

PPWR Statement

Intended use of this document

The purpose of this document is to inform and educate our customers and brands on the current status and applicability of PPWR regarding pressure sensitive label materials that UPM Adhesive Materials provides. It is not intended to be used alone as technical documentation but can be used to support those who are required to create documents of conformity when placing packaging materials onto the market. Additionally, please see full details of the [regulation EU 2025/40](#) for reference.

What is PPWR

The European Commission introduced the Packaging and Packaging Waste Regulation (PPWR) to address concerns surrounding environmental sustainability and waste management within the European Union. This regulation aims to standardize and optimize the management of packaging materials and their associated waste streams to reduce environmental impact, promote recycling, and foster a circular economy. Packaging and Packaging Waste Regulation was published in the EU Official Journal in January 2025. The Regulation entered into force on 11 February 2025 and will apply from 12 August 2026 throughout all EU countries, including any imported packaging.

Key Focus areas of PPWR are:

- **Waste Reduction**
- **Recycling and Recovery**
- **Extended Producer Responsibility**
- **Market Harmonization**
- **The use of recycled materials**

Responsibility of UPM Adhesive Materials as label material supplier

UPM Adhesive Materials is responsible for providing information for the **technical documentation** for the label materials we supply that are used for packaging placed onto the EU market (i.e., Transport packaging). The company placing the packaging onto the EU market is responsible for creating a Declaration of Conformity* using information shared in this document and the label material technical information sheet (TIS), enabling them to state their compliance with the requirements of the Packaging and Packaging Waste Regulation (PPWR).

For the packaging in which our label materials are supplied we are creating our DoC* which shall be available for environmental or market surveillance authorities.

**Declaration of Conformity specifically for PPWR, not Declaration of Conformity for Food Contact*

Articles of PPWR directly applicable for label materials (5-9)

Please find below the articles that are directly applicable to the label materials demanding specific properties or functionalities. Label materials not meeting the requirements of these articles will result in the packaging becoming non-compliant. In addition to the contents of this chapter, please refer to our TIS documents for additional material specific information.

Article 5: Substances of Concern (PFAS)

Article 5 sets limits on substances of concern, including PFAS in food packaging to specific concentrations.

- **PFAS Restrictions:** For food contact materials, PFAS limits are set at 25 ppb for individual substances, 250 ppb for the sum of targeted PFAS, or 50 ppm total fluorine.
- **Heavy Metal Limits:** The combined total of lead, cadmium, mercury, and hexavalent chromium must not exceed 100mg/kg.
- **Substance Minimization:** Packaging must be designed to minimize the presence and concentration of hazardous substances in packaging materials, including in emissions and waste, and for materials released during recycling.
- **Documentation:** Companies must demonstrate compliance with these requirements via technical documentation.

➔ **Necessary information for compliance can be found in our [combined statement](#).**

Article 6: Recyclable packaging

By 2030 all packaging must be designed for recycling (DfR). Packaging must meet DfR criteria and will be graded A-C based on recyclability.

All Packaging must be recycled at scale by 2035, requiring packaging to be separated, collected, sorted, and recycled effectively.

According to the guidance published by the EC on the 30th of March 2026, the recyclability requirements of PPWR until 2030 are based on current Packaging Waste Directive (PPWD). In PPWD, the recyclability evaluation for packaging is based on EN 13430:2004 standard.

- ➔ **The EN 13430:2004 does not limit the use of labels on packaging or provide specific design-for-recycling guidelines thus, UPM label materials are currently compliant with Article 6.**
- ➔ **The European Commission will define the DfR criteria in the secondary legislation to come in 2028. For ways to prepare for design-for-recycling, see more information below in the Q&A on the CEN Standard Series EN 18120.**

Article 7: Minimum recycled content

Recycled content targets for plastic packaging will come into effect in 2030, with different packaging types subject to varying target levels. In addition to these format-specific requirements, the average recycled content achieved per manufacturing unit may also influence the overall need and allocation of recycled content across packaging portfolios.

Plastic components such as labels are exempted from the recycled content requirement if their weight is below 5% of the total weight of the packaging.

