

1 GDPF Section 2: PPWR Packaging Compendium – Instructions for entering packaging formats

The variety of possible packaging designs – consisting of several units and components – makes it essential to have clear and consistent terminology. These terms must also be placed in the context of the PPWR requirements.

For this reason, the PPWR Packaging Compendium was created. It provides guidance on how to create specific packaging formats in the Packaging Cockpit. The list and instruction for each packaging formats can be found here:

The PPWR Packaging Compendium

To use the terms in the compendium correctly, the terms used in the Packaging Cockpit are explained below and placed in the context of PPWR terms. The PPWR Packaging Compendium is provided free of charge, without liability or warranty.

1.1 Definition of the packaging hierarchy in the Packaging Cockpit



The **material composition** describes the layer sequence as well as information on the properties and origin of individual material layers that make up packaging components.

Packaging components are individual parts consisting of one or more material compositions, which together form a packaging unit.

A **packaging unit** refers to the combination of one or more packaging components that perform a packaging function, such as product protection, containment, presentation or provision of product information. In some cases, a retail product may consist of several packaging units, for example a cream jar with a lid in a folding box. See the chapter

"Packaging unit, integrated and separate components according to PPWR – Effects on data entry" for more information. The PPWR Packaging Compendium helps you enter a wide variety of packaging formats into the Packaging Cockpit.

A **packaging system** refers to a combination of packaging units and/or other packaging systems. This allows to create:

- Sales packaging with separate packaging units,
- Sales packaging consisting of a multipack
- and any combination of sales packaging, grouped packaging and transport packaging.

1.2 Definitions of packaging components in the Packaging Cockpit



The **main body** is the central component of a packaging unit and forms its structural core, to which all other components relate. It represents the minimum necessary component of a packaging unit and is recorded once per packaging unit. The main body can be used on its own or in combination with supplementary packaging components such as closures, decorative elements or inlays.



The **closure** describes the component that closes the main body.



Decorations are components that are attached to or around the main body. They can serve decorative, informal or product protection purposes. Examples include (shrink) sleeves, banderoles or labels. Decorations can be attached with or without adhesive.



Inlays are components that are found inside the main body and are surrounded by it. They offer additional functions such as protection or organisation of the product.



Packaging aids are components that do not fulfil a primary packaging function but provide supporting functions for the packaging unit. These include components that are physically attached to the main body, such as drinking straws attached to beverage composite cartons, adhesive tapes on cartons or seal threads in combination with hang tags.

1.3 Packaging or part of the product?

Article 3(1) of the PPWR contains the basic definition of packaging. The following overview summarises the essential aspects of this definition in a practical manner:

"Packaging" is defined as any item used to protect, transport, store or present products. It is important to note that packaging is not part of the product itself, but fulfils a supporting function. This function includes:

- Packaging that protects the product during its lifetime or makes it durable, e.g. a yoghurt pot.
- Components of the packaging that are integrated into or attached to the packaging and support its function, such as lids or carrying aids.

- Attachments or fastenings directly on the product if they have a packaging function (e.g. labels or clips) but are not part of the product itself
- Service packaging that is filled in the shop, such as paper bags for pastries or snack packaging
- Disposable packaging that is filled with a product directly at the point of sale (e.g. plastic cups at a juice bar)
- Single-portion packaging used for tea or coffee, for example, which is used with the product and also disposed of together with it. This applies to both permeable and impermeable units (e.g. tea bags or coffee capsules).

In addition to the definition, Annex I of the PPWR provides examples – albeit not exhaustive – of items that are to be classified as packaging or as part of the product. In practice, the distinction remains challenging in cases that are not explicitly mentioned.

Examples:



Toolboxes are considered part of the product if they are used for permanent storage. Other forms of packaging, such as cardboard boxes, on the other hand, can be classified as packaging. If the box is wrapped in foil and has a label on it, this would again be considered packaging.



Package inserts or operating instructions are considered part of the product, as they are necessary for safe and proper use.

In case of doubt, it is advisable to consult with licensing partners (eg. EPR systems) or national authorities at an early stage in order to make a legally sound and well-founded decision.

1.4 Packaging levels of the PPWR and their classification according to the GPDF

The PPWR distinguishes three packaging levels in Article 3, paragraphs 5 to 7:

- **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 (EU, 2025/40, Art. 3 (5)).
- **Grouped packaging:** Packaging conceived so as to constitute a grouping of a certain number of sales units at the point of sale, irrespective of whether that grouping of sales units is sold as such to the end user or whether it serves as a means to facilitate the restocking of shelves at the point of sale or to create a stock-keeping or distribution unit, and which can be removed from the product without affecting its characteristics (EU, 2025/40, Art. 3 (6)).
- **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, but which excludes road, rail, ship and air containers (EU, 2025/40, Art. 3 (7)).

