



PPWR

Implementation 2026

The Brand Owner Perspective

AGENDA

Opening - 12:30 pm – 12:45 pm

Siddharth Bagri

PPWR in Context –
What Changes For Businesses

Session 1 : 12:40 pm - 01:15 pm

Dr. Johannes Justus Brinkschmidt

Mapping Responsibility:
Economic Operators Under PPWR

Session 2 : 1:15 pm - 2:00 pm

Matteo Squeo & Marzia Scopelliti

PPWR in Motion: Regulatory
Updates & Strategic Direction

Session 3 : 2:00 pm - 2:30 pm

Anna Kibet & Sabine Hug

Panel Discussion:
Brand Owners Between Regulation & Reality

Session 4 : 2:30 pm - 3:30 pm

Pedro Simões

International Perspective:
How Portugal is Implementing the PPWR.

Session 4 : 2:30 pm - 3:30 pm

Isabel Leal Gavarrón

International Perspective:
How Spain is Implementing the PPWR.

Session 5 : 3:30 pm - 4:00 pm

Tomislav Krolo

PFAS and other required tests for PPWR

Session 6 : 4:00 pm - 5:00 pm

Siddharth Bagri

Turning Compliance into Action: The Digital
EU DoC Workflow



THE GREEN CLAUSE

Law, sustainability and competitiveness

The Green Clause is a legal insight platform created and written by Matteo Squeo, lawyer specialised in EU regulatory law.

It offers a critical legal perspective on how sustainability, ESG, food and chemicals legislation shape competitiveness.

Because law, sustainability and competitiveness are not separate goals, they belong to the same legal reasoning that guides Europe's transition



Law

Law provides the structure for growth and fairness



Sustainability

Sustainability becomes credible when law aligns environmental purpose with regulatory consistency



Competitiveness

Competitiveness depends on coherent rules that foster stability, innovation and proportionality



Single Market

A unified Single Market promotes seamless trade and cooperation.



From Fragmentation to Coherence

The Green Clause was born from a simple yet profound legal observation: the EU legislates in silos, whilst sustainability is inherently systemic.

Each initiative—whether addressing products, waste streams, or corporate reporting—tackles a fragment of the same underlying challenge: regulatory coherence.

Circularity cannot emerge from a fragmented legal order. The Circular Economy Act represents a unique opportunity to connect what EU law has historically kept apart, transforming disparate obligations into an integrated framework.





The Green Clause Vision

The Green Clause project connects the dots between legal regimes that the EU has artificially separated. It advocates for a form of **legal sustainability**: rules that are proportionate, predictable, and mutually consistent.

01

Integration

Connecting fragmented sustainability regulations into a coherent framework

02

Alignment

Ensuring sustainability law evolves **with** competitiveness, not against it

03

Recognition

Understanding that sustainability, competitiveness, and the Single Market share the same legal foundation

- The project's core principle: sustainability, competitiveness, and the Single Market are not parallel goals—they represent the same legal reasoning, requiring unified treatment under EU law.

EU Packaging and Packaging Waste Regulation

REGULATION (EU) 2025/40

A regulatory framework governing the life cycle of all packaging placed on the EU market, encompassing sustainability requirements, labeling mandates, waste prevention, reuse, recycling, and extended producer responsibility. This regulation repeals Directive 94/62/EC and enters into application on **12 August 2026**.

Scope

The Regulation applies to all packaging placed on the EU market, regardless of material, and to all packaging waste generated in the EU, whether from industrial, commercial, domestic, or HORECA sources.

- **Supply Chain Coverage:** Applies to all economic operators, including manufacturers, importers, distributors, and retailers.
- **Geographic Scope:** Mandates compliance for all entities placing packaging on the EU market.
- **Regulatory Transition:** Repeals Directive 94/62/EC effective 12 August 2026, introducing binding essential requirements and mandatory conformity assessments.

Packaging and Packaging Waste Regulation Main objectives

- Reduce packaging waste by restricting excessive packaging and promoting reuse and refillable packaging solutions
- Make all packaging designed for recycling (DfR) by 2030 and recyclable at scale by 2035
- Increase the use of recycled plastics in packaging through mandatory targets
- Address Substances of Concern (SoCs) in packaging

Substances of Concern

PFAS in Food-Contact Packaging

Food packaging will be prohibited if it contains PFAS in a concentration at or above the following limit values:

- **25 ppb** for any PFAS as measured with targeted PFAS analysis
- **250 ppb** for the sum of PFAS measured as sum of targeted PFAS analysis
- **50 ppm** for PFASs (polymeric PFAS included)

This regulation mirrors the proposed **REACH PFAS restriction**.

The European Commission will conduct an evaluation to assess the need to amend or repeal these requirements **by 12 August 2030**.



Substances of Concern

- **Heavy metal restrictions** (sum of concentrations of lead, cadmium, mercury, and hexavalent chromium must not exceed 100 mg/kg)
- By **31 December 2026**: EC will work with ECHA to prepare **report on SoCs** in packaging/packaging components
 - Determine extent to which SoCs negatively affect the **re-use or recycling of materials or chemical safety**
 - May **indicate SoCs** and extent to which they could present an unacceptable risk to human health.



Recyclability Requirements

Effective **1 January 2030**, all packaging placed on the market must be recyclable, determined in accordance with design-for-recycling (DfR) criteria and categorized into performance grades:

Grade A

DfR score $\geq 95\%$

Grade B

DfR score $\geq 80\%$

Grade C

DfR score $\geq 70\%$

Non-Recyclable

Score $< 70\%$ – prohibited from the market

Commencing in **2035**, a "recycled-at-scale" criterion shall be mandated. Effective **2038**, only packaging achieving Grade A or B shall be permitted for placement on the market. Exemptions are applicable to specific medical, pharmaceutical, and dangerous-goods packaging categories.



Recyclability – Key Milestones

01

1 January 2028

EC must adopt delegated acts setting, amongst others, design for recycling (DfR) criteria and recycling performance grades

03

1 January 2030

EC must adopt implementing acts establishing, amongst others, the methodology for the recycled at scale assessment per packaging category

02

1 January 2030

Packaging placed on the market must comply with DfR criteria

04

1 January 2035

All packaging must be recycled 'at scale' – when the annual quantity of packaging waste collected separately, sorted, and recycled under each packaging category is equal to or greater than 30% for wood and 55% for all other materials

Recycled Content Requirements

- By **31 December 2026**, EC should adopt implementing acts that, amongst others, establish **the methodology for the calculation and verification of the percentage of recycled content** recovered from **post-consumer plastic waste** recycled and collected in the EU and format for supporting technical documentation
 - '**Post-consumer plastic waste**' means waste that is plastic and that has been generated from plastic products that have been placed on the market or supplied for distribution, consumption or use in a third country in the course of a commercial activity, whether in return for payment or free of charge

Mandatory Recycled Content Requirements for Plastic Packaging

Minimum recycled content requirements for the plastic part of packaging must be met by **2030 (or 3 years after adoption of above implementing act)**

Minimum limits expressed per **packaging type/format** calculated as an **average per manufacturing plant and year** (*limited exemptions apply*):

Effective 1 January 2030

- 30% for contact-sensitive PET packaging (excluding beverage bottles)
- 10% for other contact-sensitive plastic packaging
- 30% for single-use plastic beverage bottles
- 35% for all other plastic packaging

Effective 1 January 2040

- 50% for contact-sensitive PET packaging (excluding beverage bottles)
- 25% for other contact-sensitive plastic packaging
- 65% for single-use plastic beverage bottles
- 65% for all other plastic packaging

Bio-Based Feedstock

This provision outlines future regulatory developments regarding the integration of bio-based materials into packaging standards.

- By **12 February 2028**, the Commission shall review the technological development and environmental performance of bio-based plastic packaging.
- Based on this review, the Commission may submit a legislative proposal to permit the use of bio-based feedstock as a substitute for post-consumer plastic waste in meeting recycled content targets:
 - This is contingent upon findings that suitable technologies for food packaging, compliant with Regulation (EU) 2022/1616, are currently unavailable.



Packaging Minimisation

From **1 January 2030**, economic operators must ensure that the weight and volume of packaging are limited to the minimum necessary to ensure its functionality, taking into account the product's safety, hygiene and protection.

Packaging should not be designed to increase the perceived product volume.

This includes, for example, packaging features such as double walls, false bottoms or other design elements that do not serve a functional purpose..

Empty Space Ratio

Grouped packaging, transport packaging, and e-commerce packaging should not exceed a **50% empty space ratio** as of 1 January 2030.

Exemptions

Packaging protected by registered design rights or trademarks (prior to 11 Feb 2025), and products with EU geographical indication protection, are exempt where such minimisation would compromise their protected characteristics.



Reusable Packaging Requirements

To be classified as "reusable," packaging must satisfy specific technical criteria as defined in Annex VI of the Regulation. Self-declaration is insufficient.

Minimum Demonstrable Rotations

Packaging must be designed and tested to withstand a minimum number of use cycles, as defined via delegated acts for each specific packaging category.

Safety and Hygiene

Packaging must be capable of being cleaned, sanitized, and reconditioned without compromising food safety properties or structural functionality.

Maintained Quality

Following each use cycle, packaging must retain the safety and protective characteristics required for the contained product.

Collection and Logistics

Packaging must be fully compatible with efficient collection, return, and reconditioning systems (reverse logistics).

Labelling

Reusable packaging must be identifiable as such and comply with harmonised labelling requirements, as provided under Article 12 of the PPWR, with further specifications to be adopted through implementing acts. Further information on reusability to be made available through a QR code or other digital data carrier



Re-Use Targets – Article 29

Article 29 of Regulation (EU) 2025/40 sets mandatory re-use targets for specific packaging, effective from 1 January 2030.

Transport & Sales Packaging

- 2030 target: 40% (boxes, trays, crates, etc.) within a re-use system.
- Internal/partner transport: 100% reusable packaging required from 2030.
- Exemptions: dangerous goods, custom machinery, and cardboard boxes.

Grouped Packaging

- 2030 target: At least 10% of non-cardboard boxes used for stock or distribution must be reusable.
- 2040 target: Operators aim for 25%.

Beverage Packaging

- 2030 target: 10% of alcoholic and non-alcoholic drinks must be in reusable packaging.
- 2040 target: 40%
- Exemptions: Includes perishable items, dairy, and specific alcoholic categories.

- 📄 Micro-enterprises and smaller operators (e.g. below certain retail surface thresholds) may benefit from flexibility under specific re-use obligations. Member States may provide for derogations under defined conditions.

Refill & Re-Use Offer – Articles 32 & 33

New HORECA sector obligations for take-away beverage and food packaging.

