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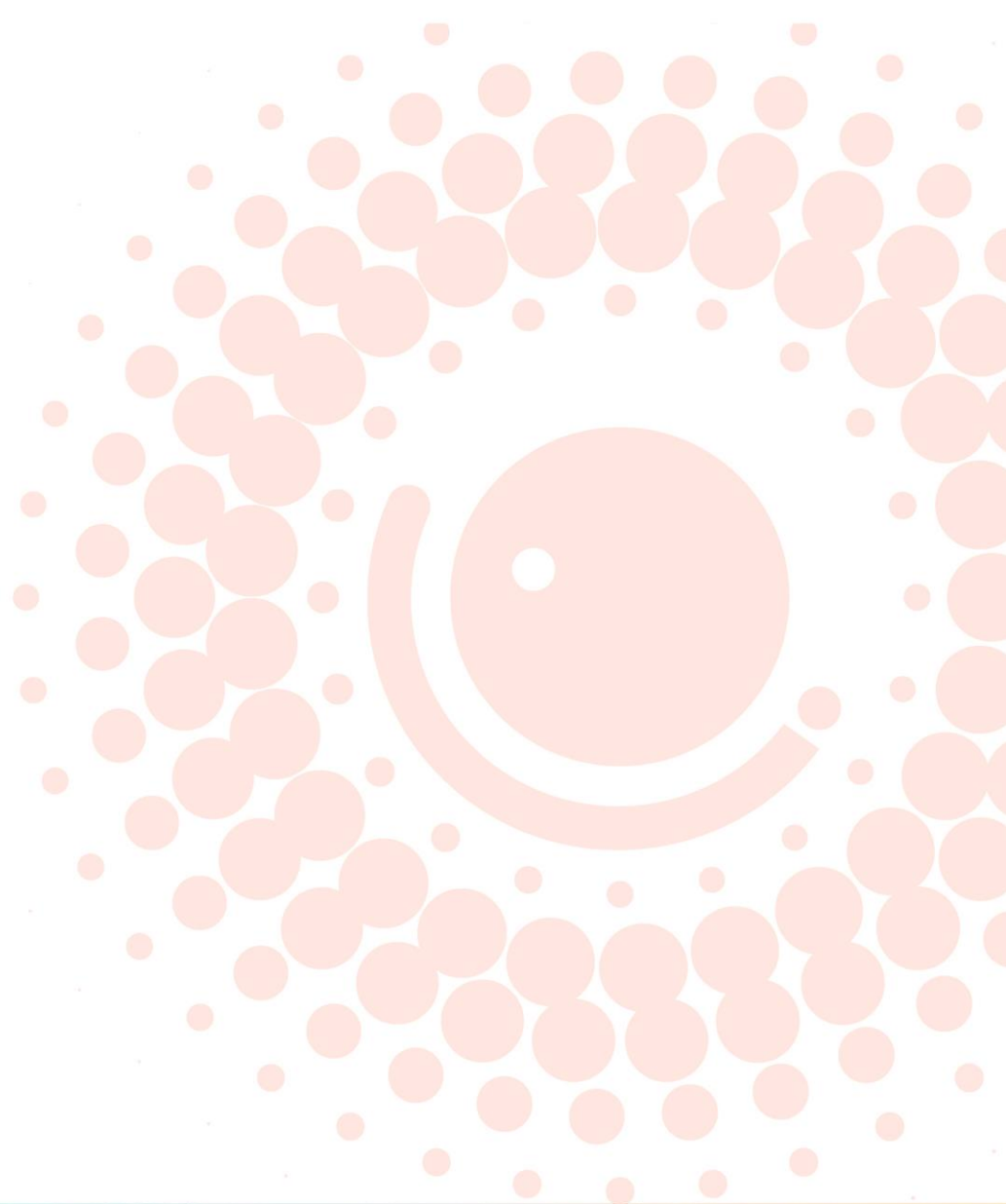
EU OVERARCHING 2024

