

# Overview of the EU PPWR and Corporate Response Strategies

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2026.Sep.11.(Fri.), Jeju International Environment Forum 2026

# Contents

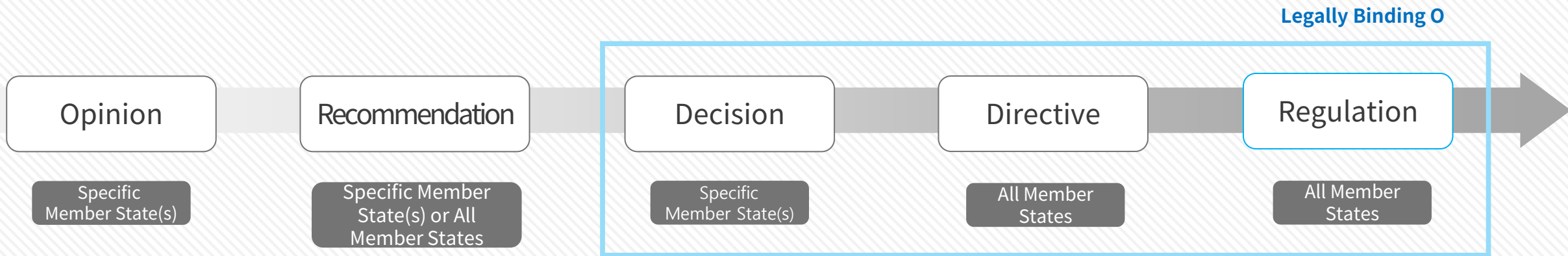
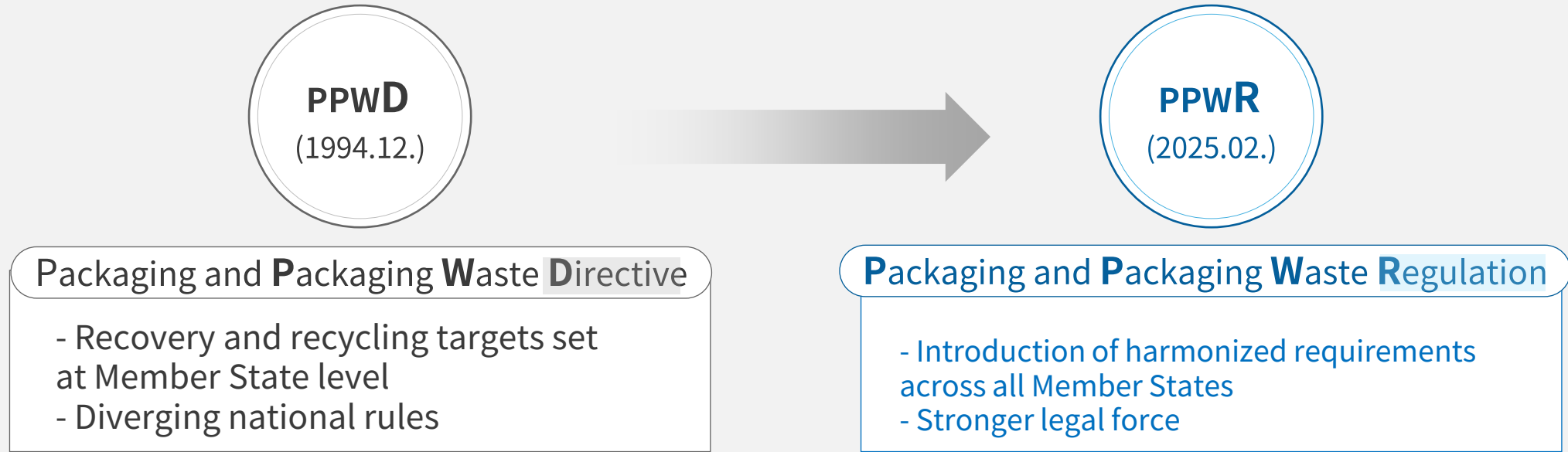
## I . Overview of the EU PPWR

- Background and Objectives
- Scope of Application
- Roles of Economic Operators

## II . Key Requirements of the EU PPWR

## III. Strategies for Responding to the EU PPWR

# I . Overview of the EU PPWR | Background and Objectives



## I . Overview of the EU PPWR | Background and Objectives



- ✓ Reducing the environmental and health impacts of packaging throughout its life cycle
- ✓ Ensuring the smooth functioning of the internal market
- ✓ Replacing the existing Directive (PPWD) with clearer, stricter and more uniform requirements for all economic operators and Member States



***“Fostering the transition to a circular economy”***

# I . Overview of the EU PPWR | Scope of Application

PPWR Article 3(1), point (1)

## “Packaging”

An item intended to be used by an economic operator for the containment, protection, handling, delivery or presentation of products to another economic operator or an end user

**Irrespective of the materials from which it is made**, and that can be differentiated by packaging format based on its function, material and design

### Sales Packaging



Packaging conceived so as to constitute a sales unit consisting of products and packaging to the end user at the point of sale

### Grouped Packaging



Packaging conceived so as to constitute a grouping of a certain number of sales units at the point of sale

