

New regulations for **packaging (PPWR)** in the context of the circular economy



The EU Packaging and Packaging Waste Regulation (PPWR) aims to reduce the environmental impact of packaging materials. As a central instrument of the Green Deal, it is part of the EU's comprehensive approach to promote the circular economy and sustainability. The regulation was adopted on December 16, 2024 and came into force on February 11, 2025. The first provisions will apply from August 12, 2026; further measures and requirements will follow through additional delegated and implementing acts.

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 recycled content in plastic packaging. From 2023 onwards, only recyclable packaging that meets the „Design for Recycling“ criteria (D4R) will have to be used. The coatings and printing inks industry is directly affected by the regulation in two ways: On the one hand, their own packaging is subject to the requirements, and on the other hand, the requirements also apply to printed end-consumer packaging.

„Design for Recycling“ criteria

From 2030, criteria for recycling-friendly design will apply. These criteria are likely to impose direct requirements with regard to printing as well. This includes, for example, the restriction of raw materials and specifications for „substances of concern“. The definition of the latter is broad and some of the details are only to be laid down through delegated acts. VdL advocates for a practical and legally sound framework. Furthermore, the D4R criteria should be based on robust scientific evidence and developed in close collaboration with industry stakeholders. The work of the CEN standardization committee for packaging provides a good framework for this.

Impact on the packaging for coatings

As of 2030, the regulation stipulates that transport packaging including pallets, plastic crates, pails and drums must be 40% reusable for the transportation or packaging of products. This quota is set to increase to 70% in 2040. However, the paints and coatings industry needs a clear definition of which transport packaging falls within the definition and which coating containers are affected. VdL supports the proposed exemptions for hazardous goods packaging and for plastic wrapping and strapping, which are to be regulated by a delegated act. However, further exemptions are necessary as the packaging listed in Article 29 cannot be reused, making these obligations unfeasible from both an environmental and economic perspective. Moreover, the quotas for the use of recyclate in plastic packaging (35% starting 2030) also create substantial challenges for the entire supply chain, as such containers for coatings are hardly available at present.

Rethinking the Circular Economy in a Holistic Way

The circular economy for packaging must be approached holistically. Reuse rates, the use of recycled materials, and the avoidance of substances of concern should be viewed not as goals in themselves, but as integral components of a broader, coherent sustainability. In addition to the D4R criteria, it is essential to optimize recycling processes and take into account the functional performance of packaging throughout its lifecycle.

Making „Design for Recycling“ criteria practical

D4R criteria are crucial for advancing the circular economy. However, recycling processes themselves must also continue to improve. Specific D4R requirements need to be designed in a way that is practical, grounded in real-world conditions, and open to technological innovation.

Dialogue and collaboration with all stakeholders

Only through constructive dialogue and close collaboration with all actors along the product life cycle can we develop realistic and applicable solutions. Existing standardization initiatives already underway should be taken into account.

Reuse and recycled content – Not ends in themselves

In cases where reuse or the incorporation of recycled content is technically unfeasible or would require disproportionate resource input, exceptions must be made.



**What we
advocate for**

Packaging cycles using the example of paint buckets

Packaging for decorative paints is already predominantly disposed of via the Dual System, local recycling centers, and on-site construction waste collection points, with only a minor share ending up in residual waste bins. Achieving the recycled content targets set out in the PPWR will require new approaches that must be jointly implemented across the entire value chain. In this context, closed-loop systems could offer a viable solution.



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