Packaging Legislative Analysis

Contents

1. Overarching Legislation	3
1.1. Circular Economy Package	3
1.2. EU Strategy for Plastics in a Circular Economy	4
1.3. Waste Framework Directive (WFD).....	5
1.3.1. Definitions	5
1.3.2. Extended Producer Responsibility (EPR) Requirements and Full Net Costs.....	6
1.3.3. Recycling Targets	8
1.3.4. Proposed Reform.....	8
1.4. Packaging and Packaging Waste Directive (PPWD).....	9
1.4.1. Definition of Packaging	9
1.4.2. Essential Requirements.....	10
1.4.3. Extended Producer Responsibility.....	10
1.4.4. Reusable Packaging.....	10
1.4.5. Recycling Targets (minimum).....	11
1.4.6. Proposed Reform	11
1.5. Chemicals Regulation (REACH).....	12
2. Plastics Regulation.....	13
2.1. Single Use Plastic Directive (SUPD)	13
2.1.2. Definitions and Scope	13
2.1.3. Consumption Reduction	14
2.1.4. Bans.....	14
2.1.5. Design requirements.....	14
2.1.6. Marking Requirements	15
2.1.7. Extended Producer Responsibility (EPR).....	15
2.1.8. Separate Collection.....	16
2.1.9. Awareness Raising	16
2.1.10. Recitals	16
2.1.11. Summary of Requirements	17
2.2. EU Plastic Tax	17
2.3. High Ambition Coalition to End Plastic Pollution	18

3. Other Regulation	19
3.1. Material Restrictions and Bans	19
Appendix.....	20
Introducing aura.....	21
Our Management Team	23



1.4. Packaging and Packaging Waste Directive (PPWD)

The European Union Packaging and Packaging Waste Directive (PPWD) 94/62/EC was first introduced in 1994 and has had several amendments since. The most recent enacted amend was published in 2018¹. In November 2022, additional updates were also proposed. These updates are still going through the legislative process and will be defined in more detail at the end of this section.

The Packaging and Packaging Waste Directive has the following overarching aims:

- Harmonize national measures on packaging and the management of packaging waste
- Provide a high level of environmental protection
- Ensure the good functioning of the internal (EU) market

The 2018 amendment focuses on the EU transition to the Circular Economy by preventing the production of packaging waste, and promoting the reuse, recycling, and other forms of material recovery instead of disposal.

Additionally, requirements for mandatory extended producer responsibility (EPR) by 2024 are set out, and specific targets for recycling are established. Further detail on key aspects of the PPWD is presented in the following sections.

1.4.1. Definition of Packaging

The Packaging and Packaging Waste Directive defines packaging as “all products made of any materials that are used for the containment, protection, handling, delivery and presentation of goods, from raw materials to processed goods, from the producer to the user or the consumer”. In addition to this definition, the Directive also outlines criteria that define what is and is not considered packaging. These are as follows:

- Items are considered to be packaging if they fulfil the definition without prejudice to other functions which the packaging might also perform, unless the item is an integral part of a product and it is necessary to contain, support or preserve that product throughout its lifetime and all elements are intended to be used, consumed or disposed of together:
 - Packaging examples include sweet boxes and film around a CD case.
 - Non-packaging examples include tea bags and toolboxes.
- Items designed and intended to be filled at the point of sale and “disposable” items sold, filled or designed and intended to be filled at the point of sale are considered to be packaging provided they fulfil a packaging function:
 - Packaging examples include paper/plastic carrier bags, disposable plates and cups, and sandwich bags.
 - Non-packaging examples include stirrers and disposable cutlery.
- Packaging components and ancillary elements that are integrated into packaging are considered part of the packaging into which they are integrated. Ancillary elements hung directly on or attached to a product and which perform a packaging function are considered to be packaging unless they are an integral part of this product and all elements are intended to be consumed or disposed of together:

¹ <https://ec.europa.eu/environment/waste/packaging/legis.htm>



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- Packaging examples include labels directly attached to a product and a mascara brush which forms part of the container closure.

1.4.2. Essential Requirements

EU Member States must ensure that the packaging placed on the market meets the essential requirements contained in Annex II of the Directive, which are:

- **To limit the weight and volume of packaging to a minimum amount in order to still meet the required level of safety, hygiene and acceptability for the packed product and for the consumers.**
- **To minimize the content of hazardous substances and materials in the packaging material and its components.**
- **To design reusable or recoverable packaging, which may include design for material or organic recycling as well as design for energy recovery.**

The European Commission is currently examining how to reinforce these essential requirements with the view to improving packaging design for reuse and promoting high-quality recycling, as well as strengthening the enforcement of the essential requirements.

