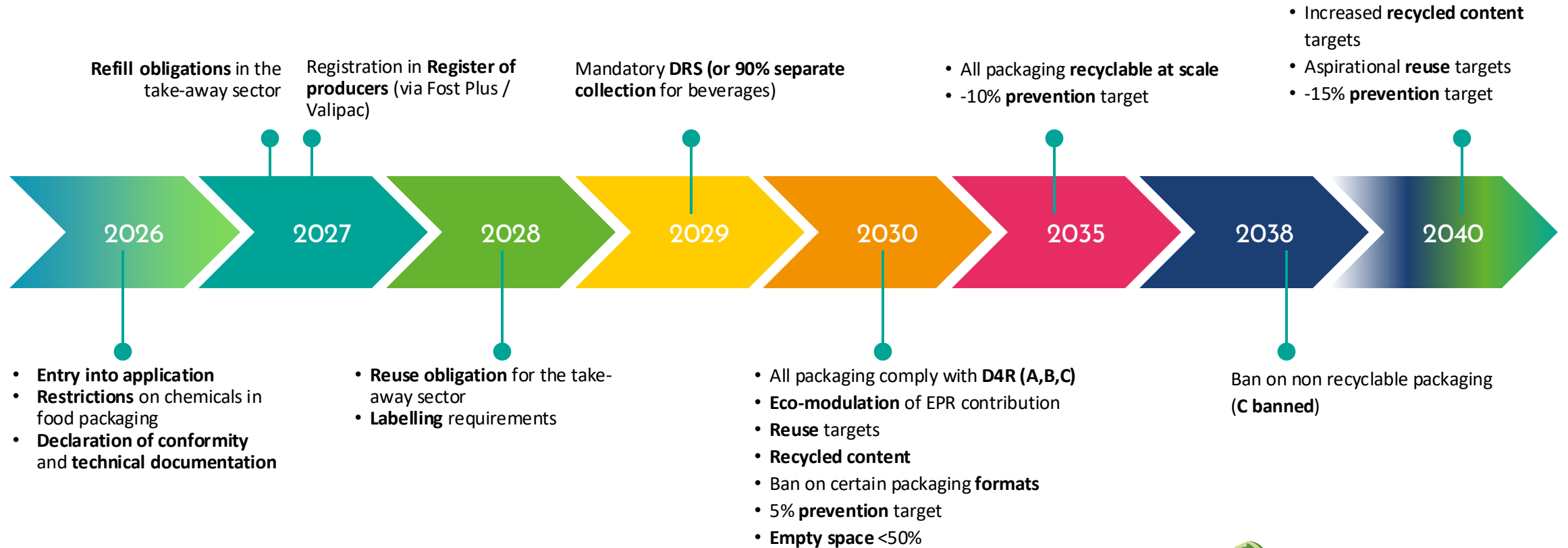
Producers < **10 000 kg/year** can make use of **simplified reporting** procedure.



Online platforms shall obtain from **producers information on registration** in the register and **self-certification of compliance** with EPR requirements.

Platforms may take over EPR financial obligations by producer mandate.

Timeline PPWR



Questions about household packaging?

members@fostplus.be

Fost Plus

Olympiadenlaan 2
1140 Brussels

T +32 2 775 03 50
fostplus@fostplus.be



Follow us