

Unpacking the **New EU Packaging Regulation (PPWR)** : A Summary of Key Requirements

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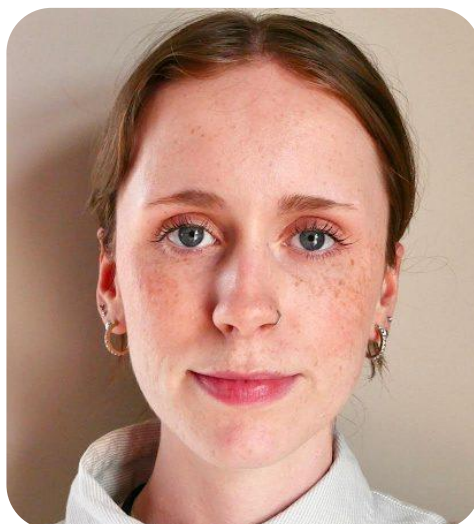


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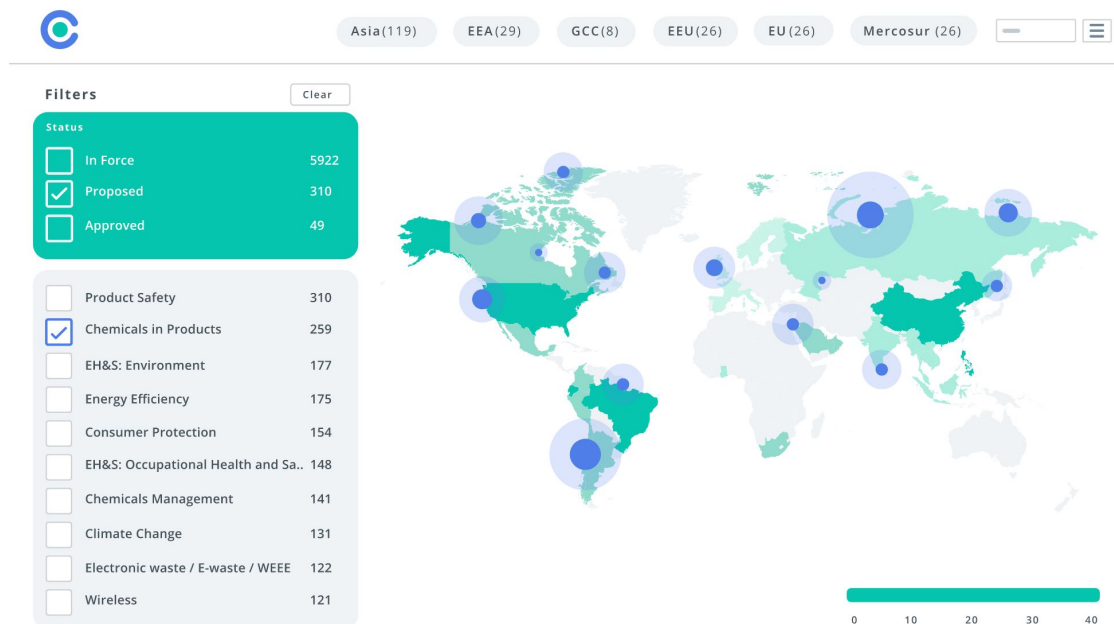
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03. Introduction

Regulation (EU) 2025/40 of 19 December 2024 on packaging and packaging waste (the PPWR) is a landmark development in the European Union's legislative framework for packaging and packaging waste, aimed at addressing the environmental impact of packaging across the EU.

As an integral part of the European Green Deal and the Circular Economy Action Plan, the PPWR seeks to modernize and strengthen existing rules to reduce packaging waste, promote recyclability, and enhance sustainability in packaging design and production. The regulation is particularly relevant in light of increasing concerns over plastic pollution, resource efficiency, and the EU's commitment to achieving climate neutrality by 2050.

The PPWR is designed to replace the existing Packaging and Packaging Waste Directive (94/62/EC), which has governed packaging management in the EU since 1994. While the directive resulted in some progress in the packaging framework, it was inconsistent in national implementation and unsuccessful in reducing the negative environmental impacts of packaging.

These impacts include, excessive overpackaging; increasing amounts of non-recyclable packaging components; conflicting labeling practices; and low

utilization of recycled materials in plastic packaging resulting in a considerable loss of valuable resources.

In addition to the impacts above, one of the key drivers behind the PPWR is the escalating problem of packaging waste. For example, the EU waste total increased from 66 million tonnes in 2009 to 84 million tonnes in 2021. Each European generated 188.7kg of packaging waste in 2021, a figure that was forecast to increase to 209kg in 2030 in the absence of additional measures.

