

AIAC/BWPA Spring Event 2025  
15 May 2025

# Cepi Updates on EUDR

**Ulrich Leberle, Raw Materials Director**

Reg.(EU) 2023/111 - Main obligation: **place** on the EU market / **export** from EU market products only if

they are  
**deforestation** and  
**forest-**  
**degradation free**

they have been  
produced in  
accordance with  
**legislation of the**  
**country of**  
**production**

they are covered by a  
**due diligence**  
**statement (DDS)**

 **Due diligence obligation** to ensure compliance

# EUDR: new timeline after postponement

The Regulation entered into force on **29/06/2023**

**December 2024**

**EC Information System** is active

**NB:** there are now 2 systems: a “test” system for training and a legally valid one!

**30 June 2025**

**Country classification** in place

(low, standard, high risk)

**30 December 2025**

Obligations for **Competent Authorities** enter into application

Obligations for **non-Small and micro operators and traders** enter into application

**30 June 2026**

Obligations for **Small and Micro operators and traders** enter into application  
(except for the timber sector)

# EUDR implementation going forward

## We have:

- ✓ Updated Guidance (April 2025)
- ✓ Updated FAQs (April 2025)
- ✓ Competent Authorities in most Member States
- ✓ Information System

## We still miss:

- ❑ Country Benchmarking
- ❑ 3 Member States have not designated a competent Authorities yet (Greece, Malta, Poland)

## New information from updated Guidance and FAQs

Clarification of role  
of downstream  
operators

Transition time for  
EUTR products

Re-importing into the  
EU

**NB:** FAQs and Guidance are not legally binding!

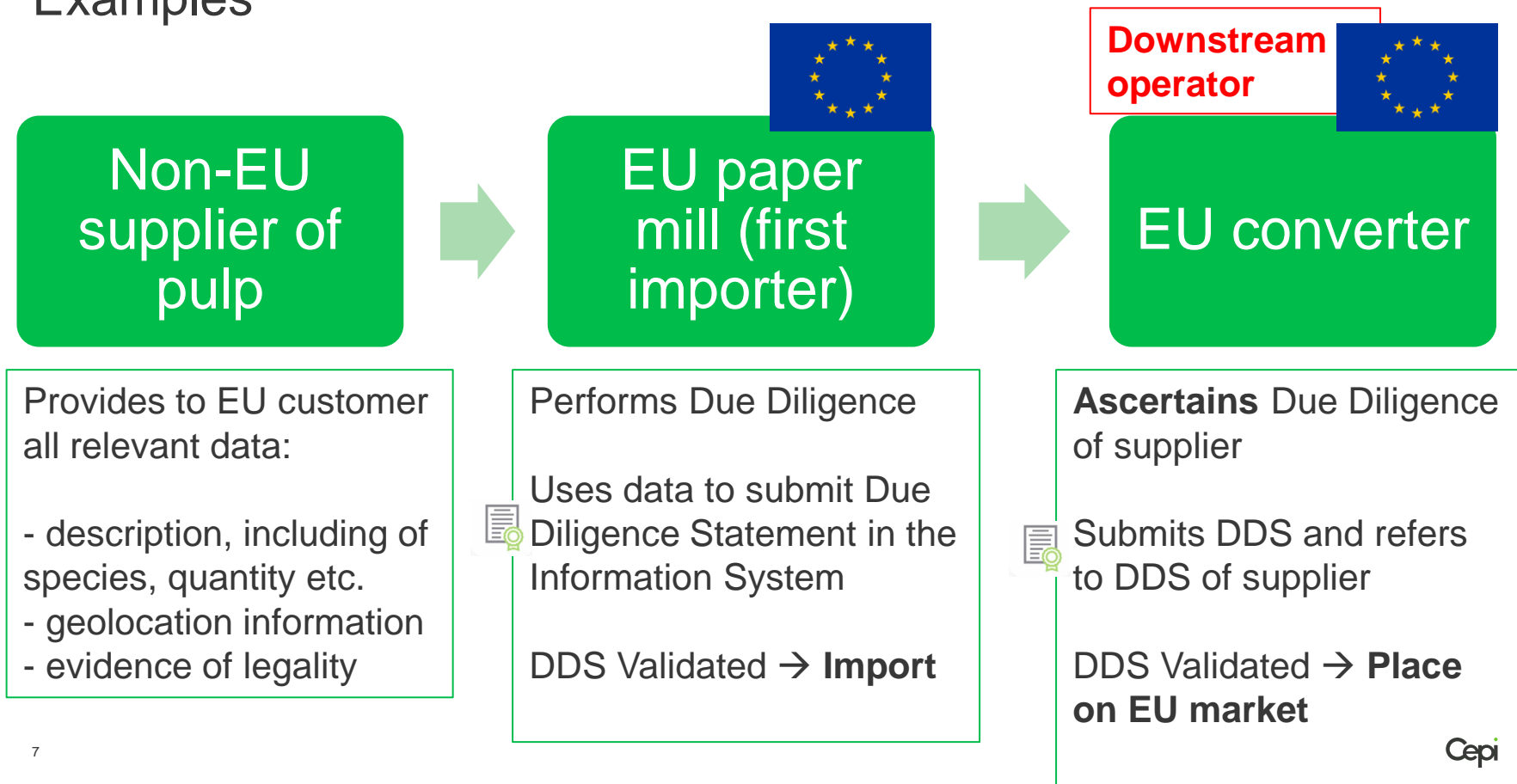
## Obligations of downstream operators – FAQ 3.4