Refill Obligation (Art. 32)

- From Feb 2027: Allow customers to use their own containers (BYOC).
- No cost or quality disadvantage compared to single-use options.
- Mandatory point-of-sale consumer information.

Re-Use Offer (Art. 33)

- From Feb 2028: Provide a system to offer reusable packaging options.
- Equal pricing and conditions required vs. single-use packaging.
- Targeting 10% reusable sales volume by 2030.

- 📌 These requirements apply to all HORECA businesses, though micro-enterprises are exempt from Art. 33 re-use offer.



Restricted Packaging Formats

From 2030, the Regulation prohibits the placing on the market of specific single-use packaging formats listed in **Annex V**, including:

- Single-use plastic packaging used by retailers to group goods sold in cans, tins, pots, tubs, and packets which are designed to enable or encourage end-users to purchase more than one portion
- Single-use plastic packaging for pre-packed fresh fruit and vegetables below 1.5 kg, subject to possible Member State derogations (e.g. to prevent water loss or microbiological risks)
- Single-use plastic packaging for food and beverages filled and consumed on HORECA premises
- Single-use plastic packaging in the HORECA sector for individual portions or servings (e.g. sauces, sugar, coffee creamers)

Labeling Specifications

Effective **12 August 2028**, all packaging should display a harmonized label identifying material composition to facilitate consumer sorting. Labeling must utilize pictograms, ensure accessibility for persons with disabilities, and minimize reliance on linguistic indicators, as per Art. 12.

Mandatory Labels (subject to implementing acts)

- Material composition (sorting identification)
- Compostability status (where applicable)
- Deposit and return system indicator
- Reusable packaging designation (effective 12 Feb 2029)

The obligation does not apply to transport packaging (except for e-commerce packaging) or to packaging that is part of a DRS.

Additional specifications apply to compostable packaging.

Environmental claims on packaging: only where they go beyond PPWR minimum requirements and are duly substantiated, without prejudice to the application of EU rules on unfair commercial practices and sustainability claims (UCPD and ECD).

The Commission should adopt implementing acts regarding harmonized labeling specifications no later than 12 August 2026.





Extended Producer Responsibility (EPR)

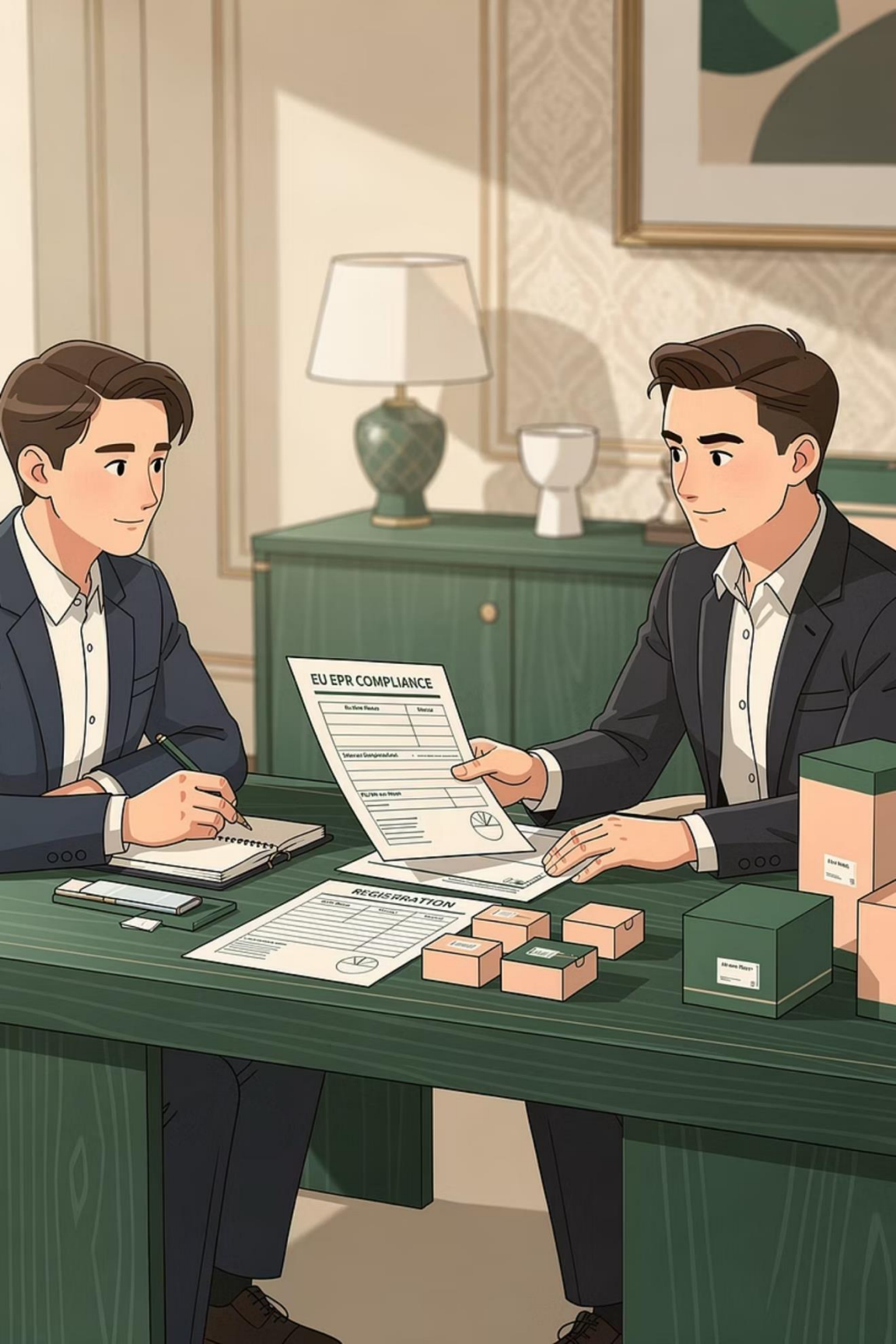
The PPWR intends to harmonize fundamental concepts by defining terms such as ‘manufacturer,’ ‘importer,’ ‘producer,’ ‘economic operator,’ ‘supplier,’ and ‘authorized representative’ and outlining their respective obligations.

- **Each EU Member State must create a national register within 18 months** of the regulation's implementation. These registers will monitor producer compliance with the extended producer responsibility (EPR) requirements.
 - Producers must register in every Member State where they sell or unpack packaging, ensuring traceability, and registers must link to other national registers, facilitating producers' cross-border registrations.
- Producers bear responsibility for all packaging they place on the market, ensuring collection, sorting, and proper recycling of waste.
- Financial contributions cover direct waste management costs and surveys of municipal waste.

Extended Producer Responsibility (EPR)

- The PPWR allows producers to delegate their obligations under the Extended Producer Responsibility framework to authorized **Producer Responsibility Organizations (PROs)**. These entities must be established under national law and operate with full coverage of the producer's obligations concerning waste management, collection, sorting, and recycling.
- PROs are mandated to publish detailed annual reports. **These reports must outline:**
 - Quantities of packaging introduced to the market,
 - The levels of waste recovery and recycling achieved,
 - Compliance with national and EU waste management targets.

Member States are tasked with ensuring that PROs operate under a transparent and independent oversight mechanism, which may include the involvement of an independent third party. This is to guarantee that PROs fulfill their obligations equitably and efficiently.





Deposit and Return Systems (DRS)

Effective 1 January 2029, Member States are required to implement mandatory deposit and return systems for single-use plastic beverage bottles (up to 3L) and single-use metal beverage containers (up to 3L).



Scope of Coverage

Single-use PET bottles and aluminum/steel containers up to 3 litres (covering water, beer, soft drinks, and juices).



Collection Targets

A minimum **90% separate collection rate by weight per year** must be achieved for the covered packaging formats.



Operational Mechanism

Consumers pay a deposit at the point of purchase, which is reimbursed upon return of the empty packaging through designated collection systems.



Exemption Provisions

Member States currently achieving a 90% separate collection rate for these specific formats may apply to the Commission for an exemption.

Note: DRS should be designed to ensure coordination and interoperability across systems, in particular in a cross-border context.

Conformity Assessment & Technical Documentation

The PPWR introduces a structured conformity framework for packaging, aligning packaging compliance with EU product legislation principles. Packaging may only be placed on the market where compliance with the Regulation is demonstrated and documented.

Conformity Assessment & EU Declaration of Conformity

- Manufacturers must ensure packaging complies with all applicable requirements of the Regulation, including design requirements, recyclability performance and restrictions on substances of concern.
- Prior to placing packaging on the market, manufacturers must carry out the relevant conformity assessment procedure and draw up an EU Declaration of Conformity (DoC) confirming compliance.

Technical Documentation

- Manufacturers must establish and maintain comprehensive technical documentation demonstrating compliance with the PPWR.
- This documentation shall include all relevant information supporting compliance, including elements related to packaging design, recyclability criteria, material composition and the presence of substances of concern.

Retention & Market Surveillance

The EU Declaration of Conformity and the technical documentation must be retained:

- 5 years for single-use packaging
- 10 years for reusable packaging

These documents must be made available to competent national authorities upon request, enabling effective market surveillance and enforcement.

Obligations of Importers and Supply Chain Actors

Importers must ensure that packaging placed on the Union market complies with the Regulation. In particular, they must verify that:

- the conformity assessment procedure has been carried out
 - the EU Declaration of Conformity and technical documentation are available
 - packaging complies with applicable labelling and information requirements
- Similar due diligence obligations apply, where relevant, to other economic operators within the supply chain.

Market Surveillance and Enforcement

Regulation (EU) 2019/1020 on market surveillance applies to all packaging within the scope of this Regulation. Principal enforcement mechanisms include:

Conformity Verification

Competent authorities shall carry out **risk-based controls** to verify that packaging placed on the market complies with the requirements of the Regulation, including the accuracy of the EU Declaration of Conformity and supporting technical documentation.

Corrective Measures and Withdrawal

Where packaging is found to be non-compliant, economic operators shall take appropriate corrective measures, including bringing the packaging into conformity, withdrawing it from the market, or recalling it, as necessary.

Penalties

Member States must lay down rules on penalties applicable to infringements of the Regulation.

Such penalties must be **effective, proportionate and dissuasive**, in line with general EU law principles.