In response to these growing concerns, the European Commission proposed a comprehensive revision of the existing packaging framework in November 2022, with the goal of replacing the Directive with a directly applicable regulation, consisting of more stringent, circularity-oriented requirements that cover the packaging's full life cycle. Importantly, this shift to a regulation from a directive facilitates uniform implementation across all Member States.



As per the Commission, the PPWR aims to:

- Prevent and reduce packaging waste, including through more reuse and refill systems;
- Make all packaging on the EU market recyclable in an economically viable way by 2030;
- Safely increase the use of recycled plastics in packaging; and
- Decrease the use of virgin materials in packaging and put the sector on track to climate neutrality by 2050.

Following a lengthy and somewhat contentious legislative process, the PPWR was formally adopted on December 19, 2024.

It was officially published in the Official Journal of the European Union on January 22, 2025, and entered into force on February 11, 2025.

Some provisions are applicable from August 12, 2026, providing a transition period for businesses and stakeholders to align their packaging practices with the new legal requirements.



04. Scope

The Regulation applies to **all packaging and packaging waste** throughout its entire lifecycle, regardless of material or origin (industry, retail, offices, services, or households).

As per Article 3 (1), packaging includes any item used for containment, protection, handling, delivery, or presentation of products. This covers:

- Items necessary to contain/support a product but not integral to it;
- Components and ancillary elements of such items;
- Items attached to a product that serve a packaging function;
- Service packaging (filled at the point of sale);
- Disposable packaging;
- Tea/coffee bags and single-serve beverage units, whether permeable or non-permeable.

Economic operators refers to the manufacturer, supplier, importer, distributor, authorized representative, final distributor and the fulfilment service provider. This covers:

- Manufacturer: any natural or legal person that manufactures packaging or a packaged product;
- Producer: any manufacturer, importer, or distributor who first makes packaging or packaged

products available in a Member State, whether domestically or across borders, including via distance sales;

- Supplier: any natural or legal person that supplies packaging or packaging material to a manufacturer;
- Importer: natural or legal person established within the Union that places packaging from a third country on the market;
- Distributor: natural or legal person in the supply chain, other than the manufacturer or importer, that makes packaging available on the market;
- Authorized representative: any natural or legal person established in the Union that has received a written mandate from the manufacturer to act on that manufacturer's behalf in relation to specified tasks with regard to the manufacturer's obligations under this Regulation;
- Final Distributor: the natural or legal person in the supply chain that delivers packaged products, including through re-use, or products that can be purchased through refill to the end user.



05. Sustainability Requirements

Substances in Packaging (Article 5)

The first sustainability requirement concerns the placement on the market of packaging which contains “substances of concern”. Article 5(1) states that the presence of these substances in packaging shall be minimized.

Substance Limits in Packaging

This is expanded upon by Articles 5(4) and 5(5) which provide us with specific limits as follows:

- Without prejudice to Annex XVII of Regulation (EC) 1907/2006 or Regulation (EC) 1935/2004 (Reach Regulation and FCM Regulation respectively), 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. As there is no specified entry into force date for this provision, it would automatically **enter into force from the application date of the Regulation (12 August 2026)**.
- Secondly, from **12 August 2026**, food-contact packaging shall not be placed on the market if it contains PFAS in a concentration equal to or above the following limits:
 - 25 ppb for any PFAS as measured with targeted PFAS analysis (polymeric

- PFAS excluded from quantification);
- 250 ppb for the sum of PFAS measured as the sum of targeted PFAS analysis, where applicable with prior degradation of precursors (polymeric PFAS excluded from quantification); and
- 50 ppm for PFASs (including polymeric PFAS); if total fluorine exceeds 50 mg/kg the manufacturer, importer or downstream user shall, upon request, provide to the manufacturer or the importer proof of the quantity of fluorine measured as content of either PFAS or non-PFAS in order for them to draw up the technical documentation per Annex VII of the Regulation.

Compliance with the above requirements shall be demonstrated in the technical documentation drawn up in accordance with Annex VII.

It is also worth noting that Article 5(7) provides for the possibility of the above 100 mg/kg limit on lead, cadmium, mercury and hexavalent chromium to be lowered by the Commission in the future via delegated acts.

