



Compliance & Risks

*Packaging Compliance in Transition: **Expert Insights & Analysis***

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01. About The Authors



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01. About The Authors



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01. About The Authors



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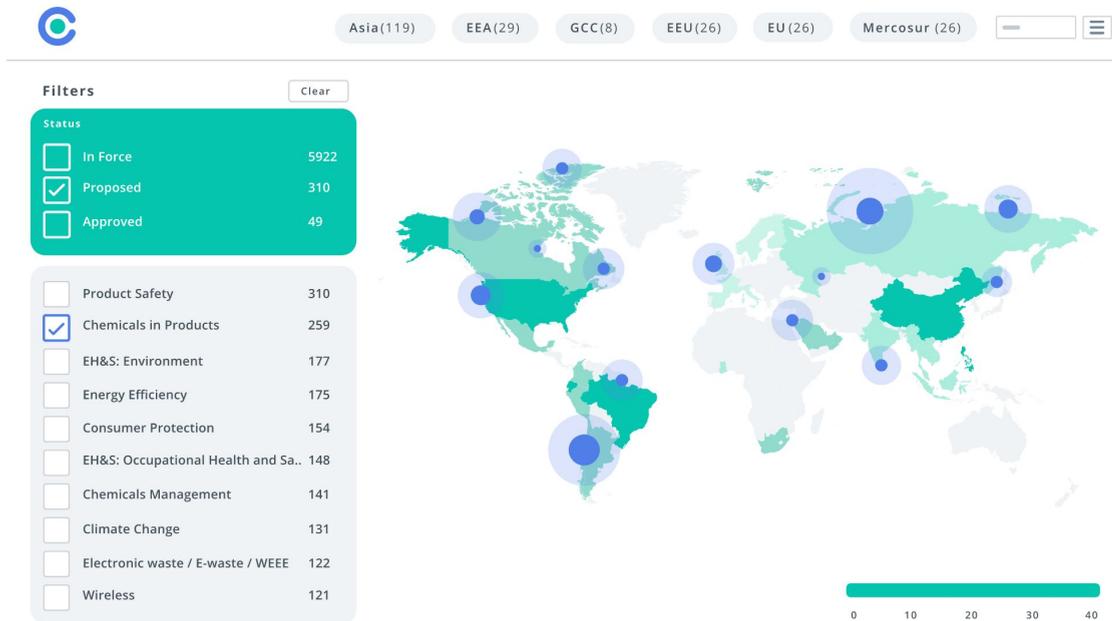
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01. Introduction

Global packaging regulations are rapidly evolving, as jurisdictions worldwide introduce stringent new rules to curb environmental impact and boost recyclability.

For companies operating across multiple jurisdictions, keeping pace with these developments has become a business-critical challenge.

This guide, based on insights from our popular webinar, [Navigating Global Packaging Regulations](#), provides an in-depth examination of the most frequently asked compliance questions related to packaging laws across Europe, North America, the Middle East, and Asia.

It outlines the implications for manufacturers, importers, and brand owners, while also highlighting compliance deadlines, labelling requirements, and enforcement trends.

By offering both a global overview and country-specific detail, this guide is designed to complement the webinar, serving as a practical resource for compliance teams, sustainability leaders, and packaging professionals.

Structured to unpack the most frequently asked questions around packaging compliance in key international markets, offering clear and practical guidance on how companies can confidently meet these emerging national and regional requirements. The analysis covers critical themes such as Extended Producer Responsibility (EPR) programs, new mandatory labeling mandates, and plastic reduction strategies.

This guide was originally published on the 17th October 2025. Further regulatory developments may have occurred after publication.

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02. The European Union's Packaging and Packaging Waste Regulation (PPWR)

The European Union's Packaging and Packaging Waste Regulation (PPWR) represents the most significant regulatory development in the packaging industry for the current year

The regulation's general application date is August 12, 2026. However, this is only one of over **20 compliance deadlines** that span all the way up to 2040. The PPWR is comprehensive, placing numerous new obligations on economic operators that cover substances, recyclability, reusability, design, and labeling of packaging. A significant area of focus is Article 12, which mandates harmonized **material composition labeling** by **August 12, 2028**, and harmonized **reusable packaging labeling** by **August 12, 2029**. These dates are dependent on the European Commission publishing the necessary implementing and delegated acts to fully detail the requirements. The Joint Research Center (JRC) has published prototype consumer sorting labels that use both color and text, leading to concerns from industry stakeholders that the required translation of text into over 20 EU languages could create single-market barriers, which runs contrary to the regulation's harmonization goal.

