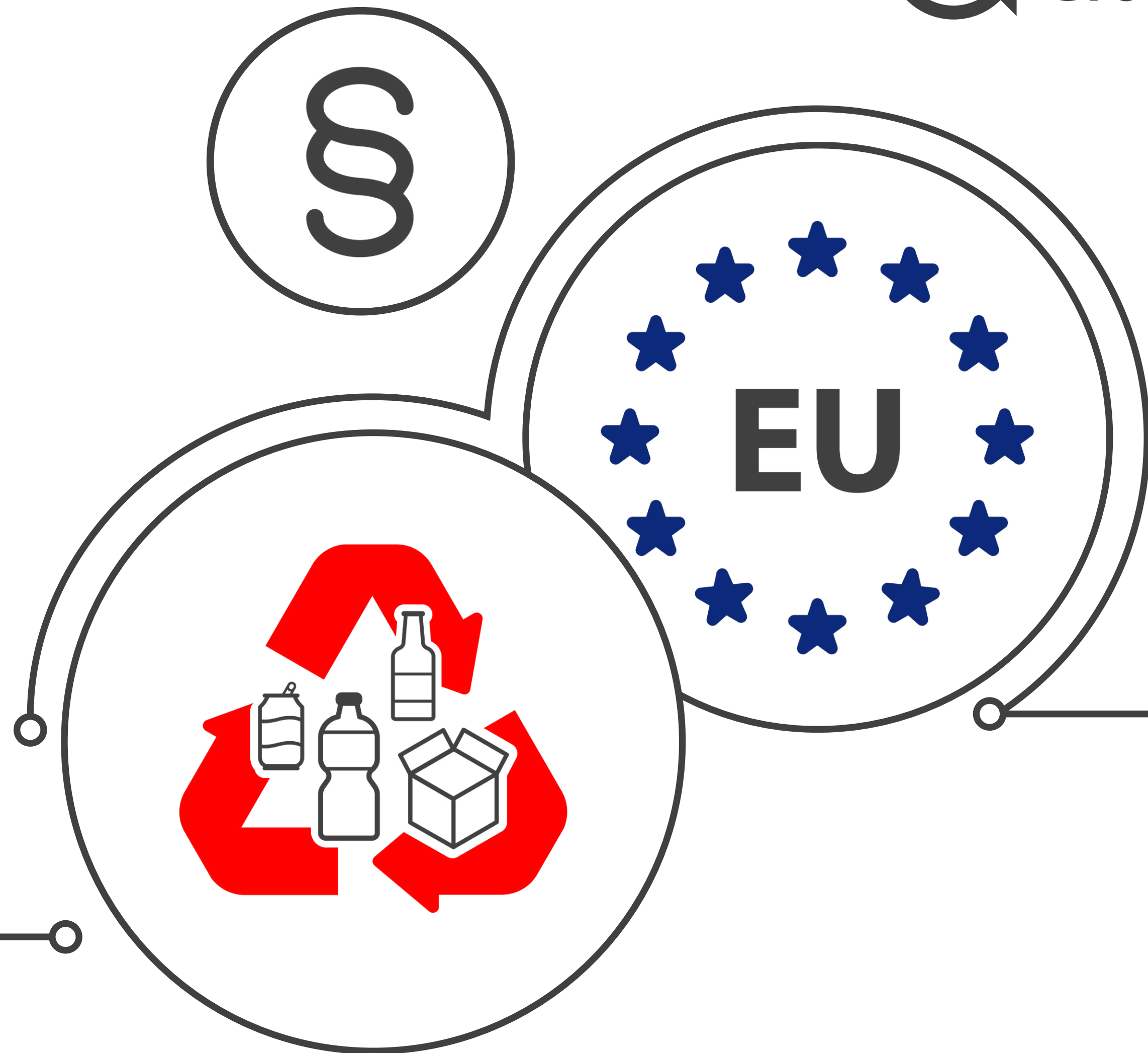


PPWR

Packaging and Packaging Waste Regulation



What to expect from the EU Packaging Regulation

Contents

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Objectives

The PPWR (Packaging and Packaging Waste Regulation) represents a significant **regulatory intervention** in the packaging market as, unlike previous directives, it is a regulation. It regulates the entire packaging life cycle.

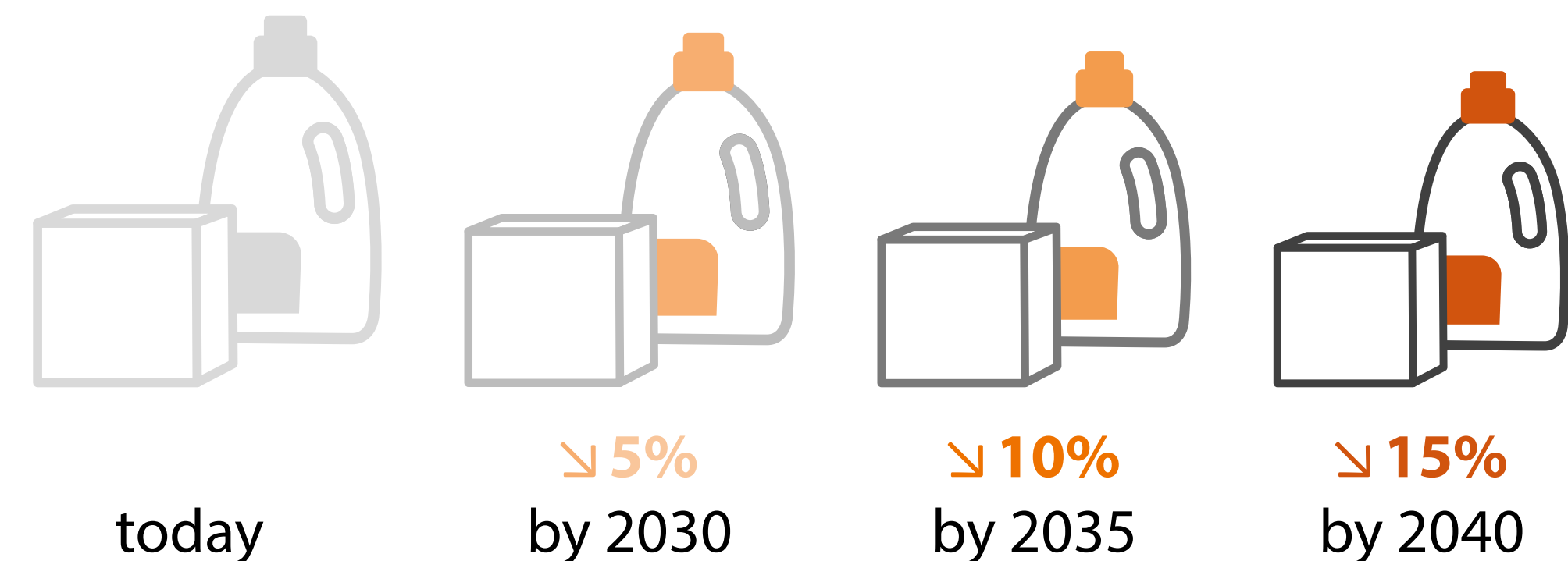
The primary goal is to reduce, reuse and recycle packaging in order to reduce the adverse environmental impacts of packaging in the European Union. The focus is on promoting a functioning circular economy. To realise these goals Europe-wide measures have been defined.