### Transport Packaging



Packaging conceived so as to facilitate the handling and transport of one or more sales units or a grouping of sales units, in order to prevent damage to the product from handling and transport

→ Applies to **all packaging** on the EU market

# I . Overview of the EU PPWR | Roles of Economic Operators

## Article 3(1), point (13)

### Manufacturer

: Any natural or legal person that manufactures packaging or a packaged product  
 ※ Including a person that has packaging or a packaged product designed or manufactured under its own name or trademark

Ensure conformity with the requirements laid down in or pursuant to Articles 5 to 12  
 Draw up the technical documentation (TD) and carry out the conformity assessment procedure  
 Draw up the EU declaration of conformity (DoC)

## Article 3(1), point (15)

### Producer

: An economic operator that makes packaging or packaged products available for the first time in a Member State

Depending on the circumstances, one of the distributors

Fulfilment of extended producer responsibility (EPR) obligations

## Article 3(1), point (17)

### Importer

: A natural or legal person established within the Union that places packaging from a third country on the market for the first time

Verify the manufacturer's technical documentation (TD), EU declaration of conformity (DoC), labelling, etc.  
 → Do not place the packaging on the market until it has been brought into conformity

## Article 3(1), point (16)

### Supplier

: A natural or legal person that supplies packaging or packaging material to a manufacturer

Provide information on packaging or packaging materials  
 Provide the information and documentation necessary to demonstrate conformity



## I . Overview of the EU PPWR | Roles of Economic Operators

If a Korean brand owner receives bottles from a **Korean PET bottle manufacturer**, fills them with beverages, **affixes its trademark**, and then **exports them** to a company established in an EU Member State

Supplier

Domestic packaging  
manufacturer



Manufacturer

Domestic brand  
owner



Producer

Importer

EU-based importer



## II.Key Requirements of the EU PPWR

Dates of application vary by Article

| Article    | Key Requirements                      | Adoption of Delegated/Implementing Acts | Date of Application | Remarks                                                                                                            |
|------------|---------------------------------------|-----------------------------------------|---------------------|--------------------------------------------------------------------------------------------------------------------|
| Article 5  | Minimization of Substances of Concern | -                                       | <b>‘26.8.12.</b>    | -                                                                                                                  |
| Article 6  | Recyclability Grades                  | ‘28.1.1.<br>‘30.1.1.                    | ‘30.1.1.            | (Jan. 1, 2028) Recyclability Performance Grades<br>(Jan. 1, 2030) Methodology for the Recycled-at-Scale Assessment |
| Article 7  | Use of Recycled Content               | ‘26.12.31.                              | ‘30.1.1.            | -                                                                                                                  |
| Article 8  | Biobased Plastics                     | -                                       | -                   | (By Feb. 12, 2028) Review of the State of Technological Development                                                |
| Article 9  | Compostability                        | -                                       | ‘28.2.12.           | -                                                                                                                  |
| Article 10 | Packaging Minimisation                | -                                       | ‘30.1.1.            | (By Feb. 12, 2027) Development of Harmonised Standards                                                             |
| Article 11 | Reusability                           | -                                       | <b>‘26.8.12.</b>    | -                                                                                                                  |
| Article 12 | Labelling                             | ‘26.8.12.                               | ‘28.8.12.           | Phased Application by Labelling Requirement                                                                        |
| Article 24 | Empty Space Ratio                     | ‘28.2.12.                               | ‘30.1.1.            | -                                                                                                                  |
| Article 29 | Re-use Targets                        | -                                       | ‘30.1.1.            | -                                                                                                                  |



## II. Key Requirements of the EU PPWR

### Article 5: Minimization of Substances of Concern

#### Heavy Metal Restrictions :: Applicable to All Packaging

Pb

(Lead)

Cd

(Cadmium)

Hg

(Mercury)

6+

Cr

(Hexavalent  
Chromium)

Total:  $\leq 100$  mg/kg

#### PFAS Restrictions :: Applicable to Food-Contact Packaging

Packaging at or above the limit values\*  
may not be placed on the market

\*Any PFAS:  $< 25$  ppb (targeted PFAS analysis)  
Sum of PFAS:  $< 250$  ppb (targeted PFAS analysis)  
PFAS:  $< 50$  ppm (including polymeric PFAS)



Compliance with the heavy metal and PFAS limits must be demonstrated through the  
TD/DoC

Packaging placed on the market before August 12, 2026 may remain on the market and  
does not need to be withdrawn

## II. Key Requirements of the EU PPWR

### Article 6: Recyclability Grades



- **DfR**(Design for Recycling) : Design for Recycling (Delegated Acts to Be Adopted by Jan. 1, 2028 → Application from Jan. 1, 2030)
- \* **RaS**(Recycled-at-Scale assessment) : Recycled-at-Scale Assessment (Implementing Acts to Be Adopted by Jan. 1, 2030 → Application from Jan. 1, 2035)

