



PET Thermoforms: are we ready for PPWR and SUP?


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SUP and PPWR - Brief review



SUP

is a directive to be transposed by Member States

entered into force in July 2019

targets single use **products** made wholly or partly of **plastic**

SUP will be amended by PPWR

PPWR

is a regulation. Does not need to be transposed

to enter into force 4Q2024 - 1Q2025*?

targets **packaging** and **packaging waste** irrespective of the material (plastic, paper, glass, metal, etc)

**pending final "vote" by Parliament and Council in 3Q2024*

The text voted by EP in April cannot undergo changes (besides the necessary linguistic-legal)




Vocabulary matters



- Food container
- Beverage container
 - Beverage bottle
- Cup for beverages

SUP Guidance

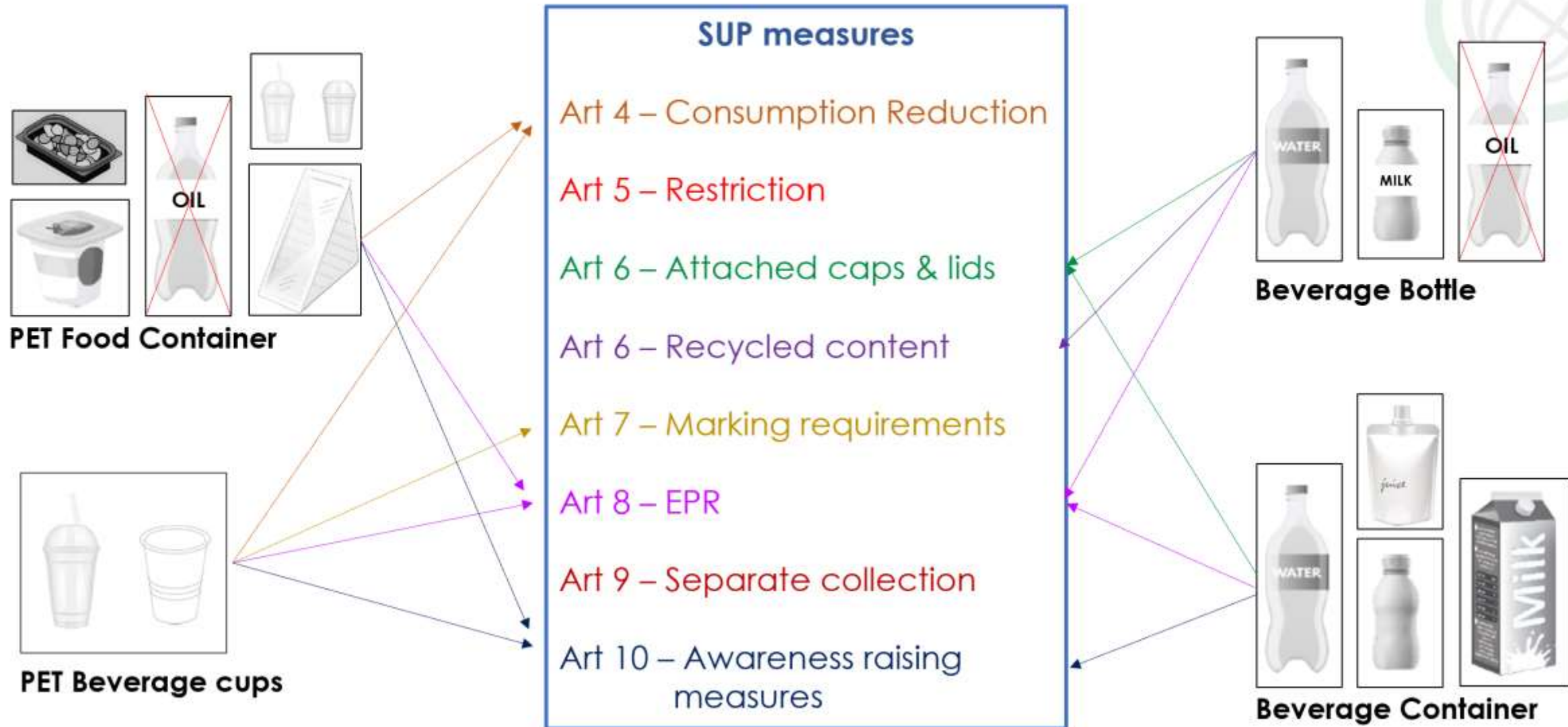
Table 4-10: Illustrative examples of beverage containers, beverage bottles, and cups for beverages

