

Sustainable Packaging

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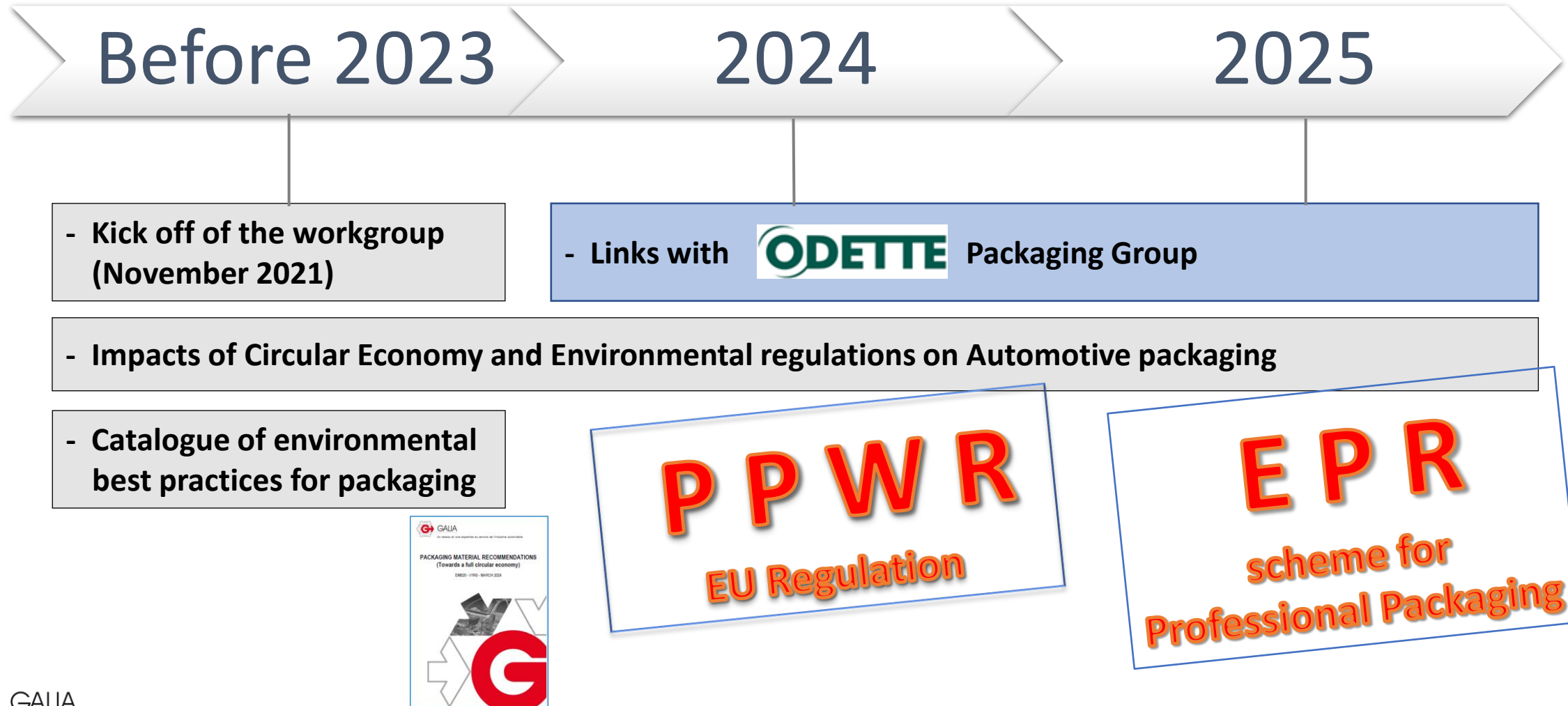