## II. Key Requirements of the EU PPWR

### Article 7: Use of Recycled Content

Recycled Content: Recovered from Post-Consumer Plastic Waste (Article 7(3))

|                                                                        | '30.1.1.~ | '40.1.1.~ |
|------------------------------------------------------------------------|-----------|-----------|
| Contact-Sensitive Packaging Made from PET as the Major Component       | 30%       | 50%       |
| Contact-Sensitive Packaging Made from Plastic Materials Other Than PET | 10%       | 25%       |
| Single-Use Plastic Beverage Bottles                                    | 30%       | 65%       |
| Other Plastic Packaging                                                | 35%       | 65%       |



Per Individual Package (X)

Average per  
Manufacturing Plant  
and Year (O)

(Dec. 31, 2026) Adoption of  
Implementing Acts on the  
Calculation and  
Verification of Recycled  
Content in Packaging

\* Indicates Minimum Percentages

## II. Key Requirements of the EU PPWR

### Article 8: Biobased Plastics

**Biobased Plastics:** Plastics Made from Biological Resources, such as Biomass Feedstock, Organic Waste or By-Products (Irrespective of Whether the Plastics Are Biodegradable or Non-Biodegradable)

Review of the State of Technological Development and Environmental Performance of Biobased Plastic Packaging (Feb. 12, 2028)



### Submission of a Legislative Proposal

- ① Establishment of Sustainability Requirements for Biobased Plastics
- ② Setting Targets for the Use of Biobased Plastics
- ③ Review of the Possibility of Using Biobased Plastics in Place of Mandatory Recycled Content

### Article 9: Compostability

#### Mandatory Items



Permeable Tea and Coffee Bags



Sticky Labels Affixed to Fruit and Vegetables



#### Where Required by EU Member States



Beverage Packaging Intended for Use in a Machine (Excluding Metal)



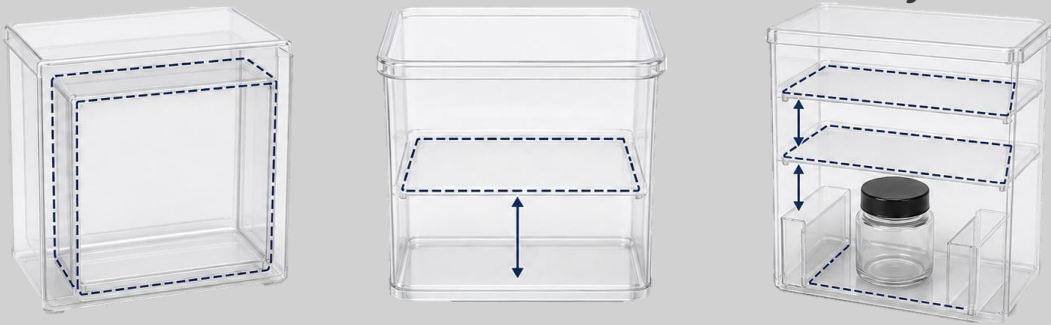
Very Lightweight and Lightweight Plastic Carrier Bags



## II. Key Requirements of the EU PPWR

### Article 10: Packaging Minimization

All Packaging Designed with Weight and Volume Reduced to the **Minimum** Necessary



Ensure That Packaging Aimed **Only at Increasing Product Volume**, Including Double Walls, False Bottoms and Unnecessary Layers, Is Not Placed on the Market

### Article 24: Packaging Empty Space Ratio

Grouped Packaging, Transport Packaging, E-Commerce Packaging  
= Empty Space Ratio  $\leq 50\%$



$$\text{Empty Space Ratio} = \frac{\text{Empty Space Volume}^*}{\text{Total Volume of Grouped, Transport or E-Commerce Packaging}}$$

\* Total Volume of Grouped, Transport or E-Commerce Packaging – Volume of Sales Packaging



※ Implementing Acts on the Calculation Methodology:  
To Be Adopted by Feb. 12, 2028

## II. Key Requirements of the EU PPWR

### Article 11: Reusable Packaging

**Re-use:** Any Operation by Which Reusable Packaging Is Used Again Multiple Times for the Same Purpose for Which It Was Conceived

Designed to Accomplish as Many Rotations as Possible

Fulfills Applicable Requirements Regarding Consumer Health, Safety and Hygiene

Can Be Emptied without Being Damaged in a Way That Would Prevent Further Re-use

Capable of Being Emptied and Refilled While Maintaining Quality and Safety

Capable of Being Reconditioned in Accordance with Part B of Annex VI

Allows Labels to Be Affixed and Mandatory Labelling Information to Be Provided Even after Reconditioning

Protection of the Health and Safety of Those Responsible during Refilling



Considered to Be Reusable When ‘**All**’  
Requirements Are Met

## II. Key Requirements of the EU PPWR

### Article 29: Re-use Targets

|                                                              | (Mandatory) From<br>Jan. 1, 2030                               | (Endeavour) From<br>Jan. 1, 2040 |
|--------------------------------------------------------------|----------------------------------------------------------------|----------------------------------|
| Pallets, Crates, Trays, Intermediate Bulk Containers, Pails  | 40%                                                            | 70%                              |
|                                                              | ※ 100% Re-use for Certain B2B Transport<br>(from Jan. 1, 2030) |                                  |
| Grouped Packaging in the Form of Boxes<br>(Except Cardboard) | 10%                                                            | 25%                              |
| Sales Packaging for Non-Alcoholic<br>and Alcoholic Beverages | 10%                                                            | 40%                              |



