New Regulations for Packaging (PPWR) within the Framework of the Circular Economy

The EU Packaging and Packaging Waste Regulation (PPWR) aims to reduce the environmental impact of packaging materials. As a key instrument of the Green Deal, it is part of the EU's comprehensive approach to promoting the circular economy and sustainability. The first mandatory regulations will take effect on August 12, 2026; further measures and requirements will follow through additional delegated acts and implementing acts.

Only recyclable packaging

European waste policy is committed to the successful implementation of the circular economy principle, which includes waste reduction, reuse, and the use of high-quality recycled materials. A key objective is the creation of an efficient EU market for secondary raw materials. Among other things, the regulation includes obligations regarding reusable packaging as well as mandatory recycling rates for plastic packaging. Starting in 2030, only recyclable packaging that meets the "Design for Recycling" (D4R) criteria will be permitted to be placed on the EU market. The coatings and printing inks industry is directly affected by the regulations in two ways: First, its own packaging is subject to the requirements; second, the requirements also apply to printed endconsumer packaging.

Responsibility shifts to fillers

A special responsibility under the PPWR falls on the so-called manufacturer. According to the European Commission's current interpretation, the company is generally considered the manufacturer if it is the first to place packaging on the market or fill it under its own name or brand, thereby assuming legal responsibility for its compliance. Consequently, many fillers of paints, coatings, and printing inks assume this role. These companies face significant pressure to adapt: Existing packaging concepts must be reviewed and, if necessary, revised to comply with the regulatory requirements of the PPWR. At the same time, manufacturers are required to demonstrate the recyclability of their packaging and to document it comprehensively, for example as part of the technical documentation and the Declaration of Conformity (DoC). This leads to a significant increase in administrative burden as well as a need for additional coordination throughout the entire supply chain.

Furthermore, in practice, manufacturers rely on reliable information from their upstream suppliers. Without reliable data on material composition and recyclability, a legally sound assessment is virtually impossible, especially since manufacturer generally have neither influence nor control over manufacturing processes and the materials used. From the VdL's perspective, responsibility is disproportionately shifted onto the filler. Particularly in the case of standardized packaging procured from suppliers in its original form, fillers should be relieved of comprehensive manufacturer obligations.

The VdL therefore calls for the obligations under the PPWR to be consistently aligned with the actual scope of influence over the manufacture and materials of packaging. A tiered system of responsibilities is necessary: While packaging producers should remain responsible for material-related requirements, fillers should be held accountable only for aspects they can influence, such as the contents. Such a differentiation would improve the feasibility of the requirements and contribute to a more balanced distribution of obligations along the value chain. Accordingly, a corresponding adjustment of legal responsibilities should be made as part of the next revision of the PPWR.

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 standardisation initiatives already underway should be taken into account.

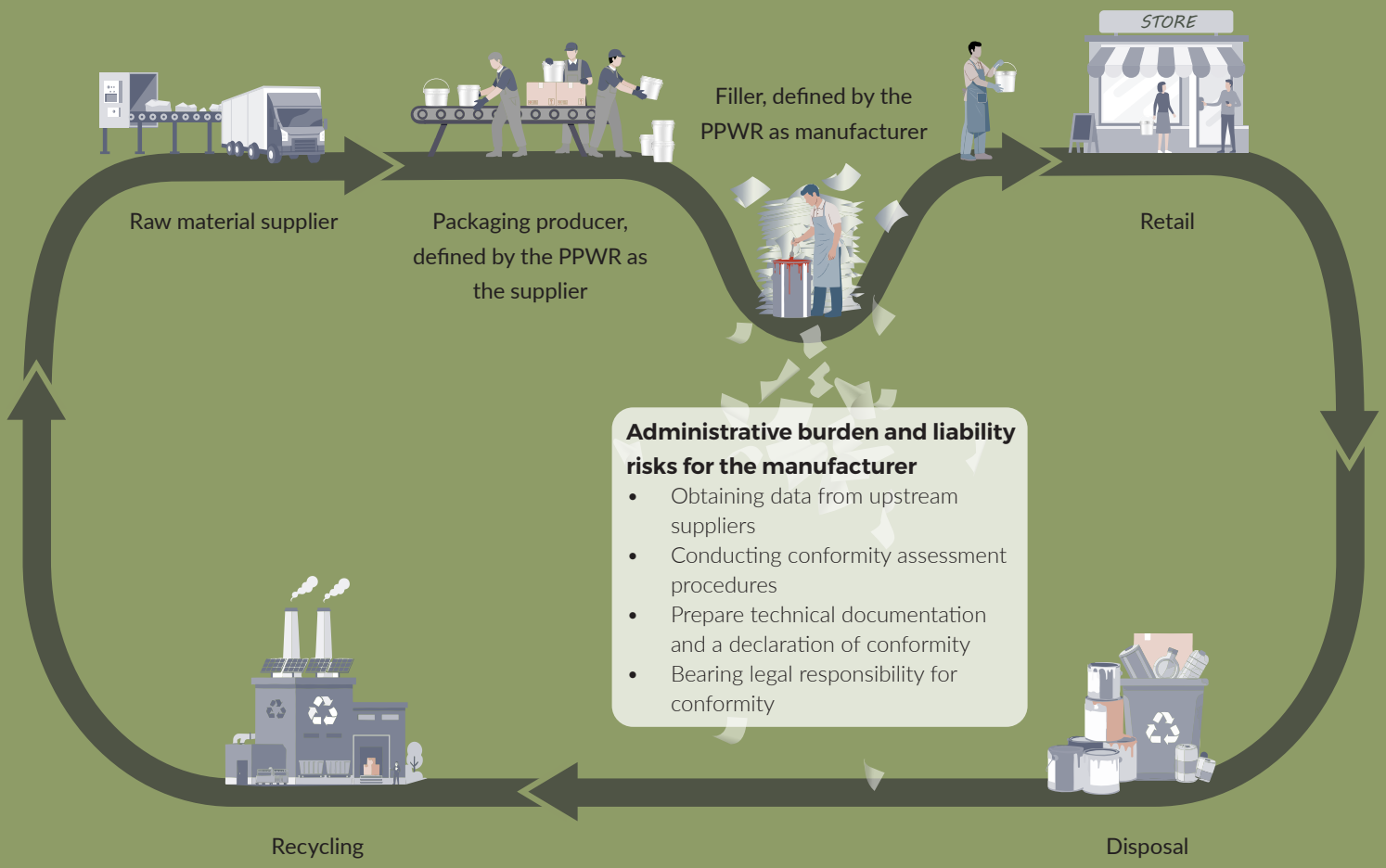
Reuse and recycled content – Not ends in themselves

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

Image generated by AI

PPWR requirements along the value chain and the key role of the manufacturer in the circular system

True circularity can only be achieved through the cooperation of all stakeholders and a functioning infrastructure. Imposing burdens unilaterally on individual stakeholders—particularly those who fill packaging— is counterproductive and disproportionate.



Viktoria Pöhlmann
+49 (0)69 2556 1702
pöhlmann@vci.de

Verband der deutschen Lack- und Druckfarbenindustrie e.V.
Mainzer Landstraße 55, 60329 Frankfurt am Main
www.WirSindFarbe.de

Verband der deutschen Lack- und Druckfarbenindustrie e.V.