KOR
2026.



# PPWR and the circular economy

## From theory to practice


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europen

SHAPING A SUSTAINABLE FUTURE FOR PACKAGING

# EUROPEN IN NUMBERS

**86**

**Members representing the entire packaging value chain**

**Founded in**

**1993**



**5**

**Packaging materials:**

**glass, metal, paper and cardboard, plastics and wood**

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SHAPING A SUSTAINABLE FUTURE FOR PACKAGING

## RAW MATERIAL MANUFACTURERS

BASF
BOREALIS
DOW
ExxonMobil
INDORAMA
stora enso
Metsä
NOVAMONT
TotalEnergies
Corbion
BILLERUD
NatureWorks
thyssenkrupp
UPM

## PACKAGING MANUFACTURERS

ArdaghGroup
amcor
Ball
Constantia Flexibles
colep Packaging
CROWN
DS Smith
ecolean
ELOPAK
GROUPE GUILLIN
Huhtamaki
mondi
Seda
SEE
SIG
SONOCO
Tetra Pak

## PACKAGING FILLERS

Abbott
amazon
ALDI
ALDI
ALMA
bel
Beiersdorf
BOLTON Home & Personal Care
Coca-Cola European Partners
Coca-Cola
Hellenic
COLGATE-PALMOLIVE
DANONE
3M
ESTĒE LAUDER COMPANIES
FERRERO
HALEON
HEINEKEN
Henkel
Johnson & Johnson
JDE Peet's
JTI
Kellogg's
kenvue
KraftHeinz
LIDL
Nestlé
PEPSICO
P&G
L'ORÉAL
reckitt
Unilever
VICTORIA'S SECRET
vestacy

## LABELS MANUFACTURERS

AVERY DENNISON

## PACKAGING MACHINERY

coesia
Sidel

# Circularity: Europe’s growth strategy




Loss of competitiveness and persistent fragmentation of the EU Single Market

Circularity is Europe’s growth strategy – an industrial policy

> ***The Commission will adopt a Circular Economy Act in 2026*, which will accelerate the circular transition, building on our single market. The Act will enable the free movement of circular products, secondary raw materials and waste, foster a higher supply of high quality recyclates and stimulate demand for secondary materials and circular products while bringing down feedstock costs.***

*Clean Industrial Deal, February 2025*

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# Persistent gaps in recycling performance across the EU