## II. Key Requirements of the EU PPWR

### Article 12: Labelling

#### Labelling on All Packaging

##### Article 12(1)

**Material Composition**

(to Facilitate Consumer Sorting)  
※ **Mandatory**

**Compostability**

Compostability, Disposal Method, etc.  
※ **Labelling Where Applicable**

**Contains Substances of Concern**

Name, Concentration, etc.  
※ **Labelling Where Applicable**

**Deposit System**

Subject to a Deposit and Return System  
※ **Labelling Where Applicable**

#### Labelling on Applicable Packaging

##### Article 12(2)

**Reusability**

Information on Reusability, Collection Points, Re-use Systems, etc  
※ **Labelling Where Applicable**

##### Article 12(4)

**Use of Recycled Content**

Share of Recycled Content  
※ **Voluntary**

**Use of Biobased Feedstock**

Share of Biobased Content  
※ **Voluntary**

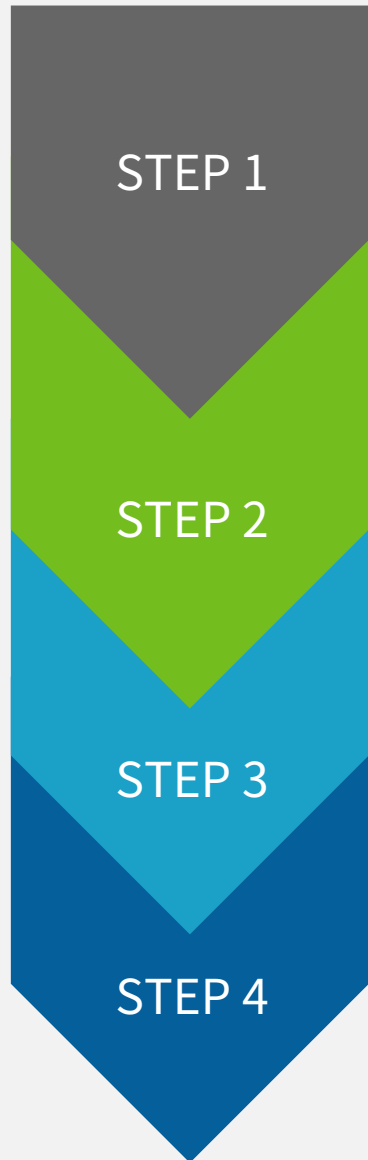
##### Article 12(9)

**EPR Applicability**

Information on Fulfilment of EPR Obligations  
※ **Labelling Where Applicable**



### III. Strategies for Responding to the EU PPWR



① Compile information on the current status of the company's products and packaging

- Review all goods and products, then create a list

② Group by packaging item

- Classify by packaging supplier, material, etc.
- Classify packaging types
- Classify packaging subject to / exempt from each Article

③ Obtain supporting documentation

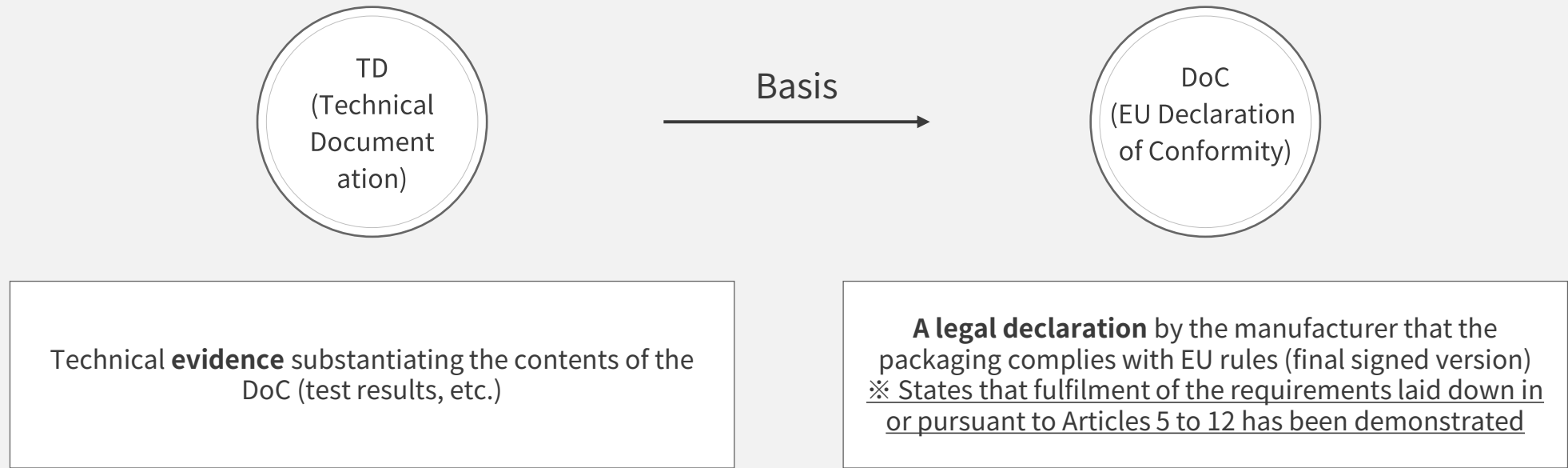
- Obtain documentation from partners (packaging manufacturers, etc.)
- Obtain basic documentation such as drawings, structural diagrams, material specifications, etc.
- (If necessary) Test report ☐ Request testing from an ISO/IEC 17025-accredited testing laboratory