Sustainable Packaging

How to comply with the new regulations

GALIA Packaging Circular Economy workgroup

Workgroup planning



GALIA Packaging Circular Economy workgroup

Participating companies





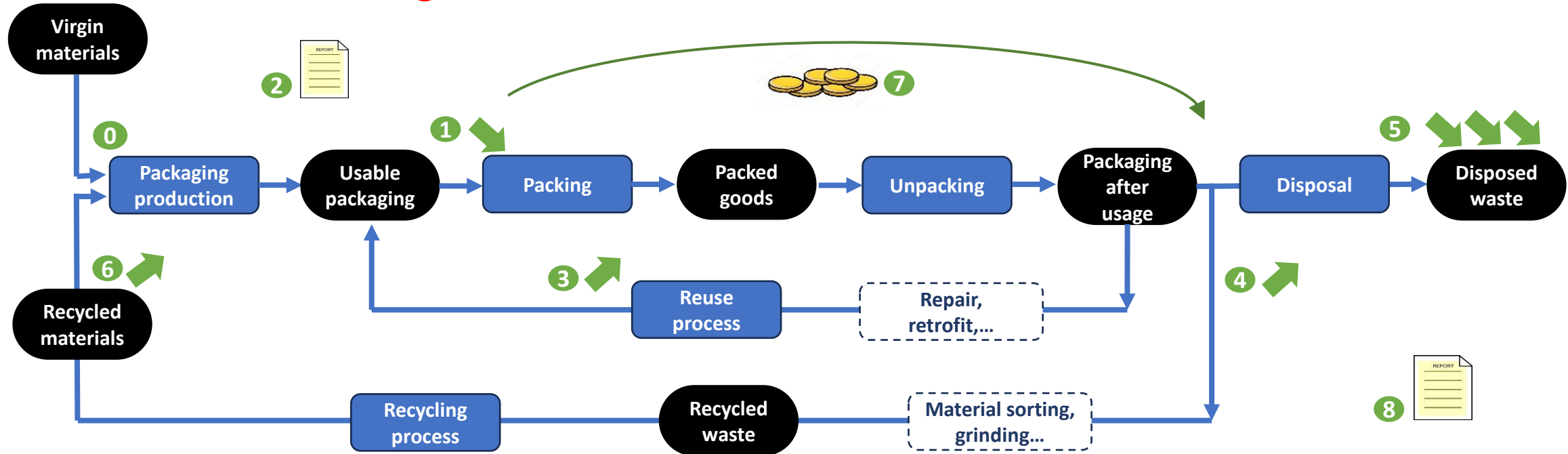
Sustainable Packaging

What is Packaging & Packaging Waste Regulation (PPWR) about?

EU Packaging & Packaging Waste Regulation (PPWR)



The logic: reduce waste, reduce waste, reduce waste...



- 0 - Follow eco-design principles (packaging to be reused, recyclable at scale...)
- 1 - Reduce the quantity of packaging (increase density, avoid overprotection...)
- 2 - Conformity assessment of packaging (EUDR, Heavy metals, PFAS, Substances of concern)
- 3 - Increase the level of reused packaging (performing more than X rotations)
- 4 - Increase recycling at end of life (Identify actual recycling scheme site by site)
- 5 - Minimise residual waste
- 6 - Increase the content of recycled materials in new packaging (reduce the use of virgin raw materials)
- 7 - Extended Producer Responsibility for Packaging incentivise the process with contribution fees
- 8 - Measure, inform and report (Performance is monitored through the EPR scheme)

EU Packaging & Packaging Waste Regulation (PPWR)



Main milestones and targets (extract)

Eco-conception

2030:

- **100% designed for material recycling**
- Recyclability assessment Grade A,B,C
- Plastic packaging: **35% recycled content**
- Packaging **weight and volume minimisation**
- **< 50% empty space ratio** for one-way Grouped and Transport packaging

2040:

- Plastic packaging : **65%** of post-consumer **recycled content**

Reuse (Réemploi)

Carboard boxes are exempt of these targets.

2030: Transport Packaging reuse

- **40%** for pallets, plastic boxes & crates, *pallet wrapping/strapping...* within EU
- **100%** between different company sites, or within the same Member State

2040: Transport Packaging reuse

- **70%** for pallets, plastic boxes & crates, *pallet wrapping/strapping...* within EU

Recycling

2025:

- **65% weight for all packaging waste**
- Minimum **weight by materials**, e.g.
50% of plastic,
25% of wood,
etc...

2030:

- **70% weight for all packaging waste**
- Minimum **weight by materials**, e.g.
55% of plastic,
30% of wood,
etc...

2035:

- Packaging waste **recycled at scale** (tbd)

EU Packaging & Packaging Waste Regulation (PPWR)



Main milestones and targets (extract)

Labelling and QR codes
2026: <ul style="list-style-type: none">- Identification of the Manufacturer (on the packaging or via QR code)
2028: <ul style="list-style-type: none">- Single-Use: Harmonised label concerning materials to facilitate consumer sorting
2029: <ul style="list-style-type: none">- Reusable: Label informing users that the packaging is reusable

Declarations & Reporting
2026: <ul style="list-style-type: none">- Declaration of Conformity for packaging placed on the EU market, keeping technical packaging records for 5 years (single-use) or 10 years (reusable).- Reporting tons by packaging categories / materials made available on the market, waste generation, recycled...
2030: <ul style="list-style-type: none">- Economic operators must report on their reuse targets by number of units, by packaging formats

PPWR embeds
EPR for Packaging



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What is Extended Producer Responsibility (EPR) for Packaging about?



