



Strategies for a Transition to Circular Economy

Navigating PPWR and ESPR:  
The Digital Product Passports and Packaging

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# 1. Introduction

## Purpose of the Document

This document aims to inform the public about the interaction between the Packaging and Packaging Waste Regulation (PPWR) and the Ecodesign for Sustainable Products Regulation (ESPR). Specifically, it focusses on the role of packaging in Digital Product Passports (DPPs).

# 2. Regulatory Background

## PPWR

The Packaging and Packaging Waste Regulation (PPWR) has been put forward as a proposal by the European Commission in November 2022 to replace the current Directive (Directive 94/62/EC). This legislation is a regulatory framework to address the environmental impact of packaging and packaging waste.

The distinguishing feature of the PPWR is the establishment of minimum packaging design criteria as prerequisites for accessing the EU market. This progress is driven by the mandate that starting 2030 all packaging placed on the European market must be recyclable and starting 2035 additionally recycled at large scale to be accepted at the EU market.

It aims to improve the sustainability of packaging by:

- **Reducing Packaging Waste:** Setting targets for reducing the amount of packaging waste generated and increasing the reuse of certain packaging materials and formats.
- **Design for Recycling:** Establishing requirements for the design of packaging to ensure it can be easily recycled. The PPWR provides binding threshold of 70% (2030) and 80% (2038) recyclability that packaging must achieve to be placed on the Union market. With future delegated acts guidance on material selection, packaging structure, and the use of labels and adhesives will be provided.
- **Extended Producer Responsibility (EPR):** Strengthening the responsibilities of producers for the entire lifecycle of their packaging, including end-of-life management.
- **Consumer Information:** Enhancing transparency and providing consumers with clear information on the desired end of life option for packaging, including harmonized disposal instructions.
- **Harmonization Across Member States:** The binding legal forces of the regulation throughout all members states enable standardization across EU member states to create a consistent approach to packaging waste management and reduce administrative burdens for businesses operating in multiple countries.

The PPWR is part of the broader EU Green Deal and Circular Economy Action Plan, aiming to transition towards a more sustainable and circular economy by ensuring that all packaging on the EU market is reusable or recyclable in an economically viable way by 2030.

For more information on PPWR, please refer to [this](#) Webinar by World Packaging Organisation (WPO) and Circular Analytics.

The legal text is available at [https://www.europarl.europa.eu/doceo/document/TA-9-2024-0318\\_EN.pdf](https://www.europarl.europa.eu/doceo/document/TA-9-2024-0318_EN.pdf) (Status: August 2024)

## ESPR

The Ecodesign for Sustainable Products Regulation (ESPR, Regulation (EU) 2024/1781) is a European Union regulation designed to promote the sustainability of products throughout their lifecycle. It replaces the old Ecodesign Directive (2009/125/EC) and extends its scope to cover a broader range of products and environmental impacts. Key aspects of the ESPR include:

- **Product Sustainability:** The ESPR sets requirements for the design of products to improve their environmental performance. This includes energy efficiency, material use, durability, repairability, and recyclability.
- **Circular Economy:** It aims to support the transition to a circular economy by encouraging the design of products that are easier to repair, upgrade, and recycle, thus extending their useful life and reducing waste.
- **Extended Scope:** The regulation covers a wider range of products compared to previous directives, including textiles, electronics, and furniture. It also considers various environmental aspects such as resource efficiency and the impact of products throughout their entire lifecycle.
- **Eco-Design Requirements:** The regulation establishes specific ecodesign requirements for different product categories, setting standards for aspects like energy consumption, use of hazardous substances, and end-of-life disposal.
- **Consumer Information:** It includes provisions to ensure that consumers are provided with clear and accurate information about the environmental performance of products, helping them make more informed choices.
- **Market Surveillance:** The ESPR enhances market surveillance mechanisms to ensure compliance with ecodesign requirements and address non-compliance effectively.

## 3. Interaction Between PPWR and ESPR

### Complementary Goals

Both PPWR and ESPR regulations aim to reduce environmental impact and enhance sustainability through better product design and waste management.

PPWR specifically covers packaging while ESPR is focused on final products (any physical goods that are placed on the market or put into service). However, ESPR mentions that it could complement the PPWD (European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste) by setting product-based requirements that focus on the packaging of specific products when placed on the market<sup>1</sup>.

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<sup>1</sup> Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC (Text with EEA relevance). Available at: [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L\\_202401781](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202401781)

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## 4. Digital Product Passports (DPPs) and Packaging

### What are DPPs?

A Digital Product Passport (DPP) is a structured collection of product related data with pre-defined scope and agreed data management and access rights conveyed through a unique identifier and that is accessible via electronic means through a data carrier. For more information, please visit [DPP in a Nutshell](#).