The Member States are granted more manoeuvring room to fulfil the minimum requirements.

The **PPWR entered into force on 12 February 2025** and will **apply from 12 August 2026**.

- **Implementation:**
The PPWR applies from 12 August 2026 following requirement-specific schedules
- **EU conformity procedures for proving compliance** with manufacturer obligations
→ Focus on design harmonisation and labelling requirements

Obligation for Member States to reduce per capita packaging waste production compared to the base year 2018:



Minimum recyclability requirements

Article 6

From 2030, all packaging should be recyclable. Recyclability criteria and performance indicators are expected to be defined by 01 January 2028 through delegated legal acts.

The methodology for assessing the greatest possible recyclability will then be defined by implementing acts by 01 January 2030.

Recyclability should serve as the basis for the modulation of the EPR fees 18 months after the entry into force of the delegated legal and implementing acts.

i Check **here** whether your packaging is recyclable.



The free online recycling tool from our partner RecyClass helps you to quickly and easily determine how recyclable a packaging is – using a rating system from A to C.

Introduction of recyclability performance grades for all packaging:



Recyclability performance grade

Grade **A** ≥ 95%

Grade **B** ≥ 80%

Grade **C** ≥ 70%

Recyclability per unit (by weight)

- i** From 2030, all packaging with < 70% recyclability will be prohibited
- From 2038, all packaging with < 80% recyclability (C) will also be prohibited

Minimum recyclability requirements

Article 6

All packaging placed on the market must be recyclable

If packaging does not meet the following requirements, it may not be placed on the market*:



Grade **C**

≥ **70% of the material recyclable**



01 January 2030
or two years after
entry into force of the
delegated acts

= enables the extraction of secondary raw materials of sufficient quality to replace primary raw materials
→ **quality**

01 January 2035
or five years after
entry into force of the
delegated acts

= **above criteria**
+ **separate collection, sorting into specific waste streams**
(without affecting the recyclability of other waste streams)
and recycling at scale
(at EU level ≥ 55% for each material, ≥ 30% for wood)

Grade **B**

≥ **80% of the material recyclable**
+ **recycled at scale**

01 January 2038

→ **quality + quantity**

*** Exceptions apply to:**

- innovative packaging (for a maximum period of 5 years from first being placed on the market)
- pharmaceuticals, medical devices & contact-sensitive cereal-based food products and baby food, hazardous goods packaging (until 31 December 2034, then review)
- sales packaging made of light wood, cork, textiles, rubber, ceramics, porcelain or wax (until 31 December 2034, then review)

Minimum recycled content in plastic packaging

Article 7

From 01 January 2030 or three years after the entry into force of the implementing act, plastic packaging must contain a minimum proportion of recycled material (minimum recycled content).

This can serve as a further criterion for modulating the EPR fees.

Note:

- Recycled material must be made from post-consumer plastic waste (PCR): collected and recycled in the EU pursuant to the emission and environmental performance standards set

out in Directive 2010/75/EU or in a third country with equivalent standards

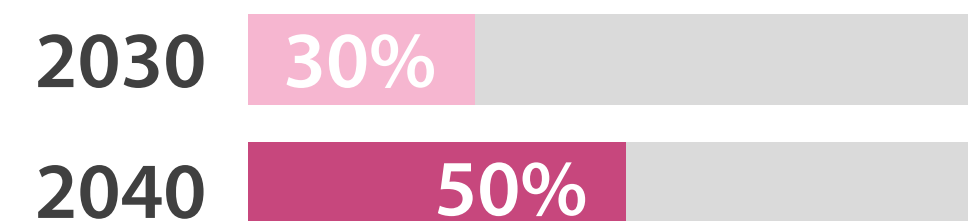
Standards

- Applies to **any plastic packaging** component
- Exceptions:**
 - Packaging components that comprise a maximum of 5% of the total packaging mass
 - Packaging for baby food, pharmaceutical products, hazardous goods
 - Compostable packaging

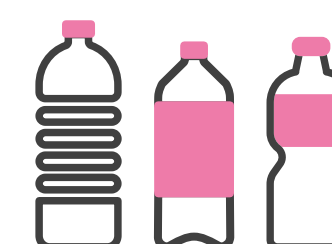
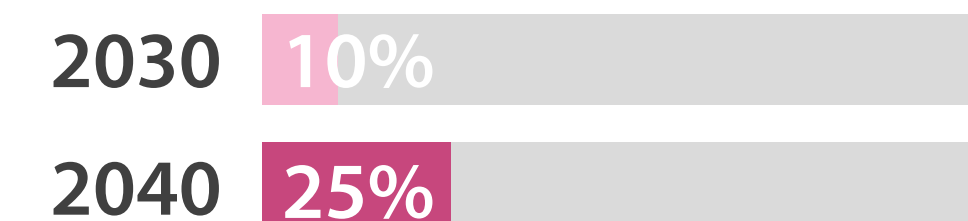
Minimum recycled content



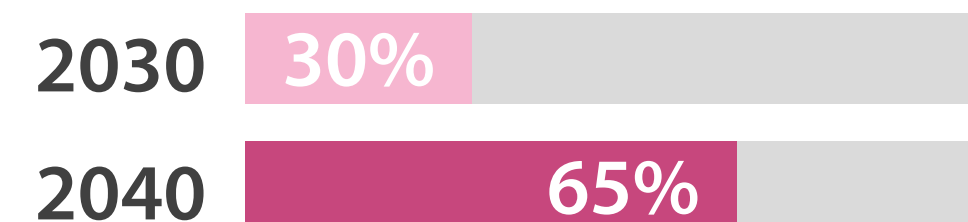
Contact sensitive packaging
made primarily of PET



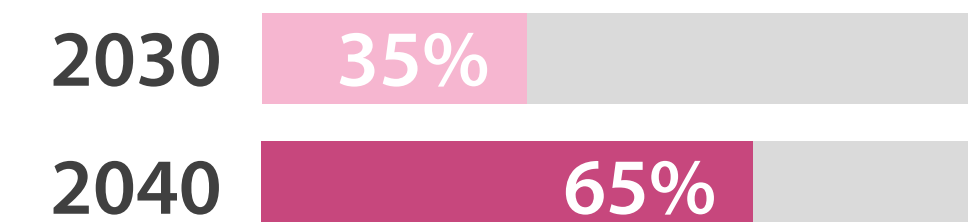
Contact sensitive packaging
(plastics other than PET)



Disposable plastic beverage bottles



Other plastic packaging



Compostable packaging

Article 9

Compostable packaging is exempt from the minimum recycled content requirements.

Member States may have different regulations on home composting, joint waste collection with bio-waste and compostability of certain packaging.

The COMMISSION will request the European standardisation organisations to **adopt harmonised standards** with the **technical specifications for compostable packaging** or to update them – by 12 February 2026.