Recyclable Packaging (Article 6)

Article 6 opens by stating that all packaging placed on the market shall be recyclable. However, Article 6(11) lists certain types of packaging which are exempt from this Article. These are:

- Immediate or outer packaging used for medicinal products for veterinary or human use;
- Contact-sensitive packaging of medical devices covered by Regulation (EU) 2017/745;
- Contact-sensitive packaging of in vitro diagnostic medical devices covered by Regulation (EU) 2017/746;
- Contact-sensitive packaging for infant formula and follow-on formula, processed cereal-based food and baby food, and food for special medical purposes as defined in Article 1, points (a), (b) and (c), of Regulation (EU) No 609/2013;
- Packaging used for the transport of dangerous goods in accordance with Directive 2008/68/EC;
- Sales packaging made from lightweight wood, cork, textile, rubber, ceramic, porcelain or wax; however, Article 6(8) shall apply to such packaging.

Recyclability Conditions

For packaging to be considered recyclable, the following must be satisfied:

- It is designed for material recycling to the extent that the use of the secondary raw materials are of sufficient quality so that they can replace the primary raw materials; and
- When it becomes waste, it can be collected separately in accordance with Article 48(1) and (5), sorted into specific waste streams without

affecting the recyclability of other waste streams and can be recycled at scale, in accordance with Article 6(5).

The first condition above shall apply from **1 January 2030 or 24 months from the date of entry into force of the delegated acts adopted pursuant to Article 6(4), whichever is the latest**. The second condition shall apply from **1 January 2035** or, for the recycled-at-scale requirement specifically, **1 January 2035 or 5 years from the date of entry into force of the implementing acts adopted pursuant to Article 6(5)**.

Duty to Assess Packaging Recyclability

The manufacturer has a duty to assess packaging recyclability on the basis of the delegated and implementing acts adopted according to Article 6(4) and 6(5). Packaging recyclability shall be expressed in the recyclability performance grades A, B or C (see Table 3 of Annex II). **From 1 January 2030 or 24 months from the entry into force of the delegated acts, whichever is the latest**, packaging shall not be placed on the market unless it is recyclable within aforementioned grades. Furthermore, from **1 January 2038**, packaging shall not be placed on the market unless it is recyclable within grades A or B.

This means that from **1 January 2030** (or from two years following the entry into force of the relevant delegated act), packaging with a recyclability grade below 70% will not be considered recyclable and may not be placed on the market. From **2038**, anything below 80% will not be considered recyclable.

Design for Recyclability Criteria and Recyclability Performance Grades

Articles 6(4) and 6(5) empower the Commission to adopt delegated and implementing acts relating to numerous matters. Of particular relevance is the design for recycling criteria and recyclability performance grades which will be established by delegated acts by **1 January 2028**.

Economic operators shall then comply with design for recycling criteria established under the delegated acts within 3 years of the date of entry into force of the relevant delegated act.

Again, compliance with the above requirements are to be demonstrated in the technical documentation concerning the packaging as set out in Annex VII.

Derogation for Innovative Packaging

Lastly, Article 6(10) provides for a rather controversial derogation for “innovative packaging” which is defined in Article 2 as “a form of packaging that is manufactured using new materials, resulting in a significant improvement in the functions of the packaging, such as the containment, protection, handling, or delivery of products, and in overall demonstrable environmental benefits, with the exception of packaging that is the result of modification to existing packaging for the main purpose of improving the presentation of products and marketing.”

It states that from 1 January 2030, innovative packaging which does not comply with the requirements of Article 6(2) may be made available on the market up to 5 years from the end of the calendar year in which it was placed on the market.

Critics have stated that this may result in packaging being inappropriately defined as “innovative” in order to avail of the derogation from Article 6(2) and 6(3).

If this derogation is used, the economic operator shall notify the competent authority before the innovative packaging is placed on the market and shall include all technical details demonstrating that the packaging is innovative packaging.

That notification shall include a timeline for reaching the recycled-at-scale requirements in terms of collection and recycling of the innovative packaging.

The Regulation does contain a provision stating that the Commission may amend this derogation if it is appropriate to do so.

Minimum Recycled Content in Plastic Packaging (Article 7)

Article 7 begins by stating that by **1 January 2030 or 3 years from the date of entry into force of the implementing act referred to in Article 7(8), whichever is the latest**, any plastic part of packaging placed on the market shall contain the following minimum percentage of recycled content recovered from post-consumer plastic waste, per packaging type and format as referred to in Table 1 of Annex II, calculated as an average per manufacturing plant and year:

- 30% for contact-sensitive packaging made from polyethylene terephthalate (PET) as the major component, except single-use plastic beverage bottles;
- 10% for contact-sensitive packaging made from plastic materials other than PET, except single-use plastic beverage bottles;
- 30% for single-use plastic beverage bottles;
- 35% for plastic packaging other than those referred to in points (a), (b) and (c) of this paragraph.