The PPWR is widely expected to replace existing **national packaging labeling requirements**, such as those in France and Spain, against which the EU Commission has already launched infringement proceedings, using strong language that indicates these national measures seriously undermine the free movement of goods.

Furthermore, Article 15(6) of the PPWR introduces new requirements for manufacturers to indicate their name, registered trade name or trademark, and postal address and, where available, the electronic means of communication.

The postal address must denote a single point at which the manufacturer can be contacted, particularly by market surveillance authorities. This single point of contact guidance is found in the non-binding EU Blue Guide, as the PPWR itself does not provide a definition. This single point can be the address of an authorized representative or customer services and is not necessarily the manufacturer's actual address. A website address can be given in addition to, but not instead of, the postal address.

The electronic means of communication, however, is not required to be a single point, meaning a link to a homepage URL may be acceptable even if it requires extra steps for a user to find contact details, though the postal address must still be provided separately. The postal address must be indicated on the packaging, in a QR code, or in an accompanying document if the first two are not possible.

03. Packaging Waste Disposal Information in Portugal

Portugal has recently introduced new packaging waste disposal information requirements via an amendment to Decree-Law 152-D/2017.

Packers managing packaging within the Integrated Packaging and Packaging Waste Management System (SIGRE) must choose between two options to comply with Article 28(5) of the decree.

Option 1 mandates the labeling of non-reusable primary and secondary packaging to indicate the **color of the correct recycling bin** for waste disposal. If this option is selected, the labeling must adhere to specific instructions published by the Portuguese Environment Agency (APA).

These instructions require the labeling to include either a symbol or a phrase indicating the green, blue, or yellow recycling bin.

Additional requirements specify that packaging with different materials must be marked with symbols or phrases indicating their respective bins, consumers must be informed if a lid or stopper needs to be removed or kept on prior to disposal, the labeling must be in Portuguese, and consideration should be given to including instructions in braille.

Producers must choose their own labels, as the Portuguese authorities have not provided official designs, but consultation with a PRO is recommended for appropriate guidance.

Option 2 offers flexibility by permitting companies to provide disposal information by **any appropriate means**, which can include the product's instructions for use or information provided at points of sale.

Guidance from the APA confirms that compliance with Option 2 can be achieved via the packer's website, a QR code placed on the packaging, or information placed in the instruction manual. This alternative may be easier for companies that wish to avoid applying physical labels. While there are separate mandatory labeling requirements for reusable packaging under Article 28(7), these are not yet in force as industry consultations are still ongoing.

Non-compliance with the Portuguese waste sorting information requirements is subject to penalties under Article 90 of Decree-Law 152-D/2017, with fines potentially ranging from approximately €12,000 to over €200,000.

04. Extended Producer Responsibility (EPR) In The United States

Extended Producer Responsibility (EPR) for packaging is a significant and escalating trend in the United States.

As of 2025, a total of seven states have enacted packaging EPR laws:

1. California
2. Colorado
3. Maine
4. Maryland
5. Minnesota
6. Oregon
7. Washington

Each of these state programs is in a different phase of implementation.

Oregon was the first state to begin implementation in July 2025. In **Minnesota**, producers were required to join a Producer Responsibility Organization (PRO) by July 1, 2025.

In **Colorado**, producer fees are due on **January 1, 2026**. In **Washington** and **Maryland**, producers must register with a PRO by **July 1, 2026**.

California's Plastic Pollution Producer Responsibility Act (SB 54) has faced continuous obstacles in the rulemaking process despite entering into force in 2023.

The process restarted in March 2025 when the governor ordered CalRecycle to revise the draft rules to address industry concerns.

A revised draft was subsequently released in August, initiating a 45-day consultation period that ended on October 7, 2025. Notable revisions in this draft include clarified definitions, refined exclusions, and extended exemption periods for small producers.