Connect with Me



The Green Clause

LinkedIn: [@TheGreenClause](#)

Matteo Squeo

LinkedIn: [@MatteoSqueo](#)

Email: m.squeo.legal@gmail.com

PPWR Implementation Summit

"PPWR in Motion: Regulatory Updates &
Strategic Direction"

24th March 2026



ABOUT EUROOPEN



81

Members representing the
entire packaging value chain



Founded in

1993



5

Packaging materials: glass,
metal, paper and cardboard,
plastics and wood

RAW MATERIAL MANUFACTURERS



PACKAGING MANUFACTURERS



PACKAGING FILLERS



LABELS MANUFACTURERS



PACKAGING MACHINERY





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SHAPING A SUSTAINABLE
FUTURE FOR PACKAGING

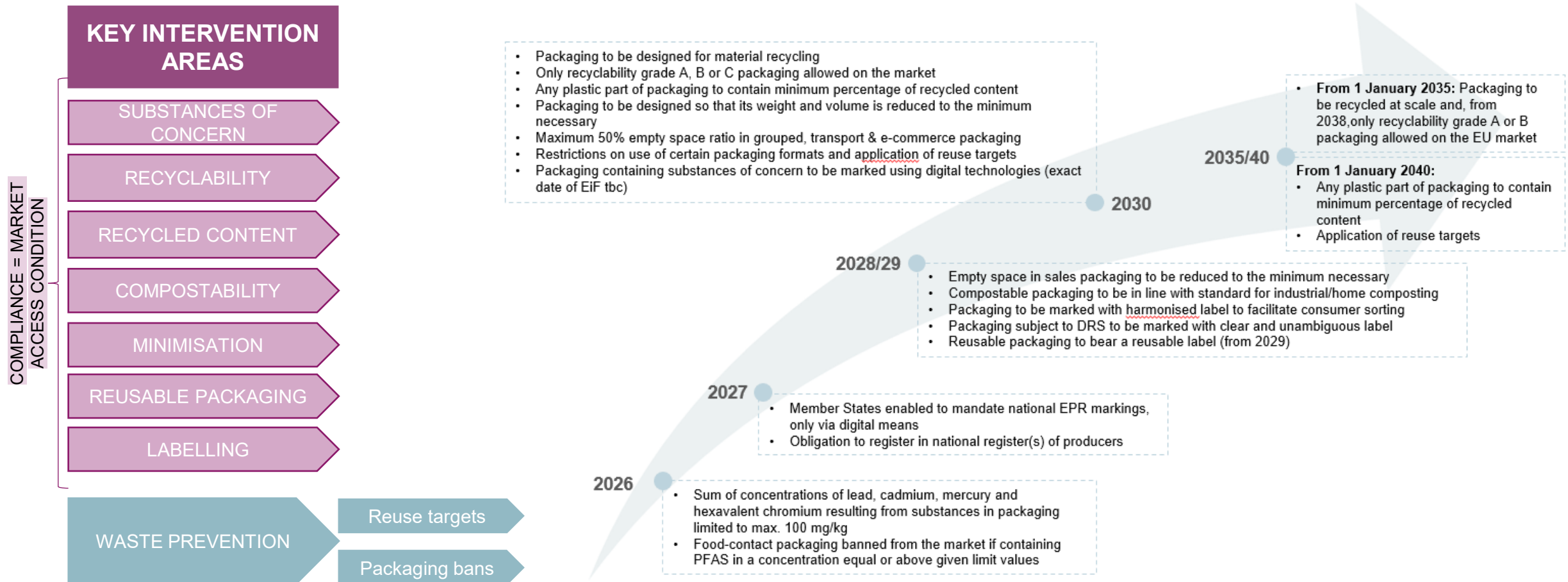
NATIONAL ASSOCIATIONS MEMBER OF EUROOPEN





The new EU packaging legislation

MARKET ACCESS REQUIREMENTS & TIMELINE



DELIVERING PPWR: KEY FRAMEWORK CONDITIONS 1/2

65%

ECB analysis finds that internal barriers in services and goods markets are equivalent to tariffs of around 100% and 65%, respectively.^[14]

SINGLE MARKET FOR GOODS &
SECONDARY RAW MATERIALS

//

Member States shall ensure that systems and infrastructures are set up to provide for the return and separate collection of all packaging waste from the end users [...]. Packaging complying with design for recycling criteria as established in delegated acts adopted under Article 6(4) of this Regulation shall be collected for recycling. Incineration and landfill of such packaging is not to be allowed, with the exception of waste [...] for which recycling is not feasible or does not deliver the best environmental outcome. //

– Article 48(1), PPWR

EPR TRANSPARENCY &
GOVERNANCE

Yet Europe is not moving fast enough. According to the European Commission's Annual Competitiveness & Single Market Report, the share of recycled materials used in the EU rose only slightly from 11.8% in 2023 to 12.2% in 2024, still far below the 24% target for 2030.

At the same time, 11 Member States landfill more than 30% of household waste, with some reaching 60–80%.

Brussels, May 2025

- Transparency remains a challenge in many Member States
- The net cost principle is increasingly challenged by some Member States, keen to establish State-run PROs systems
- Most EU27 are yet to achieve the 2025 packaging waste recycling targets

Joint Industry Statement on State-run Producer Responsibility Organisations

The undersigned organisations deplore the recognition of state-run producer responsibility organisations (PROs) in the final text of the revised Waste Framework Directive (WFD), a regrettable precedent also set in the new Packaging and Packaging Waste Regulation and Batteries Regulation.

DELIVERING PPWR: KEY FRAMEWORK CONDITIONS 2/2



Q3 2026

New Circular Economy Act

- Ensure cost-effective and transparent EPR schemes to scale recycling of D4R compliant packaging
- End State-run PROs & establish the earmarking of EPR fees
- Support circularity, e.g. via transnational circularity hubs

May 2025 and ongoing
Single Market Strategy & Roadmap

- Address goldplating & remove barriers
- Ensure separate collection of packaging waste is supported by harmonised labelling
- Improve and streamline EU waste management rules

Q1 2026 and ongoing
Simplification agenda


- Reduce unnecessary burden
- Remove regulatory overlaps & duplication of requirements
- Guarantee investment certainty

THE ENVIRONMENT OMNIBUS



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8.082 follower

1 giorno • 

📌 A coalition of European trade associations from across sectors supports the temporary suspension, within the Union, of the Authorised Representative (#AR) requirement under Extended Producer Responsibility (#EPR) as part of the ... altro

Mostra traduzione

Brussels, March 2026

Joint statement on Authorised Representative for Extended Producer Responsibility (EPR)

At a moment when EU leaders have made regulatory simplification and a stronger Single Market the cornerstone of Europe's competitiveness agenda, the Commission's proposal – as part of the Environmental Omnibus – to temporarily suspend, within the Union, the mandatory appointment of an Authorised Representative (AR) for certain waste streams covered by Extended Producer Responsibility (EPR) represents a constructive and promising first step toward a more workable EU compliance framework.

The undersigned associations, representing a wide range of sectors involved in EPR, wish to express serious concern regarding the opposition to the proposed suspension of national AR requirements for EPR, voiced by several Member States. We fully share the objective of combating free-riding and ensuring effective EPR enforcement. However, we firmly believe that opposing the suspension risks entrenching a patchwork of national requirements at a time when the Commission and EU leaders have called for a more harmonised Single Market. This should be reflected through the upcoming Circular Economy Act, the ambition of which must be preserved ahead of its formal proposal. Consequently, the undersigned associations believe that maintaining fragmented national AR obligations is the wrong instrument to deliver this objective. Such requirements risk undermining the core principles of the Single Market, notably:

Article 2

Suspension of Article 45(3) of Regulation (EU) 2025/40

The application of Article 45(3) of Regulation (EU) 2025/40 shall be suspended until 1 January 2035.

Member States may either provide that producers established in third countries shall appoint, by written mandate, an authorised representative for the extended producer responsibility when making packaging or packaged products available on their territory for the first time or ensure traceability and enforcement with regard to packaging producers established in third countries through alternative means.



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Q&A



Thank you!

THE EUROPEAN ORGANISATION
FOR PACKAGING AND THE ENVIRONMENT
(EUROPEN) AISBL

Rue du Commerce 31
B-1000 Brussels
Belgium

E-mail: packaging@europen-packaging.eu



PPWR Implementation 2026 - The brand owner perspective

Portugal: impact on the industry, eco-modulated fees

March 24th, 2026

Agenda

1. **Who is Novo Verde?**
2. **Packaging Market in Numbers**
3. **How PPWR will impact Portuguese Market?**
4. **Local regulatory tools**
5. **Ecomodulation, Technical Waste Specifications, and Environmental award criteria for selecting recyclers**

Who is Novo Verde?

1. Who is Novo Verde?

Introduced, for the first time in Portugal, the factor of **competition between packaging PRO**.

Share capital comprised of at least 70% producers.



2016

The packaging waste sector has opened up to competition after 20 years of monopoly.



2020

Expansion of the scope to include non-multipack secondary packaging and tertiary packaging.