These minimum recycled content requirements increase from **1 January 2040** as follows:

- 50% for contact-sensitive packaging made from polyethylene terephthalate (PET) as the major component, except single-use plastic beverage bottles;
- 25% for contact-sensitive packaging made from plastic materials other than PET, except single-use plastic beverage bottles;
- 65% for single-use plastic beverage bottles;
- 65% for plastic packaging other than those referred to in points (a), (b) and (c) of this paragraph.

The above requirements shall not apply to:

- Immediate or outer packaging used for medicinal products for veterinary or human use;
- Contact-sensitive plastic packaging of medical devices, devices exclusively destined for research use and investigational devices covered by Regulation (EU) 2017/745;
- Contact-sensitive plastic packaging of in vitro diagnostic medical devices covered by Regulation (EU) 2017/746;
- Compostable plastic packaging;
- Packaging used for the transport of dangerous goods in accordance with Directive 2008/68/EC;
- Contact-sensitive plastic packaging for food that is intended only for infants and young children, food for special medical purposes and packaging for drinks and food typically used for young children as referred to in Article 1, points (a), (b) and (c), of Regulation (EU) No 609/2013;
- Packaging of supplies, components and immediate packaging components for the manufacturing of medicinal products covered by Directive 2001/83/EC and veterinary medicinal products covered by Regulation (EU) 2019/6, where such packaging is needed to be in line with the quality standards of the medicinal product;
- Plastic packaging that is intended to come into contact with food where the quantity of recycled content poses a threat to human health and results in non-compliance of packaged products with Regulation (EC) No 1935/2004; and
- Any plastic part representing less than 5% of the total weight of the whole packaging unit.



Post-Consumer Plastic Waste

Article 7(3) states that for the purposes of this Article, recycled content shall be recovered from post-consumer plastic waste that:

- Has been collected within the Union pursuant to this Regulation or the national rules transposing Directives 2008/98/EC and (EU) 2019/904. Alternatively, it may be collected in a third country in accordance with standards equivalent to the above Directives;
- Where applicable, has been recycled in an installation located within the Union to which Directive 2010/75/EU applies. Alternatively, it may be recycled in a third country in accordance with standards equivalent to Directive 2010/75/EU.

Compliance with the above minimum recycled content requirements are to be demonstrated in the technical documentation concerning the packaging as set out in Annex VII.

The remainder of this Article sets numerous deadlines for the Commission to adopt implementing acts and make assessments on the need for adjustments or derogations from the minimum recycled content requirements.

Packaging Minimization (Article 10)

Article 10(1) states that by **1 January 2030**, the manufacturer or importer shall ensure that the packaging placed on the market is designed so that its weight and volume is reduced to the minimum necessary to ensure its functionality, whilst taking the shape and material from which the packaging is made into account.

Furthermore, the manufacturer or importer shall ensure that packaging which does not comply with the performance criteria set out in Annex IV of this Regulation and packaging with characteristics that aim only to increase the perceived volume of the product, including double walls, false bottoms and unnecessary layers, is not placed on the market, unless:

- The packaging design is protected by a Community design pursuant to Council Regulation (EC) No 6/2002 or Directive 98/71/EC;
- The packaging shape is a trademark under Regulation (EU) 2017/1001 or Directive (EU) 2015/2436; or
- The packaged product or beverage benefits from a geographical indication protected under EU law.

Reusable Packaging (Article 11)

This Article sets out the criteria necessary for packaging to be considered reusable. This is relevant as some provisions in the Regulation apply specifically to reusable packaging (such as a labeling requirement under Article 12 or re-use requirements from Article 26). So, for packaging to be considered reusable, the following conditions must be met:

- It has been conceived, designed and placed on the market with the objective to be re-used multiple times;
- It has been conceived and designed to accomplish as many rotations as possible under normal conditions of use;
- It fulfils applicable requirements regarding consumer health, safety and hygiene;
- It can be emptied or unloaded without being damaged in a way that would prevent its further function and re-use;
- It is capable of being emptied, unloaded, refilled or reloaded while maintaining the quality and safety of the packaged product and ensuring compliance with the applicable safety and hygiene requirements;
- It is capable of being reconditioned in accordance with Part B of Annex VI, while maintaining its ability to perform its intended function;
- It allows for affixing of labels and the provision of information on the properties of that product and on the packaging itself, including any relevant instructions and information for ensuring safety, adequate use, traceability and shelf-life of the product;
- It can be emptied, unloaded, refilled or reloaded without risk to the health and safety of those responsible for doing so; and
- It fulfils the requirements specific to recyclable packaging set out in Article 6, so that it can be recycled when it becomes waste.

A delegated act will be adopted by **12 February 2027** to supplement this Article and provide for a minimum number for the rotations for reusable packaging.