Furthermore, the required frequency for data reporting has been changed from monthly to **annual increments**, and the implementation of eco-modulated fees can now occur two years after the PRO plan is adopted.

Separately, producers must adhere to the **November 15, 2025**, deadline for submitting the first supply report based on 2023 data.



05. California's Recyclability Labeling: The Truth in Recycling Act (SB 343)

California's Senate Bill 343 (SB 343), also known as the Truth in Recycling Act or the Truth in Labeling Act, forms part of California's broader strategy to reduce plastic pollution and build a circular economy for packaging.

The law is aimed at limiting the use of misleading recyclability claims and the chasing arrows symbol.

A product or its packaging may only display recyclability claims or symbols if the material meets the following criteria:

- it is **collected by curbside programs** covering at least 60% of the California population;
- it is **accepted by recycling facilities** serving at least 60% of state programs
- it is **used as feedstock** for new products or packaging.

In April 2025, CalRecycle published the **final findings for the material characterization report**, which triggered an 18-month transition period.

Consequently, after **October 4, 2026**, any product or package displaying a recyclability claim or symbol will be considered misleading unless the item actually meets the recyclability criteria.

In August 2025, CalRecycle also issued new guidance documents, including an FAQ document to assist manufacturers with understanding the recyclability criteria, labeling restrictions, and compliance timelines.

06. Canada's Federal Plastics Registry and Proposed Regulatory Framework

Canada's regulatory landscape for packaging includes both active provincial EPR programs and new federal requirements.

Many provinces have already implemented packaging EPR programs, but there have been some recent developments in **Yukon** and **Nova Scotia**.

Yukon's stewardship plan was approved in May 2025, with full implementation scheduled to begin on **November 1, 2025**. Nova Scotia, which began preliminary data reporting in 2024, is set for full implementation on **December 1, 2025**.

At the federal level, the immediate focus is **Phase 1 reporting under the Federal Plastics Registry**.

The reports were due on September 29, 2025 and are based on 2024 data. This initial phase applies to products destined for residential waste streams within three categories: rigid and flexible plastic packaging, single-use or disposable plastic items,, and electronic and electrical equipment that contain plastic components.

The reports must detail:

- the product category and subcategory;
- the resin type and source;
- the quantity in kilograms per resin type and category; and
- the calculation methods used to determine quantity.

Obligated parties include any person that imports, manufactures, and places plastic on the market in Canada, such as producers, brand owners, importers, manufacturers, retailers, and marketplace facilitators. Exemptions apply to parties placing less than 1,000 kg of plastic on the market per year and plastics found in industrial, commercial, or institutional (ICI) waste streams for this phase.

Non-compliance can result in substantial fines: up to \$25,000 for individuals and up to \$500,000 for companies, with the maximum fines doubling for subsequent offenses.

Conversely, the proposed **Regulatory Framework for Recycled Content and Labelling Rules** for plastics is currently on hold. This framework proposes mandatory recyclability and compostability labeling for consumer-facing plastics, alongside mandatory minimum thresholds of recycled content.

However, the legal basis for the framework - a 2021 order listing "plastic manufactured items" under CEPA - was struck down by the Federal Court in November 2023.

The government appealed this decision in December 2023, and the framework remains on hold pending the appeals process.



07. Key Updates To The UK's EPR Scheme

This year the highly anticipated **"Producer Responsibility Obligations Packaging and Packaging Waste) Regulations 2024"** entered into force on January 1, 2025. Creating a new packaging EPR system in the UK and increasing the obligations placed on packaging producers.

This regulation is a vast piece of legislation that encompasses core requirements for UK packaging producers, while measures specific to packaging manufacturing i.e. design and composition etc are still contained within the **"Packaging (Essential Requirements) Regulations 2015**.

The scope of the new regulation is broad, applying to all products made of any material used for containment, protection, handling, delivery, or presentation of goods, including non-returnable items. The key producer obligations include registration, reporting, payment of fees, recycling obligations, record keeping, and certification.

Notably, unlike initial proposals, this new EPR regulation **does not currently include mandatory marking and labeling obligations** for waste sorting.

