

Repak Webinar

Monday 30 June 2025

Agenda

- Welcome
- PPWR – Colm Munnelly
- NNC / EFM – Tom Gaynor
- 2026 Fees & PPWR Support Fund – Mark Hayden
- Q & A

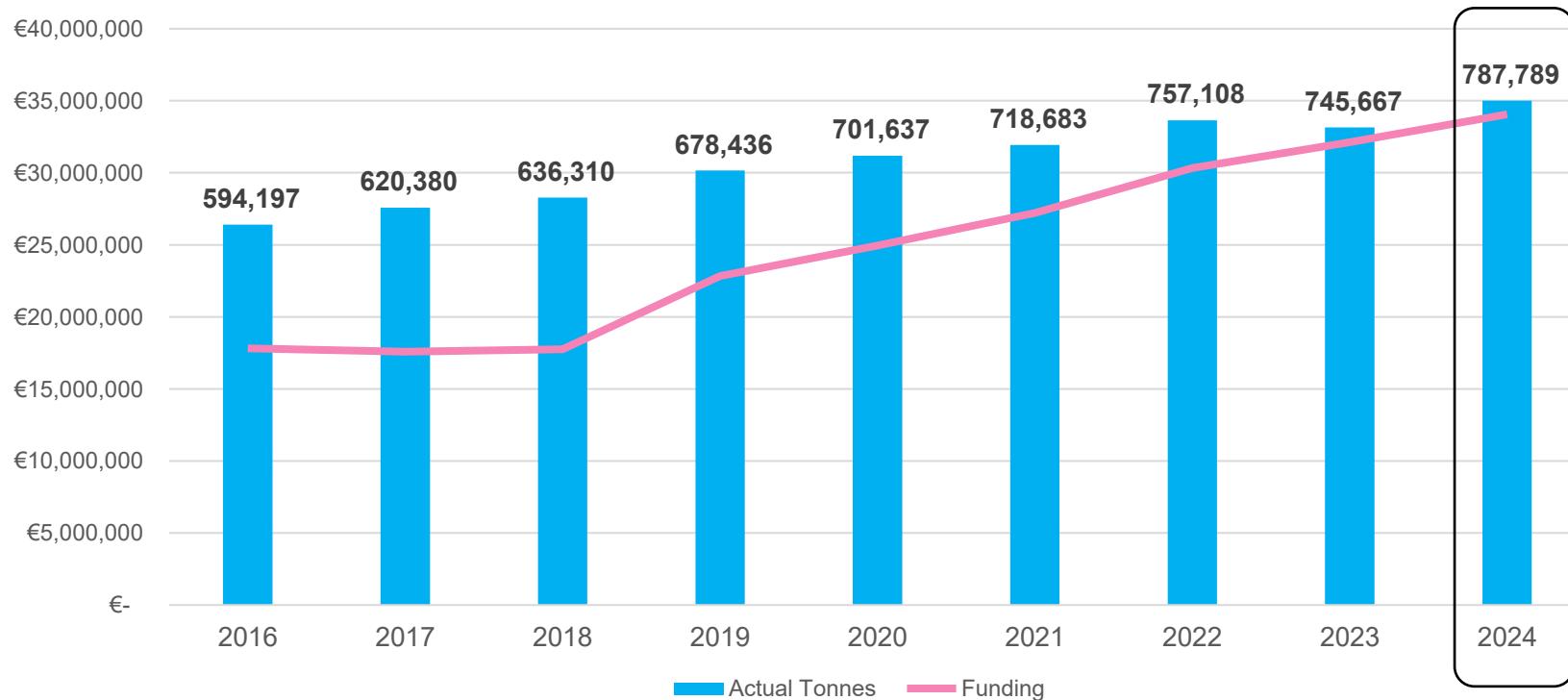


PPWR – The EU Packaging and Packaging Waste Regulation

Repak Member Webinar
30 June 2025

**Colm Munnelly, Regulatory Affairs,
Repak**