06. Labeling, Marking and Information Requirements

Labeling (Article 12)

This article introduces comprehensive labeling requirements for packaging to facilitate proper waste sorting and increase sustainability. These provisions ensure that consumers are informed about the composition and recyclability of packaging, supporting environmental goals such as reducing plastic waste and promoting a circular economy.

Core Labeling Requirements

Packaging placed on the market must contain clear labels to help consumers understand its material composition, recyclability, and disposal methods. It must also not display any labels or symbols that could mislead or confuse consumers about its sustainability or recyclability. These labels must:

- Utilize pictograms that are simple and accessible, including for individuals with disabilities;
- Be visible, legible, and securely attached to the packaging, ensuring that the information cannot be easily removed; and
- Be accessible to consumers before purchase, including through online channels.

Material Composition Labeling

From **12 August 2028, or 24 months from the date of entry into force of the implementing acts referred to in Article 12(6) and (7)**, whichever is the latest, all packaging placed on the market (excluding transport and deposit-return system packaging) must be labeled with information on its material composition and recyclability. For compostable packaging, the label must clearly state that the packaging is compostable, but not suitable for home composting, and should not be littered in natural environments. Information on the destination of each separate component may be given in the form of a QR code or other type of standardized, open, digital data carrier.

Reusable Packaging Requirements

Reusable packaging placed on the market from **12 February 2029 or 30 months from the date of entry into force of the implementing act referred to in Article 12(6)**, whichever is the latest, must bear a label informing users that the packaging is reusable, distinguishing it from single-use packaging at the point of sale. Further information on reuse systems at the local, national, or EU Level, shall be provided either



through QR codes or other digital formats. Additionally, labels should provide details about collection points and the packaging's tracking for reuse cycles.

Recycled and Bio-based Content Labeling

For packaging that contains recycled materials or bio-based plastic, the labels must clearly display the proportion of such content, adhering to harmonized specifications outlined in future implementing acts.

Extended Producer Responsibility (EPR)

By **12 February 2027**, packaging that is part of an EPR scheme may be identified by using a QR code or digital mark to show that the producer complies with their obligations.

Deposit and Return (DRS) Labeling

Packaging included in a deposit-return scheme, aside from those under Article 50(1), may be identified with a clear, non-misleading symbol under national law.

Transitional Period

Packaging that is not in compliance with the labeling requirements may be made available on the market for up to **3 years** after the labeling requirements take effect.



Labeling of Waste Containers for the Collection of Packaging Waste (Article 13)

The harmonized label requirements also extend to waste containers and receptacles.

By **12 August 2028, or 30 months after the adoption of implementing acts referred to in Article 13(2)**, whichever is the latest, Member States must ensure that all packaging waste bins have clear, durable, harmonized labels indicating proper material-specific disposal, except for those in deposit return systems.



07. Obligations of Economic Operators

Chapter IV of the PPWR outlines the general obligations of various economic operators.

These general obligations are similar to what is written in many EU Regulations and Directives and they are summarized below. For the purposes of this whitepaper, we will focus on obligations applicable to manufacturers (which are often mirrored for other economic operators).

Obligations of Manufacturers (Article 15)

Conformity Requirements

Firstly, Article 15(1) states that manufacturers shall only place on the market packaging which is in conformity with the requirements laid down in or pursuant to Articles 5 to 12 (most of which are discussed above). Before the packaging is placed on the market, a conformity assessment procedure shall be carried out and technical documentation must be drawn up in accordance with Annex VII. An EU declaration of conformity shall then be drawn up in accordance with Article 39. Manufacturers must retain the above documentation:

- In the case of single-use packaging, for 5 years from the date the packaging was placed on the market;
- In the case of reusable packaging, for 10 years from the date the packaging was placed on the market.

It is worth noting that the aforementioned conformity assessment procedure and requirement to retain documentation shall not apply to custom-made transport packaging for configurable medical devices and medical systems that are to be used in industrial and healthcare environments.

Article 15(4) states that manufacturers shall ensure that procedures are in place for series production of packaging to remain in conformity with this Regulation. Changes in packaging design, changes to harmonized standards or changes to common technical specifications must be taken into account. A re-assessment of the packaging's conformity shall be performed if the manufacturer finds that the packaging's conformity could be affected by these changes.

Providing Product and Contact Information

Moving on from ensuring the conformity of the packaging, Article 15(5) contains the requirement for packaging (or its accompanying documentation) to bear a type, batch or serial number or other element allowing its identification. The following paragraph indicates that manufacturers shall provide their name, registered trade name or registered trademark as well as the postal address and, where available, the electronic means of communication by which they can be contacted. This is to be placed on the packaging or on a QR code or another data carrier. The above information must be clear, understandable and legible and it must not obscure information required by other Union legal acts on the labeling of the packaged product.