### Who is a downstream operator?

Downstream operators are those who **place on the market** or **export** relevant products listed in Annex I whose components or ingredients (all of them) have **previously been subject to due diligence under EUDR** and have been the **object of a DDS** submission.



# Examples



## What does it mean to “ascertain”? FAQ 3.4

### Key Obligations of downstream operators:

1. Downstream non-SME operators and non-SME traders **ascertain** that due diligence was exercised upstream **by collecting the reference numbers and verification numbers of DDS submitted upstream and verifying the validity of the reference numbers.**

2. Submit a due diligence statement (DDS) and refer to previous DDS



## What does it mean to ascertain? FAQ 3.4

### Possible further steps:

Given that non-SME operators and non-SME traders retain legal responsibility in the event of a breach of the Regulation, they could, based on the risks and particularities of their supply chains, choose to take further steps:

- check the information provided in previous DDS regarding country of production (...) to verify the completeness and plausibility of the information
- use the country benchmarking;
- use the public report about Due Diligence of the supplier;
- use the results of audits
- request further information on a voluntary basis

# Important clarification on transmission of information

## FAQ 3.4:

downstream non-SME operators and non-SME traders do not have to collect information required by Art. 9 EUDR (including geolocation) but only ascertain that due diligence was exercised

## FAQ 7.15:

Art. 4(7) EUDR does **not** entail a legal obligation to share **geolocation information** along the supply chain, as ascertaining that due diligence was exercised upstream does not necessarily imply checking every single DDS upstream.



NB: geolocation information may be hidden

## Submission - Confirmation



By submitting this due diligence statement the operator confirms that due diligence according to Regulation 2023/1115 was carried out and that no or only a negligible risk was found that the relevant products do not comply with Article 3, point (a) or (b), of that Regulation.

☒ Check this box to allow the geolocation data of this DDS to be visible when referenced in another DDS



✓ Confirm & Sign

× Cancel

# Clarification on status of EUTR products and transition time

## Guidance

***Q1: Are paper products which are placed on the market from 30 December 2025 but that are manufactured from timber that was harvested and placed on the market between 29 June 2023 and 30 December 2025 required to have a Due Diligence Statement?***

harvested timber and the products manufactured from such timber must comply with **EUTR** - they do not need a Due Diligence Statement

→ Important to keep “adequate and verifiable evidence” that the wood used was harvested and placed on the EU market in the transition time or that the relevant product was placed on the market in the transition time (see **FAQ 9.2** for more info)

## Clarification on status of EUTR products and transition time

- In case of **export or re-import** of a product which was initially placed on the EU market during the transitional period (itself or in the form of an upstream relevant product), a “**conventional DDS reference number**” will be communicated by the Commission that can be used in the customs declaration submitted for export or re-import.
- In case of **mixing of stocks** (transition phase and post-transition), the DDS should cover only the post-transition material

## Re-importing into the EU – FAQ 5.4



Where an operator re-import a product that was previously exported from the EU market and places it under the customs procedure ‘release for free circulation’, it is considered a “downstream operator”

- If the re-importer is a non-SME, **already existing due diligence statements can help ascertain that due diligence was exercised upstream;**
- The non-SME re-importer needs to submit a DDS prior to re-importing and needs to provide the reference number received for its DDS when releasing products for free circulation.
- **Conventional DDS number** can be use in case of the re-import of a product which was initially placed on the market before December 2025