Regularien

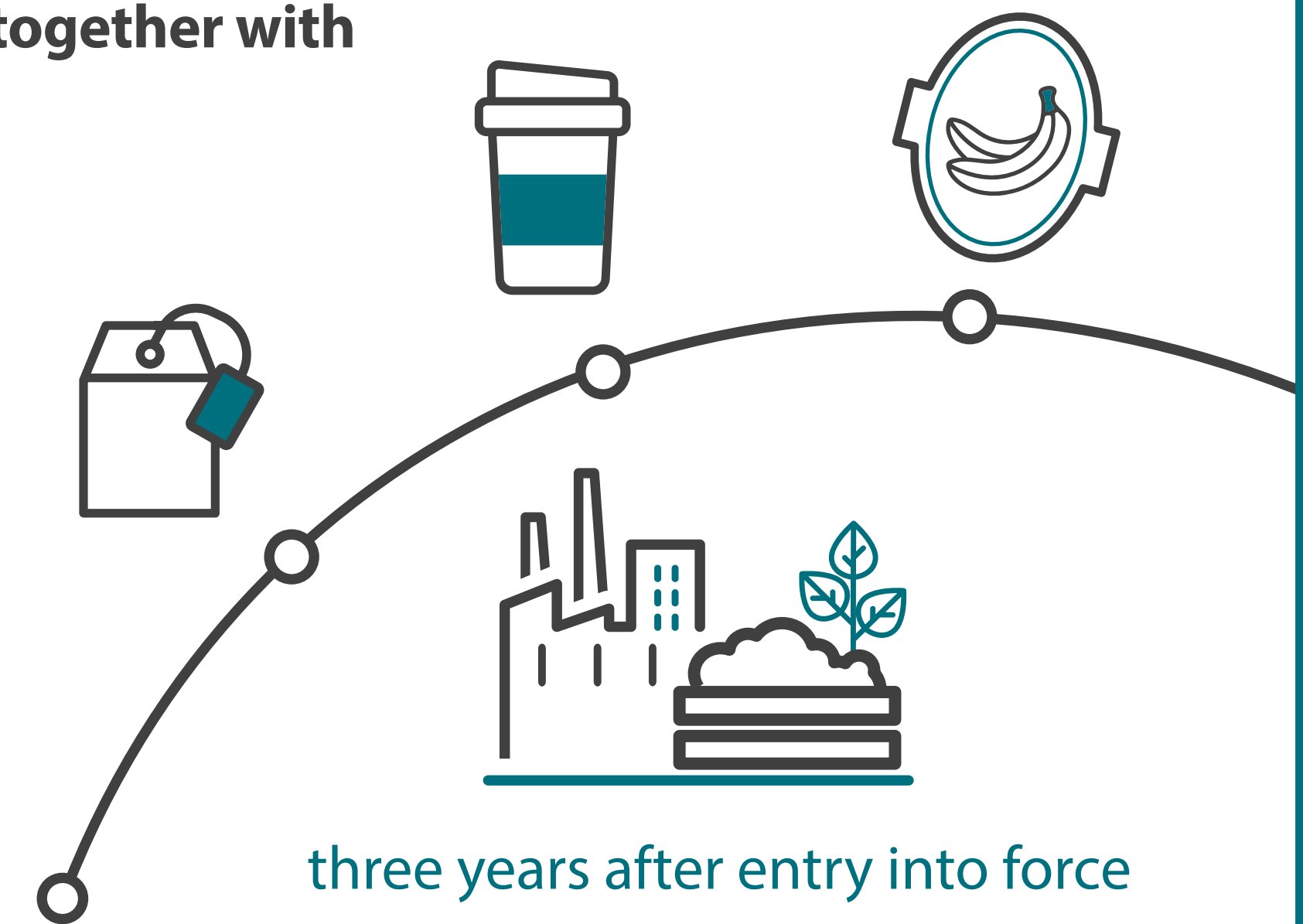
The following packaging **must be** compostable under **industrially controlled conditions in biowaste recycling plants**



shall, where required by Member States, comply with the **standards for home composting:**

- **permeable tea, coffee or other beverage bags or soft disposable capsules containing tea, coffee or other beverages to be used and disposed of together with the product**

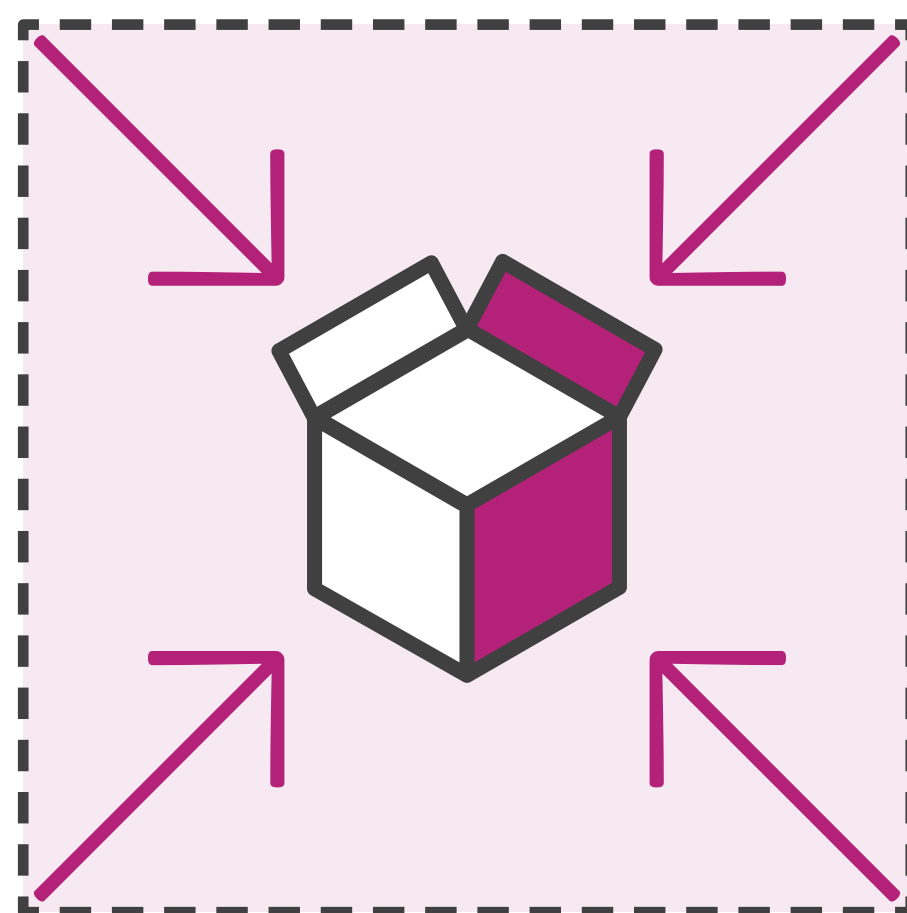
- **sticky labels on fruit and vegetables**



Minimisation of packaging

Article 10

Each packaging unit is to be reduced to its minimum size



From
01 January 2030

- The **weight, volume** and layers of the packaging must contribute to its **safety** and **functionality** and be reduced to the **minimum necessary**.
- There is a **catalogue of criteria**. Compliance is governed by a harmonised standard.
- Elaboration/ revision of **harmonised standards**, setting out the methodology for calculating and measuring the **packaging minimisation requirement** – by 12 February 2027
- **Prohibition of packaging with characteristics exclusively aimed at increasing the perceived product volume***, including double walls, false bottoms and non-essential layers.
- **Exceptions:** Only for packaging protected by Union legislation at the time of entry into force (geographical designations of origin), including spirits packaging, etc.