Non-Compliant Packaging

If a manufacturer believes that packaging they have placed on the market is not in conformity with this Regulation, they shall immediately take corrective measures to bring the packaging into conformity and withdraw or recall it. The market surveillance authority of the Member State shall also be informed by the manufacturer.

Demonstrating Conformity

Article 15(10) states that manufacturers shall, upon a reasoned request from a national authority, provide all the information and documentation necessary to demonstrate the conformity of the packaging with the requirements laid down in or pursuant to Articles 5 to 12.

As alluded to at the beginning of this section, related requirements are also outlined in Chapter V for suppliers, authorized representatives, importers, distributors, fulfilment service providers, and packaging waste management operators.

Obligations for Excessive Packaging (Article 24)

Empty space refers to the difference between the total volume of grouped packaging, transport packaging or e-commerce packaging and the volume of sales packaging contained therein. The empty space ratio is the percentage of this empty volume in relation to the total packaging. Filling materials such as bubble wrap, air cushions, foam, or Styrofoam chips are considered empty space.

For sales packaging, the empty space ratio means the difference between the internal volume of the packaging and the volume of the packaged product. Certain products, such as food items requiring headspace or goods that settle during transportation, will be assessed at the time of filling.

By **1 January 2030, or 3 years after the relevant implementing acts are adopted** (whichever is later), economic operators using grouped packaging, transport packaging, or e-commerce packaging must ensure that empty space does not exceed **50%** of the total volume. Businesses using sales packaging as e-commerce packaging or participating in reusable packaging systems are exempt from this rule, but must still comply with broader packaging requirements under Article 10.

Restrictions on Use of Certain Packaging Formats (Article 25)

From **1 January 2030**, certain single-use plastic packaging formats and uses listed in Annex V will be prohibited from the EU market.

Examples of such formats include:

- Grouped packaging used at the point of sale to group goods sold in bottles etc. (shrink wrap);
- Packaging for less than 1,5kg pre-packed unprocessed fresh fruit and vegetables (nets, bags etc.);
- Packaging for foods and beverages filled and consumed within premises in the HORECA sector (trays, disposable plates etc.);
- Packaging for individual portions or servings, used for condiments, preserves, sauces (sachets, tubs etc.);
- Packaging for cosmetics and toiletry products in the accommodation sector (shampoo bottles, etc.); and
- Very lightweight plastic carrier bags (bags for bulk groceries).

Re-use Targets (Article 29)

Ambitious re-use targets under Article 29, reflect the EU's commitment to reducing packaging waste and promoting circular economy principles. These targets apply to transport packaging, grouped packaging, and sales packaging, with phased requirements leading up to 2040.

The regulation mandates a progressive increase in the share of reusable packaging, ensuring that businesses transition to sustainable packaging alternatives over time. The main targets include:

- **Transport packaging & e-commerce packaging**
 - By **2030**, at least 40% of transport packaging - including pallets, foldable plastic boxes, crates, and intermediate bulk containers - must be reusable within a recognized reuse system
 - By **2040**, this target increases to 70%
- **Grouped packaging (excluding cardboard boxes)**
 - 10% must be reusable by **2030**, increasing to 25% by **2040**
- **Sales packaging for alcoholic and non-alcoholic beverages**
 - 10% of beverage sales packaging must be reusable by **2030**, increasing to 40% by **2040**
 - Private-label brands must also contribute fairly to achieving these targets
 - Exemptions apply to certain perishable goods, wines, spirits, and fermented beverages

Packaging used between sites of the same operator or linked enterprises must be fully reusable from **1 January 2030**.

Certain transport or sales packaging types are exempt from re-use obligations, including:

- Packaging for dangerous goods and custom-designed packaging for large machinery;
- Flexible packaging in direct contact with food; and
- Cardboard boxes, which are subject to separate sustainability requirements.

To support reuse, final distributors must accept returns of reusable packaging free of charge and must provide appropriate systems to facilitate returns. However, small retailers (under 100m² sales areas) are exempt from these obligations. Member States may also exempt businesses in remote areas (islands with fewer than 2,000 residents or municipalities with low population density).

Distributors may form pools to collectively meet reuse targets, provided the group does not exceed 40% market share and consists of a maximum of five businesses (except for those under the same brand). By **2028**, the Commission will establish detailed reporting requirements for such pooling arrangements.



08. Management of Packaging and Packaging Waste

Extended Producer Responsibility (Section 3)

Extended Producer Responsibility (EPR) is a regulatory approach that makes producers financially and/or operationally responsible for managing their products at end-of-life.