This decision was made to avoid placing an unnecessary burden on producers who would also have to comply with the forthcoming EU PPWR labelling obligations.

Despite this, the Department for Environment, Food and Rural Affairs (DEFRA) has confirmed that similar labeling obligations are still expected to be introduced in the near future.

Lastly, the enactment of the new packaging EPR regulation was followed by the release of several **new guidance and policy documents** in 2025, which are essential reading for ensuring compliance with the new regulation.



These documents provide an overview of the Recyclability Assessment Methodology (RAM) to determine eco-modulation fees , the EPR base fees for 2025 to 2026 , revised instructions for compiling and submitting data for EPR submissions , and guidance on assessing household versus non-household packaging.

The 2024 regulations will also repeal the remaining Northern Irish, Scottish, and Welsh packaging waste regulations on **January 1, 2026**, establishing a uniform, pan-UK EPR system.

Key upcoming compliance deadlines include **October 1, 2025**, for large producers to submit packaging data for the first half of the year , and **April 1, 2026**, for small producers to submit their full-year packaging data and for the submission of "nation data" for the 2025 calendar year.

08. Draft Packaging Regulations in Saudi Arabia

Saudi Arabia is set to update its packaging requirements with the revision of its Draft Regulations for Packaging, which was notified to the WTO on July 21, 2025.

The update's primary purpose is to align the text with the provisions of the recently approved **Technical Regulation on Product Safety**.

Accompanying the draft was a circular listing **43 SASO packaging standards**, which provide the detailed technical requirements necessary to ensure compliance with the regulation.

The main objectives of the Draft are to safeguard the protection, health, and safety of packaging users and consumers, preserve the environment, and mitigate associated risks.

The regulation's scope is extensive, applying to all packaging products used in packing, protection, circulation, and display, including imported packaging.

Exemptions are provided for primary and secondary packaging for food, drug, and cosmetic products, all levels of packaging for medical devices and medical supplies, and food contact packaging that is subject to the technical regulation on food safety for tools and equipment used in kitchens.

The requirements cover the design and manufacturing of packaging, safety, reuse and recycling obligations, chemical restrictions, and the mandatory provision of product information.

The regulation is proposed to enter into force **180 days** after its official publication, with a one-year transition period.

No specific compliance deadlines are set out in the current draft text.

09. India's Evolving Plastic Waste Management Rules

India's Plastic Waste Management Rules, in force since March 2016, are notoriously difficult to follow because numerous amendments have not been accompanied by a consolidated Rule or updated official guidelines.

The objective of the rules is to ensure the proper management of plastic waste. Extended Producer Responsibility (EPR) obligations established by the rules apply to both pre-consumer and post-consumer plastic packaging waste, encompassing rigid, flexible, and multi-layered plastic packaging.

The obligated parties include; producers and importers of plastic packaging, brand owners (such as online platforms and retail chains), and plastic waste processors.

The requirements set out in the rules cover a wide spectrum of obligations, including the payment of fees, mandatory marking and labeling, the provision of product information, registration of obligated parties, recycling and mandatory use of recycled plastic in packaging and annual reporting.

A key focus area is the labeling requirements, which mandate that plastic packaging must be affixed with the **name and registration certificate number** of the producer, importer, or brand owner. Recent amendments allow this information to be provided via a **Barcode or Quick Response code** printed on the packaging or in the product information brochure.

Exemptions are provided for packaging covered under the Legal Metrology Packaged Commodities Rules and where printing the required information is technically not feasible.

There are specific labeling rules tied to material content:

- **Recycled plastic packaging** must bear a label stating 'recycled having of recycled plastic' and conform to Indian Standard IS 14534: 2023.
- **Compostable plastics** must be labeled 'Compostable only under industrial composting' and conform to Indian Standard IS/ISO 17088:2021.
- **Biodegradable plastic** requires a label stating its biodegradability timeline and the specific recipient environment (e.g., soil, landfill, water).
- All **packaging bags** made of plastic raw material must be marked with a statement prohibiting their use in the manufacture of banned single-use plastic items.

Compliance deadlines require every person engaged in recycling or processing of plastic waste to submit an annual report by **April 30**, while manufacturers/importers of plastic raw materials and those selling plastic raw materials must submit their annual reports by **June 30** each year.