**2016 – 2024: Recycled Tonnes increased by 194k (33%) via €650m funding
Achieving a 61% Recycling Rate in 2024**



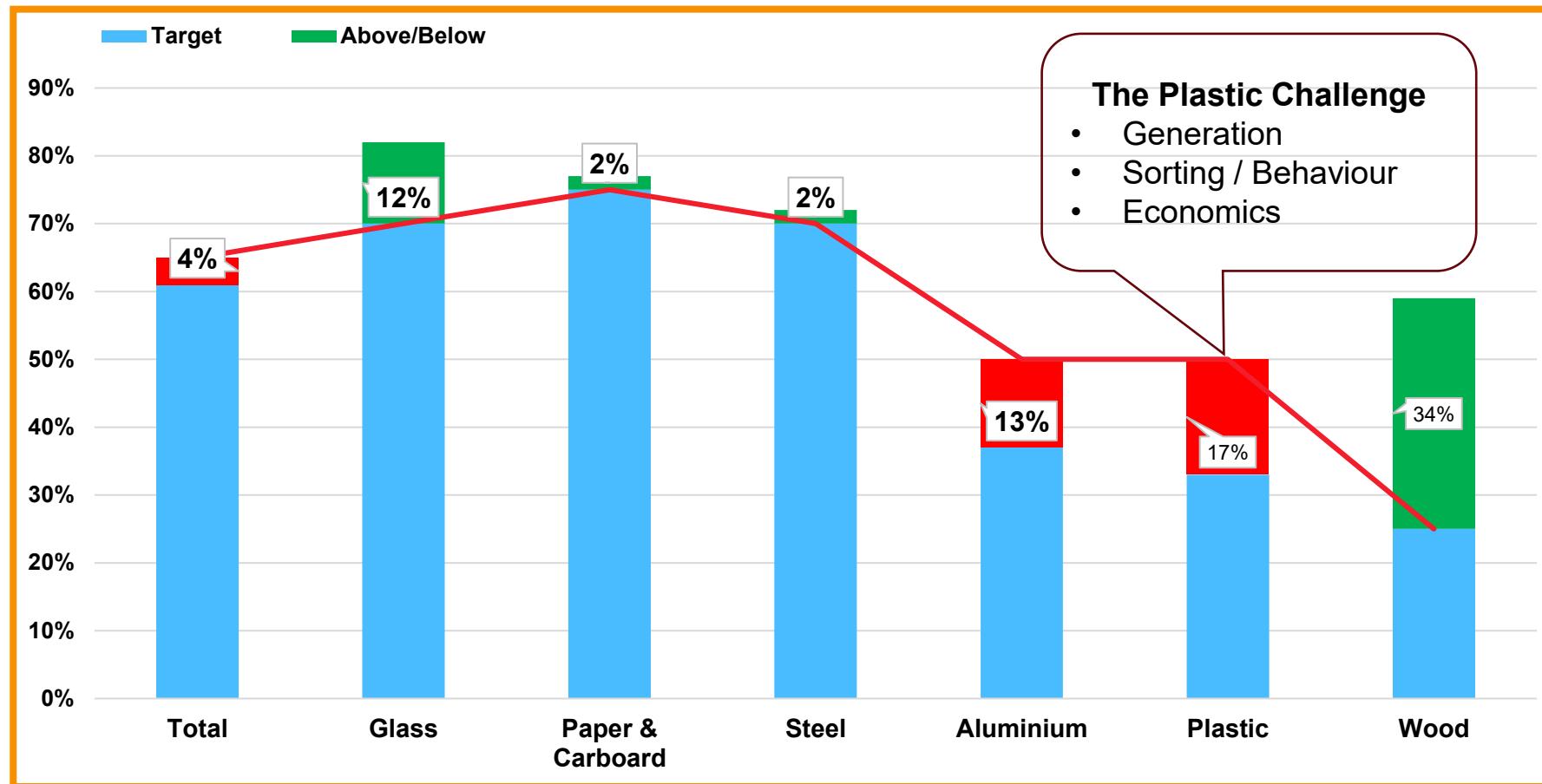
Since its foundation in 1997, Repak members have contributed over €650 million to supporting Ireland's climate challenge in the development of collection and recycling infrastructure, delivering strong recycling targets.