- ➔ **Typically, the PSL falls into the 5% exemption category. If you have a packaging format where you believe that is not the case, please choose one of our filmic label materials containing PCR or reach out to our experts who can support.**
- ➔ **The average recycled content needed at manufacturing unit level should be considered when selecting materials, as it may still influence overall compliance strategies.**

Article 8: Bio-based Plastics

The intention of this article is to reduce fossil-based material dependency. The European Commission will assess by 2028 whether to set requirements or targets for bio-based plastic packaging.

Article 9: Compostable Packaging

While the primary goal under PPWR is to design packaging for recyclability at scale, there are a few derogations where compostability is required instead. These are sticky labels affixed to fruit and vegetables, which must adhere to composting standards by 2028.

- ➔ **UPM Adhesive Materials does not currently offer any certified compostable label materials.**

Articles of PPWR indirectly applicable for label materials

Please find below the articles that are indirectly applicable to the label materials. The following articles require assessment of the full packaging and will not be impacted only by the label material.

Article 10: Packaging Minimization

Impose limits on empty space to a maximum of 50% for transport / e-commerce packaging and also bans unnecessary packaging such as double walls, false bottoms.

- ➔ **The evaluation for packaging minimization should be done for the final packaging.**

Article 11: Reusable Packaging Targets

PPWR sets reuse targets for transport packaging, grouped packaging used for transport, beverage packaging, and food service packaging. Use of labels differs based on the reuse scheme of the different applications.

➔ **Please reach out to our experts to find the correct label materials for different reuse applications.**

Article 12-13: Labelling & Harmonized Marking

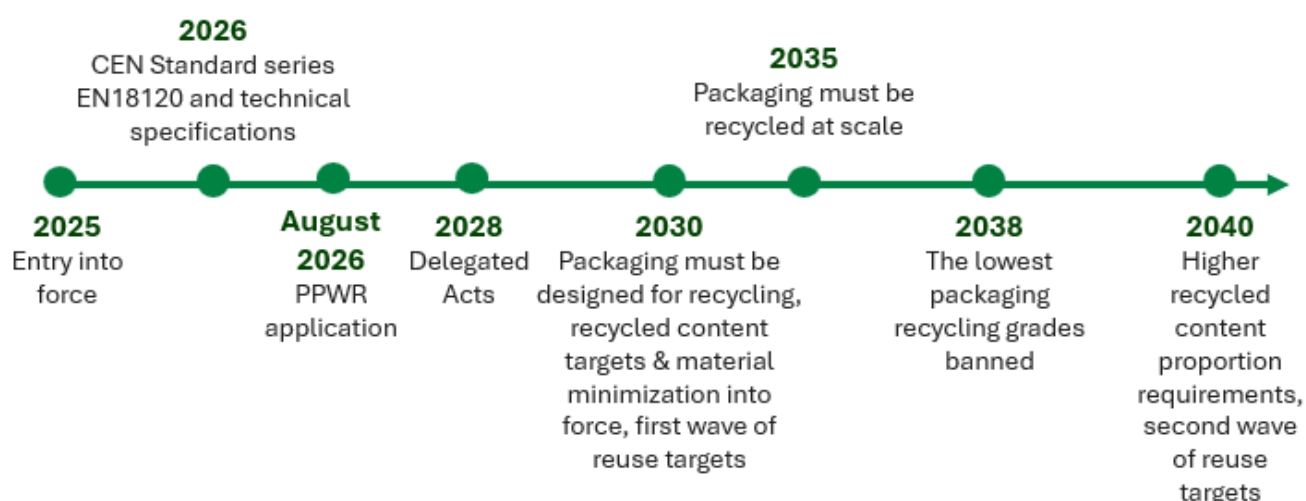
Compulsory, standardized labelling will inform consumers about material composition, reusability, and recycling disposal methods.

Article 45: Extended Producer Responsibility

Producers will be required to pay Extended Producer Responsibility (EPR) fees to offset packaging waste management expenses by 2028. Fees are adjusted to incentivize the adoption of recyclable packaging and increased utilization of recycled materials. Alternatively, less sustainable alternatives will be penalized. The fees will be based on packaging recycling grade (A-C) and also the proportion of recycled content in plastic packaging.