④ Preparation and drafting of TD/DoC

- Demonstrate compliance with the requirements laid down in or pursuant to Articles 5 to 12 based on the supporting documentation in ③

- ✓ Check subsequently adopted implementing acts and delegated acts
- ✓ Review and modify packaging taking into account the date of application of each Article
- ✓ Relevant documentation needs to be updated when packaging is changed

### III. Strategies for Responding to the EU PPWR



**Conformity Assessment:** The process demonstrating whether the sustainability, safety, labelling and information requirements of this Regulation relating to packaging have been fulfilled (Article 3(1), point (65))

Drawn up in, or translated into, one or more languages required by the Member State

Where subject to more than one Union act, a single EU declaration of conformity shall be drawn up

Retention required from the date the packaging was placed on the market, (single-use packaging) 5 years (reusable packaging) 10 years

# III. Strategies for Responding to the EU PPWR

## TD (Technical Documentation)

### 2. Technical documentation

The manufacturer shall establish the technical documentation. The documentation shall make it possible to assess the packaging's conformity with the applicable requirements, and shall include an adequate analysis and assessment of the risks of non-conformity.

The technical documentation shall specify the applicable requirements and shall cover, as far as relevant for the assessment, the design, manufacture and operation of the packaging. The technical documentation shall contain, wherever applicable, at least the following elements:

- (a) a general description of the packaging and its intended use;
- (b) conceptual design, manufacturing drawings and materials of components;
- (c) descriptions and explanations necessary for the understanding of the drawings provided under point (b) and the schemes and operation of the packaging;
- (d) a list of:
  - (i) the harmonised standards, referred to in Article 36, applied in full or in part;
  - (ii) the common specifications, referred to in Article 37, applied in full or in part;
  - (iii) other relevant technical specifications used for measurement or calculation purposes;
  - (iv) in the event of partly applied harmonised standards or common specifications, an indication of the parts which have been applied;
  - (v) in the event of harmonised standards or common specifications not being applied, a description of the solutions adopted to meet the requirements referred to in point 1;
- (e) a qualitative description of how the assessments provided for in Articles 6, 10 and 11 have been carried out; and
- (f) test reports.

## PPWR ANNEX VII

## DoC (EU Declaration of Conformity)

EU declaration of conformity No (\*) ...

1. No ... (unique identification of the packaging):
2. Name and address of the manufacturer and, where applicable, the manufacturer's authorised representative:
3. This declaration of conformity is issued under the sole responsibility of the manufacturer.
4. Object of the declaration (identification of the packaging allowing traceability): description of the packaging:
5. The object of the declaration referred to point 4 is in conformity with the relevant Union harmonisation legislation: ... (reference to the other Union acts applied).
6. References to the relevant harmonised standards or the common specifications used or references to the other technical specifications in relation to which conformity is declared:
7. Where applicable, the notified body ... (name, address, number) ... performed ... (description of intervention) ... and issued the certificate(s): ... (details, including the date of the certificate(s), and, where appropriate, information on the duration and conditions of validity).
8. Additional information:
  - Signed for and on behalf of:
  - (place and date of issue):
  - (name, function) (signature):

## PPWR ANNEX VIII

The PPWR Annexes specify the elements to be included in the TD / DoC

### III. Strategies for Responding to the EU PPWR

#### TD (Technical Documentation)

|     | Key Content                                                                                                                                                                                                                                                                       | Examples of Practical Documentation                                                                                                                                       |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (a) | A General Description of the Packaging and Its Intended Use                                                                                                                                                                                                                       | Packaging Name, Type, Use, Applicable Product<br>Packaging Type, etc.                                                                                                     |
| (b) | Design and Manufacturing Drawings, and Information on Packaging Components and Materials                                                                                                                                                                                          | Drawings, Structural Diagrams, Materials of Components,<br>Material Specifications, etc                                                                                   |
| (c) | Explanations Necessary for Understanding the Drawings and Documentation and the Operation of the Packaging                                                                                                                                                                        | Explanations Regarding (b)<br>- Packaging Composition and the Role of Each Component<br>- How the packaging is used and operates, etc.                                    |
| (d) | List of Harmonised Standards, Common Specifications and Technical Specifications Applied<br>- Where applied in part, indicate the parts applied<br>- Where harmonised standards or common specifications are not applied, describe the solutions adopted to meet the requirements | EN Standards, Common Specifications and Other Specifications Applied<br>Where standards are not applied, specify the methods used to demonstrate conformity with the PPWR |
| (e) | How the Assessments Specified in Articles 6, 10 and 11 Were Carried Out                                                                                                                                                                                                           | (Article 6) Packaging Grade (Grade)<br>(Article 10) Assessment of Whether the Packaging Is at the Minimum Necessary Level<br>(Article 11) Number of Rotations             |
| (f) | Test Reports                                                                                                                                                                                                                                                                      | Test Reports, Measurement Results and Other Test Data                                                                                                                     |