61% is Recycled

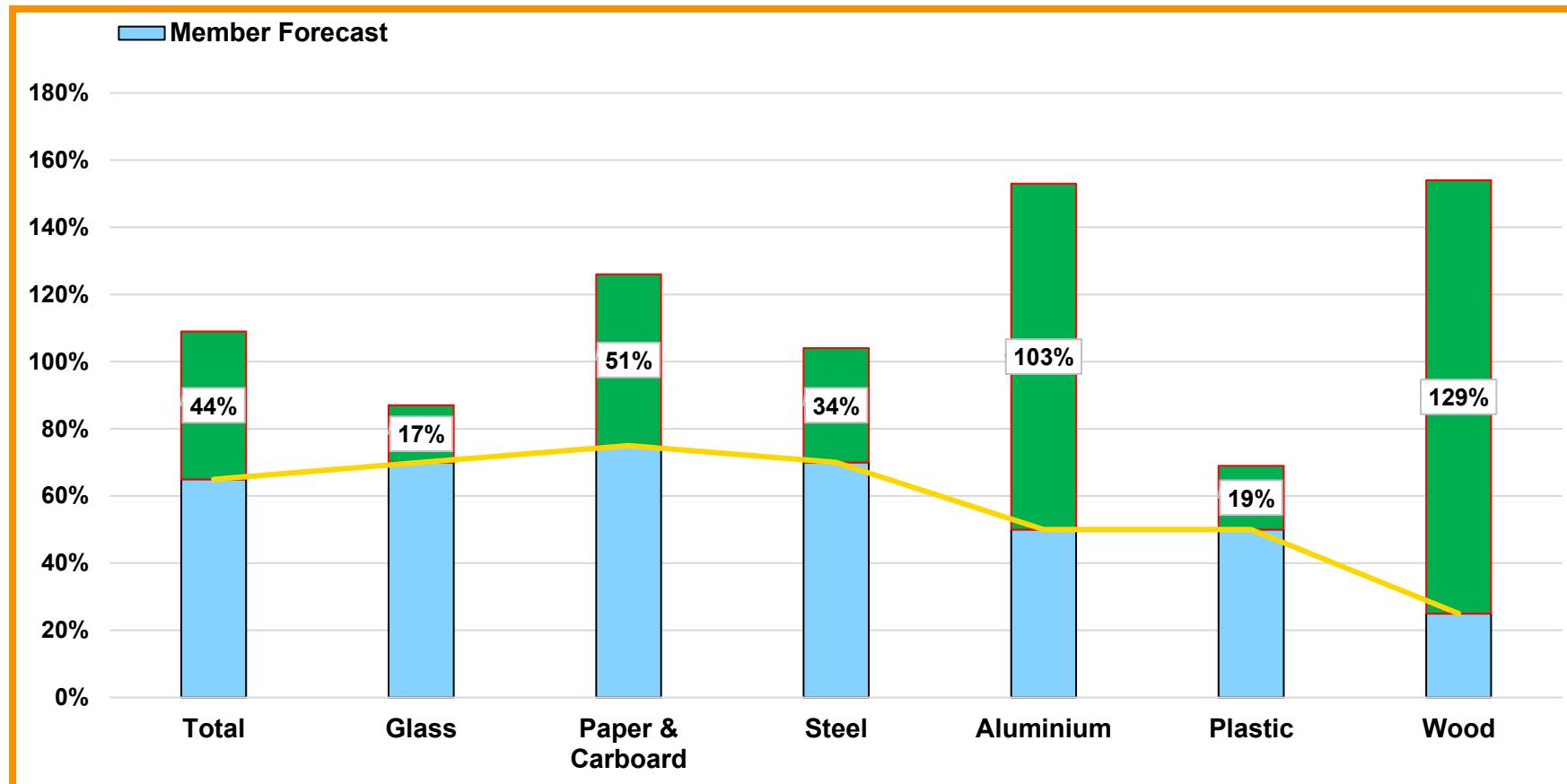
30% Recovered (WtE)