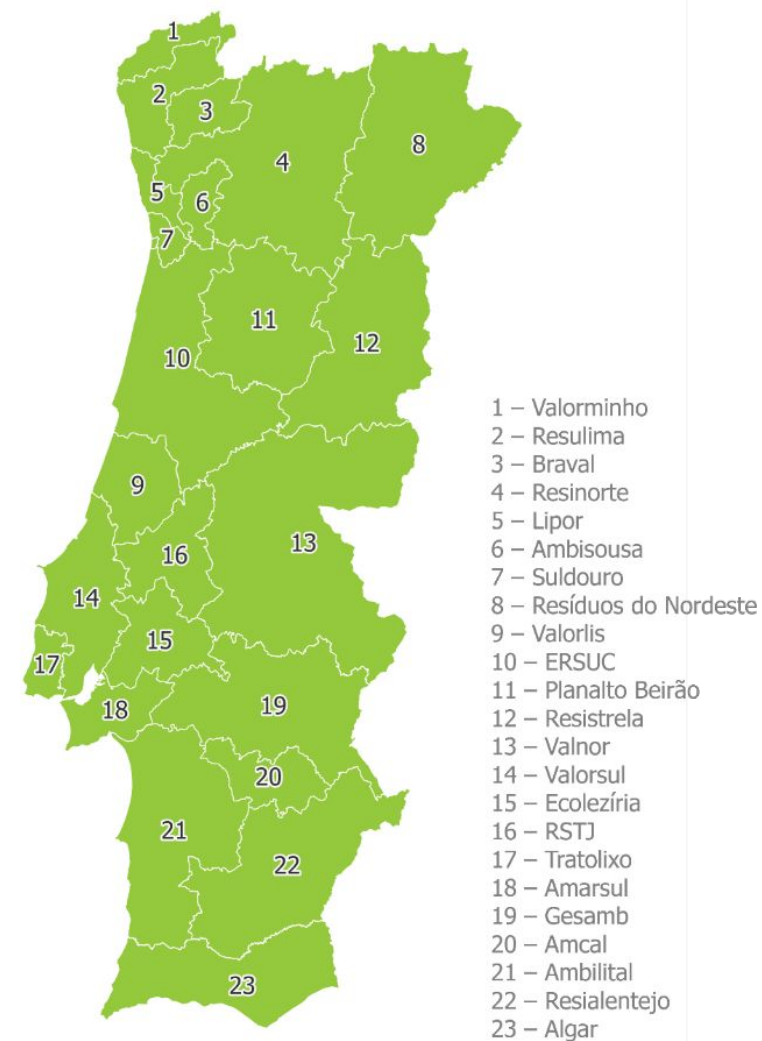


2025

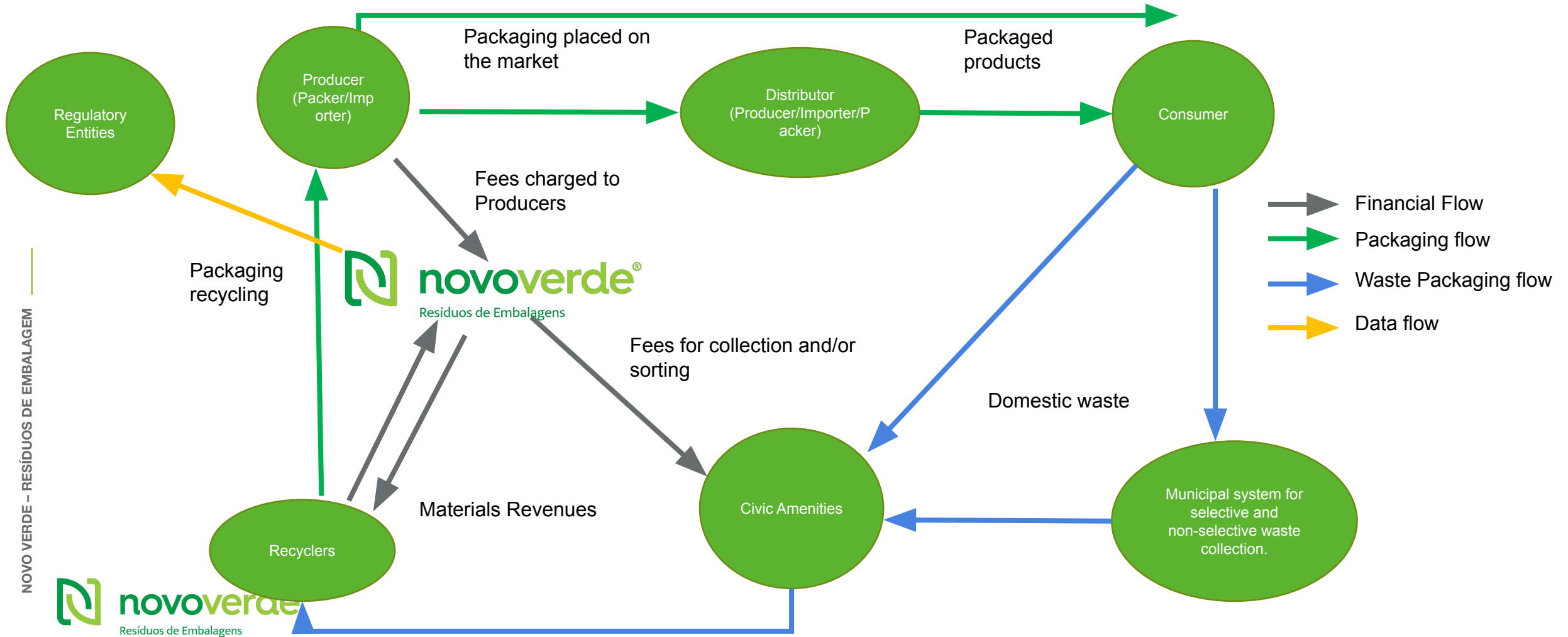
The new permit comes into effect through Joint Order No. 12/ME/MAEN/2024, and through the First Addendum to the license, through Joint Order No. 2/SEEco/SEAMB/2024.

1. Who is Novo Verde?

Approximately **61,000 collection points**, based on the network of recycling bins managed (ecopontos) by Civic Amenities, with 100% coverage of the mainland and islands.



1. Who is Novo Verde?



Packaging Market in Numbers

2. Packaging Market in Numbers

SIGRE Targets and Results

Recycling Rate in 2024
(includes organic recycling)

58.6%

Target
55%



NOVO VERDE – RESÍDUOS DE EMBALAGEM



Glass
51.8%



Paper*
79.3%



Plastic*
51.5%



Metal*
59.2%



Wood
28.3%



Targets

60%

60%

22.5%

50%

15%

* Amount of Beverage Cartons allocated to paper/cardboard (75%), plastic (20%) and aluminum (5%), in accordance with EU Directive 2018/852 and Decision 2019/665.

2. Packaging Market in Numbers

Permit Packaging Targets

Target (%)	2024	2025	2026	2027	2028	2029	2030
Glass	60%	65%	65%	65%	65%	65%	75%
Plastic	23%	50%	50%	50%	50%	50%	55%
SUP Cups*				50%	50%	50%	80%
Paper/Cardboard	60%	75%	75%	75%	75%	75%	85%
Beverage							
Cartons							
Steel		70%	70%	70%	70%	70%	80%
Aluminium		40%	40%	40%	40%	40%	60%
Wood	15%	25%	25%	25%	25%	25%	30%
Other materials							
Total	55%	65%	65%	65%	65%	65%	70%

* Collection rates

2. Packaging Market in Numbers

Difference between Market and SIGRE

	National (2023)	SIGRE (2024)
Placed on the market (t)	1 943 997	910 801
Recycling (t)	1 202 302	533 816

From 2025 onwards, all packaging will be covered by the EPR.

How PPWR will impact Portuguese Market?

3. How PPWR will impact Portuguese Market?

Source: Portugal's Packaging Market: Growth in Fresh Food, Recycling as a Constraint



Portugal's packaging market is gaining momentum in fresh food, while recycling performance and reliable material streams increasingly define competitiveness.



- The PPWR arrives at a time when Portugal is vulnerable in terms of meeting targets for Glass and Aluminum materials. In this sense, the **PPWR can be seen as the necessary boost and an opportunity to promote competitiveness.**
- The food/fresh products sector is the major driver of the packaging market, however, it may be one of the most targeted. **The PPWR poses recycling and recyclability challenges, especially in complex packaging, which innovation and food safety will have to address.**

3. How PPWR will impact Portuguese Market?

Source: Portugal's Packaging Market: Growth in Fresh Food, Recycling as a Constraint



- The growth in the use of Plastic and the pressure on its recyclability are inseparable. It is essential to align supply in terms of market placement with collection, sorting and recycling capacity. **The PPWR should be seen as an opportunity to modernize the collections and sorting sector.**
- Paper/Cardboard and Glass are sectors of the packaging industry with great potential, but also with greater challenges. **Glass industry is heavily dependent on energy and recycling rates. The paper/cardboard industry is fighting for an increasingly cost-competitive market.**

Local regulatory tools

4. Local regulatory tools

Ecomodulation Criteria – Portugal

Material Category	Ecomodulation Criteria (Eligible if ALL conditions are met)
Glass	<ul style="list-style-type: none"> No non-detachable ceramic or steel caps Not opaque or black No dispensers with glass spheres or metal springs
Paper & Cardboard	<ul style="list-style-type: none"> No coatings, paraffins, or waxes No non-detachable plastic or metal components Paper/cardboard content > 85%
Aluminum	<ul style="list-style-type: none"> No steel components
PET Bottles (Hollow Bodies)	<ul style="list-style-type: none"> Not opaque or black No multi-material lamination No metal caps No full-sleeve labels (> 2/3 height) of different material Labels not made of PVC or PET > 1 g/cm³ density
Thermoformed PET	<ul style="list-style-type: none"> Transparent Monomaterial PET only
HDPE Bottles (Hollow Bodies)	<ul style="list-style-type: none"> Not black No silicone or rubber components No full-sleeve labels (> 2/3 height) of different material
Plastic Film (PE & PP)	<ul style="list-style-type: none"> No multi-material laminates No metallized materials
PP Bottles (Hollow Bodies)	<ul style="list-style-type: none"> Not black No full-sleeve labels (> 2/3 height) of different material No silicone or rubber components
Other Plastic Packaging	<ul style="list-style-type: none"> Not composite with non-plastic materials
Liquid Packaging Board (ECAL)	<ul style="list-style-type: none"> No HDPE opening system at the top

10% of bonus will be applied to fees, per material, if all the ecomodulation criteria defined meets for each material.

To prove compliance with this criterion, the producer must present the **Technical Data Sheet** for the packaging and/or a **Declaration of Conformity** from the suppliers **by reference/SKU** (stock keeping unit) of the products they have placed on the national market and, also, **photographic records or samples**, if necessary, by reference/SKU.

Note: PackintelX translation

4. Local regulatory tools

The evidences must be kept by the producer for a **period of 3 years** from the date of submission of the annual declaration and may be requested at any time by the PRO or Auditors who are verifying compliance with the declarations submitted.

Ecomodulation FAQ

https://apambiente.pt/sites/default/files/_Residuos/FluxosEspecificosResiduos/faq_ecomodulacao.pdf

Prestações Financeiras | Fees 2026

Materiais Materials	2026			
	Base de 01/01/2026 a 21/02/2026** Base Fee 01/01/2026 to 21/02/2026	Base a partir de 22/02/2026** Base Fee from 22/02/2026	Base média 2026** Average base Fee 2026	Bonificado Média 2026*** Average Eco-modulated fee 2026
Vidro Glass	0,07669	0,07669	0,07669	0,06902
Papel e Cartão Paper and cardboard	0,27125	0,28482	0,28288	0,25460
ECAL* Beverage Cartons	0,51870	0,51870	0,51870	0,46683
EPS EPS	0,46734	0,51408	0,50742	
Filme Plástico Plastic Film	0,46734	0,51408	0,50742	0,45668
PEAD HDPE	0,46734	0,51408	0,50742	0,45668
PET PET	0,46734	0,51408	0,50742	0,45668
Outras Embalagens de Plástico Other plastic packaging	0,46734	0,51408	0,50742	0,45668
PP PP	0,46734	0,51408	0,50742	0,45668
Termoformados PET PET Trays	0,46734	0,51408	0,50742	0,45668
Aço Steel	0,41967	0,46164	0,45566	
Alumínio Aluminium	0,08242	0,08242	0,08242	0,07417
Madeira Wood	0,05201	0,05201	0,05201	
Cortiça Cork	0,39119	0,39119	0,39119	
Outros materiais Other materials	0,39119	0,39119	0,39119	

4. Local regulatory tools

Idea proposed by PackintelX













User Platform

PACKINTELX




Company Name / Logo Dashboard Packaging Verificaion Reports Help user@email.com

Packaging Compliance Verification

In this section, we will check your packaging declaration against Ecomodulation Criteria in Portugal.