Minimisation of packaging

Article 24

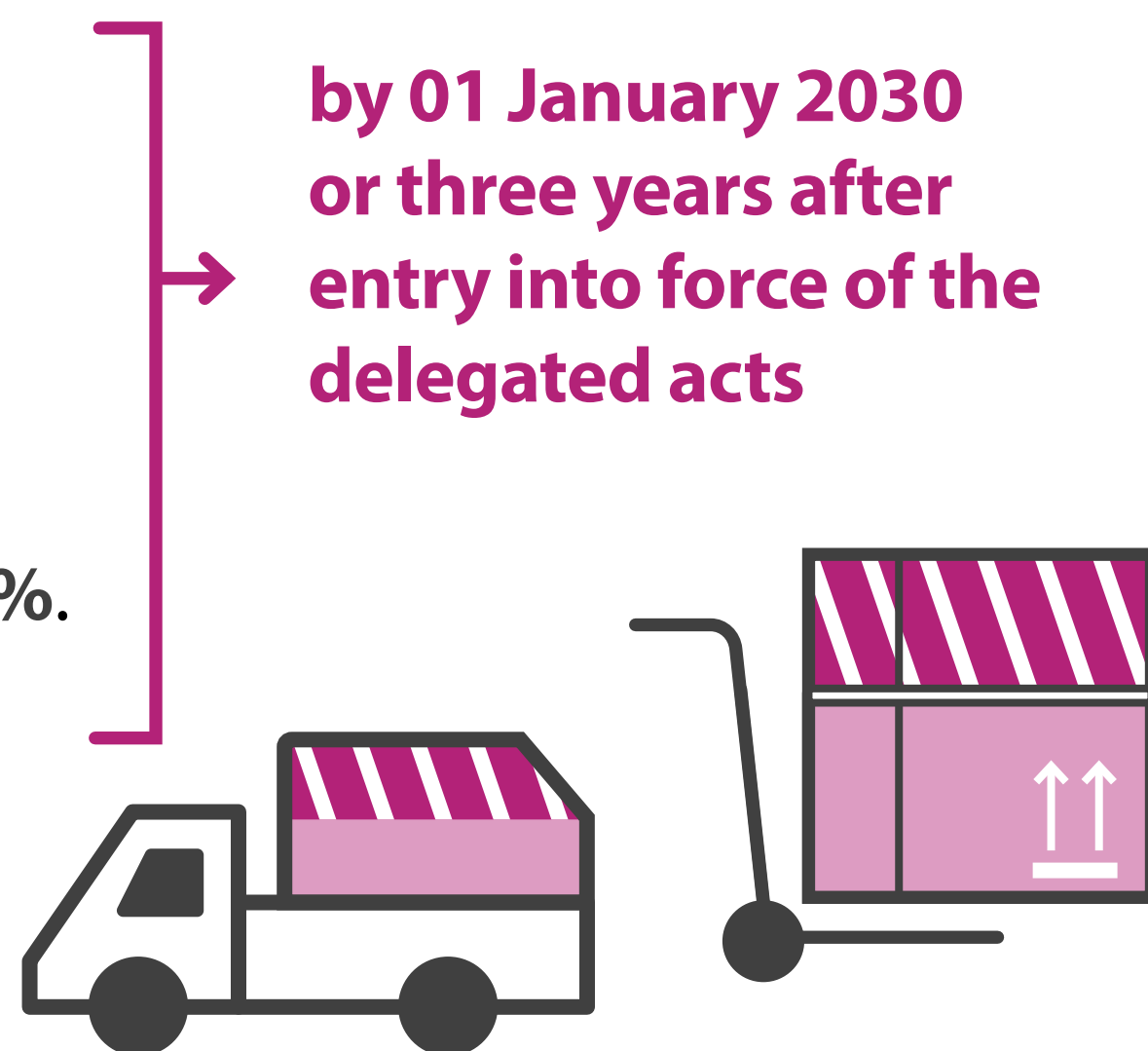
Empty space ratio

The COMMISSION IS empowered to adopt **implementing acts** to **establish the methodology for calculating the empty space ratio** - by 12 February 2028.

By 12 February 2032, the COMMISSION shall **review the empty space ratio** and examine the option of prescribing it for sales packaging.

Bulk, transport or e-commerce packaging

The economic operator filling the packaging must ensure the **empty space ratio*** is no more than 50%.



by 01 January 2030 or three years after entry into force of the delegated acts

Sales packaging

The economic operator who fills the sales packaging must ensure that the empty space ratio** is **reduced to the minimum necessary** to ensure the functionality of the packaging, including product protection.

by three years after entry into force of the PPWR



i Filling materials (paper trimmings, air cushions, bubble wrap, foam filler, wood wool, polystyrene or polystyrene chips) are considered “empty space”.

* “Empty space ratio” refers to the difference between the volume of the outer packaging, transport packaging, etc., and the sales packaging contained

** “Empty space ratio” refers to the difference between the total internal volume of the packaging and the volume of the packaged product.

Reusable packaging

Article 11

Minimum number of rotations for the most common reusable packaging



**From
01 January 2030:**

The PPWR defines reusable packaging throughout the EU and measures to promote its use.

In delegated acts, a minimum number of rotations for reusable packaging shall be established for the most frequently used reusable packaging – by 12 February 2027.

- i** See also related articles:
- Art. 26/27: The economic operator who places reusable packaging on the market for the first time must ensure that a reuse system is in place as an incentive for collection.
 - Art. 29/30/31: Re-use targets

Reusable packaging

Article 28 + 32 + 33 ■ Refilling obligations

Service packaging and refill (HORECA)

The following applies to HORECA sector final distributors of cold and hot drinks, ready meals and food intended for immediate consumption:



Target: 10% Reusable

- Obligation to offer reusable alternatives
- Obligation to enable the filling of containers brought by customers
- Target: achieve 10% reusable packaging
- The refill option must be clearly indicated and cannot lead to higher costs or other disadvantages for the customer.

Final distributor with sales area over 400 m²

- Should “strive to” use 10% of the sales area for refill stations.
- Member States may adopt additional requirements to meet waste prevention targets.