Beverage containers	Beverage bottles (part of beverage containers)	Cups for beverages (not part of beverage containers)
Receptacles with a capacity of up to 3 litres, used to contain beverages (includes also beverage bottles)	Rigid beverage containers with a narrow neck or mouth and a capacity of up to 3 litres, including their caps and lids, used to contain beverages	Typically round, usually bowl-shaped drinking vessels with or without a cover or a lid, sold empty or containing beverages
		



Definitions in directives (or regulations) are rarely “absolute” definitions, but rather relative definitions that take into account the context and objective of the directive (regulation).

SUP directive (EU) 2019/904

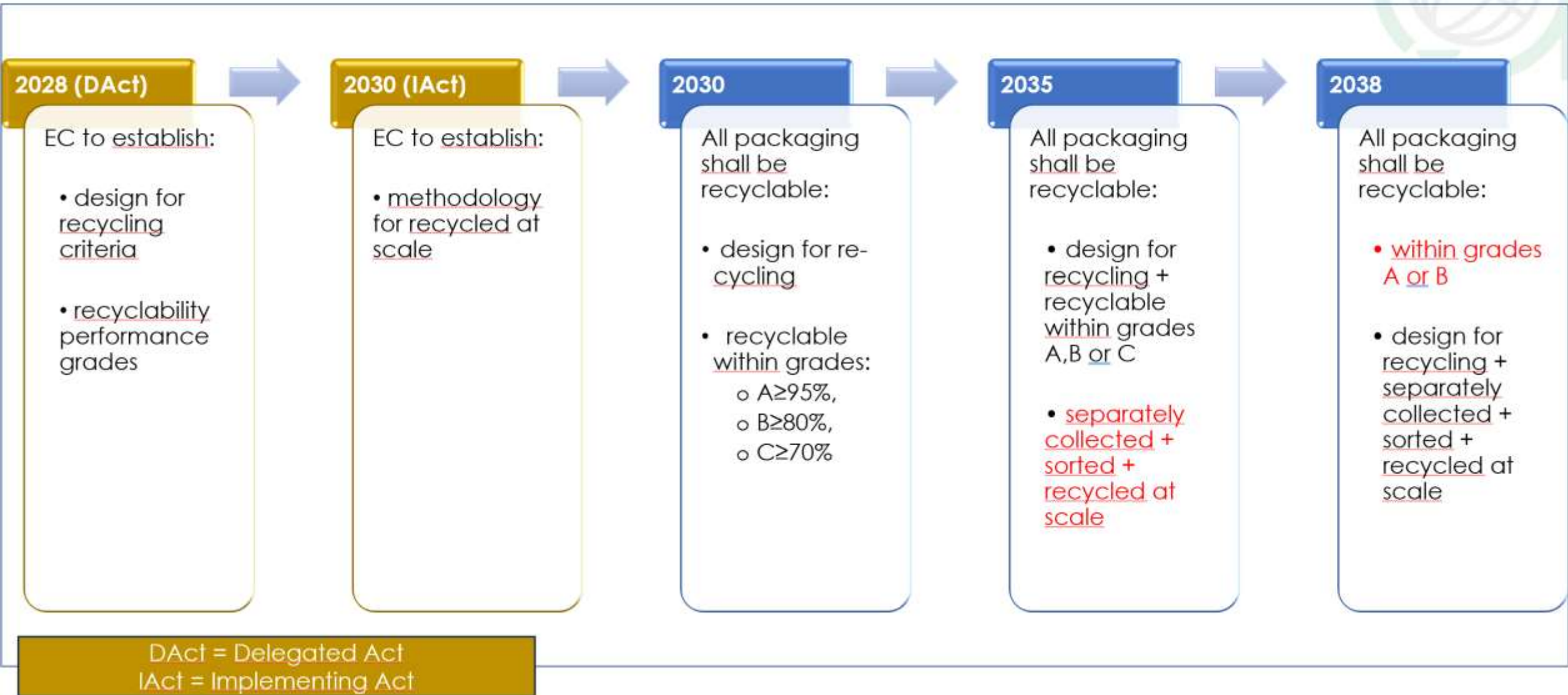


PPWR – Overall content



- Definitions
- Sustainability requirements:
 - **Substances of concern (SoC) in packaging**
 - **Recyclability**
 - **Recycled content**
 - **Restrictions on packaging formats**
 - Packaging minimisation
 - Reusability
- **Labelling, marking, info requirements**
- **Claims**
- Obligations of economic operators
- Plastic carrier bags
- Conformity of packaging – Declaration of conformity
- Management of packaging and packaging waste
 - Waste prevention (5%/10%/15% by 2030/2035/2040; per capita in 2018)
 - Register of producers, EPR, PRO, DRS, ...
- Safeguard procedures
- Green public procurement
- Delegated powers and committee procedure, amendments, final provisions