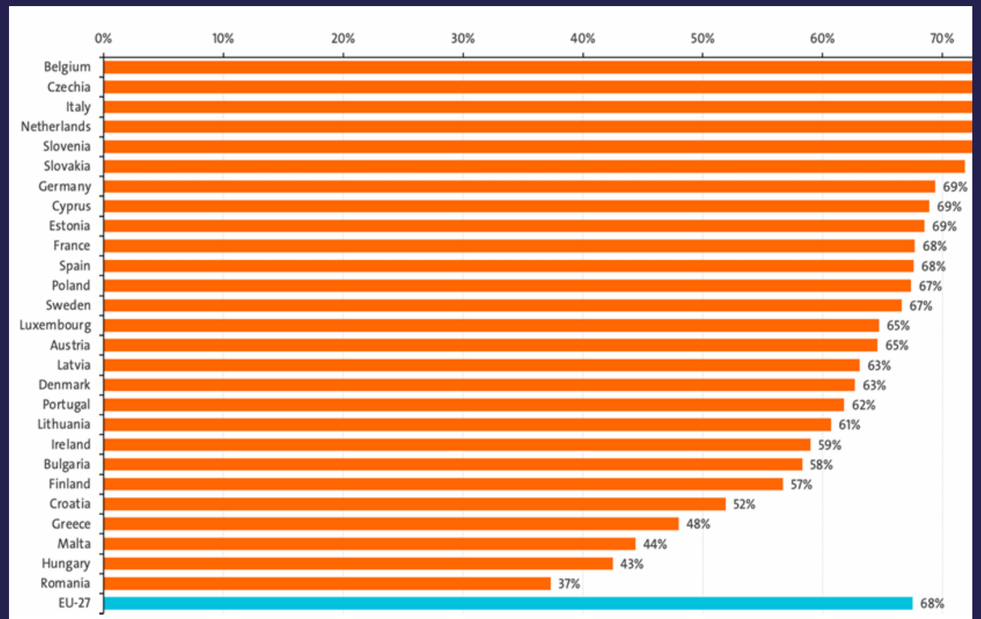
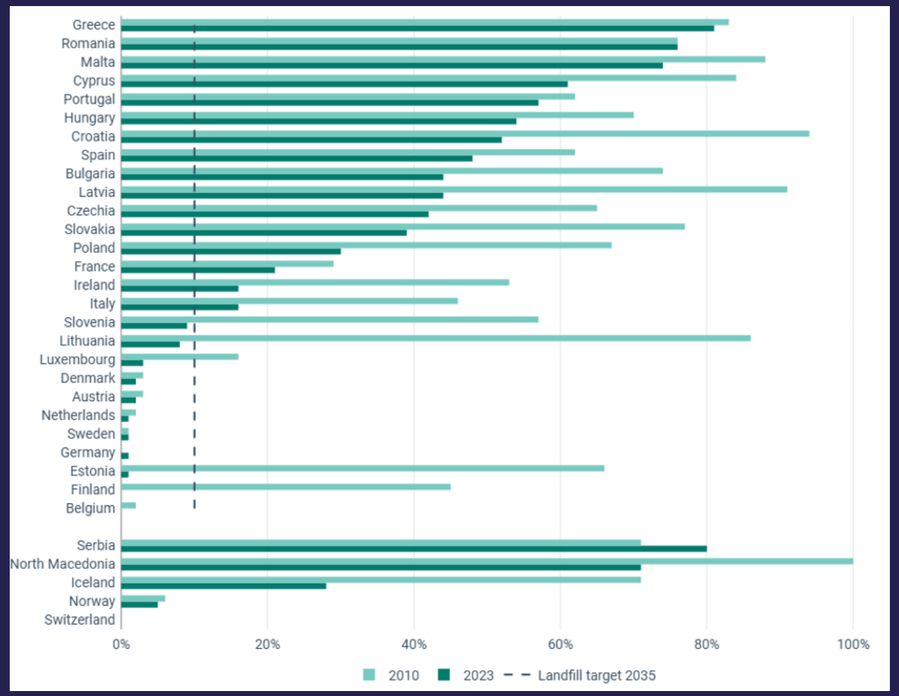



**Figure 1.** Overall packaging recycling rate by Member State, 2023. *Source: Eurostat, env_w reporting period).*

Two-thirds of Member States are subject to infringement proceedings for failing to comply with the recycling obligations under the PPWD and WFD

**Packaging recycling target 2025:** 65%; **2030:** 70%




According to data from Eurostat and the EU Environment Agency, almost half of EU countries continue to send more than 30 per cent of their municipal waste to landfill, with four countries recording figures of between 60 per cent and 80 per cent.

**Landfill target 2035:** 10%

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# And the EU Single Market?

***The principle of subsidiarity vs. the Single Market:***

**Modulation of EPR quotas for recycled plastic in packaging. To qualify for a bonus in France, collection and recycling must take place within 1,500 km of Paris.**

***Residue or Product?***

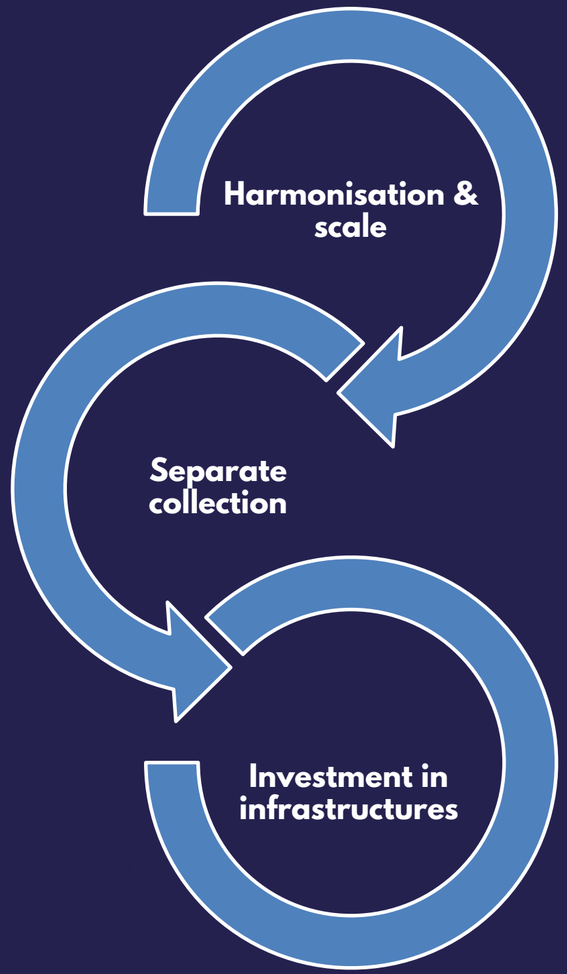
**The lack of harmonised end-of-waste criteria, particularly for plastics, creates uncertainty and barriers to the movement of recycled materials.**