10. Webinar Q&A

During the live webinar, numerous questions were sent in by our live audience. Our webinar presenters, [Rúan Doherty](#), [Conor O'Donoghue](#), [Freida Wüschner Gubbins](#) and [Juliana Kecerova](#) provided expert answers to the most popular queries below.

Q1. Are there publications of official guidance documents expected for the PPWR requirements coming into force in August 2026?

Yes, the EU Commission has announced that it will be releasing guidelines, supplementary legislation and harmonised standards to support the implementation of requirements.

Q2. Are there any differences in the PPWR and Portugal's Decree Law related to the packaging requirements between packaging for industrial, professional and consumer users?

Yes, there are significant differences between the two because Portugal's packaging Decree-Law implements the older EU Directive on Packaging and Packaging Waste which is not as comprehensive as the requirements that now exist under the PPWR.

So, while the PPWR creates many new requirements relating to substances in packaging, recyclability, re-use, labelling, packaging design etc., the Portuguese Decree-Law focuses mainly on the management of packaging waste.

Q3. Would you be able to provide me with more information regarding labelling for traceability and origin in the EU please?

In accordance with Article 15 of the EU's PPWR, packaging manufacturers are obliged to provide;

- an 'EU declaration of conformity', ensure packaging bears a 'type, batch or serial number or other element allowing its identification', and
- indicate on the packaging or on a QR code or another data carrier 'their name, registered trade name or registered trademark as well as the postal address' at which and, where available, the electronic means of communication by which they can be contacted.

Furthermore, as outlined in Article 16 of the Regulation, suppliers of packaging or packaging materials are obliged to provide the manufacturer with all the information and documentation necessary for the manufacturer to demonstrate the conformity of the packaging and the packaging materials with this Regulation, including the technical documentation referred to in Annex VII and required under or pursuant to Articles 5 to 11, in one or more languages which can be easily understood by the manufacturer.

This information can be provided in either paper or electronic form.

Q4. Is the PPWR specific to B2C only?

Article 2 of the PPWR specifies that the Regulation applies to *“all packaging, regardless of the material used, and to all packaging waste, whether such packaging is used in or such packaging waste originates from industry, other manufacturing, retail or distribution, offices, services or households.”*

Therefore, the Regulation generally applies to both B2B and B2C packaging.

Q5. Per the EU Cosmetics Regulation, we are required to list the name and address of a Responsible Person who is the regulatory contact. Will that satisfy the address requirements of Article 15?

If you are referring to basic traceability requirements, then yes both the EU Cosmetic Products Regulation and the PPWR require the provision of the relevant economic operator's name or registered name and address in Article 19 of the Cosmetics Regulation and Article 15.6 of the PPWR.

Further details on the harmonisation of requirements across multiple EU Regulations etc can be found in the EU's Blue Guide.

Q6. Federal Plastic Registry - Are you able to breakdown the different tabs of the BULK SUBMISSION file? Are we reporting the same information across the tabs

The information that must be included in the report differs slightly across the categories (i.e. resins; plastic products; plastic waste; plastic EOL management).

I would recommend consulting the [Resources section](#) of the Regulatory Services Platform, which contains reporting templates for various years and guidance documents on how to access and use the platform.

If you still require more information on reporting, I would recommend contacting the [Support division](#) of the platform.

Q7. For CA SB 343, is it just packaging or all products with existing recyclability claims that are in scope?

The recyclability claim/labelling restrictions apply to products and packaging manufactured after October 6, 2026.

Q8. Does the PPWR postal address have to be in the EU?

In accordance with instructions provided in the EU's Blue Guide, products must contain the name and address of the manufacturer, however if the product was imported the importer's address must also be included.

Typically, this would result in an EU address being provided either by the manufacturer residing in the EU or through the importer. For further details and examples please see the [EU's Blue Guide](#) for more details.

Q9. Are there exemptions for small businesses under California's packaging law?

Yes, Senate Bill 54 exempts small producers, retailers, or wholesalers that, in the most recent calendar year, had gross sales of less than one million dollars (\$1,000,000) in the state.

