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SECURING THE FUTURE OF CITRUS THROUGH SCIENCE
Cutting Edge No. 442

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Packing Waste Regulation

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The European Union (EU) is implementing a significant regulatory shift in its approach to packaging through the **Packaging and Packaging Waste Regulation (PPWR) 2025/40**, which replaces the previous Directive 94/62/EC.

The primary goals of the PPWR are to:

1. Ensure all packaging is recyclable
2. Optimise packaging materials and reduce waste
3. Restrict harmful substances
4. Harmonise the EU packaging rules
5. Improve producer responsibility
6. Ensure traceability

The PPWR is a legally binding EU regulation that applies to all EU member states. It applies to all packaging placed on the EU market, irrespective of where the packaging originates. The PPWR should be viewed as the minimum requirement for packaging to gain access to the EU, as individual member states and importers are entitled to apply more stringent regulations as they see fit.

For South African citrus exporters, the most critical immediate implications are effective of 12 August 2026.

The following is required from the 12th of August 2026:

1. **Declaration of Conformity and technical documentation should be passed along the value chain.**
2. **The sum of the concentrations of lead, cadmium, mercury, and hexavalent chromium resulting from substances present in packaging or packaging components shall not exceed 100 mg/kg.**
3. **Food contact packaging may not contain per- and polyfluorinated alkyl substances (PFAS) in a concentration equal to or above the following limit values:**
   a. **25 ppb for each PFAS, measured using targeted PFAS analysis (polymeric PFAS excluded from quantification).**
   b. **250 ppb for the sum of PFAS, measured as the total of the targeted PFAS analysis, where applicable after prior degradation of precursors (polymeric PFAS excluded from quantification); and EN 124/331.**
   c. **50 ppm for PFAS (including polymeric PFAS) where the total fluorine content exceeds 50 mg/kg.**

For the fields required for the Declaration of Conformity (DOC), please refer to Annex 1.

The CGA has also developed a template of a DOC that is relevant to citrus packaging. The is not an official template, but serves as a document exporters can use to engage their clients to confirm whether the level of detail provided is sufficient. Please email albert@cga.co.za if interested.

Importantly, the technical documentation requires information on each component that makes up a packaging unit. Exporters and packhouses are advised to request material declarations and technical specifications from suppliers of the components that make up a packaging unit. Any claims that are made in the DOC must be substantiated with the relevant evidence, should it be requested.

The PPWR takes a phased approach concerning the implementation of the rest of the sustainability requirements:

- 12 February 2028: Compostable Packaging – Sticky labels to be industrially compostable.
- 12 August 2028: Sorting labels will be obligatory on packaging and must be compliant with the EU labelling system. https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L_202500040#art_12
- 12 February 2029: Reusable packaging must include a label indicating it is reusable.
- 1 January 2030: Restrictions on the use of certain packaging formats.
- 1 January 2030: Packaging must be reduced to the minimum volume or weight to ensure its functionality.
- 1 January 2030: Plastic packaging must consist of a minimum percentage of recycled plastic. https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L_202500040#art_7

- 1 January 2030: 70% of packaging must be recyclable, and 40% of transport packaging must be recyclable.

It is important to note that the PPWR forms a part of the broader EU compliance framework, and there are other overlapping regulations that may also need to be considered.

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Annex 1: Fields necessary for the declaration of conformity as found in Annex VIII of REGULATION (EU) 2025/40

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 in 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):

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Regulering van Verpakkingsafval

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Die Europese Unie (EU) implementeer 'n beduidende regulatoriese verskuiwing in sy benadering tot verpakking deur die ***Packaging and Packaging Waste Regulation (PPWR) 2025/40***, wat die vorige Direktief 94/62/EG vervang.

Die primêre doelwitte van die PPWR is om:

1. Te verseker dat alle verpakking herwinbaar is
2. Verpakkingsmateriaal te optimaliseer en afval te verminder
3. Skadelike stowwe te beperk
4. Die EU-verpakkingsreëls te harmoniseer
5. Produsentverantwoordelikheid te verbeter
6. Naspeurbaarheid te verseker

Die PPWR is 'n wetlik bindende EU-regulasie wat op alle EU-lidlande van toepassing is. Dit is van toepassing op alle verpakking wat op die EU-mark geplaas word, ongeag waar die verpakking vandaan kom. Die PPWR moet beskou word as die minimum vereiste vir verpakking om toegang tot die EU te verkry, aangesien individuele lidlande en invoerders geregtig is om strenger regulasies toe te pas soos hulle goeddink.

Vir Suid-Afrikaanse sitrusuitvoerders is die mees kritieke onmiddellike implikasies op 12 Augustus 2026.