1.4.3. Extended Producer Responsibility

The Packaging and Packaging Waste Directive latest amendment in 2018 requires that Member States ensure that extended producer responsibility (EPR) systems are set up to provide for the return and/or collection of used packaging and/or packaging waste, as well as the reuse or recovery including recycling of the packaging and/or packaging waste collected.

By the end of 2024, Member States should ensure that producer responsibility organisations (PROs) are established for all packaging. PROs provide for the financing (or financing and organization) of the return and/or collection of used packaging and/or packaging waste and directing it to the most appropriate waste management option, as well as for reuse or recycling of the collected packaging and packaging waste.

Extended producer responsibility schemes must comply with the minimum requirements set out in the Waste Framework Directive (see previous section), and should help incentivise packaging that is designed, produced and marketed in a way that promotes packaging reuse or high-quality recycling and minimize the impact of packaging and packaging waste on the environment. Member States are required to take measures, such as national programmes, incentives through extended producer responsibility (EPR) schemes and other economic instruments to prevent the generation of packaging waste and to minimize the environmental impact of packaging.

1.4.4. Reusable Packaging

Member States should also encourage the increase in the share of reusable packaging put on the market and of systems to reuse packaging in an environmentally sound manner without compromising food safety or the safety of consumers.

Measures to achieve this may include:

- Deposit return schemes (DRS)
- Targets
- Economic incentives
- Minimum percentages of reusable packaging placed on the market for each type of packaging

1.4.5. Recycling Targets (minimum)

EU Member States must also take the necessary measures to meet recycling targets which vary by packaging material. For this purpose, they must apply the new calculation rules for reporting on the new recycling targets to be achieved by 2025 and 2030. The new calculation rules aim to make sure that only waste that enters a recycling operation or waste that has achieved end of waste status should be used for the calculation of the recycling target and, as a general rule, the measurement of waste should be at the input to the recycling operation.

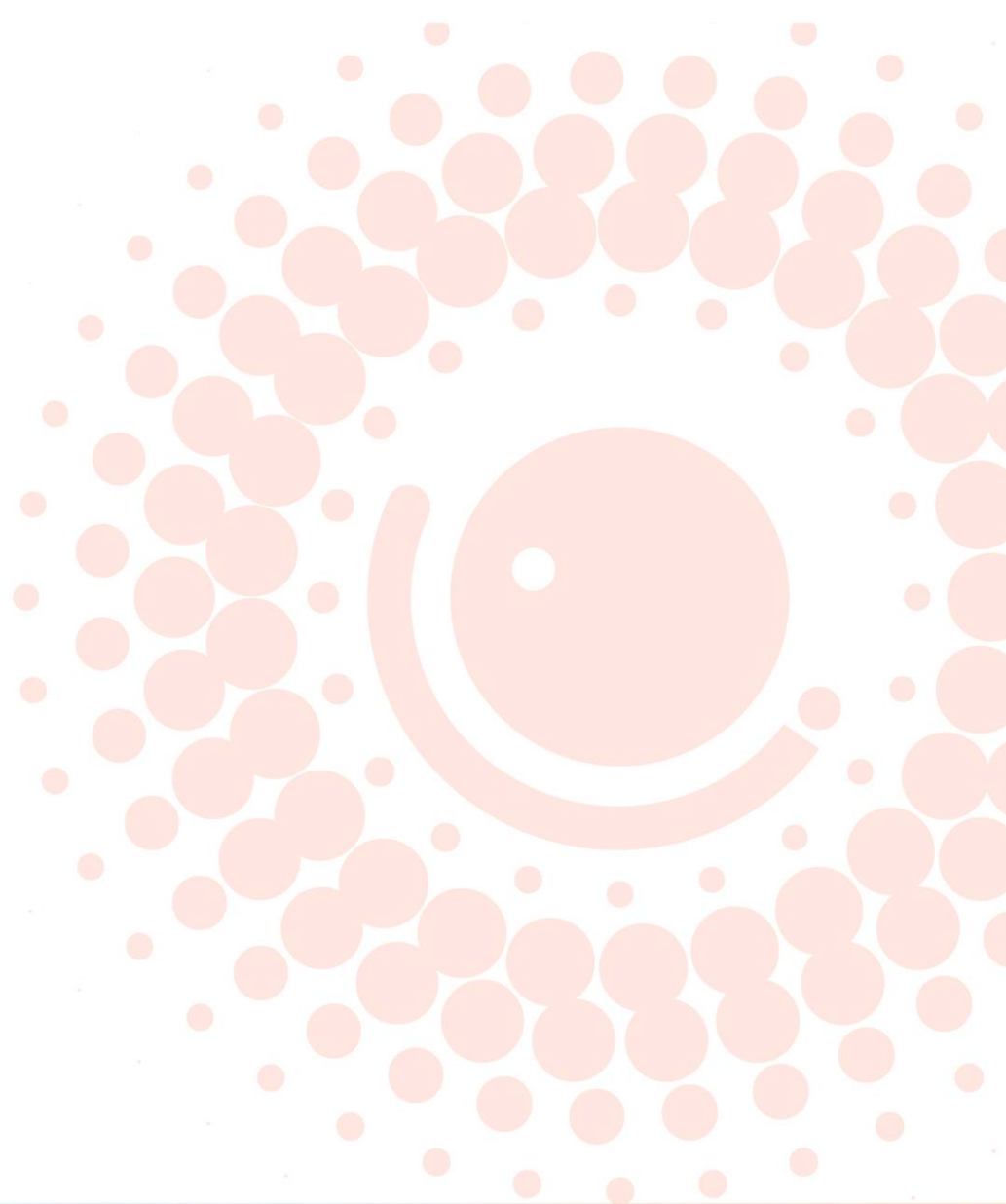
The Directive sets recycling targets to be achieved per material and collectively by 2025 and 2030. By 31st December 2025, at least 65% by weight of all packaging waste must be recycled, increasing to 70% in 2030.