### Packaging Inclusion in DPPs:

The proposal for a regulation on packaging and packaging waste, resolution of 24 April 2024, explicitly mentioned that “, where the packaged product is covered by the Regulation (EU) 2024/1781 or other Union legal acts requiring a digital product passport, that digital product passport should also be used for providing the relevant information under this Regulation.”<sup>2</sup>

Based on this information, it is expected that if a product is in scope of the ESPR, the information of both the product and the packaging can be carried via the DPP, but not all packaging will be affected by the DPP.

## 5. How PPWR and ESPR Work Together for Packaging

### Unified Approach

Both regulations push for packaging that is easier to recycle, uses fewer resources, and has a lower environmental footprint.

### Synergies

#### Design for Sustainability

ESPR's ecodesign requirements support PPWR's objectives by ensuring that packaging is designed from the outset to be recyclable and reusable.

#### Data and Transparency

DPPs mandated by ESPR provide valuable data that aligns with PPWR's objectives, aiding in regulatory compliance and enhancing packaging sustainability.

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<sup>2</sup> European Parliament legislative resolution of 24 April 2024 on the proposal for a regulation of the European Parliament and of the Council on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC (COM(2022)0677 – C9-0400/2022 – 2022/0396(COD)). Available at: [https://www.europarl.europa.eu/doceo/document/TA-9-2024-0318\\_EN.pdf](https://www.europarl.europa.eu/doceo/document/TA-9-2024-0318_EN.pdf)

## 6. FAQs

### 6.1 Will packaging be part of the Digital Product Passports?

**Answer:** in the first working plan (lasting at least for 3 years) the European Commission prioritises 11 product groups in scope of this regulations. Packaging is not explicitly mentioned but could potentially be included in the future.

In case product are affected by the ESPR, resp. is in scope of the Digital product passport, the packaging data needed due to the requirements of the PPWR should also be carried via the Digital Product Passport (see [Packaging inclusion in DPP](#))

Moreover, most of the packaging are affected as the data carried via the DPP must be physically present on the product or its packaging.

### 6.2 How will DPPs benefit packaging?

**Answer:** If packaging becomes in scope of the ESPR based on the following delegated acts, the DPP will also provide detailed information on packaging materials, recycling instructions, and sustainability metrics, helping consumers make informed choices and facilitating better recycling practices.

### 6.3 In the ESPR, is it correct to assume that intermediate products will have their own delegated acts defining the key data attributes to be shared across DPPs, or will the delegated acts be at the level of the end-use products, including intermediate products?

**Answer:** As currently delegated acts are not published, only assumption can be made. The DPP of an end-use product will only concern the product itself, including all components, but these components (intermediate products) will not require their own DPPs. This means one DPP per end-product and not several based on the number of components. However, further information is contingent upon final secondary legislation.

### 6.4 Where can one find the list of data points as required in the ESPR on the DPP?

**Answer:** The exact details that need to be included in the DPP for each product or product category will be specified through Delegated Acts.

### 6.5 Is there anything from the PPWR measures and conformance that will need to be integrated into the DPP as part of the ESPR?

**Answer:** Yes, it is expected that certain packaging information (including the listed below) , will be included in the DPP. However, confirmation will happen once the delegated acts are released:

- type,
- weight,

- volume,
- recyclability, and
- percentage of recycled material

**6.6** Is it correct to say that the only shared measure between the ESPR and PPWR is the weight and volume of the product and its packaging, and the product-to-packaging ratio? Do they differ in calculation or are they exactly the same?

**Answer:** This can only be confirmed once the delegated acts are published, which will clarify the specific Ecodesign criteria for each product group and whether there are differences in calculations.

## 7. Conclusion

### Summary

Both the PPWR and ESPR regulations shall promote sustainable packaging through better design, use of recycled materials, and transparency via Digital Product Passports.

It is expected that certain packaging information will need to be shared as part of a Digital Product Passport.

### Call to Action

Stay informed about these regulations with Circular Analytics: <https://circularanalytics.com/en/>

## 8. Additional Resources

1. Cirpass, 2024. DPP in a Nutshell. Available at: <https://cirpassproject.eu/dpp-in-a-nutshell/>
2. European Parliament legislative resolution of 24 April 2024 on the proposal for a regulation of the European Parliament and of the Council on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC (COM(2022)0677 – C9-0400/2022 – 2022/0396(COD)). Available at: [https://www.europarl.europa.eu/doceo/document/TA-9-2024-0318\\_EN.pdf](https://www.europarl.europa.eu/doceo/document/TA-9-2024-0318_EN.pdf)
3. Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of eco-design requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC (Text with EEA relevance). Available at: [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L\\_202401781](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202401781)

Please contact Circular Analytics ([office@circularanalytics.com](mailto:office@circularanalytics.com)) for further information on the PPWR