Sales area over
400 m²

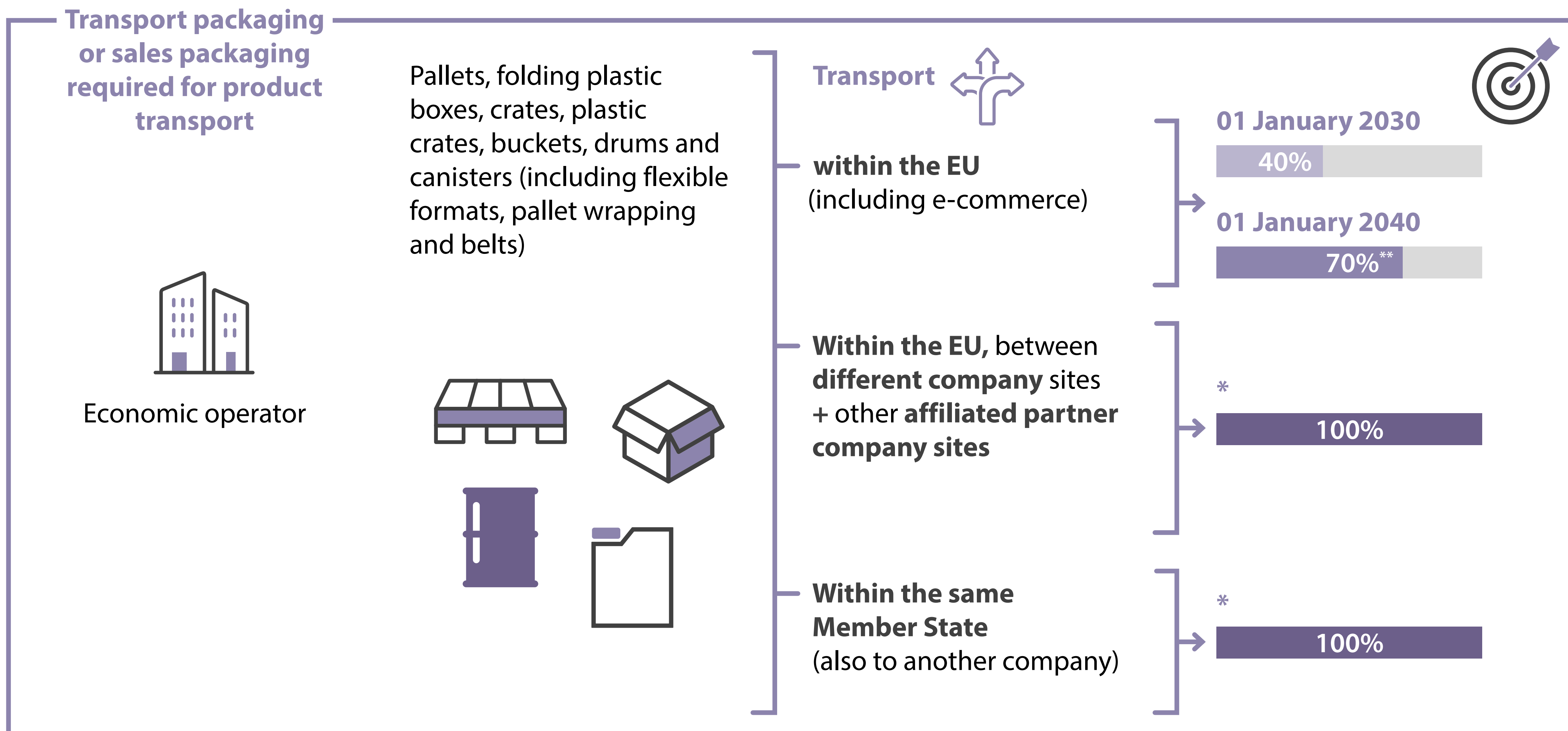


Refill stations
10% area



Reusable packaging

Article 29 ■ Reuse targets



* With entry into force of the Regulation, but deviations from the target “within the EU”= 01 January 2030

** Economic actors “strive”

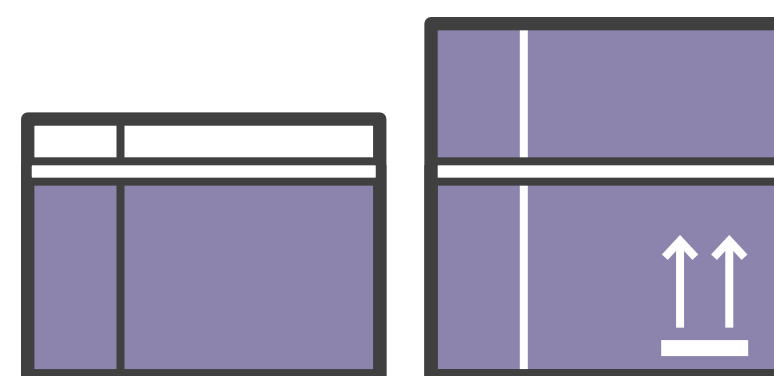
Reusable packaging

Article 29 ■ Reuse targets

Bulk packaging



Economic operator



Boxes, excluding cardboard boxes, used outside **sales packaging** to collect a **certain number of products** into a warehouse or sales unit

01 January 2030

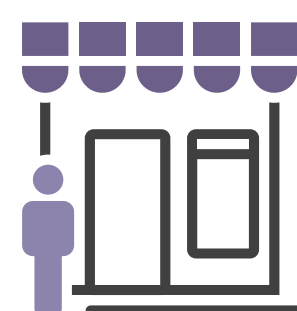
10%

01 January 2040

25%^{**}



Sales packaging



Final distributor
(2030)



Economic actor^{***}
(2040)



Packaging for **alcoholic and non-alcoholic beverages** – COMMISSION guidelines by 12 February 2027

Exceptions: packaging for milk and dairy products, perishable beverages, wine, flavoured wine and similar products, other fermented beverages under CN 2206, spirits under CN 2208.

01 January 2030

10%

01 January 2040

40%^{**}



^{**} "the economic operator must strive"

^{***} the final distributor contributes in reasonable proportion to the achievement of the targets through the packaged products manufactured under its brand

Labelling (environmental statements)