9% sent to Landfill.

2025 Targets V 2024 Recycling Performance – National



2025 Targets V 2024 Recycling – Repak Members



Future Consideration:

With PPWR Europe is mandated to change how packaging is designed, used and managed.

Emphasis on Extended Producer Responsibility, **shifting more responsibility on producers**



THE PROPOSAL CONTAINS (AMONG OTHER THINGS):

- Information on Declarations of Conformity
- Information on Producer Registers
- Information on Labelling of Packaging and Waste Receptacles
- Restrictions on certain substances in packaging and certain packaging formats
- Packaging waste prevention targets and minimisation of packaging
- Re-use and Refill targets
- Information on the Recyclability of Packaging and Recyclability Performance Grades
- Minimum recycled content in plastic packaging
- Compostable packaging
- Authorised Representative for packaging
- Reporting of packaging data (by material type)

PPWR, OBLIGATIONS & TIMELINES

Obligated companies must prepare for new requirements before 2030

Administrative

- Obligation to register and be compliant
- Appointment of authorized representative
- Data reporting obligation/system participation obligation
- Bans on placing on the market

Technical

Recyclability

Minimum recycled content

Labeling

Design



The respective EU decrees will be issued after the PPWR comes into force (Delegated Acts):

12 Months/2025

18 Months/2026

24 Months/2026

until 31.12.2026

36 Months/2027

until 1.1.2028

42 Months/2028

48 Months/2028

Summary of Main Provisions

- Definitions
- Producer Register
- Packaging waste prevention targets and minimisation of packaging
- Re-use and Refill targets
- Recyclability of Packaging and Recyclability Performance Grades
- Minimum recycled content in plastic packaging
- Compostable packaging
- Authorised Representative for packaging
- Reporting of packaging data (by material type)

Also of Interest

- Inclusion of Commercial and Industrial Packaging
- Requirement for DRS
- Chemical Recycling

Definitions

- ‘Economic operators’ are obligated under the regulations and are defined as manufacturers, suppliers of packaging, importers, distributors, authorised representatives, final distributors, and fulfilment service providers
- Definition of ‘Producer’ has also been widened
- ‘Material Recycling’ & ‘High-Quality Recycling’ also defined.

Producer Register

- Producers shall be obliged to register in a national register
- For each member state
- PRO can fulfil obligations
- Authorised Representative for Packaging is now required
- **Introduces a deminimis for ‘micro-enterprises’, but even deminimis producers will have (lower) reporting obligations.**

PPWR 2025 – 2030 High Level Overview

Prevention Targets

Packaging waste generated per capita should be reduced compared to 2018 baseline by at least:

-5% by 2030

Prevention targets:
-10% by 2035
-15% by 2040

Re-use and Refill Targets

New % targets to be made available in reusable packaging within a system for re-use or by enabling refill.