Q10. In the Compliance & Risks published whitepaper on packaging labelling requirements in Europe, * Indicates that national material identification packaging labelling requirements (ie in Spain and Portugal) is voluntary until the application of EU-wide mandatory material identification labelling requirements on 12 August 2028. Is the 'voluntary' element clearly stated in the national laws and if so, would not be grounds for punitive measures for any non compliance?

The reference to voluntary material identification labelling is based on the status of EU Decision 97/129/EC, which was made mandatory in a short list of EU countries not including Portugal and Spain. However, with the entry into force of the PPWR such labelling will be made mandatory across the EU in line with soon to be announced instructions as per Article 12 of the PPWR.

The status of EU Decision 97/129/EC does not correlate to the status of other packaging labelling systems in either country. But the EU is taking action against national packaging labelling schemes, such as Spain's in accordance with the Treaty on the Functioning of the European Union (TFEU). We are still awaiting the results of these legal actions.

Q11. Regarding the "indicate a single point of contact" under PPWR, does this mean that for packaging (boxes) of electrical and electronic products sold in each EU country, the "indicate a single point of contact" must be somewhere in the EU where the product is imported? Or does it mean that a "indicate a single point of contact" is required for each EU country?

The EU's Blue Guide clarifies that the single contact point may not necessarily be located in the Member State where the product is made available on the market.

Furthermore, the single contact point does not need to be in every Member State where the product is made available.

Q12. US EPR for Packaging (Washington, California, Oregon, Maine, etc) apply to boxes used to package electrical and electronic products or plastic bags used to package their accessories? If so, does this apply to companies selling electrical and electronic products?

Yes, this type of packaging is subject to the EPR provisions in state EPR programmes. Generally, the only type of packaging that is not covered is packaging for medical/hazardous products, agricultural/construction products etc.

I would recommend consulting each state programme for the full scope of exempt packaging materials.

Overall, yes, companies that sell EEE products in such packaging are generally considered producers under these programmes and are responsible for compliance, unless they meet specific exemptions.

Q13. Does the Portuguese Packaging Labelling (Decree-Law 152-D/2017) apply to boxes used to package electrical and electronic products or plastic bags used to package their accessories? If so, does this apply to the company selling or producing electrical and electronic products?

Yes, this applies to this type of packaging.

The scope of the Decree-Law applies broadly to all packaging placed on the market, regardless of whether it is used in the domestic, industrial, agricultural, commercial or service sectors, or the material from which it is made. It also applies to primary, secondary, and tertiary packaging.

Overall, companies that sell EEE products in such packaging would fall within scope.

Q14. Is there a de minimis threshold in the new UK Packaging Rules?

Yes, there are exemptions under UK EPR requirements for packaging producers who have supplied less than 25 tonnes of packaging to the UK market in the previous calendar year.

Q15. Do you have any clarity on whether the harmonised material composition labelling applies to both consumer and professional products?

Article 12(1) of the PPWR states that from 12 August 2028 (or later if the Commission implementing act(s) are late), *"packaging placed on the market shall be marked with a harmonised label containing information on its material composition in order to facilitate consumer sorting" and "with the exception of e-commerce packaging, this obligation does not apply to transport packaging."*

Therefore, the indication is that these specific labels will apply to B2C packaging only.

However, we are still awaiting the publication of implementing acts to provide supplementary information about this labelling requirement.

Q16. Does Portugal packaging reg apply to professional packaging e.g. medical device? Similar question for other national regs

The scope of the Decree-Law applies broadly to all packaging placed on the market, regardless of whether it is used in the domestic, industrial, agricultural, commercial or service sectors, or the material from which it is made.

It also applies to primary, secondary, and tertiary packaging - so medical device packaging would be included unless subject to certain exemptions. For example, certain medical devices are excluded from scope (active implantables/potentially infectious before end-of-life).

Additionally, with regards to packaging labelling, a guidance document published by the Portuguese Environment Agency (APA) outlined that the requirements of Article 28(5) do not apply to non-reusable medical packaging.

Q17. Is there guidance on best ways to calculate EPR fees?