### III. Strategies for Responding to the EU PPWR

#### DoC (EU Declaration of Conformity)

|   | Key Content                                                                                                                      | Examples of Practical Documentation                                                                                                                                                        |
|---|----------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Unique Identification Number of the Packaging                                                                                    | Packaging Part Number, Model Number, etc.                                                                                                                                                  |
| 2 | Name and Address of the Manufacturer<br>(Where Applicable) Name and Address of the Manufacturer's<br>Authorised Representative   | Company Name, Headquarters Address, EU Authorised<br>Representative Information, etc.                                                                                                      |
| 3 | Statement That the DoC Is Issued under the Responsibility of<br>the Manufacturer                                                 | "This declaration of conformity is issued under the sole<br>responsibility of the manufacturer."<br>"OO Company declares that the above product complies with<br>Regulation (EU) 2025/40." |
| 4 | Identification and Description of the Packaging<br>(in sufficient detail to allow traceability)                                  | Packaging Name, Packaging Format, Material, Specifications, etc.<br>(in detail)                                                                                                            |
| 5 | Statement of Conformity with Union Harmonisation<br>Legislation and Reference Information                                        | Other Union Acts Applied                                                                                                                                                                   |
| 6 | Information on Harmonised Standards, Common<br>Specifications and Other Technical Specifications Used to<br>Determine Conformity | EN Standards, Common Specifications, Other Specifications<br>Applied, etc.                                                                                                                 |
| 7 | Name, Address and Number of the Notified Body, Description<br>of the Intervention Performed and Certificate Information          | Notified Body, Description of Intervention, Certificate Number and<br>Related Information                                                                                                  |
| 8 | (Where Applicable) Representative Information                                                                                    | Place and Date of Issue, Name, Signature, etc.                                                                                                                                             |

### III. Strategies for Responding to the EU PPWR

[www.portal.budamgum.or.kr](http://www.portal.budamgum.or.kr)

Korea Environment Corporation – Operation and Management of Resource Circulation System –  
Customer Service - Integrated Resources – EPR – Business Category: EU PPWR

# Korea Environment Corporation – Operation and Management of Resource Circulation System

## System Overview

## Calculators

## Customer Service

🏠 · 고객마당 · 통합자료실

## Customer Service

## Integrated Resources

## Waste Charge System

EPR

EcoAS

Presentation Materials from the 1st and 2nd Briefing Sessions  
Examples of TD / DoC Preparation, etc.  
Release of Relevant Materials

## Notices

## Integrated Resources

## Simplified Packaging Material and Structure Evaluation

Business  
Category

EU PPWR

## 조회

| No. | Business Category | Title                                                                                                                 | Author        | Date       | Views |
|-----|-------------------|-----------------------------------------------------------------------------------------------------------------------|---------------|------------|-------|
| 6   | EU PPWR           | <div>Notice</div> European Union Packaging and Packaging Waste Regulation                                             | Administrator | 2026-01-29 | 1363  |
| 5   | EU PPWR           | Example of Preparing Technical Documentation (TD)                                                                     | Administrator | 2026-02-20 | 102   |
| 4   | EU PPWR           | Example of Preparing the EU Declaration of Conformity (DoC)                                                           | Administrator | 2026-02-20 | 92    |
| 3   | EU PPWR           | [Korea Packaging Recycling Cooperative] Report on Key PPWR Content and Schedule for Follow-up Actions                 | Administrator | 2026-02-02 | 16    |
| 2   | EU PPWR           | [KOTRA] Key Content of the EU Packaging and Packaging Waste Regulation (PPWR)                                         | Administrator | 2026-02-02 | 132   |
| 1   | EU PPWR           | Presentation Materials for the Briefing on Global Regulatory Response Strategies for the Product and Packaging Sector | Administrator | 2026-01-30 | 137   |

# III. Strategies for Responding to the EU PPWR

## Packaging and Packaging Waste Regulation (PPWR)

## Domestic Resource Circulation Policy

2020

2030

<Heavy Metals> Article 5 (Aug. 12, 2026)  
Restriction on Lead + Cadmium + Mercury + Chromium Content

<PFAS> Article 5 (Aug. 12, 2026)  
Restriction on PFAS Content (Food-Contact Packaging)

<Labelling> Article 12 (Feb. 12, 2027 - Phased Application)  
Labelling for EPR, Sorting, Reusability, etc.

<Biodegradability (Compostability)> Article 9 (Feb. 12, 2028)  
Mandatory Requirements for Tea Bags, Fruit and Vegetable Labels, etc.

