

PPWR within the Pirlo Group: Metal Packaging Sector



Relevance and implementation of the PPWR – Packaging & Packaging Waste Regulation (EU Regulation 2025/40 on packaging and packaging waste)

Articles 1-3 Subject, Scope and Definitions: Within the meaning of this Regulation, Pirlo acts as a supplier delivering packaging to the so-called producer. All products of the Pirlo Group are considered single-use packaging within the meaning of this Regulation and comply accordingly.

Article 5 Requirements for substances in packaging: Compliance with substance requirements in packaging continues to be ensured in accordance with EU Directive 94/62, Regulation (EC) No 1907/2006 (REACH), and Regulation (EC) No 1935/2004. Requirements regarding PFAS are fulfilled.

Articles 6-7 Recyclability and minimum recycled content: The recyclability of our metal packaging can be guaranteed in accordance with the current version of the PPWR and is classified as Performance Grade A (without foreign materials). For metal packaging combined with plastic components, please contact your Pirlo representative.

According to European tinplate and aluminium manufacturers, the recycled content can be estimated at over 67% (source: thyssenkrupp Rasselstein GmbH, "Recycled Content and Recycling Rate of Packaging Steel", April 11, 2025). For coated/printed metal packaging, coatings, printing inks and sealing compounds account for less than 5% of the total mass; therefore, the requirements for minimum recycled content in plastics do not apply.

Article 10 Minimisation of packaging: The minimisation requirements set out in Article 10 can only be implemented in cooperation with our customers due to missing information (e.g. headspace after filling) and the need for final testing (e.g. reduced material thickness). Joint projects are recommended for this purpose.

Article 11 Reusable packaging: Our packaging is not designed for reuse.

Article 12 Labelling of packaging: Mandatory from February 2028. Packaging of the Pirlo Group can be labelled with the relevant recycling codes (e.g. embossing or within printed artwork). This is generally the responsibility of the producer and may also be applied subsequently (e.g. by labelling). The exact format of future labelling requirements is still under development of standards.

Articles 16-17 Information obligations and authorised representatives: Documents are retained within the QM system as before for at least 10 years. Documents required for your declaration of conformity can be provided at any time upon request.

Article 29 Reuse targets: Reuse quotas are still under discussion within various industry associations due to undefined classifications, such as the exact categorisation of metal packaging types (e.g. "pails") and the applicability of this regulation to food and hazardous goods packaging.

Annex II Performance grades for recyclability: Tinplate and aluminium are classified according to Table 1 as Category 4 (steel) and Category 5 (aluminium), and according to Table 3 as Grade A (>95% recyclable).

Should you have any questions, please do not hesitate to contact your Pirlo representative or reach out to us at sales@pirlo.com.