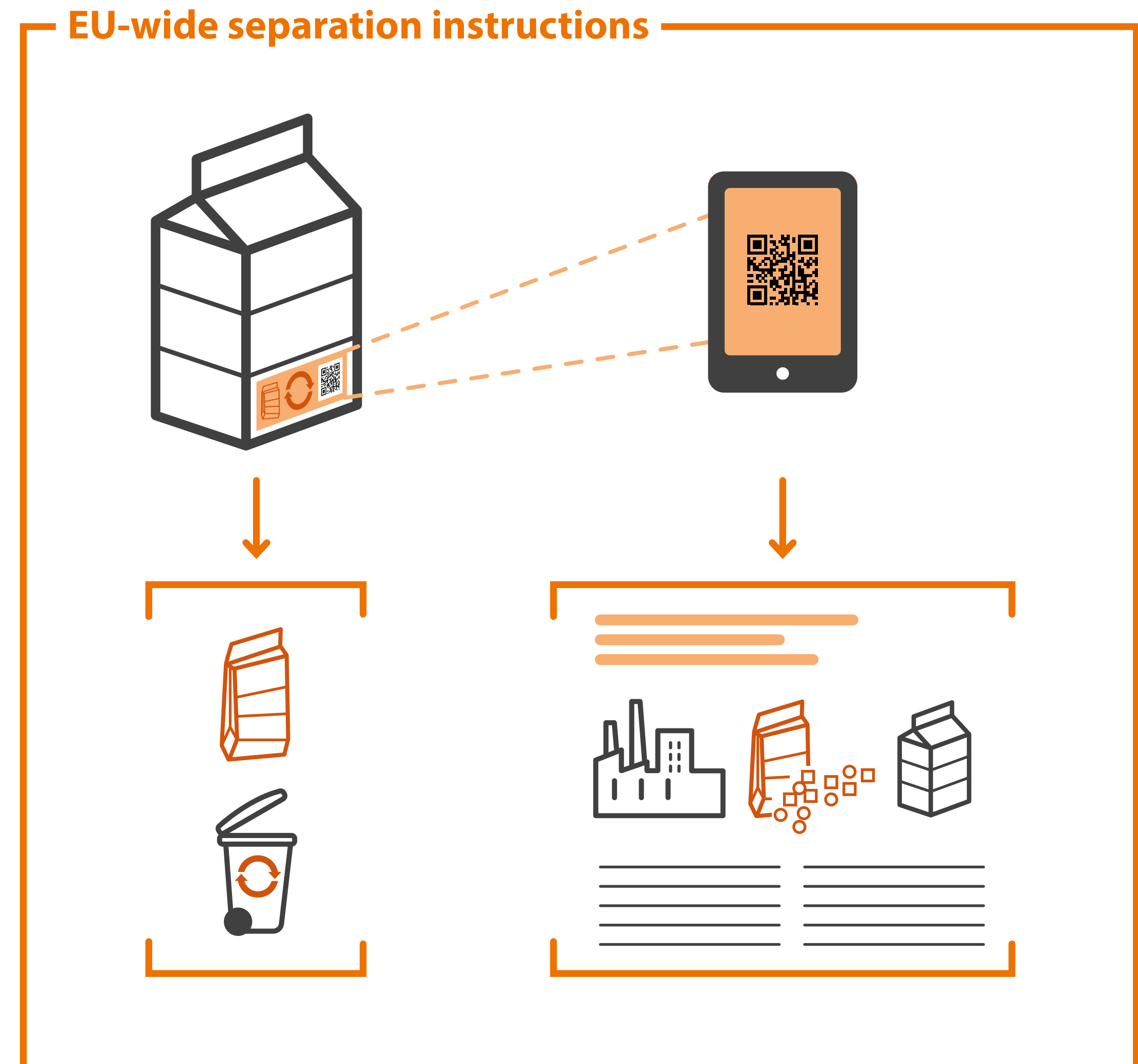
Articles 12 + 13 + 14

The COMMISSION shall adopt **implementing acts** on harmonised labels, including **digitally-provided information** – by 12 August 2026.

The COMMISSION will issue **guidelines** to clarify labelling issues that could mislead or confuse consumers.

Packaging must comply with certain labelling standards, including labelling recyclable packaging and providing information on proper disposal.

- **EU-wide harmonised separation instructions** on packaging with easily understandable pictogrammes
- Possibility or partial obligation to provide further **information via QR codes** or similar technologies
- Harmonised criteria for **voluntary labelling** of recycling components
- Sustainability claims are only admissible if the PPWR legal requirements are exceeded



Labelling

Articles 12 + 13

The following markings must be visible on the packaging:

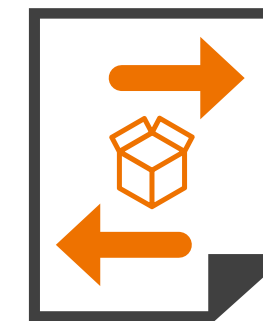


Packaging material composition

From 12 August 2028 or two years after publication of the **implementing act**

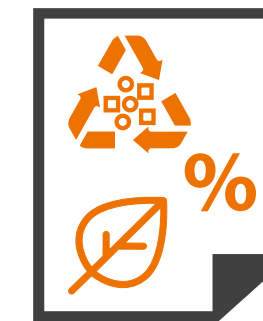


Participation in a deposit system



Packaging reusability

By 12 February 2029 or 2.5 years after publication of the **implementing act**



Harmonised criteria for labelling recycled & bio-based plastic proportions

By 12 August 2028 or two years after publication of the **implementing act**



Substance of concern

By 01 January 2030 through standardised, open, digital technologies



EPR system participation

Two years after entry into force by QR code or other standardised digital technology



Prohibition of misleading and confusing labelling



Waste container for correct disposal

By 12 August 2028 or 2.5 years after publication of the **implementing act**

Labelling

Article 12

Digital information



The following information must be provided via a QR code

or other data carrier.

Where this is not possible, the information must be included in a document accompanying the packaged product (see also previous pages).

- **Manufacturer name, registered trade name or registered trademark + Contact** (postal address/ electronic communication channels) – Art. 15
- **Waste stream information for each individual packaging component** to facilitate waste separation by consumers. (“Optional requirement”)
- **Recycled content information**
- **Reusability information**, including availability of a local, national or EU-wide reuse system, **information on collection points** and simplification of **packaging tracking and rotation calculations**
- **Packaging labelling that is part of an EPR system** (national)
- **Identification of substances of concern**

i If an EU legal act prescribes that information on the packaged product must be provided via a data carrier (digital product passport), a data carrier should be used to provide the necessary information for the packaged product + the packaging, with easily assignable information.

Packaging bans

Article 25

Member State influence

- should support the COMMISSION and the EU Food Safety Authority in publishing guidelines with explanations of the packaging bans in Annex V by **12 February 2025**
- restrictions on additional materials adopted before **01 January 2025** may be maintained. The Commission will assess the prohibitions after seven years
- **micro-enterprises** may be exempted if it is not technically possible to eliminate the use of packaging or to gain access to a reuse infrastructure
- by **12 February 2027**, guidelines with detailed explanations and exceptions for individual fruits and vegetables can be published




Packaging bans


Article 25


The PPWR prohibits the use of certain “packaging formats” in Annex V






From
01 January 2030

-  **Single-use plastic grouped packaging (SUP), e.g. outer packaging film, shrink film**
 Packages of goods sold in bottles, cans, pots, tubs and packs designed as convenience packaging to enable or encourage consumers to purchase multiple products

-  **SUP packaging for unprocessed fruit or vegetables under 1.5 kg, e.g. nets, bags, trays and containers**
 Member States may establish exceptions to the ban in order to avoid water loss, microbiological hazards or physical shocks, etc.