PPWR – Recyclable



PPWR – Recycled content

31 DEC 2026




- IAct on the methodology for calculation and verification of % of recycled content recovered from PC plastic waste recycled and collected within EU.
- Assessment on economic and environmental performance of recycling technologies including quality of output, availability of waste, energy needed and GHG emissions
- IAct on sustainability criteria for plastic recycling technologies
- IAct establishing methodology for assessing, verifying and certifying equivalence of rules PC plastic waste recycled or collected outside EU

1 JAN 2029

Calculation and verification of % recycled content need to comply with IAct

1 JAN 2030

Any plastic part of packaging to contain a minimum of recycled content recovered from PC plastic waste:

Any plastic part of packaging	2030 *
SUP 	30%
Contact Sensitive:	
	30%
	10%
Other	35%

2031/2032

EC to present report:




- reviewing the implementation of the 2030 min % recycled content
- feasibility of achieving 2040 targets
- relevance of maintaining exemptions/derogations Where appropriate a legislative proposal to amend article 7 of PPWR

EC to review situation of use of recycled packaging materials in packaging other than plastics:

- assess appropriateness of establishing measures, or setting targets
- where appropriate make a legislative proposal

1 JAN 2040

Any plastic part of packaging to contain a minimum of recycled content recovered from PC plastic waste:

Any plastic part of packaging	2040 *
SUP 	65%
Contact Sensitive:	
	50%
	25%
Other	65%

PPWR – Restrictions on packaging formats



2027?

Publication of guidelines in consultation with MS and EFSA to explain Annex V with examples, the exemptions to the restrictions and list of fruit and vegetables excluded from annex V point 2.

1 JAN 2030

- SU plastic* grouped packaging at point of sale for bottles, cans, tins, pots, tubs excl. grouped packaging to facilitate handling
- SU plastic* packaging** for <1.5 kg unprocessed fresh fruit and vegetables
- SU plastic* packaging for foods and beverages filled and consumed in HORECA***. Flexible non-plastic* packets and wrappers exempted.
- SU plastic* packaging for individual portions for servings used in HORECA (some exemptions)
- SU accommodation sector packaging for individual booking

2031/2032?

- EC to assess the positive environmental impact of the restrictions and the derogations
- Revision of the provisions and Annex V
- Appropriateness of establishing new restrictions, relevance of maintaining exemptions/derogations
- Where appropriate make a legislative proposal

*MS may maintain restrictions on these packaging formats but made from other materials, if adopted before 1 January 2025