<EPR> Article 44 (Aug. 12, 2026)  
Producer Registration in Each Member State

<Deposit> Article 50 (Jan. 1, 2029)  
Introduction of a Deposit and Return System (DRS)

<Recycled Content> Article 7 (Jan. 1, 2030)  
Mandatory Use of Recycled Content

<Recycled Content> Article 7 (Jan. 1, 2040)  
Increase in the Mandatory Recycled Content Percentage

<Recyclability> Article 6 (Jan. 1, 2030)  
Only Grades A, B and C May Be Placed on the Market

<Recyclability> Article 6 (Jan. 1, 2038)  
Only Grades A and B May Be Placed on the Market

<Excessive Packaging> Article 10 (Jan. 1, 2030)  
Packaging Minimisation

<Excessive Packaging> “Rules on the Standards, etc. on Packaging Materials and Packaging Methods of Products” ('03)  
Establishment of Packaging Space Ratio Standards

<Biodegradability (Compostability)> “Environmental Technology and Industry Support Act” ('03)  
Certification of Biodegradable Resin

<Heavy Metals> “Rules on the Standards, etc. on Packaging Materials and Packaging Methods of Products” ('06)  
Restriction on Lead + Cadmium + Mercury + Chromium Content

<PFAS> “Persistent Pollutants Control Act” (~'23)  
Prohibition on the Use of PFOA, PFOS and PFHxS

<Recycled Raw Materials> “Act on the Promotion of Saving and Recycling of Resources” ('24)  
Implementation of the Recycled Material Content Rate Labeling System

<Excessive Packaging> “Act on the Promotion of Saving and Recycling of Resources” ('26)  
Establishment of the Product Packaging Management Support Center

<Recycled Raw Materials> “Act on the Promotion of Saving and Recycling of Resources” (from 2030)  
Strengthening the Mandatory Use of Recycled Raw Materials (30%)

<Labelling> “Act on the Promotion of Saving and Recycling of Resources” ('03)  
Mandatory Separate Discharge Mark

<EPR> “Act on the Promotion of Saving and Recycling of Resources” ('03)  
Imposition of Recycling Obligations on Producers

<Recyclability> “Act on the Promotion of Saving and Recycling of Resources” ('19)  
Implementation of the Evaluation System for Quality and Structure of Packaging Materials

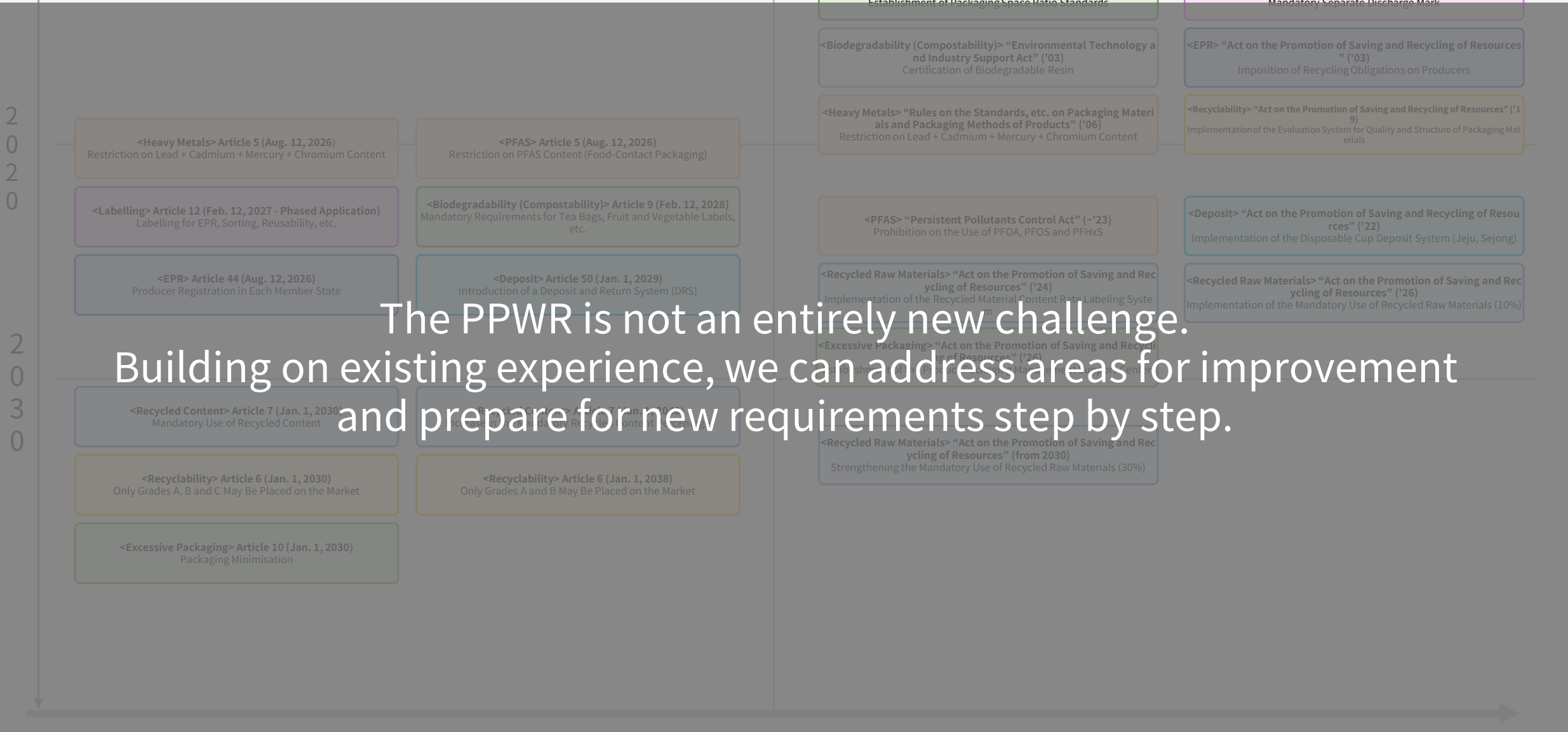
<Deposit> “Act on the Promotion of Saving and Recycling of Resources” ('22)  
Implementation of the Disposable Cup Deposit System (Jeju, Sejong)