-  **SUP packaging for beverages or foodstuffs bottled and consumed in the HORECA sector**
 e.g. disposable trays, plates or cups

-  **SUP packaging for spices, tinned food, coffee, cream, sugar, etc. in the HORECA sector**
 except in the case of packaging which
 - “is supplied with ready-prepared foodstuffs for immediate consumption without further preparation” [or]
 - which is required to ensure safety and hygiene in (medical and similar) facilities

-  **SUP packaging in the accommodation sector to be disposed of before the arrival of the next guest**
 e.g. shampoo bottles, sachets, bars of soap
-  **Very lightweight plastic carrier bags**
 e.g. for loose foodstuffs, unless they are required for hygienic reasons or as primary packaging for loose foodstuffs

Deposit systems

Article 50

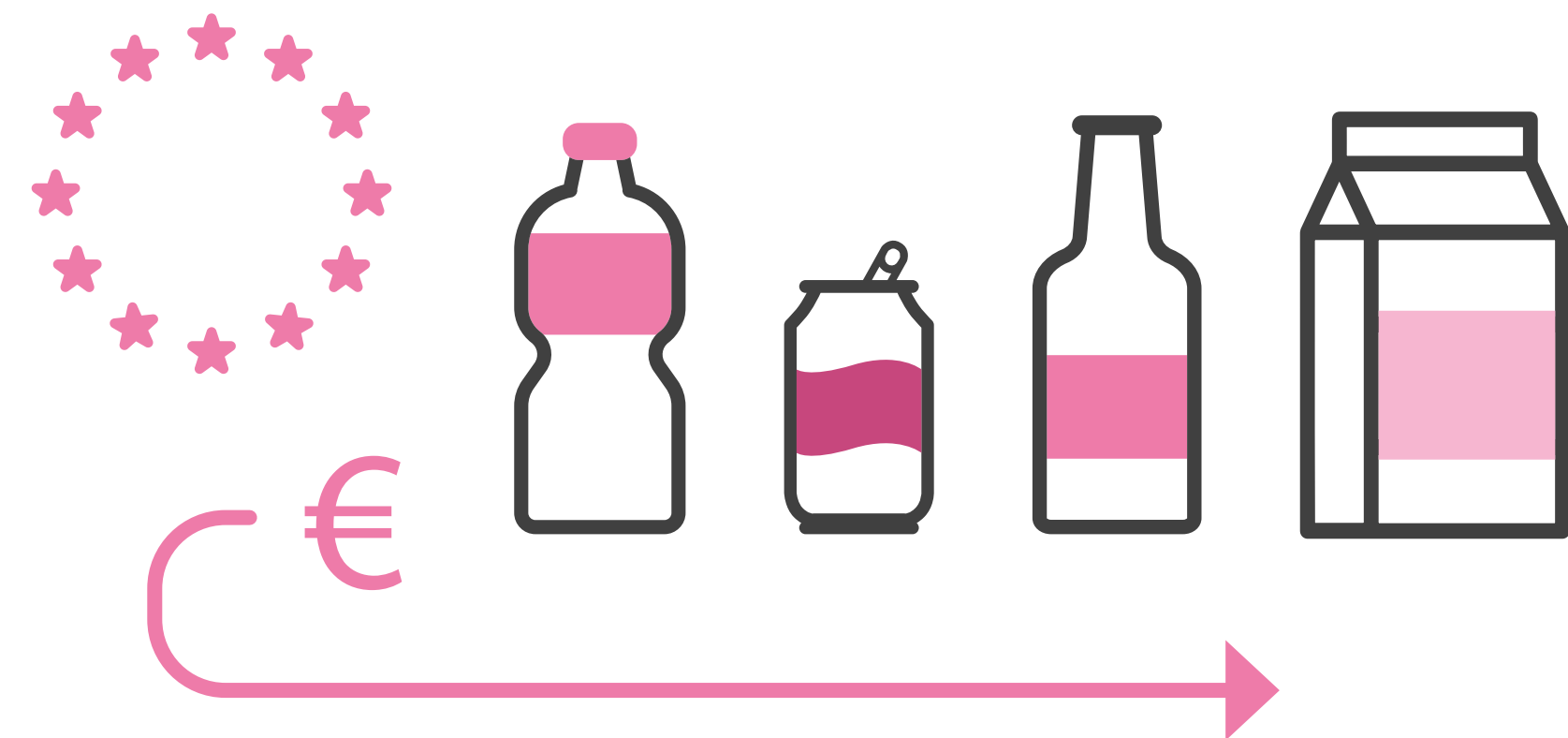


By
01 January 2029

The PPWR supports the introduction and expansion of deposit systems in the EU Member States. The aim is to harmonise deposit systems within countries in order to minimise cross-border problems and increase the efficiency of the systems.

- Separate collection of at least 90% (by weight) per year via a deposit return system
- Deposit system for disposable plastic and metal beverage containers with a capacity of up to 3 litres each
- Member States may be exempted from deposit systems if the rate of separate collection in calendar year 2026 is >80% and there is a strategy for 90% in place by the beginning of 2028
- Deposit systems must meet certain minimum requirements (non-profits, minimum deposit amount, documentation requirements, etc.)
- Effort required for disposable glass and beverage carton deposit systems as well as for interoperability in regions with high border traffic

Deposit *



Authorised representative

Article 17 + 45

Two types of authorised representative may be required:

- **for packaging design conformity -> EU (voluntary)**
- **for EPR obligation compliance -> national (mandatory)**

The assignment must take place as soon as the first manufacturer obligation applies, which the manufacturer cannot fulfil due to absence of a registered office in the country/the EU.

The assignment is therefore time-bound to these obligations from the PPWR. This applies equally to the authorised representative (EU/ Design) & the authorised representative for EPR (national/ EPR).

In addition, the current sale/ transfer of a product does not apply to the authorised representative for EPR, rather to the point in time from which a producer offers the product in a country.

For packaging design compliance – EU-wide



A natural or legal person established in the Union who has been commissioned in writing by the producer to perform certain tasks on behalf of that producer in fulfilment of that producer's obligations under this Regulation.

for EPR obligation compliance – national



A natural or legal person established in a Member State in which the manufacturer places packaging on the market for the first time, with the exception of the Member State in which the manufacturer is established, and who has been designated by the manufacturer in pursuant to Article 8a (5) to fulfil the obligations of that manufacturer pursuant to Chapter VII (EPR) of this Regulation.

Time frame

Published on 22 January 2025



2025

All EU Member States must implement an EPR system
by 12 February 2026: development of harmonised standards with technical specifications for compostable packaging

2026

Countries surpassing the collection target of 80% may apply for an exemption from the introduction of the DRS*
by 31 December 2026: determination of the calculation and verification method for the recycled content percentage



2027

publication of a reuse target calculation methodology



2028

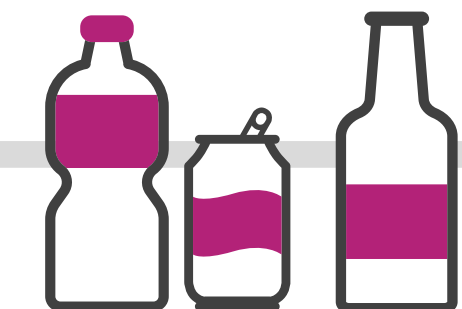
Section 6

by 01 January 2028: criteria for recycling-friendly design and recyclability performance levels
by 01 January 2028: setting a framework for fees payable by manufacturers in conjunction with the new performance criteria