 Glass ✓	 Paper/Cardboard ✓	 Aluminum ✓	 PET Bottle ✓	 HDPE Bottle ✗	 Plastic Film ✗
 Thermoformed PET ✓	 PP Bottle ✗	 Plastic Film ✗	 Other Plastics ✗	 Liquid Packaging Board ✓	 Liquid Packaging Board ✓

Control Table | Compliant Non-Compliant All Newest first


Material	Compliance	Reason for Non-Compliance
 HDPE Bottle	✗	<ul style="list-style-type: none"> Black color Silicone or rubber components
 Plastic Film	✗	<ul style="list-style-type: none"> Full-sleeve label made of a different material (> 2/3 height)
 PP Bottle	✗	<ul style="list-style-type: none"> Multi-material laminate Metallized material Full-sleeve label made of a different material (> 2/3 height)

✓ Total: 3 results (🗨️) Export Report

Summary




Compliant
5




Non-Compliant
3

You have 5 **Compliant** and 3 **Non-Compliant** packaging items.

Summary



Compliant



Non-Compliant

You have 5 **Compliant** and 3 **Non-Compliant** packaging items.

Export Report

Ecomodulation, Technical Waste Specifications, and Environmental award criteria for selecting recyclers

5. Ecomodulation, Technical Waste Specifications, and Environmental award criteria for selecting recyclers

Ecomodulation

- Acts at the beginning of the chain.
- It forces producers to put packaging on the market that generates waste compatible with actual recycling.

Technical Specifications

- Operate in the middle of the chain.
- They determine whether the waste is accepted, separated, and transformed into quality recycled material.

PP, PET Trays, HDPE, Film, EPS, Other Plastics Packaging, etc..

Environmental award criteria for selecting recyclers in tenders

- Operate at the end of the chain.
- They ensure that Waste Management Operators have the technical capacity to meet targets and produce valuable secondary raw materials.

Carbon footprint, Recycling rate, Traceability, Certifications, etc..

**What do these 3 topics
have in common?**

The aim is to end up with high grade secondary raw materials available to the market.





novoverde®

Resíduos de Embalagens

Thank you



(+351) 219 119 630



info@novoverde.pt



<https://novoverde.pt/>



Novo Verde – Sociedade Gestora de Resíduos de Embalagens, S.A.
Rua de São Sebastião, 16 – Cabra Figa
2635-448 Rio de Mouro, Sintra



The Extended Producer Responsibility (EPR) in Spain

By Isabel Leal Gavarrón
Director of Institutional Relations & Sustainability



Agenda



01

Current regulatory context

02

Packaging regulations in Spain

03

EPR systems in Spain

04

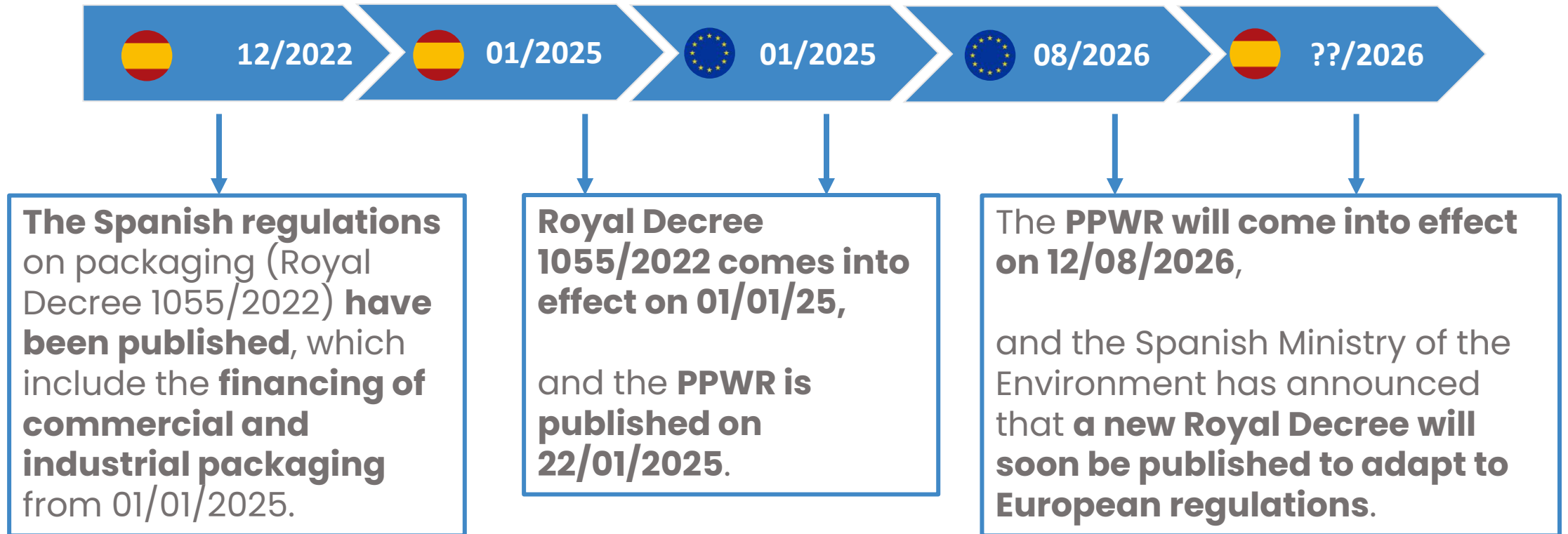
IMPLICA, the EPR system for commercial and industrial packaging

05

Contacts

Current regulatory context

The law in Spain has anticipated the PPWR but does not fully align with it



Packaging regulations in Spain

At present, there are **two coexisting regulation frameworks in Spain.**

The new Royal Decree is currently being developed, and changes are on the way, **but the current obligations remain in effect.**

If your company sells packaging on the Spanish market, your company is responsible for its **management and financing once it becomes waste.**

This includes **manufacturers, importers, and foreign companies** selling in Spain.

It doesn't matter where your company is, but where your company sells.

Packaging regulations in Spain

If you **introduce packaging** on the Spanish market **as a foreign company** (as an exporter), you have two options to comply with Spanish packaging legislation:

1. Appoint an **Authorized Representative** in Spain, who will legally act on your behalf and fulfill all the obligations in Spain for your company.
2. If you do not have an Authorized Representative, the law states that the **Spanish company** importing your packaged products **becomes the obligated producer**. In that case, the Spanish importer must assume responsibility for the packaging placed on the market.

It means either the foreign company designates an Authorized Representative, or the Spanish importer is legally responsible for the packaging.

Packaging regulations in Spain

If you are affected by extended producer responsibility (EPR) for selling packaged products on the market in Spain, you **must comply with 3 key obligations**:

1. **Register** on the Ministry for Ecological Transition's **register of product producers**.
2. **Report information on packaging introduced** on the Spanish market (quantity, material, category, ...).
3. **Finance and organize** the future management of this waste, which may mean joining a collective extended producer responsibility system, known as a **SCRAP**.

Here are the 19 authorized SCRAPs in Spain: <https://www.miteco.gob.es/en/calidad-y-evaluacion-ambiental/temas/prevencion-y-gestion-residuos/flujos/responsabilidad-ampliada.html>

19 EPR systems in Spain

A SCRAP (collective EPR system) may only be authorized to manage certain categories of packaging. This means that not all SCRAPS are suitable for all types of packaging.

Types of SCRAP authorization.

1. Household packaging
2. H & Commercial packaging
3. Industrial packaging
4. All kind of packaging but only single-use
5. Commercial and industrial packaging, single-use and reusable
6. Other combinations

Each SCRAP may only operate within the scope for which it has been authorized.

Depending on the packaging you introduce on the market, you will need to join a SCRAP that covers all your packaging or join several SCRAPS if one does not cover all.

Important: you can **not join 2 SCRAPS for the same type** of packaging. It means, if you have household packaging, you may only join one SCRAP for that category.

19 EPR systems in Spain

From the 19 EPR systems (SCRAPs) for packaging currently authorized in Spain, **only a much smaller group is dedicated exclusively to packaging EPR.**

Many of these 19 SCRAPs originate **from other sectors**—such as pharmaceuticals, Waste Electrical and Electronic Equipment (WEEE), or plant protection products—and have recently expanded into the packaging responsibility.

Within this context, IMPLICA has a particularly relevant origin. IMPLICA was created and promoted by **CONFECOI, the Spanish Confederation of Industrial Eco-Packaging**, which represents the interests of organizations dedicated specifically to industrial packaging.

Today, IMPLICA already manages **more than 400,000 tonnes of commercial and industrial packaging, contributed by over 1,700 companies** that have joined the system.

Implica as an EPR system in Spain



IMPLICA is an EPR system for **industrial & commercial packaging**.

- ✓ IMPLICA is a non-profit association, that provides **legal coverage** to producers (EPR responsibility) and **organizes and finances** the packaging waste recovery (all kind of materials, **single-use, reusable**, dangerous or non-dangerous).
- ✓ IMPLICA is a **pioneer in reuse**. The SCRAP integrates **reusing systems** of reusable packaging: individual/collective, open/closed...
- ✓ IMPLICA **helps companies** to give **information to the Public Administration** (National and Regional) and to suppliers and customers.