Die volgende word vereis vanaf 12 Augustus 2026:

1. **Verklaring van Ooreenstemming en tegniese dokumentasie moet deur die waardeketting deurgegee word.**
2. **Die som van die konsentrasies van lood, kadmium, kwik en heksavalente chroom, wat voortspruit uit stowwe wat in verpakking of verpakkingskomponente teenwoordig is, mag nie 100 mg/kg oorskry nie.**
3. **Voedselkontakverpakking mag nie per- en polifluorineerde alkielstowwe (PFAS) bevat in 'n konsentrasie gelyk aan of bo die volgende grenswaardes nie:**
   a. **25 ppb vir elke PFAS, gemeet met behulp van geteikende PFAS-analise (polimeriese PFAS uitgesluit van kwantifisering).**
   b. **b. 250 ppb vir die som van PFAS, gemeet as die totaal van die geteikende PFAS-analise, waar van toepassing ná voorafgaande degradasie van voorlopers (polimeriese PFAS uitgesluit van kwantifisering); en EN 124/331.**
   c. **c. 50 dpm vir PFAS (insluitend polimeriese PFAS) waar die totale fluoorinhoud 50 mg/kg oorskry.**

Vir die velde wat vereis word vir die Verklaring van Ooreenstemming (DOC), verwys asseblief na Aanhangsel 1.

Die CGA het ook 'n DOC-templaat ontwikkel wat relevant is vir sitrusverpakking. Die doel van hierdie templaat is nie om as 'n amptelike templaat te dien nie, maar as 'n dokument wat uitvoerders kan gebruik om hul kliënte te betrek om te bevestig of die vlak van detail in die templaat voldoende is. Stuur asseblief 'n e-pos na albert@cga.co.za as u belangstel.

Dit is belangrik dat die tegniese dokumentasie inligting vereis oor elke komponent wat 'n verpakkingseenheid uitmaak. Uitvoerders en pakhuise word aangeraai om materiaalverklarings en tegniese spesifikasies van verskaffers van die komponente wat 'n verpakkingseenheid uitmaak, aan te vra. Enige eise wat in die DOC gemaak word, moet met die relevante bewyse gestaaf word, indien dit versoek word.

Die PPWR volg 'n gefaseerde benadering rakende die implementering van die res van die volhoubaarheidsvereistes:

- 12 Februarie 2028: Komposteerbare Verpakking – Kleef-etikette moet industrieel komposteerbaar wees.
- 12 Augustus 2028: Sorteer-etikette sal verpligtend op verpakking wees en moet voldoen aan die EU-etiketteringstelsel.
- 12 Februarie 2029: Herbruikbare verpakking moet 'n etiket insluit wat aandui dat dit herbruikbaar is.

JOU HEFFING WERK VIR JOU - PRODUSENTE SE HEFFINGS WORD AANGEWEND OM DIE AKTIWITEITE VAN DIE CRI TE BEFONDS

- 1 Januarie 2030: Beperkings op die gebruik van sekere verpakkingsformate.
- 1 Januarie 2030: Verpakking moet tot die minimum volume of gewig verminder word om die funksionaliteit daarvan te verseker.
- 1 Januarie 2030: Plastiekverpakking moet uit 'n minimum persentasie herwinde plastiek bestaan.
- Januarie 2030: 70% van verpakking moet herwinbaar wees, en 40% van vervoerverpakking moet herwinbaar wees.
- Dit is belangrik om daarop te let dat die PPWR deel vorm van die breër EU-nakomingsraamwerk, en daar is ander, oorvleuelende regulasies wat moontlik ook oorweeg moet word.

<u>Aanhangsel 1: Velde wat nodig is vir die Verklaring van Ooreenstemming soos gevind in Aanhangsel VIII van REGULASIE (EU) 2025/40</u>

EU-verklaring van ooreenstemming Nr. (*) …

1. Nr. … (unieke identifikasie van die verpakking):
2. Naam en adres van die vervaardiger en, waar van toepassing, die vervaardiger se gemagtigde verteenwoordiger:
3. Hierdie verklaring van ooreenstemming word uitgereik onder die uitsluitlike verantwoordelikheid van die vervaardiger.
4. Voorwerp van die verklaring (identifikasie van die verpakking wat naspeurbaarheid moontlik maak): beskrywing van die verpakking:
5. Die voorwerp van die verklaring waarna in punt 4 verwys word, is in ooreenstemming met die toepaslike Unie-harmonisasie-wetgewing: … (verwysing na die ander toegepaste Unie-wette).
6. Verwysings na die toepaslike geharmoniseerde standaarde of die algemene spesifikasies wat gebruik word of verwysings na die ander tegniese spesifikasies met betrekking tot watter ooreenstemming verklaar word:
7. Waar van toepassing, die aangemelde liggaam … (naam, adres, nommer) … uitgevoer … (beskrywing van intervensie) … en die sertifikaat(e) uitgereik het: … (besonderhede, insluitend die datum van die sertifikaat(e), en, waar van toepassing, inligting oor die duur en voorwaardes van geldigheid).
8. Bykomende inligting:

Geteken vir en namens:
(plek en datum van uitreiking):
(naam, funksie) (handtekening):