In practice, the distinction between packaging levels is not always clear, as there is often overlap and room for interpretation. The PPWR Packaging Compendium therefore provides a guiding assessment for each packaging format presented, based on defined principles:



- **Grouped packaging:** Shrinkfoil
- **Sales packaging:** Bottles



- **Sales packaging:** Becher
- **Sales packaging:** Banderole



- **Sales packaging:** Cup
- **Sales packaging:** Banderole
- **Grouped packaging:** Box

Guidance on classification between sales packaging and grouped packaging:

Components that together form the smallest saleable unit at the point of sale are classified as sales packaging. If sales units are additionally grouped together by a packaging component (e.g. shrink wrap for a pack of six water bottles) that can be sold both as a bundle and as individual units, this component is classified as grouped packaging.

A distinction between grouped and transport packaging is deliberately not made, as the scope in practical application is too broad to derive a universally valid regulation (e.g., in the case of plastic crates for fruit and vegetables). Instead, the PPWR Packaging Compendium is intended as a practical aid, providing concrete examples and assessments that can be applied on an individual basis..

1.5 Packaging unit, integrated and separate components according to PPWR – effects on data entry

The packaging unit plays a central role in the PPWR. According to this, recyclability assessments must be carried out (EU, 2025/40 Art. 6 (4) b). It may consist of integrated and separate components (EU, 2025/40, Art. 3 (1) 43 & 44), which in turn may require a separate assessment of recyclability depending on their design and handling (EU, 2025/40, Art. 6 (9)). As a standardised method for calculating recyclability is not expected to be available until 2028, the following definitions specify how the terms are to be understood and applied in data entry in the Packaging Cockpit. The latter is also presented for each packaging format in the PPWR Packaging Compendium.

1.5.1 When are components of packaging specified in a packaging unit?

Components are considered part of a packaging unit if they are either permanently attached to the main body of the packaging or completely enclosed by it, such as inlays. Physical connections include gluing, shrinking (e.g. shrink wrap as a sleeve), plug connections or similar methods that can be separated by hand or with simple mechanical aids. An example of a packaging unit is shown in Figure 17.



Figure 1: Example of a packaging unit with a main body, two closures (lid and peel-off foil) and decoration

This includes components that are defined as integrated or separate parts according to PPWR. The Packaging Cockpit allows the detection of an integrated or separate component according to PPWR through relevant data fields (separation conditions) in the tool for individual components.

1.5.1.1 The separation conditions





For the packaging components closure, decoration, inlay and packaging aids, specific data fields are queried that enable an assessment of whether they are integrated or separate components. The following separation criteria are taken into account:

1. Irreversible separation through consumption or use
2. Separate disposal by average consumer
3. Separation through collection or sorting
4. Adhesion to main body

Binding guidelines for dealing with separation conditions are expected as part of the future procedure for assessing recyclability, which is scheduled for publication in early 2028. Evidence – such as studies or surveys – will probably be required for a "yes" assessment of the criteria "separate disposal by average consumers" and "separation through collection and sorting".

Until then, the PPWR Packaging Compendium offers practical guidance on how to deal with the separation conditions for each packaging format. It is based on the minimum standard of the Central Agency Packaging Register (ZSVR), which already contains specific requirements. The separation criteria and guidelines on how to deal with them for each packaging format are clearly presented in the PPWR Packaging Compendium.

1.5.2 When are separate packaging units specified for sales packaging?

	Examples
<p>Mandatory case 1: Sales packaging must be divided into separate packaging units and combined in a common packaging system if it is multipack packaging comprising several main bodies. The number of main bodies must be specified in the packaging system.</p>	 <ul style="list-style-type: none"> • Packaging unit 1: Banderole • Packaging unit 2: Cup with lids (2x)
<p>Mandatory case 2: Sales packaging must also be divided into separate packaging units if two packaging components that are separated during consumption can be considered independent main bodies and are additionally equipped with other components (e.g. lids, decorations, inlays or packaging aids).</p>	<div>  <ul style="list-style-type: none"> • Packaging unit 1: Cup with wit lid (for yoghurt) • Packaging unit 2: Tray with closure (for crunchy muesli) </div> <div>  <ul style="list-style-type: none"> • Packaging unit 1: Foil with label • Packaging unit 2: Hang-Tag with thread </div> <div>  <ul style="list-style-type: none"> • Packaging unit 1: Jar with closure and label • Packaging unit 2: Folding box </div>

1.5.3 Borderline cases in the data entry

For certain packaging formats, especially in the case of non-food products, a very large number of different packaging components may occur. These may be classified on the one hand as inlays or packaging aids, but on the other hand may also be regarded as separate packaging units, since they are present individually.

However, when a large number of such individual parts are involved, it is often too labor-intensive to record each part separately as its own packaging unit. In such cases, it is advisable to record the components collectively as parts (e.g., inlays or packaging aids) within a single packaging unit. This significantly reduces the input effort.

Nevertheless, by applying the separation condition “irreversible separation through consumption or use”, a separate recyclability analysis can still be carried out. An example of such a borderline case is shown in the following figure:



Total number of packaging units: 1

- **Main body:** (Folding) Box
- **Inlays:**
 - Several edge protection / transport protection components made of cardboard
 - Several plastic bags with screws

The PPWR compendium provides assistance with entering different packaging formats. Assistance is also provided for other borderline cases.

2 Change log