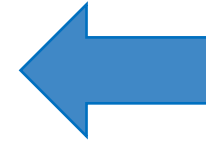
Implica as an EPR system in Spain

PRODUCERS OF PRODUCT
(for the sale of products with packaging)

ADHESION CONTRACT



(compliance with EPR)

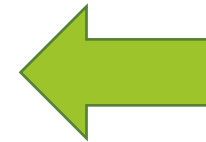


LAST OWNERS of PACKAGING WASTE
(for the unpackers)

VOLUNTARY AGREEMENT



(maintaining the contracts you have)

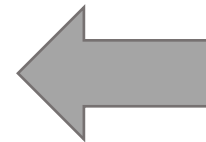


PACKAGING WASTE MANAGERS
(or collectors, for the waste managers)

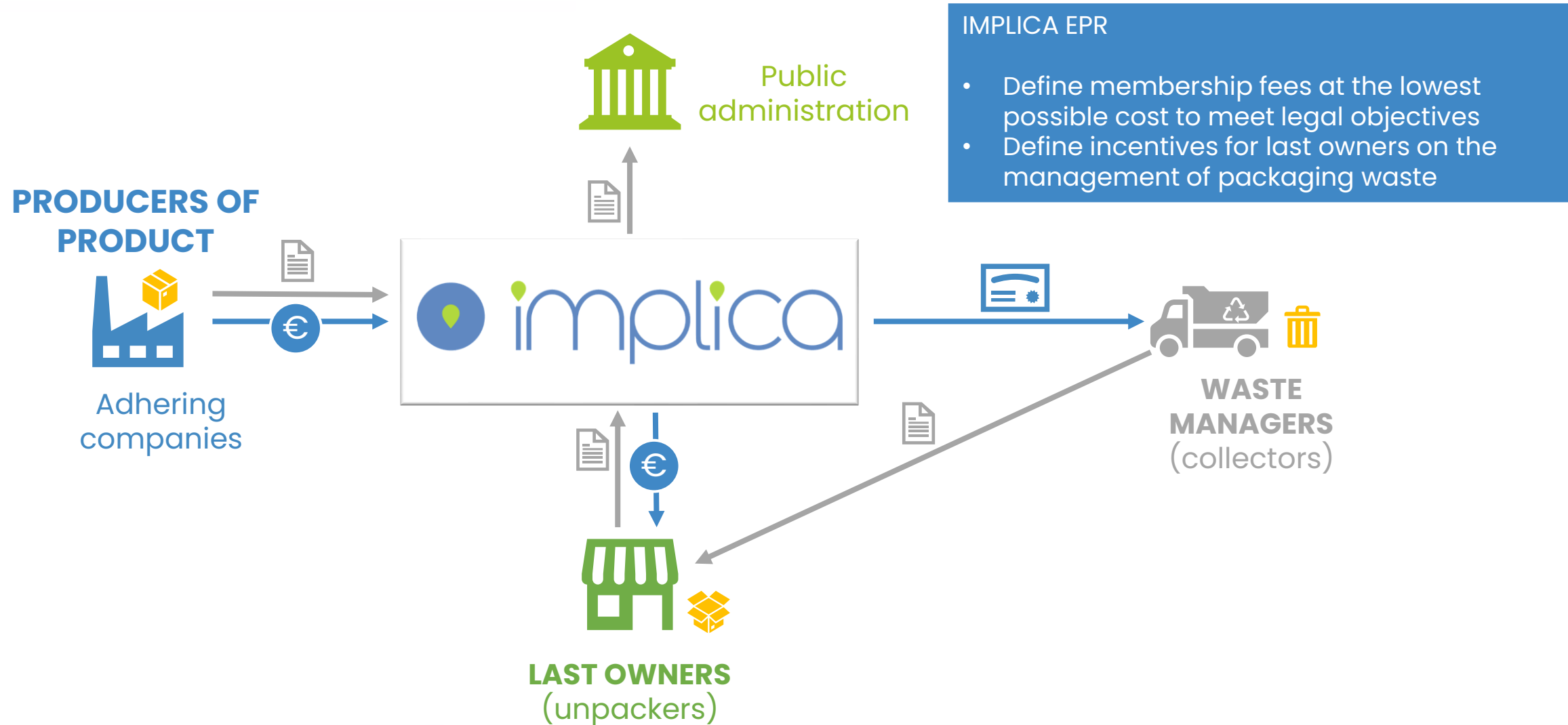
HOMOLOGATION



(guarantee right management)



Implica as an EPR system in Spain



Who are with Implica?

LEGAL TEAM



Creation of the association
and development of
contracts, agreements and
procedures

TECHNICAL TEAM



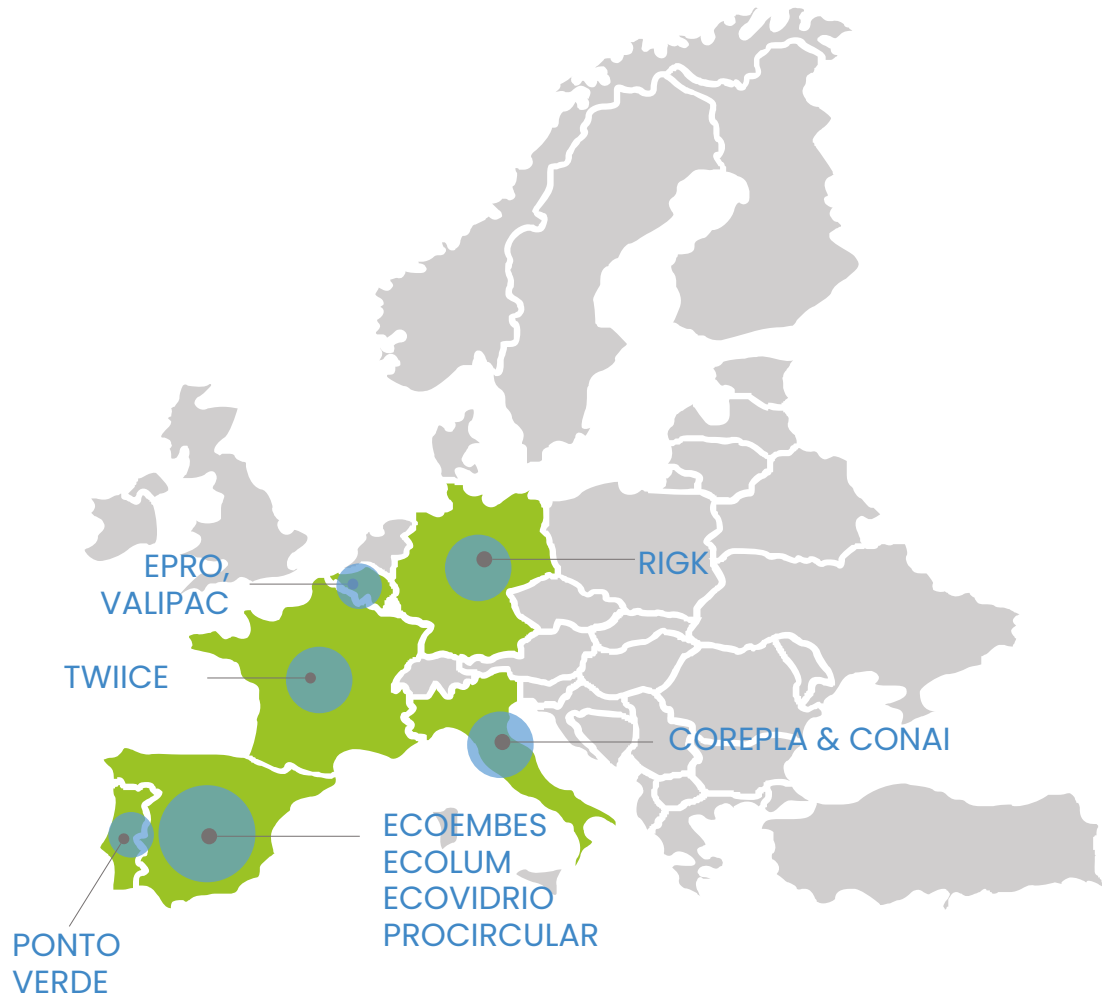
Questionnaires, typologies
and operational study

IT TEAM



Development of
the digital platform

Agreements and collaborations



EPRO Members in europe

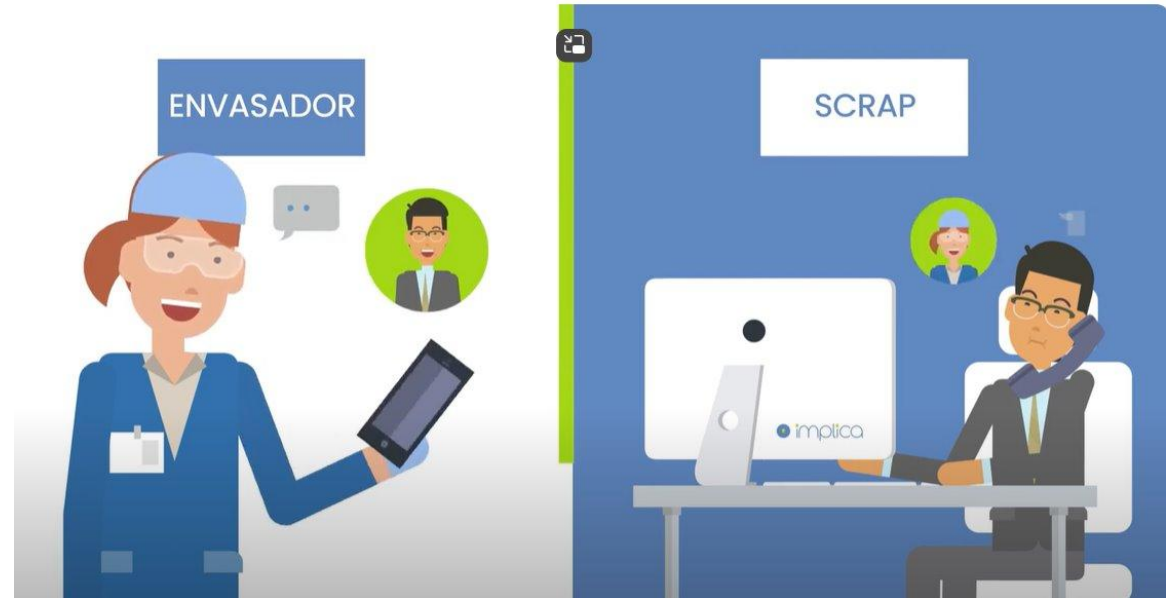


Our fees and contact email

If you would like to have an appointment with us or you want to ask us about any doubts, please email us at info@somosimplica.com

You can find our fees for EPR packaging responsibility here: [Fees 2026](#)

LinkedIn:
<https://www.linkedin.com/company/somosimplica/>





<http://somosimplica.com>

info@somosimplica.com

<https://www.linkedin.com/company/somosimplica/>

<https://www.instagram.com/somosimplica/>



Turning Compliance into Action

Smart & Digital

Bridging the gap between Waste Regulations and Recycling Solutions

PackIntelX simplifies complex packaging regulations and supports companies with digital and operational solutions on their path to full compliance.

- **Digital solutions:** Manage your packaging compliance centrally via a digital platform—efficiently, quickly, and cost-effectively, in line with all EU requirements.
- **Operational solutions:** Benefit from our network of recyclers, sorting facilities, and PROs—for full PPWR compliance in recyclability, recycled content, EPR, and reusability.



PPWR – A regulation or a bureaucratic storm?