Generally, fees are calculated based on packaging weight and type. For specific guidance/resources on how to calculate EPR fees in a specific state, I would recommend contacting the designated PRO (i.e. Circular Action Alliance).

As a starting point, a blog entitled "[EPR Fee Calculation and Reporting Frameworks: Multi-Jurisdictional Compliance Strategies](#)" was recently published on Compliance & Risks' website, which you may find useful.

Q18. CA SB - Is there any requirements for the documents to prove recyclability?

Section 42355.5. (a) of SB 343 outlines that: *"The Legislature finds and declares that it is the public policy of the state that environmental marketing claims, whether explicit or implied, should be substantiated by competent and reliable evidence to prevent deceiving or misleading consumers about the environmental impact of plastic products."*

However, no definitions or guidance has been published on how to substantiate these claims. I would recommend contacting CalRecycle for further information.

Q19. Regarding DoC required by the PPWR, is this expected to remain a requirement in the indicated date? Since by then, only material composition requirements will be in force (continuing from the Packaging Directive.)

The PPWR will apply from 12 August 2026. On this date, Article 15 (which requires the manufacturer to draw up the DoC) will come into effect.

The material composition labelling requirements will come into effect later. Article 12 states that this labelling requirement will apply *"from 12 August 2028 or 24 months from the date of entry into force of the implementing acts adopted pursuant to paragraphs 6 or 7 of this Article, whichever is the latest"*.

Q20. Are US companies that export their products into Canada responsible to report to the Canadian Federal Plastic Registry?

The official guidance document for Phase 1 reporting outlines in Question 7 of the FAQ section:

"Do companies outside of Canada that export their products to Canada have an obligation to report to the FPR?"

No. Only persons resident in Canada, with a Canadian address, have the responsibility to report on the plastics in the products that are imported. Companies that export into Canada have an important role to play, however, in supporting the Canadian entities that import their goods in their reporting obligations by providing information on the identities, sources, and quantities of resins in their products.

Failure to supply this information may result in the Canadian entities with which they do business being out of compliance with the FPR. The Government of Canada has created a letter for communicating with foreign suppliers that is available for download.

The letter is designed to help entities obtain information from their suppliers to complete their submissions to the FPR."

Q21. Regarding the labelling requirements under EU PPWR, is the information needed to print directly to the packaging itself or it is acceptable to have the labelling info printed on sticker and paste to the packaging surface?

The Regulation specifies that "where such affixing, printing or engraving is not possible or not warranted on account of the nature and size of the packaging, the label, QR code or other standardised, open, digital data carrier shall be affixed to the grouped packaging.

Where even that is not possible or not warranted on account of the nature and size of the packaging or where it is relevant to provide for non-discriminatory access to information for vulnerable groups, particularly visually impaired persons, the information shall be provided via a single electronically readable code or other type of data carrier."

Q22. What is the date of enforcement for India: Plastic Waste Management Rules?

The Rules have been in force since the 18 March 2016 and the most recent amendment to the Rules entered into force on 23 January 2025.

Q23. What is the date of implementation in Portugal?

Decree-Law No. 152-D/2017 has been in force since 1 January 2018 and the most recent amendment entered into force on 27 March 2024.

The packaging labelling obligations outlined in the most recent amendment entered into force on 1 January 2025.

Q24. If we are not placing more than 25 tons of packaging per year on the UK market, then I agree with the statement that the company is not obligated in the UK for packaging

Yes, there are exemptions under UK EPR requirements for packaging producers who have supplied less than 25 tonnes of packaging to the UK market in the previous calendar year.

Q25. Does it apply for B2B packaging, and own use?

I will assume you are asking about the EU Packaging Regulation for the purposes of answering your question.

Article 2 of the PPWR specifies that the Regulation applies to "all packaging, regardless of the material used, and to all packaging waste, whether such packaging is used in or such packaging waste originates from industry, other manufacturing, retail or distribution, offices, services or households."

Therefore, the Regulation generally applies to both B2B and B2C packaging.

Q26. How do the prototype labels realize the requirement that the labelling should be suitable for disabled people (e.g. blind people)?

The prototype designs were published by the JRC in the [following document](#).