***Divergent administrative procedures:***

**Cross-border movements of plastic and recycled waste are subject to different processes across Member States, with non-harmonised documentation requirements.**

# Delivering the PPWR objectives

| THEORY | PRACTICE |
| --- | --- |
| SUBSTANCES | INVESTMENT IN DESIGN |
| RECYCLABILITY | PCR AVAILABILITY IN QUANTITIES & QUALITY |
| RECYCLED CONTENT TARGETS | REORGANISING THE LOGISTIC |
| COMPOSTABILITY | ADMINISTRATIVE BURDEN & COMPLIANCE’ |
| LABELLING | |
| PREVENTION & MINIMISATION | |




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# An example: recyclability at scale

From 1 January 2030, packaging that complies with the design criteria laid down in delegated acts by 1 January 2028

By 1 January 2030, packaging will not be permitted on the EU market unless it is classified as grade A, B or C (>/= 70 per cent).

From 1 January 2035, recycled packaging in practice and on a large scale

By 1 January 2038, packaging that has not been placed on the EU market if it falls within Class C, i.e. unless it has a recyclability score of 80 per cent or more.

**CHALLENGES:**

**Most Member States are a long way from meeting the 2025 packaging recycling targets.**

**Last year, the European Commission sent early warning reports to two-thirds of EU Member States and launched infringement proceedings against all EU Member States for breaching the Packaging and Packaging Waste Directive and/or the Waste Framework Directive.**

**Proliferation of 'state-run' EPR schemes.**

**The fragmentation of labelling schemes does not support the separate collection of packaging.**

**The proliferation of unilateral measures at national level diverts resources away from R&D and limits economies of scale.**

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# Circpack study on EPR

- **EUROPEN commissioned a study from CIRCPACK by Veolia to identify what separates the EPR schemes already on track from those that are not, and what must change for the 2030 and 2035 PPWR obligations to be met across the EU-27.**
- **The analysis draws on Eurostat 2023 data, PRO-published financial and operational reports, national waste registry submissions and a household-scope, format-specific recycling-rate dataset covering 13 packaging subcategories across all 27 Member States.**
- **Five country case studies (BE, IT, ES, DE, HU) illustrate how design choices translate into outcomes.**

**2025**
EU-27 packaging recycling objective at 65%; spread between MS is 40pp

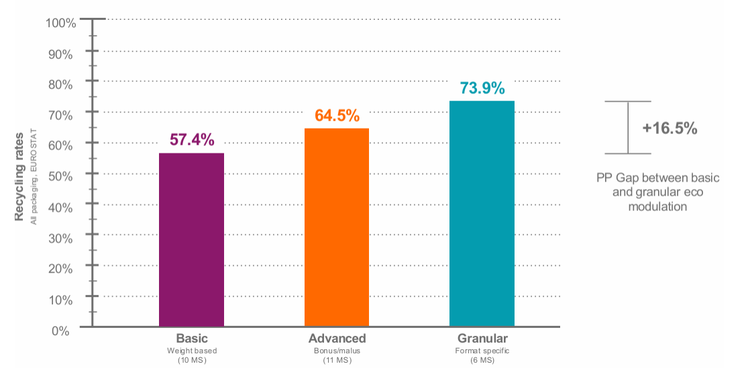
**2030**
Design for Recycling becomes a strict condition for market access