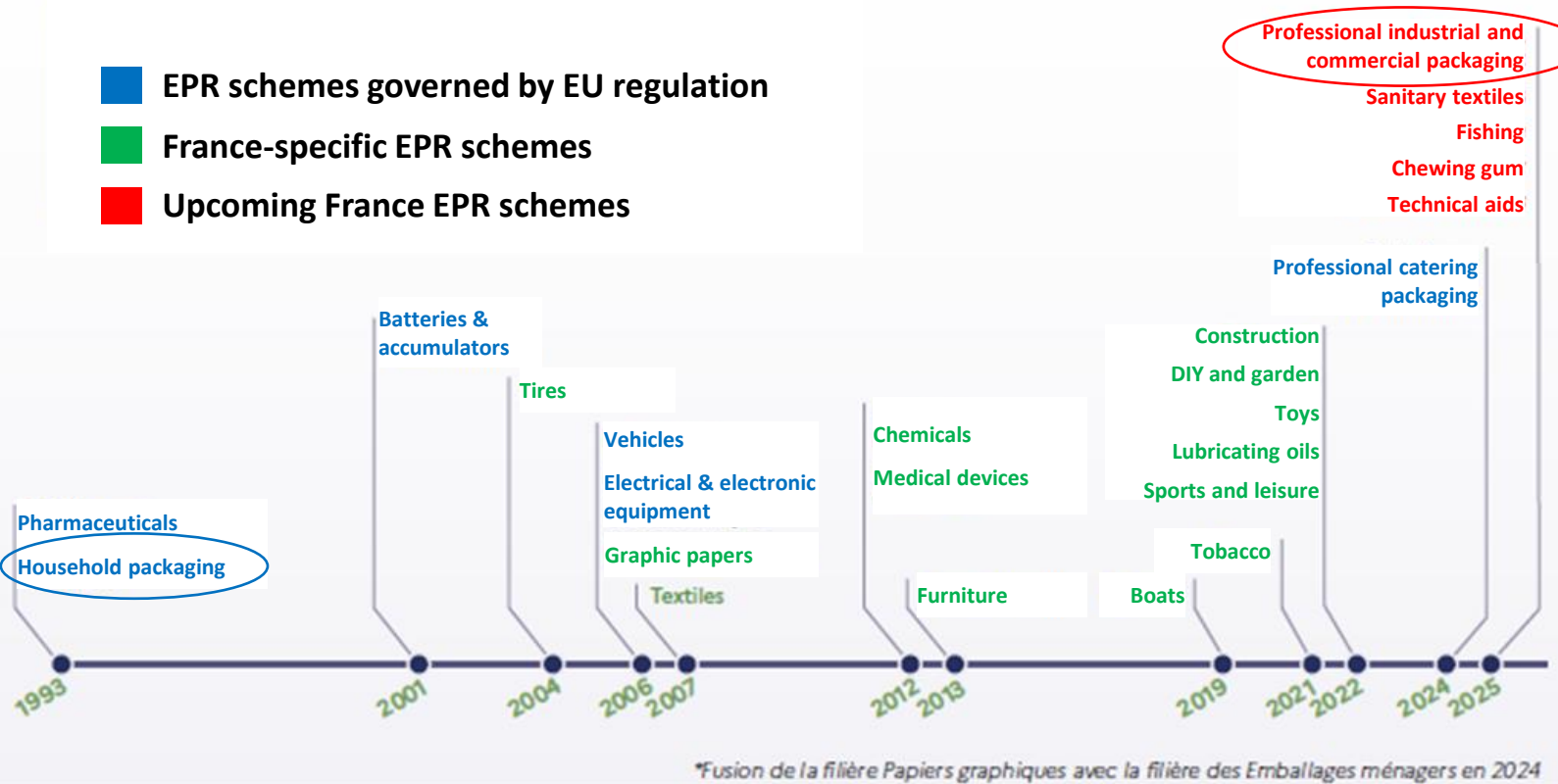
Extended Producer Responsibility (■ ■ : REP)