It supports national and EU recycling objectives by shifting waste management costs from local authorities to producers.

Producer Registration and Compliance (Article 44)

Each Member State must maintain a national producer register to monitor compliance, and producers must register in each Member State where they place packaging on the market, either directly or through an authorized representative.

Key requirements include:

- Registration before placing packaging on the market;
- Submission of annual data on packaging volumes and materials, by 1 June for each full preceding calendar year; and
- Public accessibility of producer registration lists while maintaining commercial confidentiality.

Failure to comply with registration obligations results in restrictions on placing packaging on the market.

Financial and Operational Obligations of Producers (Article 45)

Producers are financially responsible for packaging waste management under EPR scheme. Financial contributions must cover:

- Waste receptacle labeling costs as per Article 13; and
- Compositional surveys of collected mixed municipal waste to improve recycling efficiency.

Additionally, online platforms facilitating packaging sales must verify that producers comply with EPR obligations before permitting them to sell products. In cases where producers operate via online marketplaces, the platform provided may be mandated to fulfill EPR obligations on their behalf.

Role of Producer Responsibility Organizations (PROs) (Article 46)

Producers can delegate EPR duties to PROs, which manage collection, sorting, and recycling. Membership in a PRO may be mandatory, and each PRO must publish annual reports on packaging volumes and recycling rates.

Authorization and Monitoring (Article 47)

Both individual producers and PROs must obtain authorization from competent national authorities to fulfill EPR obligations.

This process involves:

- Verification of collection, sorting, and recycling infrastructure;
- Assessment of financial contributions and cost efficiency; and
- Ensuring compliance with waste management agreements.



09. What's Next?

With the adoption of Regulation (EU) 2025/40, the focus now shifts to its implementation across Member States and the development of delegated acts.

The European Commission is expected to establish delegated acts to define specific technical criteria, including:

- Labeling requirements;
- Recyclability performance grades;
- Design-for-recycling requirements; and
- Reporting obligations for EPR scheme.

Guidelines clarifying exemptions and compliance mechanisms will also be published.

Additionally, Member States will need to align national regulations with the new framework, ensuring uniform application and enforcement of the regulation across the EU.

10. Annex - Selected Compliance Deadlines and Key Dates

Date	Description	Related Article
From 12 August 2026	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.	Article 5(4)
From 12 August 2026	Food contact packaging shall not be placed on the market if it contains PFAS in a concentration of or above the limit values expressed in Article 5(5).	Article 5(5)
From 1 January 2030 or 24 months from the date of entry into force of the delegated acts referred to in Article 6(4), whichever is latest	Packaging shall be considered recyclable if it is designed for material recycling.	Article 6(2)(a)
From 1 January 2035 or five years after the date of entry into force of the delegated implementing acts referred to in Article 6(5), whichever is latest	Packaging shall be considered recyclable if it can be collected separately when it becomes waste and be sorted into specific waste streams without affecting the recyclability of other waste streams and can be recycled at scale.	Article 6(2)(b)
From 1 January 2030 or 24 months from the entry into force of the delegated acts adopted pursuant to Article 6(4)	Packaging shall not be placed on the market unless it is recyclable within grades A, B or C as described in Table 3 of Annex II.	Article 6(3)
From 1 January 2038	Packaging shall not be placed on the market unless it is recyclable within grades A, B or C as specified in Table 3 of Annex II.	Article 6(3)
Three years after entry into force of the relevant delegated act referred to in Article 6(4)	Economic operators shall comply with the new or updated design for recycling criteria.	Article 6(4)
From 1 January 2028	Innovative packaging that does not comply with the requirements under paragraph 2 of Article 6 may be placed on the market for a maximum period of 5 years after the end of the calendar year when it was first placed on the market.	Article 6(10)
By 1 January 2030 or three years after the date into force of the implementing act referred to in Article 7(8), whichever is latest	Any plastic part of packaging placed on the market, shall contain the following minimum percentage of recycled content recovered from post-consumer plastic waste, per packaging type and format as referred to in Table 1 of Annex II.	Article 7(1)