** With potential derogations at MS level

*** Derogation if no access to drinking water

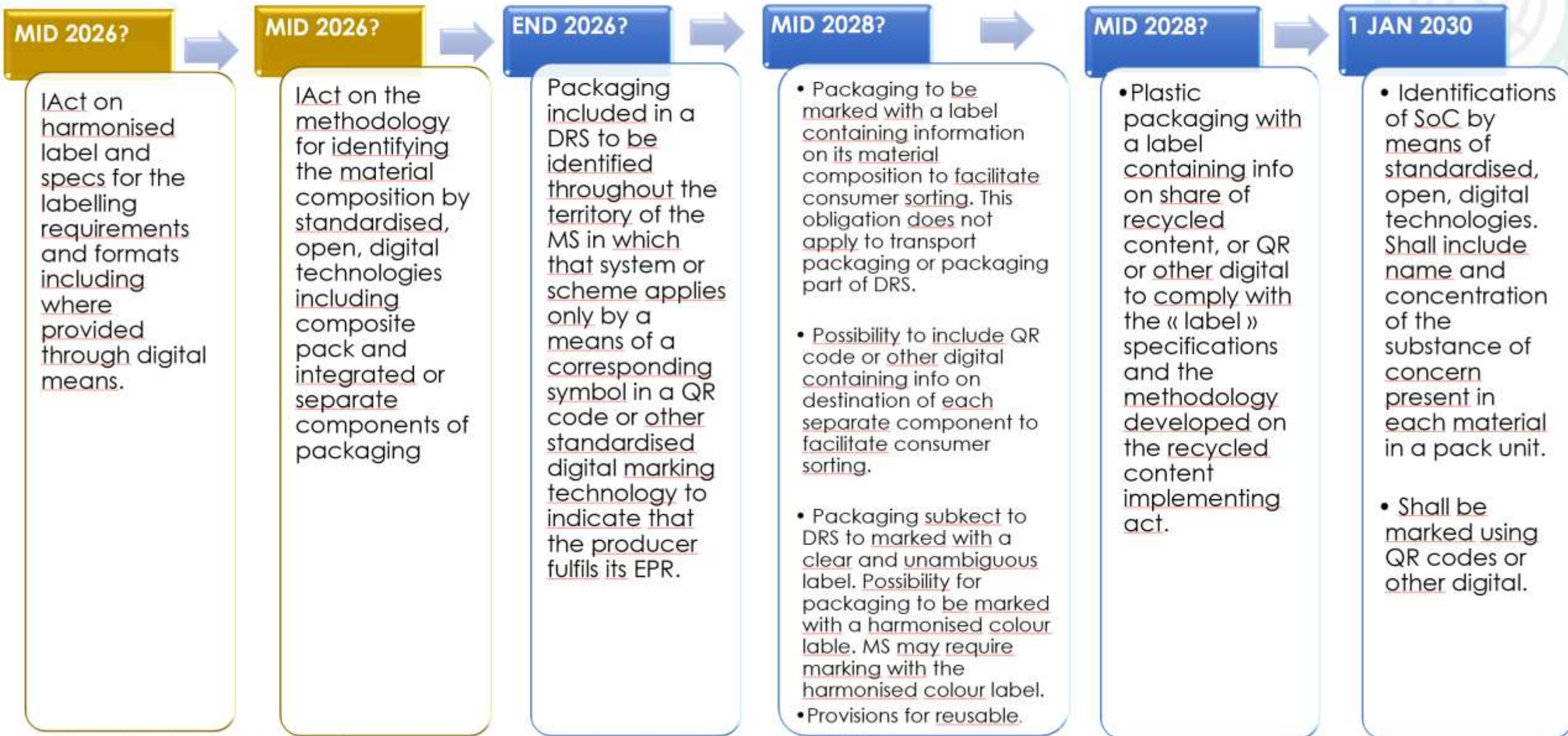
PPWR – Substances in packaging



*SoC = Substances of Concern

**to the extent that the placing on the market of this packaging containing this concentration of PFAS is not prohibited pursuant to another Union legal act

PPWR – Labelling and Substances of Concern (SoC)



PPWR - Claims



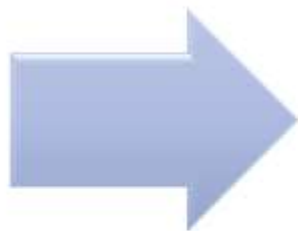
- **only possible** when the packaging properties **exceed the applicable minimum requirements** set out in this regulation (PPWR) and in accordance with the criteria, methodologies and calculation rules
- and
- **need to specify** whether
 - for the packaging unit,
 - part of the packaging unit or
 - all packaging placed on the market by the producer

PPWR – Packaging minimisation



2026/2027

EC to request European standardisation org. to prepare methodology for the calculation and measurement of compliance with packaging minimisation requirements.



2030

- Packaging shall be designed so that its weight and volume is reduced to the minimum to ensure its functionality.
- Compliance to be demonstrated in the technical documentation.

PPWR – Excessive packaging



By 2028?

EC empowered
adopt IAct
establishing the
methodology for the
empty space ratio

By 2028?

- Economic operator who fills the sales packaging shall ensure that empty space is reduced to the minimum necessary for ensuring the packaging functionality, including product protection.
- Empty space ratio for sales packaging shall mean the difference between the total packaging internal volume and the volume of the packaged product.

2030

Economic operators who fills the packaging in grouped packaging, transport packaging or e-commerce packaging, shall ensure that the empty space ratio is maximum 50 %.



Thank you



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