By 2030 percentages range from 10-100% across categories

Transport, group and alcoholic and non-alcoholic packaging are affected

Recyclable Packaging

By 2030 packaging that does not meet 70% recyclability threshold cannot be placed on EU market

In 2038 the recyclability threshold will be moved to 80%

Minimum Recycled Content in Plastic Packaging

Any plastic part of packaging placed on the market must contain minimum %s of recycled content recovered from post-consumer plastic waste by:

1 January 2030

Categorised per packaging type and format calculated as an average per manufacturing plant and year

Compostable Packaging

36 months after the regulation takes effect, specific packaging shall be compatible for composting in industrial bio-waste treatment facilities

Packaging, including biodegradable plastic polymers types to allow material recycling in line with Article 6 without affecting the recyclability of other waste streams

Packaging Waste Prevention

Packaging waste generated per capita should be reduced compared to a baseline of 2018 by at least:

- -5% by 2030
- -10% by 2035
- -15% by 2040

After 7 years from the date of application of this regulation, the commission can review these targets.

Prevention Targets

Packaging waste generated per capita should be reduced compared to 2018 baseline by at least:

-5% by 2030

Prevention targets:

-10% by 2035
-15% by 2040

Re-use and Refill Targets

Category	% Made available in reusable packaging within a system for re-use or by enabling refill	
	Enforced by 1 Jan 2030	Enforced by 1 Jan 2040
Transport packaging (pallets, foldable-plastic boxes, boxes, trays, plastic crates, intermediate bulk containers, pails, drums and canisters, or pallet wrappings or straps for stabilisation)*	40%	70%
Transport packaging (as above) between different sites within the EU of the same economic operator or partner of the economic operator*	100%	100%
Transport packaging (as above) between different economic operators within the same Member State*	100%	100%
Grouped packaging: boxes (excluding cardboard) used outside of sales packaging to group a certain number of goods to create a SKU	10%	25%
Alcoholic and Non-Alcoholic beverages in sales packaging**	10%	40%

* Exemptions for dangerous goods, large scale machinery, food contact packaging, and cardboard boxes.

** Exemptions for highly perishable beverages, categories of wine and wine like products

Re-use and Refill Targets

New % targets to be made available in reusable packaging within a system for re-use or by enabling refill.

By 2030 percentages range from 10-100% across categories

Transport, group and alcoholic and non-alcoholic packaging are affected

Recyclable Packaging

- The PPWR outlines that for packaging to be recyclable:
 - It needs to be **designed for material recycling**
 - It can be **separately collected**, and
 - It can be **recycled at scale**
- Packaging will be categorised into A B or C, dependent on its recyclability (see next slide)
- A definition of design for recycling criteria for the whole of Europe will be defined by 1st Jan 2028 by the European Commission
- By 2030, packaging should be designed for recycling
- By 2035, it should be recyclable at scale (Implementing act defining “recyclable at scale” by 1st January 2030).

Note:

From 2030 - If packaging does not meet the 70% recyclability threshold, it cannot be put on the EU market.

In 2038, the recyclability threshold will be moved to 80%.

Recyclable
Packaging

By 2030 packaging that does not meet 70% recyclability threshold cannot be placed on EU market

In 2038 the recyclability threshold will be moved to 80%

Recyclable Packaging Grading System

2030		2035		2038	
Recyclability Performance Grade	Design for recycling (DfR) Assessment of recyclability per unit, in terms of weighting	Recyclability Performance Grade (DfR)	Recyclability performance Grade (for Recycled at scale Assessment) (RaS)	Recyclability Performance Grade (DfR)	Recyclability performance Grade (for Recycled at scale Assessment) (RaS)
Grade A	Higher or equal to 	Grade A	Grade A (RaS)	Grade A	Grade A (RaS)
Grade B	Higher or equal to 	Grade B	Grade B (RaS)	Grade B	Grade B (RaS)
Grade C	Higher or equal to 	Grade C	Grade C (RaS) Cannot be placed on the market	Grade C (RaS)	
Technically NON-RECYCLABLE	Lower than 	Technically NON-RECYCLABLE	NOT RECYCLED AT SCALE Below thresholds of Article 3(1)(39)	Technically NON-RECYCLABLE	NOT RECYCLED AT SCALE Below thresholds of Article 3(1)(39)