Challenges for Packaging companies under PPWR

- Ambiguity in legal roles (manufacturer, importer, distributor), especially in complex supply chains
- High effort required for detailed packaging data collection and validation (materials, weights, recyclability, country-specific reporting)
- Need for coordination across the entire value chain (suppliers, converters, recyclers, PROs)
- Mismatch between design-for-recycling requirements and actual recycling infrastructure. Uncertainty in future EPR fee structures and eco-modulation criteria
- Increased operational and compliance costs

Positive Aspects of PPWR

- Harmonized regulatory framework reduces fragmentation across EU markets
- Mandatory compliance for all players ensures a level playing field
- Standardized processes that can be reused for other regulations (e.g. CSRD, ESG reporting)
- Improves supplier accountability and data reliability
- Builds long-term competitive advantage for early adopters

Three critical aspects of PPWR with high financial impact

Aspects with high data complexity and financial impact



Eco-modulated EPR fees

Financial impact based on the recyclability of packaging

EU DoC & Technical Documentation

Introduced for the first time -> High data complexity -> Required from 12. August 2026

Recyclability & Eco-modulated EPR fees

Recyclability – a long-standing concept

Regulatory focus – briefly explained

- EU: The Packaging and Packaging Waste Directive (94/62/EC) introduced binding requirements for recyclable and recoverable packaging for the first time.

Why are we still talking about recyclability today?

- The quality of input waste streams is decreasing, not increasing
- Lightweight packaging design has increased the use of multi-layer flexible materials that are difficult to recycle.
- Complex packaging designs make mechanical sorting difficult.



Sorting plant for lightweight packaging
Quelle: PREVENT Waste Alliance, 2020, EPR-Toolbox

Recyclable packaging (Article 6)



Criteria for design for recycling

The criteria for recyclable design specify how packaging must be designed so that, after use, it can be recycled into secondary raw materials of sufficiently high quality to replace primary raw materials in new packaging. The criteria for recyclable design are based on the following principles:



Recycled at Scale / Recycling on a large scale

Packaging is considered to be "recycled on a large scale" if its waste is regularly collected, sorted and recycled via existing, proven industrial infrastructure. This ensures that — throughout the EU — a significant annual amount of this type of packaging is successfully recycled. The packaging waste that is not recycled is sent to landfills or incinerated.

Eco-modulated EPR fees (EPR)

The recyclability grades serve as a framework for differentiating EPR fees (applicable 18 months after the expiry of the delegated acts/implementing acts).

- If the recyclability of packaging is not high, the **financial contribution for extended producer responsibility** would be high.
- **Resistance from PROs:** In order to meet the increased recycling targets, PROs would be very cautious about approving "difficult to recycle" materials.



Based on the Bonus or Malus System -> Already in place in various EU member states -> Other member states in planning!

EU Declaration of Conformity

What is the EU Declaration of Conformity?



The **EU Declaration of Conformity (DoC)** is a formal legal declaration issued by the manufacturer that confirms packaging complies with EU law. It is mandatory under **PPWR – Regulation (EU) 2025/40** and covers compliance with **Articles 5–12**.

This declaration **applies to every packaging** type, material, and use case placed on the EU market—making it a universal requirement for all economic operators operating within the European Union.

Inspiration from CE



*The EU DoC is similar to the concept of the **CE mark**, which indicates the manufacturer's declaration that a product complies with all applicable EU legislation.*

Formal Legal Declaration

Issued by economic operator

EU Law Compliance

Mandatory under PPWR

Articles 5–12 Coverage

Comprehensive scope

Why is the EU DoC Important?



Legal Permission

Grants authorisation to place packaging on the EU market



Authority Verification

Must be shown to market surveillance authorities upon request



Pan-EU Validity

Valid across all 27 EU Member States



Regulation Status

Mandatory because PPWR is a Regulation, not a Directive



Without a DoC: Packaging cannot be sold legally. Companies risk fines, product recalls, and market bans.

Economic Operators as Responsibility Holders

Economic Operator	Draw Up DoC?	Hold / Retain DoC & Technical File?	Verify Compliance / Perform Checks?	Provide / Present DoC to Authorities?
Manufacturer	Yes (primary responsibility under Art. 15 & Art. 39)	Yes – 5 years (single-use), 10 years (reusable)	Yes – full conformity assessment (Art. 38)	Yes – must supply complete DoC + technical documentation
Authorised Representative (AR)	No (cannot perform conformity assessment)	Yes – must hold DoC + technical documentation as mandated	Limited to mandate; supports compliance under instruction of manufacturer	Yes – must provide DoC/documentation to authorities on request
Importer	Only if deemed manufacturer under Art. 21 (own-name/brand or modifying packaging)	Yes – must be able to obtain and retain DoC for products they place on the market	Yes – must verify manufacturer performed CA & that DoC exists before placing packaging on	Yes – must present DoC when required by authorities
Distributor	No (unless deemed manufacturer under Art. 21)	Access required – not obliged to retain full file but must rely on DoC/QR access	Yes – check labelling, identification, EPR registration, visible compliance	Cooperate – provide information and support authorities
Supplier of Packaging / Materials	No	No (unless also manufacturer)	Yes – must provide accurate material composition & performance data	Cooperate with authorities and supply documentation to customers
Fulfilment Service Provider	No (unless no EU economic operator exists → Art. 20 + 2019/1020)	As required when acting as responsible EO under market surveillance rules	Conditional – ensure a responsible EO exists; otherwise obligations shift to them	Cooperate and, where treated as manufacturer, must present the DoC

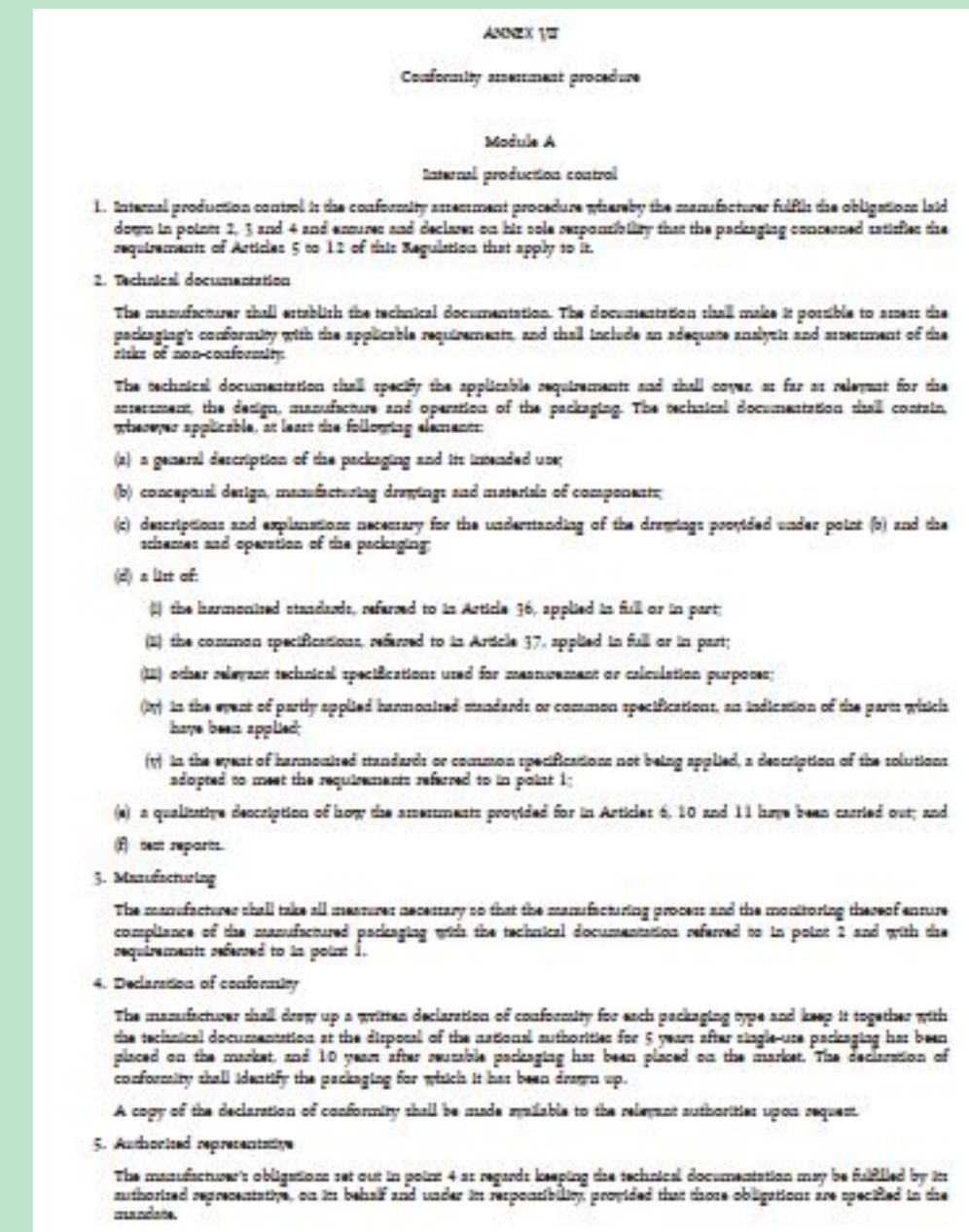


Each economic operator must ensure that the EU DoC and the complete technical documentation are either prepared or verified and available for all packaging placed on the EU market by 12 August 2026.