EPR implements the “polluter pays” principle

- EPR schemes governed by EU regulation
- France-specific EPR schemes
- Upcoming France EPR schemes

Household packaging = B2C

Managed by CITEO & Leko PROs in France



Professional packaging = B2B

Not implemented yet in France



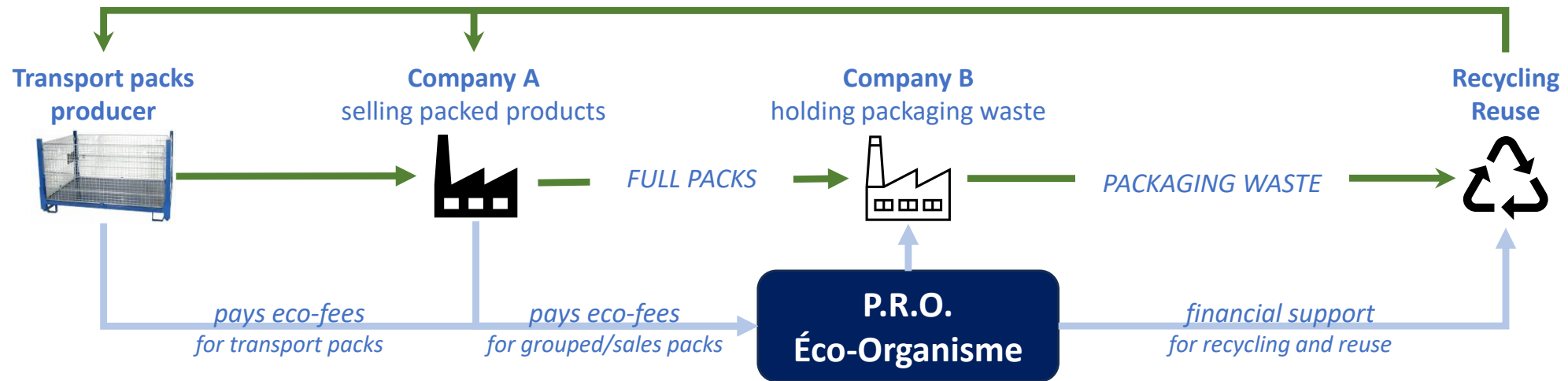
Producers must choose between joining a **PRO : Producer Responsibility Organization (■ ■ : Éco-organisme)**...
... or setting up an **individual compliance scheme**.



EPR for B2B packaging in France

All packaging... except those already managed by another EPR scheme :

(B2C / chemicals / lubricating or industrial oils / agricultural supplies)



Annual declaration of all **tonnage / units per material** for which your company is considered in France as the « producer ». (1st use in France only for reusable packs).

Eco-fees to pay to P.R.O. :

- **Plastic:** 200 to **400 € / ton**
- Cardboard: 20 to 40 € / ton
- Wood, metal: 2 to 5 € / ton

**NOT
VALIDATED**

Main targets of this ERP:

REDUCE: waste generation










REUSE: > 5% of eco-fees to finance reuse projects

RECYCLE: achieve PPWR target by material

Bonus-malus system to favour eco-design (e.g.: bonus if PCR plastic recycled content in the packs or malus if not recyclable)

But **who** is the PRODUCER ?