- Lowest threshold 70% by 2030, 80% by 2038

Minimum Recycled Content in Plastic Packaging

- **By 1 January 2030** any plastic part of packaging placed on the market, shall contain minimum percentages of recycled content recovered from post-consumer plastic waste, per packaging type and format calculated as an **average per manufacturing plant and year**. ([Click to view 'EU Packaging and Packaging Waste Guide' for details](#))
- Compliance with the requirements shall be demonstrated by **economic operators** in the technical information concerning the packaging
- The financial contributions paid by producers to comply with their extended producer responsibility obligations **may** be modulated based on the percentage of recycled content used in the packaging.

Minimum Recycled Content in Plastic Packaging

Any plastic part of packaging placed on the market must contain minimum %s of recycled content recovered from post-consumer plastic waste by:

1 January 2030

Categorised per packaging type and format calculated as an average per manufacturing plant and year

Compostable Packaging

By 36 months after the regulation entered into force (11th February 2025), the following packaging shall be compatible for composting in industrial bio-waste treatment facilities:

- Permeable tea, coffee or other beverage bags or soft after-use system single-serve
- Units that contain tea, coffee or other beverage and are intended to be used and disposed of together with the product
- Sticky labels attached to fruit and vegetables

Compostable Packaging

36 months after the regulation takes effect, specific packaging shall be compatible for composting in industrial bio-waste treatment facilities

Packaging, including packaging made of biodegradable plastic polymers and other biodegradable materials, shall allow material recycling, in accordance with Article 6, and **without affecting the recyclability of other waste streams**.

Packaging, including biodegradable plastic polymers types to allow material recycling in line with Article 6 without affecting the recyclability of other waste streams

Extended Producer Responsibility (Authorised Representative)

- “A producer shall appoint, by written mandate, an authorised representative for the extended producer responsibility in each Member State other than the Member State where it is established where it makes packaging available for the first time.”
- This means that every company or online seller that ships packaged goods to a European country in which they do not have a branch must have a representative for extended producer responsibility in each of these countries.

Reporting:

- To the Commission
- Register of Producers

- **Member States** required to report by 13 material types to the EU commission (see Annex for these types)
- **EPR** Reporting requirements will be at least this, possibly up to the 22 types listed in Annex II, Table 1. (see next slide)
- There are also requirements to report composite breakdowns, and EFM requirements
- “By 12 months after entry into force, EC to adopt implementing acts establishing the format for registration in and reporting to the register, including the **granularity of reported data**, and covered packaging types and categories”

Reporting – Register of Producers

(Refers to Annex IX Part B, then refers to Annex II Table 1)

Table 1: Indicative list of packaging materials, types and categories referred to in Article 6 Cat. No (new)	Predominant packaging material	Packaging type
1	Glass	Glass and <u>composite</u> packaging, of which the majority is glass
2	Paper/ cardboard	Paper/cardboard packaging
3	Paper/ cardboard	<u>Composite</u> packaging of which the majority is paper/cardboard
4	Metal	Steel and <u>composite</u> packaging of which the majority is steel
5	Metal	Aluminium and <u>composite</u> packaging of which the majority is aluminium – rigid
6	Metal	Aluminium and <u>composite</u> packaging of which the majority is aluminium – semi rigid and flexible

Table 1:	Predominant packaging material	Packaging type
7	Plastic	PET – rigid
8	Plastic	PET – rigid
9	Plastic	PET – flexible
10	Plastic	PE – rigid
11	Plastic	PE – flexible
12	Plastic	PP – rigid
13	Plastic	PP – flexible
14	Plastic	HDPE and PP – rigid
15	Plastic	PS and XPS – rigid
16	Plastic	EPS – rigid
17	Plastic	Other rigid plastics (e.g. PVC, PC) including <u>multi-materials</u> – rigid
18	Plastic	Other flexible plastics including <u>multi-materials</u> – flexible
19	Plastic	Biodegradable plastics - rigid (e.g. PLA, PHB) and flexible (e.g. PLA)
20	Wood, cork	Wooden packaging, including cork
21	Textile	Natural and synthetic textile fibres
22	Ceramics or porcelain stoneware	Clay, stone