➔ **Choosing label materials designed to support recyclability and that contain recycled content can effectively reduce the impact of EPR fees.**

PPWR Regulatory timeline



Q&A CEN Standard Series EN 18120

1. What is CEN?

- The European Committee for Standardization is one of three European Standardization Organizations (together with CENELEC and ETSI) that have been officially recognized by the European Union and by the European Free Trade Association (EFTA) as being responsible for developing and defining voluntary standards at European level.

2. What is the CEN standard series that was published?

- The EN 18120 standards are a new European standard series which contain design for recycling guidelines for plastic packaging and a testing protocol for evaluating the recyclability of a full package.

3. How are the design for recycling guidelines presented in the standard?

- The traffic light tables presented in the standards indicate if the constituent or component of packaging is fully compatible (green), limited compatible (yellow) or not compatible (red) in recycling. Similar table structure has also been used in design for recycling guidelines from third-party organizations i.e. RecyClass, CEFLEX.
- Fully compatible constituents and components do not negatively impact on the recyclability of packaging. Limited compatible constituents and components have a limited negative impact on recyclability, but their use can still result in recyclable packaging. The use of not compatible components and constituents results in the package to not be recyclable.

4. What is the role of the standards for PPWR?

- The standards are used as the foundation for the Joint Research Center (JRC) to provide to the European Commission (EC) the design for recycling guidelines for the Packaging and Packaging Waste Regulation (PPWR). They are not to be confused with the final legislative text, but it is highly likely that most of the requirements in the standards will also be found from the legislation. This offers brands the opportunity to start preparing for the PPWR guidelines by meeting the criteria of the CEN standards.

5. What is the role of the standards outside of PPWR?

- The standards are applicable in all 34 countries that are part of CEN but are at least for now not used for legislative purposes outside of PPWR. For example, despite the UK being a member of CEN, their design for recycling guidelines is based on the Recyclability Assessment Methodology (RAM) rather than the newly published standards.

6. What is the current status on the timeline for PPWR?

- The next milestone is the publication of design for recycling guidelines from CEN for other materials than plastics, i.e. paper, glass, metals. These guidelines are estimated to be published in July 2026.
- The design for recycling guidelines of PPWR will be published in 2028. In 2030, all packaging placed onto the EU market will need to comply with the PPWR guidelines.

7. What do end-users need to comply with currently regarding Recyclability (Article 6) of PPWR?

- As the legislative design for recycling guidelines are published in 2028, the packaging placed onto the EU market after, needs to comply with the already existing Packaging and Packaging Waste Directive (PPWD). In PPWD, the recyclability evaluation for packaging is based on EN 13430:2004 standard.
- There are no specific guidelines in the EN 13430:2004 that limit the use of labels or require any specific functionality from the label, which means that our materials currently comply with the PPWD.

8. What is the role of existing third-party organizations such as RecyClass or cyclos-HTP?

- Existing third-party organizations continue to offer recyclability evaluations based on their own test protocols and/or certification schemes in the meantime. While brands may still use their services or request different certificates, there are no guarantees that they can be used to claim compliance with the PPWR in the future.

Current Status

Please be aware that the design-for-recycling requirements (DFR) under PPWR have not yet been established and will not be conclusive until secondary legislation (delegated Acts) is set in early 2028. **→Thus, claiming PPWR design-for-recycling compliance for specific label materials is not something label material suppliers can currently offer.**

In the interim period prior to 2028, brands can decide if they choose to begin preparing their packaging in alignment with the aforementioned standards, or if they will follow other existing guidelines such as RecyClass / similar third-party organizations. UPM Adhesive Materials can currently refer to materials within our portfolio that carry third-party recyclability approvals, state how our materials fulfill the requirements of the standards, or state that our materials currently comply with PPWD. Our long-term approach is to ensure our materials meet the requirements set forth in the EN 18120 standards and in the future, the requirements that will be established under PPWR. For more information, please visit our [PPWR Webpage](#)

General information regarding recyclability

UPM Adhesive Materials (hereafter UPM) provides pressure sensitive label materials (PSL) and as such, recyclability must be assessed based on the whole package. Many factors can impact overall recyclability. The main package determines the recycling stream, and we recommend using compatible label materials for the given substrate. Ensuring compatible label materials are used with the main package can support in enabling the highest level of recyclability, as the PSL generally becomes an integral part of the finished packaging.

→ [Refer to packaging recyclability guide](#)

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