New regulations for packaging (PPWR)
within the framework of the circular economy

The proposed Packaging and Packaging Waste Regulation (PPWR) by the European Commission aims to minimise the environmental impact of packaging materials. As an integral part of the Green Deal, it contributes to the EU's comprehensive strategy for promoting the circular economy and sustainability. While the regulation is on the verge of finalisation and is expected to be enforced in spring 2024, numerous specifics will only be conclusively determined during the upcoming legislative period.

Only recyclable packaging

European waste policy is dedicated to effectively implementing the circular economy principle, encompassing waste reduction, reuse, and the utilization of high-quality recyclates. A pivotal goal is to establish a streamlined EU market for secondary raw materials. The regulation entails obligations related to reusable packaging alternatives and stipulates mandatory recycling percentages for plastic packaging. Starting in 2030, exclusively recyclable packaging meeting „design for recycling" criteria is mandated. These regulations extend to both printed end consumer packaging and the packaging of paints and varnishes.

"Design for recycling" criteria

The „Design for Recycling (D4R)" criteria will be defined through delegated acts in the upcoming legislative periods. These acts are likely to impose direct requirements related to printing, encompassing constraints on raw materials and specifications for „substances of concern". The definition of these substances is broad, and some details will only be specified in delegated acts. VdL advocates for a practical and legally secure structure. Additionally, the D4R criteria should be grounded in scientifically sound findings and developed with close industry involvement. The efforts of the CEN standardisation committee for packaging offer a solid foundation for this purpose.

Effects on the packaging of paints and varnishes

From 2030, the regulation stipulates that transport packaging, including pallets, plastic boxes, collapsible plastic boxes, tubs, and drums, must be 30% reusable for the transport or packaging of products. This quota is set to increase to 90% by 2040. However, significant uncertainties persist for the paint industry. It is crucial to clearly define the types of transport packaging falling under this regulation and identify the specific paint and varnish containers affected. Exceptions are warranted for sensitive areas with stringent purity requirements, as reuse in such cases is neither ecologically nor economically sensible. Meeting the target quotas for recyclate use in plastic packaging (35% by 2030) poses substantial challenges for the entire supply chain, particularly as suitable containers for paints and varnishes have been scarcely available to date.

Thinking circular economy holistically

The circular economy for packaging must be approached holistically. Reuse rates, the utilisation of recyclates, and the avoidance of substances of concern should be viewed as facets of sustainability rather than ends in themselves. In addition to the „design for recycling" criteria, recycling processes must be optimised, and the performance of the packaging must be considered.

This is what we are calling for

Practical "Design for Recycling" criteria for the circular economy

"Design for Recycling" criteria play a crucial role in the circular economy. Nevertheless, recycling processes need continuous optimization. The specific D4R requirements should be practical, realistic, and adaptable to technological advancements.

Dialogue and cooperation with all stakeholders

Realistic and practical solutions can only be achieved through a constructive dialogue and close collaboration with all stakeholders throughout the product life cycle. Existing standardisation activities should also be considered.

Do not view reuse and the use of recycled materials as an end in themselves

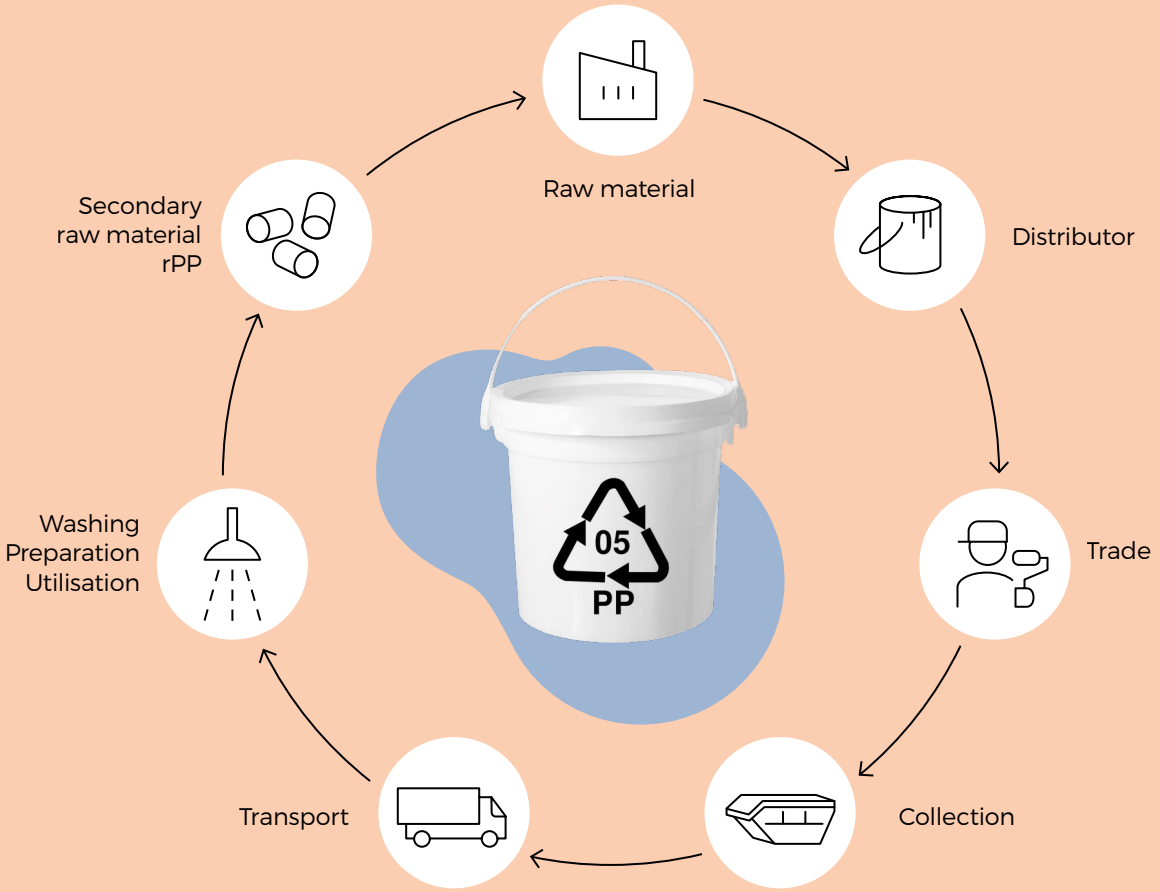
Exceptions should be granted in cases where, due to technical limitations, reuse or the utilisation of recycled materials is not feasible or can only be achieved with an undue consumption of resources.

Verband der deutschen Lack- und Druckfarbenindustrie e.V.

Packaging cycles using the example of paint buckets

Packaging for architectural paints is primarily discarded through the dual system, recycling centres, and waste collection points at construction sites, with only a small proportion ending up in the residual waste bin. However, there are very few buckets on the market made from recycled plastic.

Achieving the PPWR's target quotas for the use of recycled materials will necessitate new approaches that must be collaboratively implemented across the entire supply chain. Closed loops could offer potential solutions in this regard.



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