Reporting to the Commission

Material	Category	Packaging made available on the market for the first time on the territory of the Member State (t)	Packaging waste generation (t)	Total packaging waste disposed of (t)	Total packaging waste Recovered (t)	Total packaging waste recycled (t)	Total packaging waste disposed of (t)	Total packaging waste Recovered (t)	Total packaging waste recycled (t)
				Within the national territory			Outside the national territory		
Plastic	PET rigid								
	PE rigid, PP rigid, HDPE and PP rigid								
	Films/flexible								
	PS, XPS, EPS								
	Other rigid plastics								
	Biodegradable (rigid and flexible)								
Paper/ cardboard	Paper/cardboard (except liquid packaging board)								
	Liquid packaging board								
Metal	Aluminium								
	Steel								
Glass	Glass								
Wood	Wood, cork								
Others	Textile, ceramics/porcelain and others								

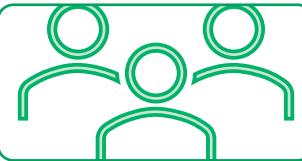
Implementation Timeline of PPWR ([access full guide here](#))

PPWR	2026	2027	2028	2029	2030	2032	2035	2038	2040
 Reduce Prevention (Article 43)					Member States must reduce packaging waste by 5%	Member State packaging waste reduction targets are to be reassessed	Member States must reduce packaging waste by 10%		Member States must reduce packaging waste by 15%
 Reduce Minimisation (Articles 10, 24)	Methodology for calculating minimised packaging requirements established				Minimum standards for packaging dimensions and empty space come into effect				
 Reuse (Article 29)	Guidelines for Reuse targets will be published	A methodology for the calculation of reuse targets will be published			Reuse targets for alcoholic and non-alcoholic beverages and other reusable packaging systems come into effect				Increased Reuse targets for both beverage containers and other transport and grouped packaging
 Recycle Performance (Article 6)		Criteria for D4R (Design for Recycling) Guidelines will be set			Recycling Grades (A,B,C) implemented and a methodology for RaS (Recycled at Scale) will be developed	RaS (Recycled at Scale) scores introduced for grades A, B and C	Recycling performance grade C is prohibited from the market		
 Recycle Recycled Content in Plastic Packaging (Article 7)	A methodology to certify the validity of recycled content labels will be established		Delegated Acts for the calculation and verification of recycled content are to be adopted		Initial recycled content requirements set for various packaging types				Increased recycled content requirements for relevant packaging types
 Labelling (Article 12)	Packaging in an EPR scheme may only be identified by a symbol in a QR code				On pack pictogram and digital data carrying labels will become mandatory				
 Reporting to the Commission (Article 56) and Register of Producers (Article 44)	Format for registration and reporting to national registers established	Member States to establish National Registers	First reporting period for new packaging material formats		Member State packaging waste recycling targets are to be reassessed				

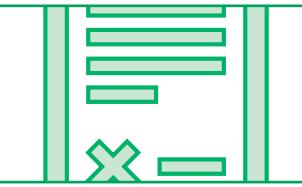
PPWR Further Clarification



Further clarification required on legislation at national and EU level.



Repak team actively participating in consultation process and expert groups at national and EU level, providing informed input and seeking clarification on legislation.



EU Commission to issue several Implementing Acts to provide further clarity.



Commission to share FAQ Document to address some of the issues raised by expert groups by early Q3 – date TBC.



