

HOW THE UPCOMING PPWR REGULATION WILL CHANGE THE PACKAGING PORTFOLIO

„Coffee lovers“ beware! According to current packaging regulations, even metal coffee capsules will be considered packaging, and therefore, it will be necessary to fulfil the obligations of extended producer responsibility for packaging. On the other hand, producers of some meat products can breathe a sigh of relief.

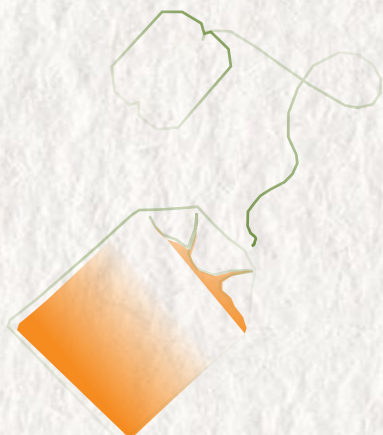


WHAT IS CHANGING FROM AUGUST 2026?

ANNEX I TO THE REGULATION ON PACKAGING AND PACKAGING WASTE, SO-CALLED PPWR, CONTAINS AN INDICATIVE LIST OF ITEMS COVERED BY THE DEFINITION OF PACKAGING.

THE NEWLY DEFINED TERMS IN THE REGULATION, INCLUDING THE TERM PACKAGING, WHICH IS CONTINUED BY THIS LIST, SHALL APPLY AS OF AUGUST 2026.

THERE WILL BE SEVERAL CHANGES IN COMPARISON WITH THE CURRENTLY VALID WASTE ACT.



ADDITIONS AND FURTHER SPECIFICATIONS IN THE SCOPE OF PACKAGING

- As part of the packaging, seed trays are also added to the flower pots..
- **The boxes used for toothpaste tubes, as well as self-adhesive labels stuck on fruit and vegetables, were further specified.** These self-adhesive labels will be subject to an additional obligation a year and a half later, namely that **from February 2028**, they will have to be **compostable** under industrial conditions..

ADDITIONS OUTSIDE THE SCOPE OF PACKAGING

- Specified liver casings, which will now fall under the technological packaging of meat products. **Technological packaging is packaging that comes into direct contact with the meat product** (direct packaging), such as natural casings, artificial casings, foil or a mould in which the technological production process takes place. The scope of non-packaging will therefore be extended from liver casings to several meat products.
- **Flower pots, including seed trays, which are used in inter-company relations and in various stages of production, will also be**

exempted. Those that are intended for sale with a plant and are intended to serve the entire life of the plant will retain their exemption and will therefore no longer be considered packaging. However, under the conditions of the Slovak Republic, those that have the potential to end up in municipal waste will be considered non-packaging products.

- **Packaging obligations will not apply to tire stickers.** However, they can also be considered non-packaging products.

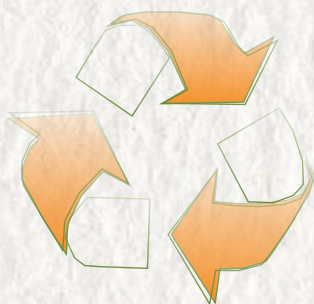
COMPLETE PACKAGING RECATEGORY

- The change also applies to **packaging for tea, coffee and other beverages.** These will now always be considered **packaging**, regardless of whether they are **permeable (bags)** or **impermeable.** They therefore also include **disposable capsules** that are used and thrown away with the product. Until now, only capsules that remained empty after use were considered packaging.
- You should be careful with those **permeable tea and coffee bags and bags** containing another beverage, as well as **disposable capsules containing tea, coffee or another beverage that soften after use and are thrown away with the product.** These will have to be

mandatorily compostable in industrial conditions from February 2028. Even leak-proof capsules (if they are made of a material other than metal) may not be exempt from mandatory compostability - this will depend on the decision of the specific member state. The Slovak Republic does not currently envisage such an additional obligation. However, care must be taken when transporting to other member states.

- **On the contrary, disposable plates and cups not intended for filling at the point of sale,** i.e. if they are intended for use at home, will not be counted as packaging. It will therefore be necessary to distinguish whether disposable plates and cups are intended for filling at the point of sale (e.g. in a buffet, on store counters, for example, for salads), when they will be considered packaging.

ATTENTION! However, this does not mean that disposable plates and cups for use at home would completely avoid the obligation of extended producer responsibility. **They should smoothly move under the "non-packaging" product** (if they are made from the specified plastics) and fulfil the obligations of extended producer responsibility for non-packaging products.



COMPARISON OF THE INDICATIVE LIST FROM THE PPWR WITH THE CURRENTLY VALID LIST FROM THE WASTE ACT

Table A: Definition in accordance with Article 3(1)(1)(a) of the PPWR as "separable, use, consumption and disposal together with the product"

PPWR	Act No. 79/2015 Coll. on waste
A – Included in Packaging:	
Flower pots, including seed trays, intended for use only in sales and transport	Flower pots intended for use only in the sale and transport of plants and not for the entire life of the plant.
	Capsules used to prepare beverages (e.g. coffee, cocoa, milk) that remain empty after use
Foil bags for tea and coffee	
Boxes used for toothpaste tubes	
A – Not Included in Packaging:	
Flower pots, including seed trays, used in business-to-business relationships and at various stages of production or intended for sale with the plant	Flower pots designed for the entire life of the plant
	Tea bags
Technological packaging of meat products	Liver fluke intestine
	Coffee capsules for preparing drinks, foil coffee bags and coffee filter paper pads discarded together with the used coffee product.

Table B: Definition within the meaning of Article 3(1)(1)(b) and (c) of the PPWR as "component, auxiliary element"

PPWR	Act No. 79/2015 Coll. on waste
B – Included in Packaging:	
Labels hung directly on the product or attached to the product, including self-adhesive labels attached to fruit and vegetables	Hang tags hung directly or attached to the product
B – Not Included in Packaging:	
Tire labels in the form of stickers	

Table C: Definition within the meaning of Art. 3, para. 1, point 1, letters d) and e) of the PPWR as "service packaging"

PPWR	Act No. 79/2015 Coll. on waste
C – Not Included in Packaging:	
Disposable plates and cups not intended for refilling at the point of sale	