The recycling targets per material are:

Target Year	Overall	Plastic	Glass	Ferrous metal	Aluminium	Paper/cardboard	Wood
Current Targets	55%	25%	60%	50%*	N/A	50%	15%
2025 (recycled**)	65%	50%	70%	70%	50%	75%	25%
2030 (recycled**)	70%	55%	75%	80%	60%	85%	30%

*current targets for ferrous metals include Aluminium

****up to 5% points may be attained via reusable sales packaging placed on the market, as an average across the past three years. Wood which is repaired for reuse can be used when calculating the recycling achievement for wood.**



Appendix



Introducing aura

About Us

At the heart of our business is a sheer fascination with packaging and the impact it has on our world. Packaging's relationship with the environment is complex and we work with true ethical partners to educate, unite like-minded thinkers and share knowledge.

A global business, the reference point for packaging sustainability, utilising knowledge and data to provide the justification required to drive positive change.

Services

Our expertise falls into three categories designed to deliver a strategic programme focused on the sustainability goals of our clients. These services are supported by a multi-disciplinary team made up of packaging, sustainability, technology and retail experts committed to making a measurable difference every day.

Consulting – Pioneering Packaging Strategy

We are packaging sustainability pioneers committed to true partnerships, focused on the delivery of mutual goals.

Our breadth of packaging sustainability knowledge across substrates, design, technical packaging, legislation, and recyclability allows us to evolve strategies to make a measurable difference both now and in the future.

Our Consultants build road maps for global change, our Technical Engineers develop specifications to refine the impact of your packaging and our Supplier Success Managers are on hand to assist with client education, communications and engagement.

As a result, we will deliver a robust strategy compliant with your sustainability goals aligned to current and future legislation.





Technology – Managing Sustainability Everyday

We provide live data and control to deliver the accurate information you require to make real time decisions that impact your business and our planet.

e-halo is an unrivalled packaging sustainability platform combining state-of-the-art technology with consulting services, designed to manage the changing landscape of global packaging legislation, compliance, and sustainability commitments.

e-halo provides packaging component data at a granular level, making sustainable packaging part of everyday decision making.

e-halo manages compliance to evolving legislation and recyclability requirements with a comprehensive reporting suite allowing for real-time measurement against your business and sustainability targets.



Insights – Data Driven Decisions

We utilise knowledge and data to provide the justification required to drive positive change.

Data Management – We interact with digital information every day. We gather, check, manage and translate data into valuable insights that our clients can use to measure and motivate positive change.