An Roinn Comhshaoil,
Aeráide agus Cumarsáide
Department of the Environment,
Climate and Communications



PROSPA



REPAK
PROUDLY SUPPORTING
A CIRCULAR ECONOMY

Key Points

- Registration of all Producers
- Reporting requirements (22 materials etc.)
- Prevention Targets
- Re-use Targets
- Recyclability
 - Performance Grades
 - Recycled at Scale
 - Recycled Content

Key Takeaways

- Check your compliance status
- Use the resources available
 - Repak Guide



- Repak account managers
- Repak Packaging Technology Advice Service

Thank You.

Tom Gaynor

Net Necessary Costs & Eco Fee Modulation

Eco Fee Modulation (EFM) & Net Necessary Cost (NNC)

➤ **Waste Framework Directive (WFD) Concept of Necessary Costs**

- Producers to fund min 80% of the net necessary costs of recycling packaging waste.
- Necessary costs to be established transparently between stakeholders that provide “waste management services in a cost efficient way”.
- Legal obligation on Repak Members and Recovery Operators

➤ **Necessary Costs include**

- Operational costs - collection, processing and recycling - of packaging materials
- Support services costs – communications, enforcement, auditing, data gathering,
- Producer Responsibility Organisation (Repak) costs

Example 1: Costs of Non-Recycled Plastic & Non-Recycled Composites

100% Operational & Management Costs = €642.90
Collection, Treatment/Processing, Supporting Activities

100% Net Necessary Costs = €763.85
(net of income from sale of materials)

Revenue from Sale of Material/Cost of Disposal = -€120.95

80% Net Necessary Costs = €611.08
Paid by Producers of Pkg (e.g. Repak Members)

20% NNC/ €152.77
Paid by Customers (e.g. consumers)

Revenue from Sale of Material/Cost of Disposal = -€120.95

Calculated fee (80%NNC) = €611.08 + €9.14 = €620.22

Example 2: Costs of Recycled Plastic

**100% Operational & Management Costs = €642.90
Collection, Treatment/Processing, Supporting Activities**

**100% Net Necessary Costs = €200.69
(net of income from sale of materials)**

**Revenue from Sale
of Material
= €442.21**

**80% Net Necessary Costs
= €160.55
Paid by Producers of Pkg
(e.g. Repak Members)**

**20% NNC/ €40.14
Paid by Customers
(e.g. consumers)**

**Revenue from
Sale of Material
= €442.21**

Calculated fee (80%NNC) = €160.55 + €9.14 = €169.70

Guidance for Eco Modulation 2026

- Guidance on Categories is provided in our updated Design Guide which is available on our website.



<https://repak.ie/members/packaging-optimisation-design/>

Mark Hayden

2026 Fees & 2026 PPWR Fund

Membership Fees 2026

Material	Recycled							Non recycled	
	Plastic / Composite	Paper / Card-board	Steel	Alum	Wood	Glass	Plastic / Composite	All Other Material	
2025 Fees Per Tonne	€146.03	€32.54	€68.82	€7.68	€18.47	€11.41	€450.07	€225.05	
2026 Fees Per Tonne	€169.70	€45.60	€68.76	€9.14	€18.18	€23.14	€620.22	€328.06	
€ Difference	€23.67	€13.06	-€0.06	€1.46	-€0.29	€11.73	€170.15	€103.01	

PPWR Preparation Fund 2026 - €5 million

To assist and support Members in preparation for PPWR, Repak is providing a **€5 million PPWR Preparation Fund**.

- New pilot data submission form to be developed for Members to share additional information where required
- Reporting structure to change from current Shared Responsibility Model to a "Single Point of Reporting Model"
- Increased granularity of data required from Packaging Producers
- **A comprehensive Repak support plan will be put in place to help Members secure funding. The support plan includes:**
 - **Member engagement campaign including webinars, workshops and meetings**
 - **Support on additional data reporting**
- Support will be provided to qualifying Members in 2026 via Credit Note and bank transfer refund (similar to current rebate process)

Questions & Answers

Thank You

Email: membership@repack.ie