ANNEX VII - Conformity Assessment Procedure (Module A)

Requirements: Articles 5 to 12, Articles 24 & 26

- Article 5 - **Requirements for substances in packaging**
- Article 6 - **Recyclable packaging**
- Article 7 - **Minimum recycled content in plastic packaging**
- Article 8 - **Bio-based raw materials in plastic packaging**
- Article 9 - **Compostable packaging**
- Article 10 - **Minimization of packaging**
- Articles 11 & 26 - **Reusable packaging**
- Article 12 - **Labeling of packaging**
- Article 39 - **EU Declaration of Conformity**



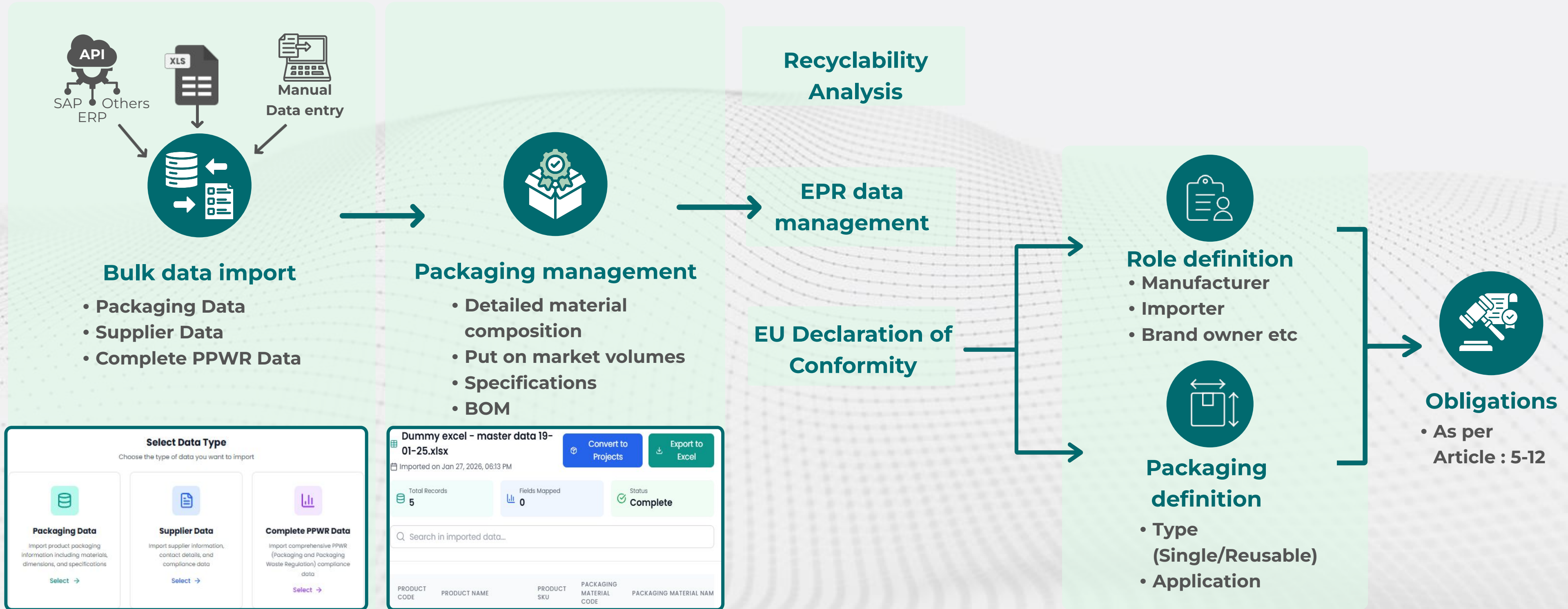
In short there's a lot to do before August 12, 2026...

In short there's a lot to do before August 12, 2026...

How to do it?

Smart & Digital

Integrated Digital Data Management Platform



EU DoC Creation Process - Digital



Supplier onboarding

Supplier Data
Import supplier information, contact details, and compliance data
[Select](#)



Packaging assignment to suppliers

Packaging Sourcing Platform - Assign Materials to Suppliers

Packaging Materials Library

- Tube
- Carton
- Label
- Corrugated Box

Approved Suppliers List

- Supplier 1
- Supplier 2
- Supplier 3

Drop to Assign

Save Assignment



Access to standard templates

Component Name	Material Type (e.g., PET, PP, Paper)	Weight (g)	% of Total Weight	Recycled Content % (Post-Consumer)
1. Main Body				
2. Closure/Cap				
3. Label/Sleeve				
4. Adhesive/Ink				
TOTAL		0.00 g	100%	Avg: 0%



Upload of Technical documents

ANNEX VII – Conformity Assessment Procedure (Module A)

Internal Production Control – Template

Section No.	Requirement Area	Description (Regulatory Requirement)	Manufacturer Input / Evidence	Remarks / Status
1	Internal Production Control	Manufacturer ensures and declares, under sole responsibility, that the packaging complies with Articles 5–12 of PPWR.	<input type="checkbox"/> Compliance statement <input type="checkbox"/> Internal checklist	
2	Technical Documentation – Overview	Technical documentation established to assess conformity and risks of non-compliance	<input type="checkbox"/> Technical file reference	
2(a)	Packaging Description	General description of packaging and its intended use	<input type="checkbox"/> Packaging name <input type="checkbox"/> Use case	
2(b)	Design & Materials	Conceptual design, manufacturing drawings, and materials of components	<input type="checkbox"/> Drawings <input type="checkbox"/> BOM <input type="checkbox"/> Material specs	
2(c)	Design Explanation	Descriptions necessary to understand drawings, schemes, and operation	<input type="checkbox"/> Design rationale document	
2(d)	Harmonized Standards	List of harmonized standards applied (fully or partly) – Article 36	<input type="checkbox"/> EN/ISO references	
2(d)(i)	Common Specifications	List of common specifications applied (fully or partly) – Article 37	<input type="checkbox"/> Specification references	
2(d)(ii)	Other Technical Specs	Other relevant technical specifications used	<input type="checkbox"/> Internal / external specs	
2(d)(iii)	Partial Application	Identification of parts applied when standards/specs are partial	<input type="checkbox"/> Section references	
2(d)(v)	Alternative Solutions	Description of solutions used when standards/specs are not applicable	<input type="checkbox"/> Justification document	

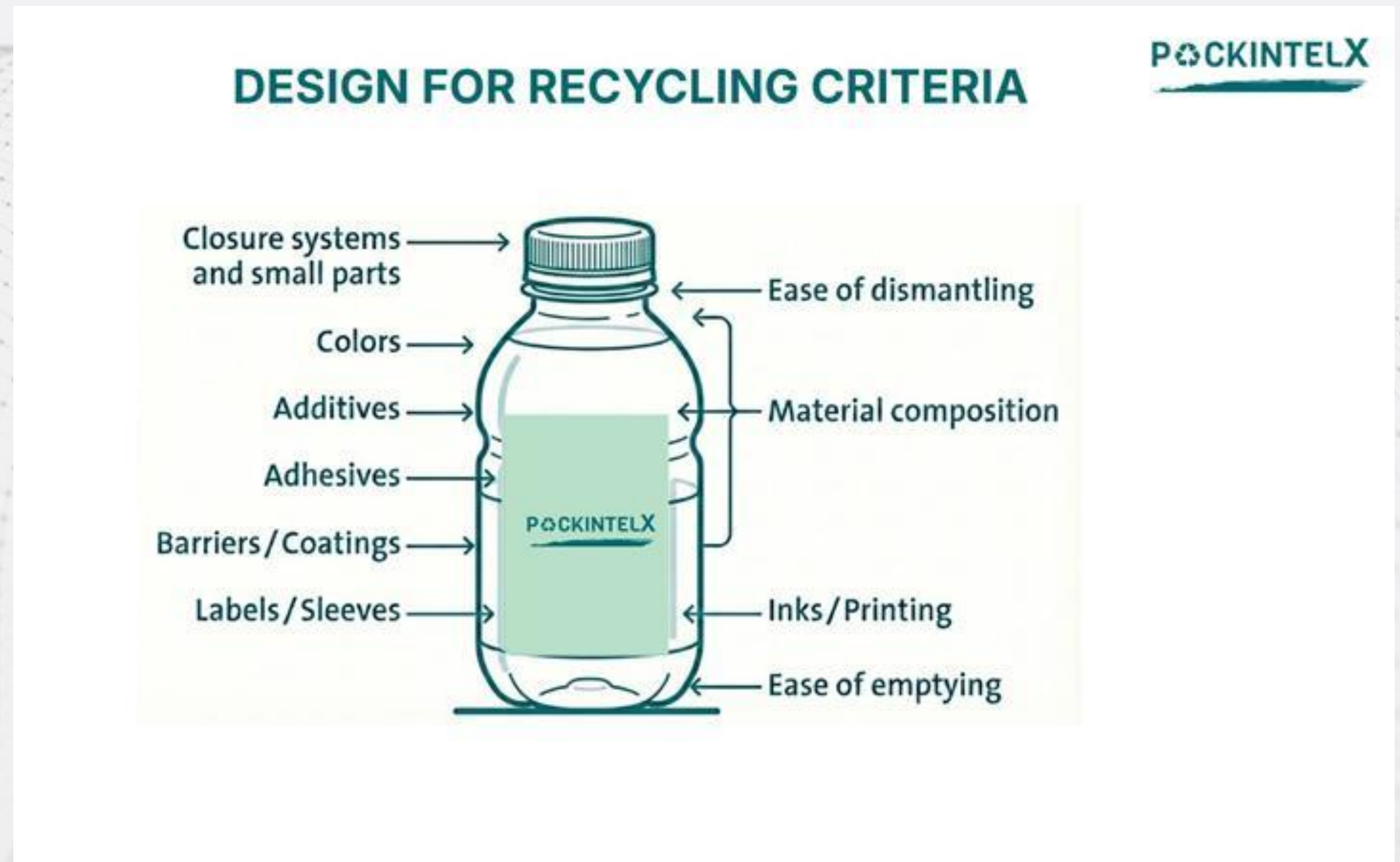


Creation of EU DoC

ANNEX VIII – EU Declaration of Conformity

Required Information	Details to be Filled by Manufacturer
EU Declaration of Conformity No.	
Unique Identification of Packaging	
Manufacturer Name & Address	
Authorized Representative (if applicable)	
Responsibility Statement	"This declaration of conformity is issued under the sole responsibility of the manufacturer."
Object of the Declaration	Description of the packaging allowing traceability
Applicable Union Legislation	Regulation (EU) 2023/40 (PPWR) and other applicable Union acts
Harmonized Standards / Specifications	List of EN / ISO standards, common specifications, or other technical specifications
Notified Body (if applicable)	Name, address, number, scope, certificate reference, validity
Additional Information	
Place and Date of Issue	
Name & Function of Signatory	
Signature	

- Sample Packaging
- **Plastic Beverage Bottle**
 - **Main component** - Body
 - **Minor components** – cap & label
- **Material:** PET
- **Application:** Food-contact
- **Type:** Single use



Next steps:

Combine Expertise & Digitalisation

1.

Identify **your role and your obligations** with a comprehensive **“Roadmap”**

2.

Analysis of your **packaging portfolio and guidance** for your **suppliers** on the preparation of **technical documentation**

3.

Digitalized data management and **EU declaration of conformity** by the **12. August 2026**

PACKINTELX

Holzstraße 14, 55116

Mainz, Deutschland

+49 17626741383

contact@packintelx.com

Our Digital Services

- All in one platform—**PPWR, EPR & data management** clearly combined
- Preparation for PPWR obligations from 12. August 2026
- Time and resource savings through automated analyses
- Direct access to expert knowledge

EPR NAVIGATOR



PPWR COMPLIANCE



EU CONFORMITY DECLARATION



PACKAGING DATA MANAGEMENT



RECYCLABILITY ANALYSIS



CIRCULAR ECONOMY CONSULTING



Thank You

PACKINTELX

Holzstraße 14, 55116

Mainz, Deutschland

+49 17626741383

contact@packintelx.com