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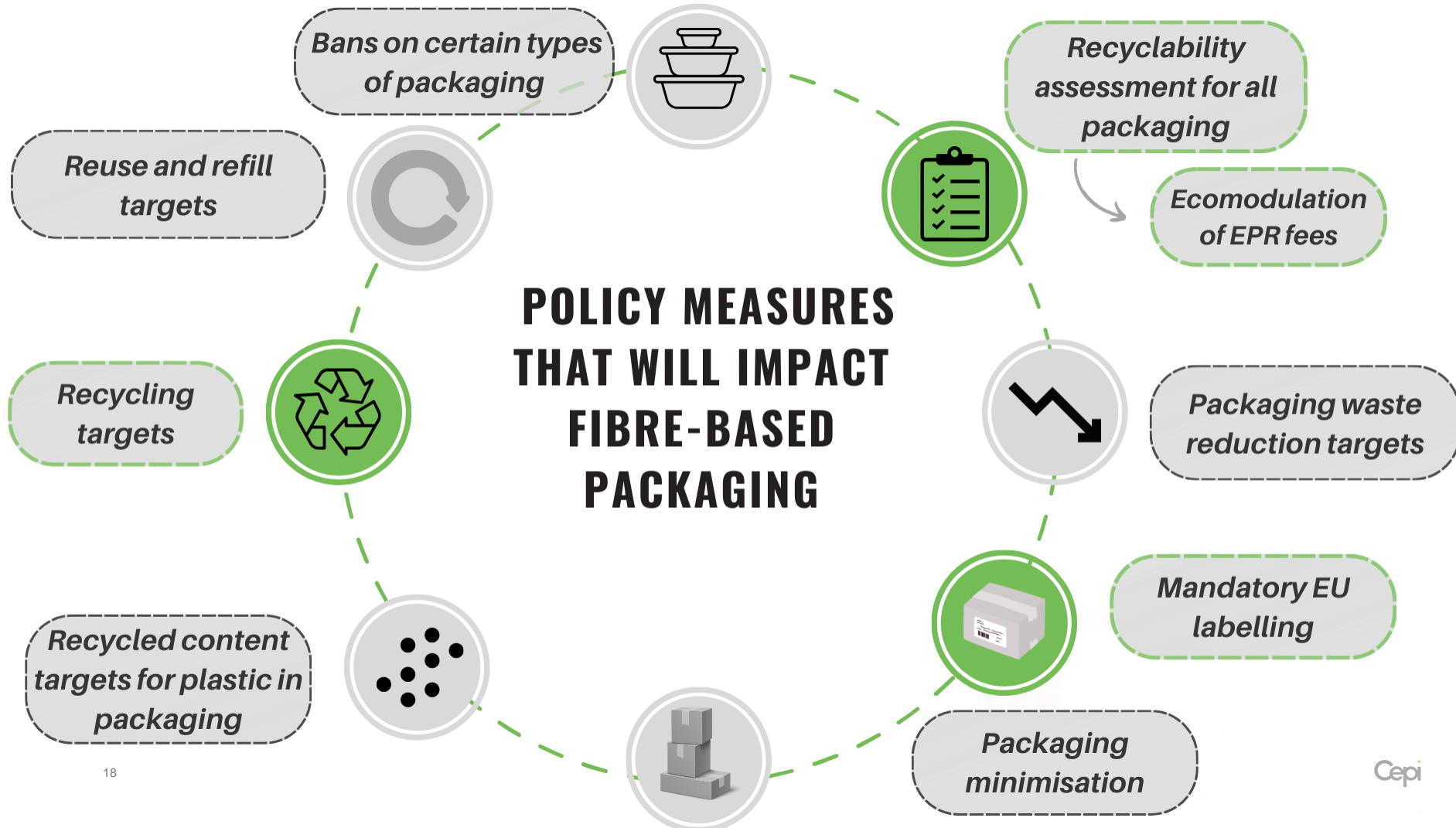


15 May 2025



# EU Regulation on Packaging and Packaging Waste

**Ulrich Leberle, Raw Materials  
Director**



# Legislative timeline

2022

30 November 2022  
Publication of the European  
Commission Legislative  
Proposal

2024

December 2024  
Adopted by Council and  
European Parliament

2025

22 January 2025  
Publication in the Official  
Journal of the EU –  
Entry into force 20<sup>th</sup> day  
following publication

2026

12 August 2026  
Application of Regulation

# PPWR - ROADMAP

2025

By 31 December

Recycling targets for Member States

65% by weight of all packaging waste generated

75% of paper and cardboard contained in packaging waste generated.