Horizon Futures – We offer horizon scanning services for global packaging legislation across 54 countries and for this we are unique. We interpret legislation rather than just quoting a legal directive, to help you understand the current and future packaging landscape. We then consider how emerging trends might potentially affect current policy and practice, enabling our clients to take a longer-term strategic approach to packaging sustainability.

Our Management Team

- We are packaging sustainability pioneers committed to true partnership, which means to us a relationship focused on the delivery of the mutual goals of our business and that of our clients.
- Visionary
- Pioneering strategies which educate, unite and influence change
- Responsible
- Real-time data drives the changes needed to positively impact our planet
- Honest
- Decisions are informed, and our communications are authentic
- Collaborative
- Ethical Partnerships unify our mutual goals to create a vision fit for the future



Greg Lawson
Managing Director



Gillian Garside-Wight
Consulting Director



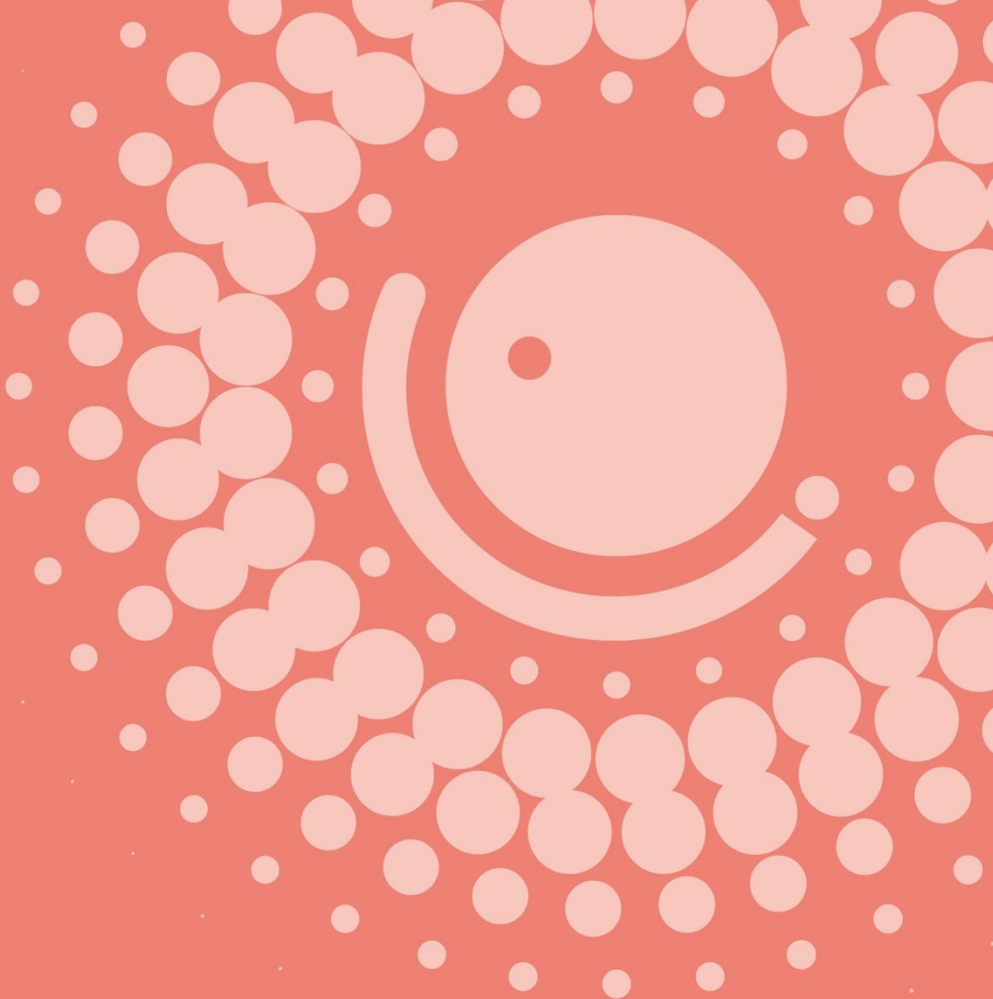
Harriet Young
Marketing Director



Sarah Kroon
Operations Director



Trevor Yong
Business Development Director



Thank you from Team Aura