Date	Description	Related Article
By 1 January 2040	Any plastic part of packaging placed on the market shall contain the minimum percentage of recycled content recovered from postconsumer plastic waste, per packaging type and format as referred to in Table 1 of Annex II.	Article 7(2)
By 1 January 2029 or 24 months after the date into force of the implementing act referred to in Article 7(8), whichever is latest	The calculation and verification of the percentage of recycled content contained in packaging under paragraph 1 shall comply with the rules laid down in the implementing act referred to in Article 7(8).	Article 7(11)
From 12 February 2028	Packaging other than that referred to in Article 9(1) or Article 9(2), including packaging made of biodegradable plastic polymers and other biodegradable materials, shall be designed for material recycling in accordance with Article 6.	Article 9(3)
From 1 January 2030	The manufacturer or importer shall ensure that packaging is designed so that its weight and volume is reduced to the minimum necessary for ensuring its functionality taking account of the shape and material that the packaging is made of.	Article 10(1)
From 11 February 2025	Packaging placed on the market from this date shall be considered to be reusable where it fulfils the conditions laid out in Article 11(1).	Article 11(1)
From 12 August 2028 or 24 months from the date of entry into force of the implementing act referred to in Article 12(6) or 12(7), whichever is latest	Packaging shall be marked with a harmonized label containing information on its material composition in order to facilitate consumer sorting.	Article 12(1)
From 12 February 2029 or 30 months from the date of entry into force of the implementing act referred to in Article 12(6), whichever is latest	Reusable packaging shall bear a label informing users that the packaging is reusable.	Article 12(2)
From 12 August 2028 or 24 months from the date of entry into force of the implementing act adopted pursuant to Article 12(6)	Where packaging to which Article 7 applies is marked with a label containing information on the share of recycled content, label shall comply with the specifications laid down in the relevant implementing act.	Article 12(4)
By 1 January 2030 or 3 years from the entry into force of the implementing acts adopted pursuant to Article 24(2)	Economic operators who fill grouped packaging, transport packaging or e-commerce packaging shall ensure that the maximum empty space ratio, expressed as a percentage, is 50 %.	Article 24(1)
By 12 February 2028	Economic operators who fill sales packaging shall ensure that empty space is reduced to the minimum necessary for ensuring the packaging functionality, including product protection.	Article 24(4)

Date	Description	Related Article
From 1 January 2030	Economic operators shall not place on the market packaging in the formats and for the uses listed in Annex V.	Article 25(1)
From 1 January 2030	Economic operators that use transport packaging, or sales packaging used for transporting products in the form of pallets, foldable-plastic boxes, boxes, trays, plastic crates, intermediate bulk containers, pails, drums and canisters of any size or material, including flexible formats or pallet wrappings or straps for stabilization and protection of products put on pallets during transport, shall ensure that at least 40% of such packaging in total is reusable packaging within a re-use system.	Article 29(1)
From 1 January 2040	Economic operators subject to Article 29(1) shall endeavour to use at least 70% of the packaging referred to in the first subparagraph in a reusable format within a re-use system.	Article 29(1)
From 1 January 2030	Economic operators that use transport packaging or sales packaging used for transporting products, in the forms as listed in Article 29(1), within the territory of the Union, between different sites on which the operator performs its activity, or between any of the sites on which the operator performs its activity and the sites of any other linked enterprise or partner enterprise, shall ensure that such packaging is reusable within a re-use system.	Article 29(2)
From 1 January 2030	Economic operators that use transport packaging or sales packaging used for transporting products, including for products distributed via e-commerce, in the forms as listed in Article 29(1), to deliver products to another economic operator within the same Member State shall ensure that such packaging is reusable within a re-use system.	Article 29(3)
From 1 January 2030	Economic operators that use grouped packaging in the form of boxes, excluding cardboard, outside of sales packaging to group a certain number of products to create a stock-keeping or distribution unit shall ensure that at least 10% of such packaging is reusable packaging within a re-use system.	Article 29(5)
From 1 January 2040	Economic operators shall endeavour to use at least 25% of the packaging referred to in Article 29(5) in a reusable format within a re-use system.	Article 29(5)
From 1 January 2030 or 18 months from the date of entry into force of the implementing act referred to in Article 30(3), whichever is latest	Economic operators shall demonstrate the achievement of the re-use targets set out in Article 29.	Article 30(4)
Each calendar year from 2030	Economic operators as referred to in Article 29(1) to (8) shall submit a report containing data concerning the achievement of the re-use targets set out in Article 29.	Article 31(1)

Date	Description	Related Article
By 1 June each year	Producers shall submit the information set out in Part B, points 1 and 2 of Annex IX to the competent authority responsible for the national register of producers.	Articles 44(7) and 44(8)
Each year	Producers or their PRO shall submit the information set out in Part B, point 3, of Annex IX to the competent authority for each preceding calendar year.	Article 44(10)

References

- [Packaging waste - European Commission](#)
- [EU packaging waste generation with record increase](#)

OUR NUMBERS

300+

CUSTOMERS WORLDWIDE

195

COUNTRIES COVERED

100,000+

REGULATIONS