2026

By 12 August

Maximum PFAS concentration levels for all  
food-contact packaging

2027

By 12 February

The HORECA sector shall offer a system for consumers to bring their own  
containers for takeaway food and/or beverages.



# PPWR - ROADMAP

2028

**By 1 January**

Member States (MS) annual reporting on packaging placed on the market and collected (per type and material).

**By 12 February**

HORECA to provide the option of reusable packaging.

**By 12 August**

Harmonized consumer sorting labels for all packaging (except transport packaging and DRS).

2029

2030

**By 1 January**

All packaging must be designed for recycling (DfR).

Minimum recycled plastic content targets for the plastic part in packaging.

Reuse targets for sales packaging for alcoholic and non-alcoholic beverages, transport packaging and grouped packaging (excl. cardboard boxes).

Waste reduction target of 5% for Member States.

Maximum empty space ratio of 50% for grouped packaging, transport packaging, e-commerce packaging.

Market bans on certain uses of single use plastic packaging

**By 31 December**

Recycling targets for Member States:

70% by weight of all packaging waste generated

85% of paper and cardboard contained in packaging waste generated.

# PPWR - ROADMAP

2035

**By 1 January**

All packaging must be recyclable at scale - 55% recycling rate per packaging type.

Waste reduction target of 10% for Member States

2038

**By 1 January**

Stricter recyclability requirements  
(grade C banned)

2040

**By 1 January**

Minimum recycled plastic content targets for the plastic part in packaging.

Reuse targets for sales packaging for alcoholic and non-alcoholic beverages, transport packaging and grouped packaging (excl. cardboard boxes).

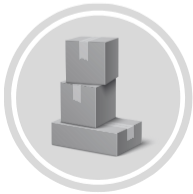
# REDUCE



***Bans on certain types of single-use plastic packaging***



***Packaging waste reduction targets***



***Minimisation targets***

Single use plastic packaging  
for foods and beverages filled  
and consumed within the  
premises in the HORECA  
sector



Single use plastic  
grouped packaging  
used at the point  
of sale to group  
goods



# Bans on single-use plastic packaging by 1 January 2030



Single use plastic packaging  
for unprocessed fresh fruit  
and vegetables that weigh  
less than 1.5 kg



Single use plastic  
packaging  
containing  
individual portions  
or servings in  
HORECA sector

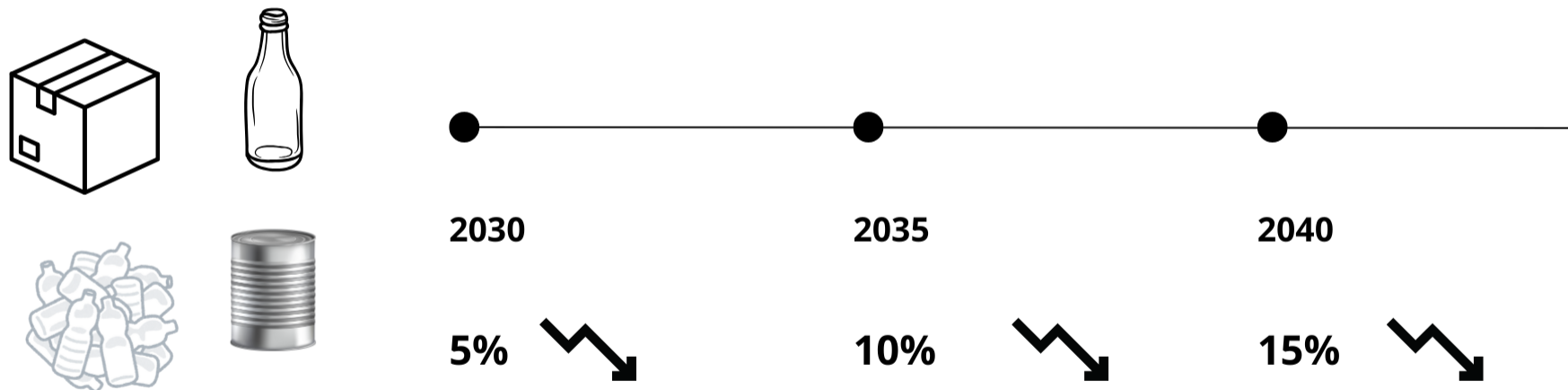
Very lightweight  
plastic carrier  
bags