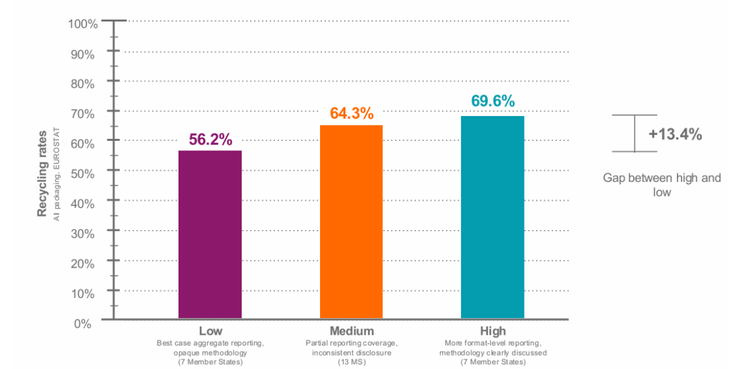
**2035**
DfR gets stricter and Recycling at Scale becomes a second condition for market access

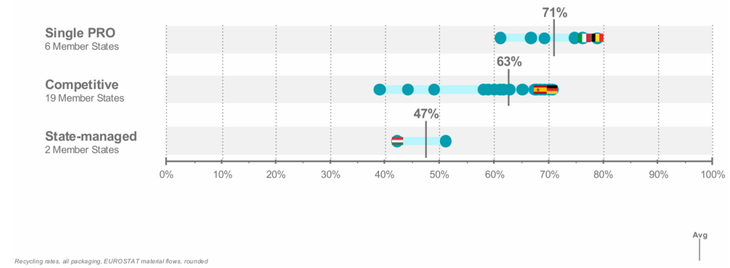


# Key findings

- Fee structure, not fee level, is a significant indicator of recycling performance.
- Underperformance is mostly driven by infrastructure, not packaging formats and collection and sorting remain the primary bottleneck across the European Union.
- Governance quality matters more than governance model.
- High-transparency systems perform better.
- The current system doesn't facilitate tracking where the money goes, and what it improves (No consistent public reporting requirement on downstream allocation across the EU ->PROs disburse to municipalities or contractors without comparable downstream visibility).



# An EU Circular Economy Act

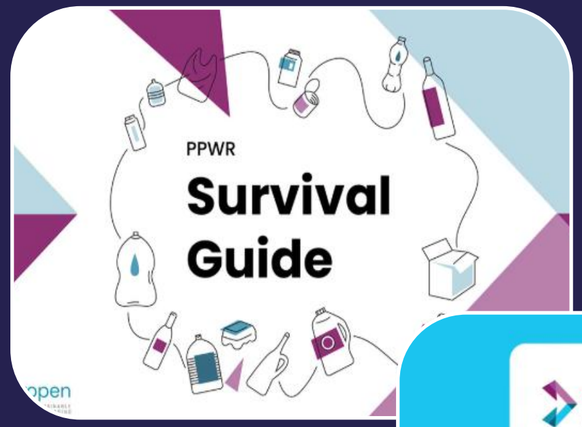
**Bridge the gap in the management of packaging waste at national level by adopting a regulation based on the legal framework of the internal market**

**Strengthening the governance of EPR systems**



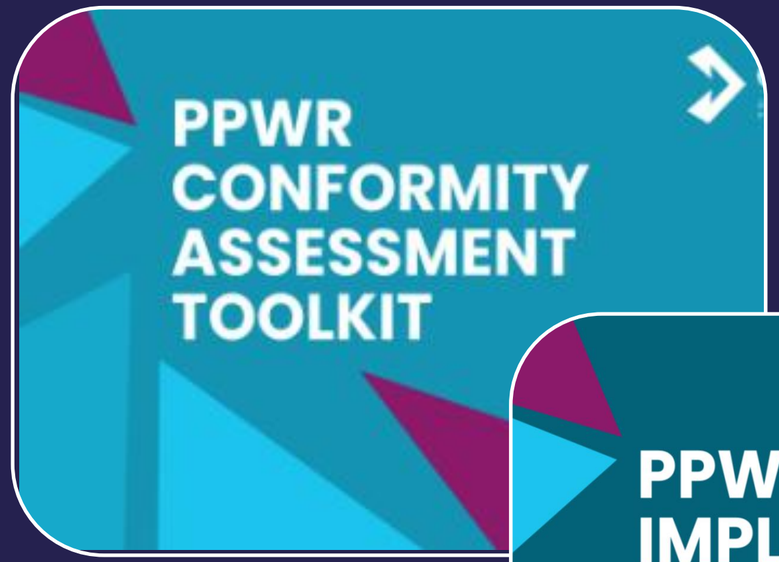

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# Navigate the PPWR: EUROPEN resources










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**THANK YOU FOR YOUR ATTENTION!**

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