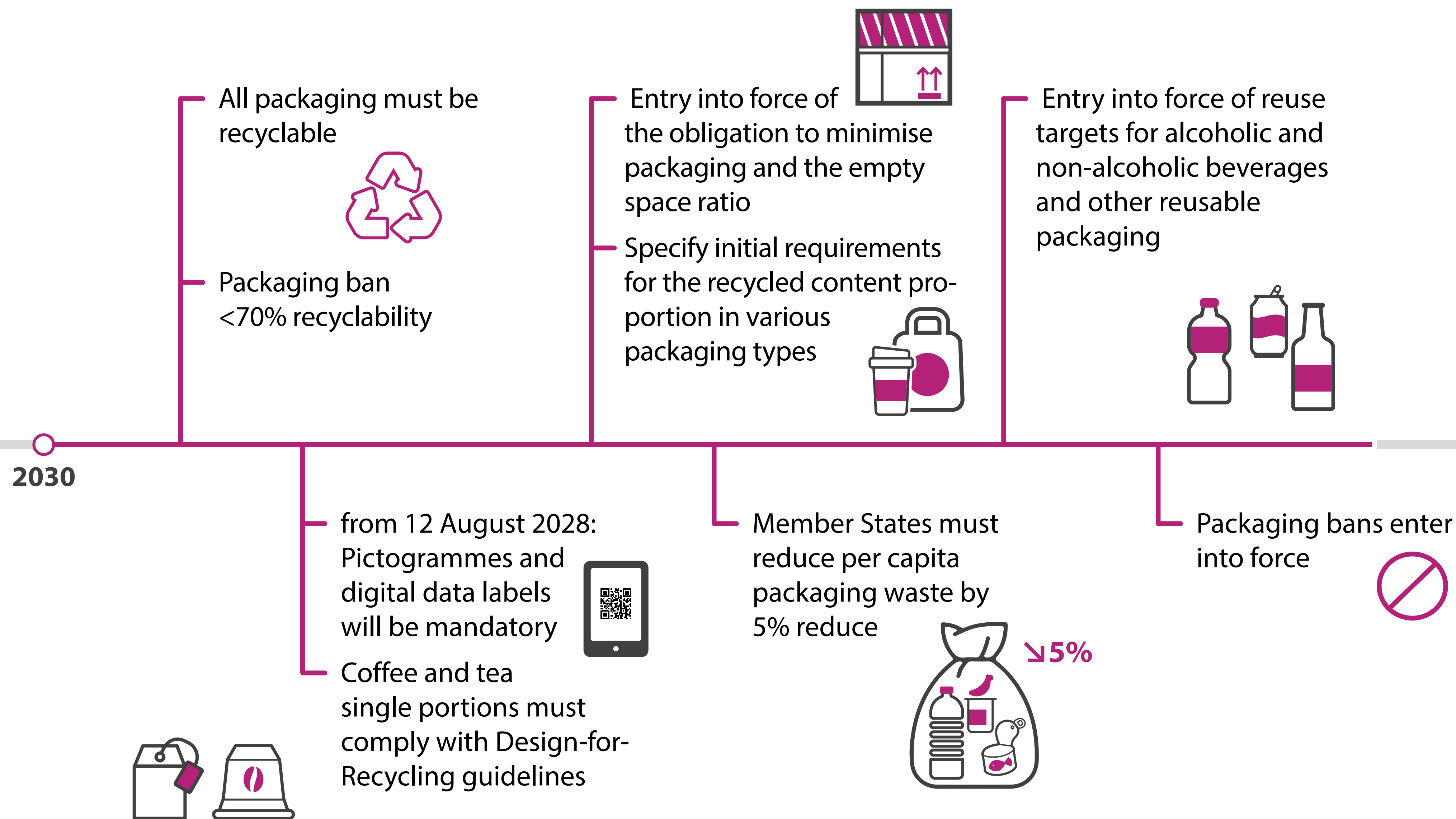


2029

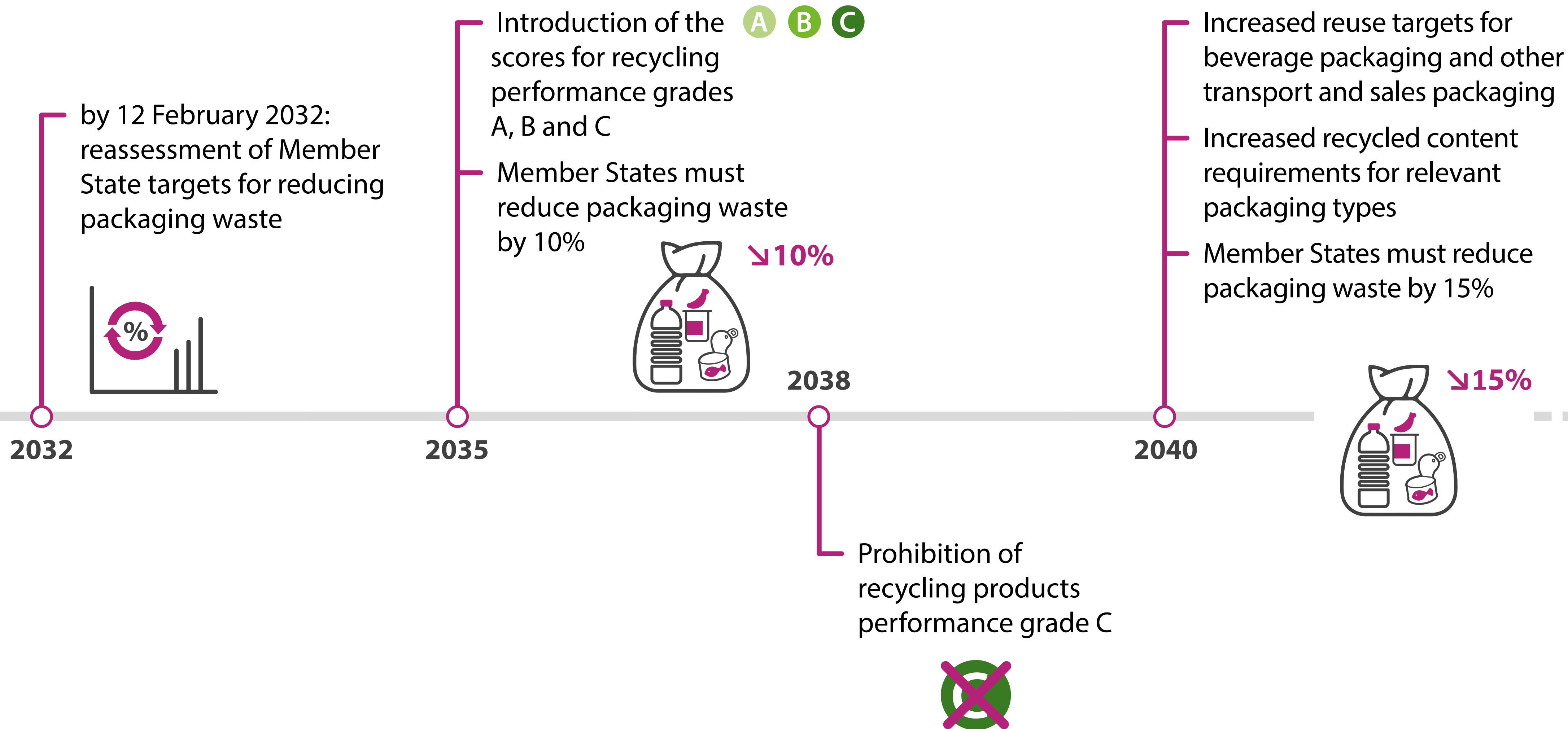
obligation of all Member States to establish deposit return systems for certain packaging types



Time frame



Time frame



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