*\*Scope of bans & examples of the packaging  
formats to be provided by Q4 2026 (tbc) from  
Commission.*



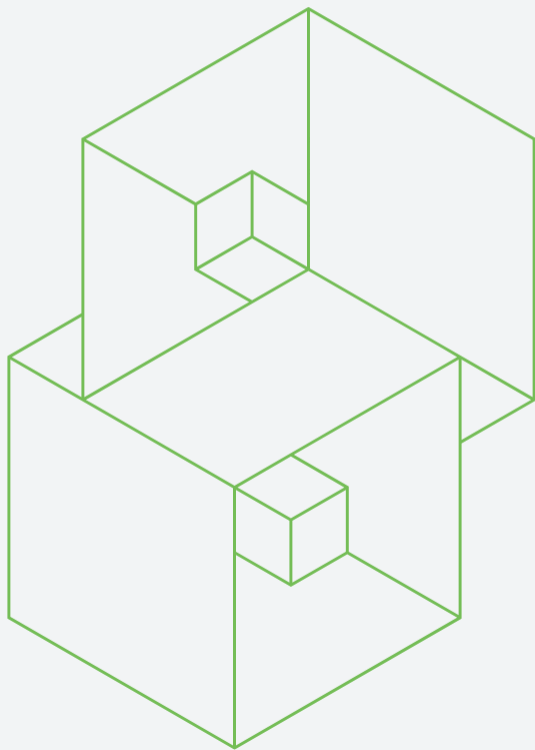
# Packaging waste reduction targets



*Waste reduction targets are cross-material (one target for all packaging waste) and are imposed on Member States.*

*The base year is 2018.*

# Packaging minimisation



By 1 January 2030, the economic operator who fills packaging in:

- grouped packaging,
- transport packaging
- e-commerce packaging

shall ensure that the empty space ratio is maximum 50 %.

# REUSE & REFILL



***Reuse targets and refill obligation***



# Reuse/refill targets

## Packaging type/use



**Transport packaging** or sales packaging used for transporting products, including via e-commerce (B2C & B2B).

Reuse/refill  
targets  
(minimum  
targets)

**40% by 2030**  
**70% by 2040**  
(aspirational)

Exemptions  
(non-  
exhaustive)

Cardboard  
boxes



**Transport packaging** or sales packaging used for transporting products used **intra-business** and **B2B** in same Member State.

**100% by 2030**

Cardboard boxes  
IA to exempt  
pallet wrappings  
and straps (tbc).

**Grouped packaging** in the form of boxes used outside of sales packaging to group a certain number of products to create a stock-keeping or distribution unit

**10% by 2030**

**25% by 2040**  
(aspirational)

Cardboard  
boxes



## Reuse/refill targets

### Packaging type/use

Reuse/refill  
targets  
(minimum  
targets)

Exemptions  
(non-  
exhaustive)

Alcoholic and non-alcoholic beverages  
in sales packaging

**10% by 2030**

40% by 2040  
(aspirational)

Highly  
perishable  
beverages,  
milk and  
milk  
products

**Take-away packaging for beverages or ready-  
prepared food** intended for immediate  
consumption filled into a container at the point  
of sale.

10% by 2030  
(aspirational)

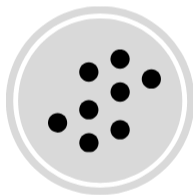
# RECYCLE



***Recycling targets***



***All packaging shall be recyclable via recyclability assessment***



***Recycled content targets for plastic in packaging***



# Recycling targets for Member States

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## By 31 December 2025

**65% by weight of all packaging waste generated.**

Material specific:

50% plastic

25 % of wood

70 % of ferrous metals;

50% aluminium

70% glass

**75% paper/cardboard**

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## By 31 December 2030

**70% by weight of all packaging waste generated.**

Material specific:

55% plastic

30 % of wood

80 % of ferrous metals;

60% aluminium

75% glass

**85% paper/cardboard**



# Recyclability requirements for all packaging

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## By 1 January 2030

Comply with Design for Recycling criteria.

Only performance grades A,B,C allowed on the market.

## By 1 January 2035

To be recycled at scale.

55% recycling rate for all packaging types, 30% for wood packaging.

## By 1 January 2038

Only performance grades A & B allowed on the market.