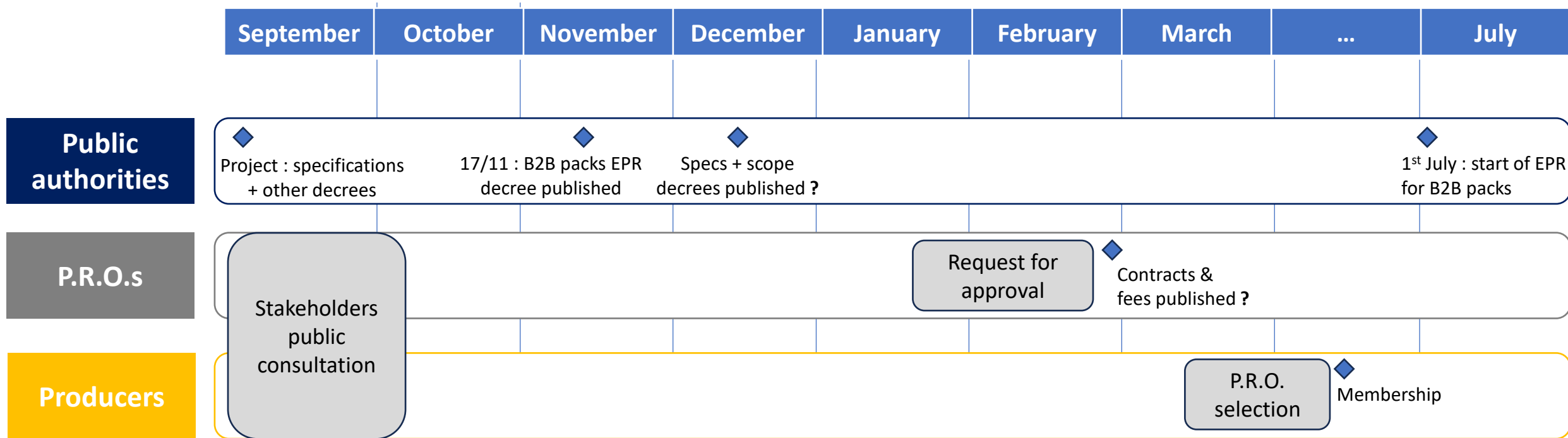


First placing on the market in France	Manufacturer, Distributor or Importer	Other legal entity
Transport pack (empty/full) or parts in grouped/sales pack (not branded)	PRODUCER Company A 	Company B 
	PRODUCER Company C  	Company D (final user) 
Transport pack (empty/full) or parts in grouped/sales pack with Company F branding on pack	Company E   	PRODUCER Company F 

If packaging are then exported out of France & become waste abroad: nothing to declare, no eco-fees.

Risk when the Producer is not in France: will the final user in France be held responsible if the Producer pays nothing?

France planning & candidate PROs (🇫🇷: Éco-organismes)



2 main candidate PROs:

CITEO PRO	Subsidiary of CITEO, dedicated to professional packaging. Experienced in EPR for household packaging since 1992.
twi)ce	100% dedicated to professional packaging. Created in 2019 by Valorplast to push for a voluntary EPR. Experienced in recycling / reuse projects of plastic industrial packaging.

👉 your choice depending on contracts and eco-fees proposed by each PRO



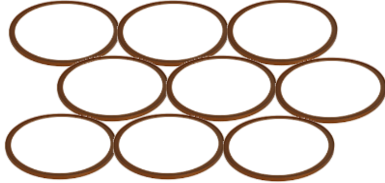

Sustainable Packaging

... and in your companies ...

ERP short-term priority for Renault Group : data reliability !



Before EPR : few impact if errors on material and weight in Packaging Data Sheet

Example 1	<p>Wheels from one supplier outside EU :</p> <ul style="list-style-type: none">In e-PDS : plastic stacking rings between layers : 9kg → 200 tons of annual plastic waste x 400 €/t = 80 000 €Reality : 900 g → 20 tons of plastic waste x 400 €/t = 8 000 €	
Example 2	<p>One harnesses supplier using standard GALIA-ODETTE boxes BAC-O-6423</p> <ul style="list-style-type: none">In e-PDS : forced as <i>one-way</i> packaging : 2,38kg → 80 tons of annual plastic waste x 400 €/t = 32 000 €Reality : returnable boxes, no eco-fee to pay for each rotation.	

Many different errors spread across all PDS... Time-consuming identification/correction but with huge savings.

To all our parts suppliers : pay now attention for each packaging element to

MATERIAL (including soon : % of PCR recycled content in plastic)

WEIGHT (real weight, don't mix kg & grams)

RETURNABLE or ONE-WAY

We are thinking of future penalties for important / recurrent mistakes !



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GALIA Packaging Circular Economy workgroup

How should companies prepare?

- **Review your packaging design** (current and future)
 - Reduce the packaging material as much as possible.
 - Set up reusable solutions as much as possible.
 - Ban non recyclable material or solutions difficult to recycle.
- **GALIA Recommendation : Version 2 will be published in a few weeks**
- **Take care of your National EPR process for packaging**
 - Financial contribution fees at stake
 - Beware of specific country taxes
- **Not all Member States have clarified the requirements yet**
- **Prepare data collection for conformity assessment and reporting**
 - Need to collect packaging data from suppliers/manufacturers
 - Your system should keep track of the packaging solution, with quantities and weight
 - Need to collect effective recycling data from downstream recyclers?
 - Accountability for Reuse

→ **ODETTE Packaging Group white papers to accompany PPWR milestones**