<Recycled Raw Materials> “Act on the Promotion of Saving and Recycling of Resources” ('26)  
Implementation of the Mandatory Use of Recycled Raw Materials (10%)

III. Strategies for Responding to the EU PPWR

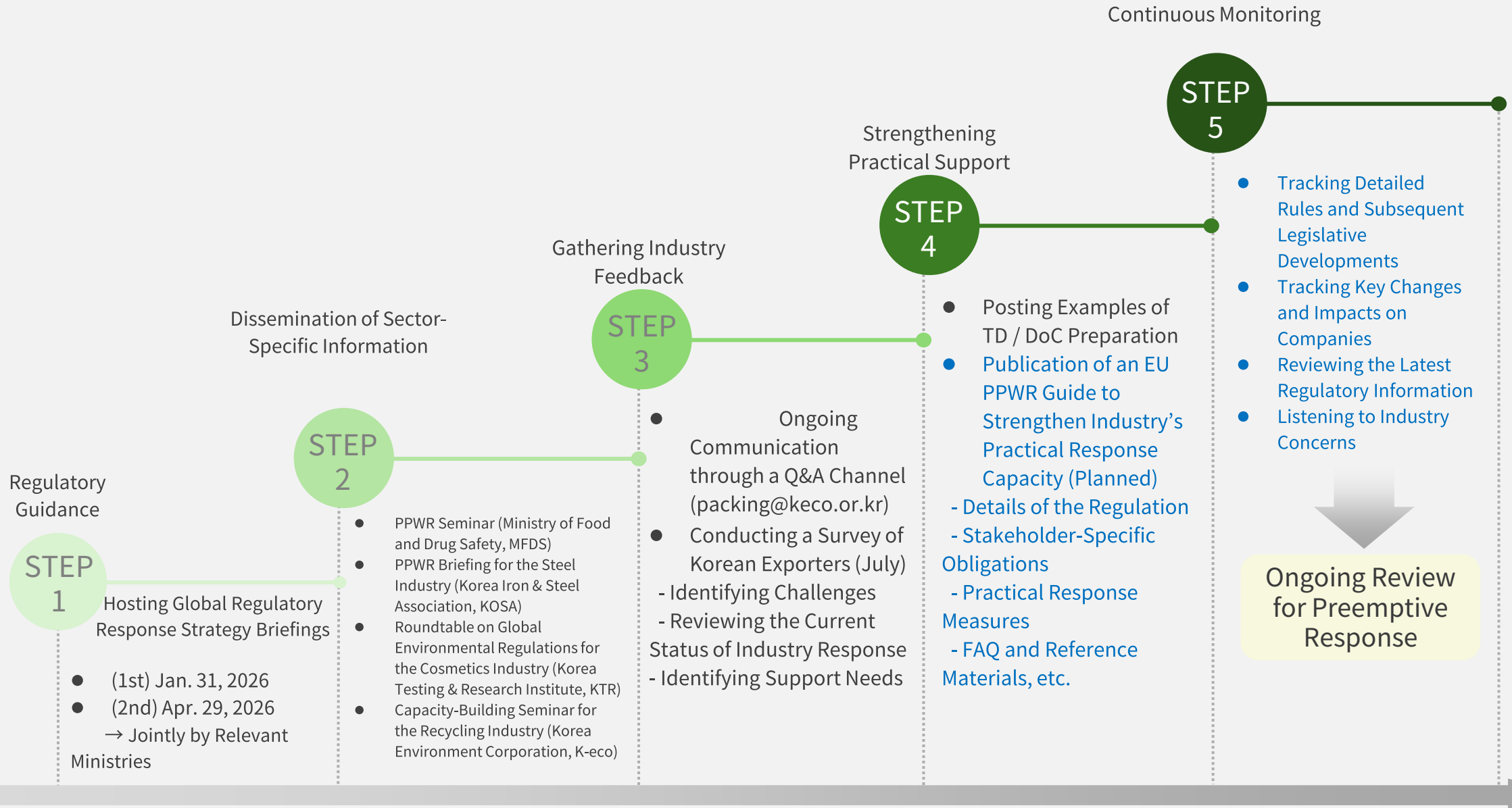
Packaging and Packaging Waste Regulation (PPWR)

Domestic Resource Circulation Policy





### III. Strategies for Responding to the EU PPWR



# Thank you

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