# Recyclability assessment for all packaging

Each packaging unit assessed based on design for recycling criteria developed for each packaging category:

## 1. Paper/cardboard packaging

## 2. Composite packaging of which the majority is paper/cardboard

The assessment will provide a recyclability score -->

Recyclability score	Recyclability grade	
	By 2030	By 2038
Higher or equal to 95%	A	A
Higher or equal to 80%	B	B
Higher or equal to 70%	C	Market ban
Lower than 70%	Market ban	Market ban

**Where a unit of packaging includes integrated components**, the recyclability assessment shall include all integrated components. In case the integrated components can be separated as a result of mechanical stress during transportation or sorting, a separate recyclability assessment can be carried out.

**Where a unit of packaging includes separate components**, the recyclability assessment shall be carried out separately for each separate component.

# Recycled content targets for plastic part in packaging

Packaging type	By 2030	By 2040
Single use plastic beverage bottles.	30%	65%
Contact sensitive packaging		
PET as major component	30%	50%
from plastic materials other than PET	10%	25%
Other plastic packaging	35%	65%

\*Recycled content recovered from post-consumer plastic waste, per unit of plastic packaging.

**Exemptions:** any plastic part representing less than 5% of the total weight of the whole packaging unit, contact sensitive plastic packaging for food only intended for infants and young children, in case the amount of recycled content poses a threat to human health and results in noncompliance of packaged products with Regulation (EC) 1935/2004;



# Substances of concern in packaging

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**By 12 August 2026**

Restriction on **food contact packaging containing** per- and polyfluorinated alkyl substances - **PFASs** above certain thresholds.

**By December 2026**

Commission and ECHA to prepare a **report on the presence of substances of concern in packaging** to determine the extent to which they negatively affect the re-use and recycling of materials or impact chemical safety.

# RECYCLE



***By 12 August 2028 - Harmonised sorting labels for all packaging (except transport packaging and DRS).***



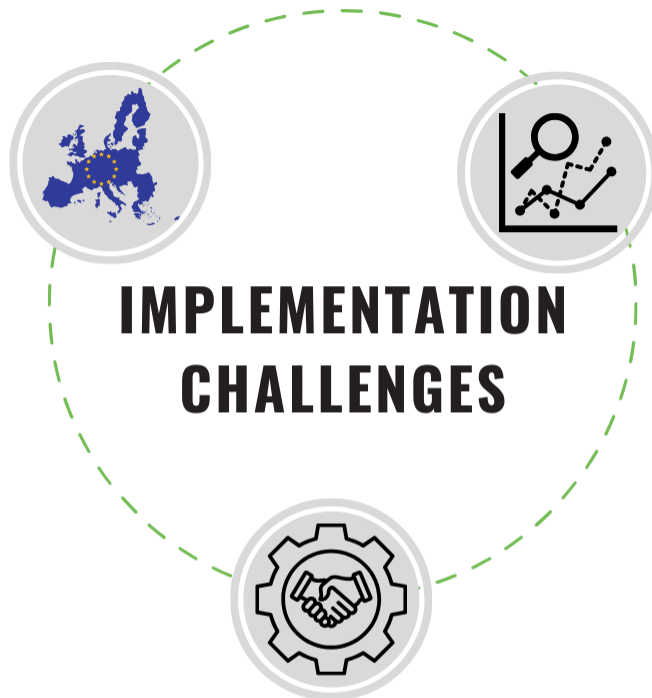
***By 12 August 2028 - Mandatory labelling containing information on recycled plastic content***



***By 1 January 2030 - Ecomodulation of Extended Producer Responsibility fees according to recyclability assessment and recycled plastics content***

***The revised PPWR will not deliver the anticipated and necessary harmonisation of EU rules.***

***High risk of diverging national rules on packaging - Member States retained the freedom to introduce additional measures on certain policy areas.***



***Legal uncertainty on the scope and timeline of certain policy measures.***

***EU industry and markets need regulatory predictability to thrive.***

***Setting recyclability requirements for market placement of packaging require technical expertise and appropriate tools.***

***Cooperation between the Commission, the industry and European standardisation bodies is required.***

***The Commission needs to set the necessary safeguards to ensure a well-functioning single market.***



***Legal clarity and predictability needs to be provided to ensure both timely compliance with EU rules and a resilient EU industry.***

***The Commission needs to guarantee a formal pathway of cooperation with the industry and CEN - European Committee for standardisation.***

***The paper and board industries have valuable technical expertise and tools.***



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