I note that on page 10, the JRC confirmed that they conducted a "separate targeted consultation with the European Blind Union Association". On page 41, it states that "simplified, embossed designs were recommended to ensure inclusivity for visually impaired individuals. Respondents advocated for straightforward symbols to enhance consumer understanding while avoiding overlapping or complex icons that could introduce ambiguity."

They also confirmed that they considered discussions surrounding accessibility for colour-blind individuals when designing the pictograms.

As more information is released by the JRC and the Commission, additional measures may be announced to aid people with disabilities.

Q27. Under the PPWR article 15 how is manufacturer defined? Can this be the importer?

The Regulation defines a manufacturer as follows;

'manufacturer' means any natural or legal person that manufactures packaging or a packaged product; however:

(a)
subject to point (b), where a natural or legal person has packaging or a packaged product designed or manufactured under its own name or trademark, regardless of whether any other trademark is visible on the packaging or on the packaged product, 'manufacturer' means that natural or legal person;

(b)
where the natural or legal person that has the packaging or packaged product designed or manufactured under its own name or trademark falls within the definition of micro-enterprise set out in Recommendation 2003/361/EC as applicable on 11 February 2025, and the natural or legal person that supplies the packaging to the natural or legal person that has the packaging designed or manufactured under its own name or trademark is located in the same Member State, 'manufacturer' means the natural or legal person that supplies the packaging;

As specified in Article 21 there are cases where manufacturer obligations can apply to an importer or distributor.

"Where an importer or a distributor places packaging on the market under its own name or trademark or modifies packaging already placed on the market in a way that could affect compliance with the relevant requirements of this Regulation, that importer or distributor shall be considered to be a manufacturer for the purposes of this Regulation and shall be subject to the obligations of the manufacturer under Article 15.

Where an importer or a distributor as referred to in the first subparagraph falls within the definition of micro-enterprise set out in Recommendation 2003/361/EC as applicable on 11 February 2025, and the natural or legal person that supplies the packaging to the importer or distributor is located in the Union, the natural or legal person that supplies the packaging shall be considered to be the manufacturer for the purposes of Article 15."

Q28. Does article 15 apply to each piece of packaging or just one? How about for B2B?

According to Article 15, manufacturers must ensure that all packaging they place on the market is in conformity with the requirements laid down in or pursuant to Articles 5 to 12. Therefore, Article 15 applies generally to each piece of packaging.

“Placing on the market” is defined as “the first making available of packaging, whether empty or with a product, on the Union market”.

This may include B2B packaging as it can include providing the packaging to a distributor.

Q29. What is the EPR Packaging status in Quebec? What is the timeline for the expansion to B2B Packaging?

Quebec's packaging EPR programme is currently in force, with Éco Entreprises Quebec operating as the designated PRO.

Expansion to B2B packaging and waste began in January 2025, when the residual material collection system expanded to the industrial, commercial, and institutional (IC&I) sector.

Q30. PPWR: Manufacturer need to indicate name, registered name, etc. in QR code, the information here means the packaging information or the packaged goods information?

This requirement is specific to packaging information.

Q31. I would be very curious to understand the obligations for producers? Is there something new there as well?

I am assuming that your question is in reference to manufacturer obligations under Article 15 of the PPWR.

The obligations also apply to producers in this case, as 'manufacturers' are considered to be a type of 'producer' within the PPWR. The definition of 'producer' encompasses any manufacturer, importer or distributor. Therefore, there are not specific producer obligations, but there are specific obligations for manufacturer, importers, distributors, and authorised representatives.

Q32. For USA EPR programs is the anticipation that private enforcers will be heavily involved as we have seen with CAL Prop 65 with class action suits driving enforcement of these programs?

It's difficult to say at this point, given that packaging EPR programs in the U.S. are still in the early stages of implementation.

So far, these programs rely mainly on state agencies and Producer Responsibility Organizations (PROs) for enforcement, rather than private enforcers and class action suits.

However, as EPR legislation expands and becomes more complex, private enforcement involvement could increase, though we cannot be certain at this moment.

Q33. Is the packaging requirement applicable for spare part and accessories also or only for End-product?

If you are referring to requirements listed under the EU's PPWR, then an example list of packaging types (i.e. labels, stickers etc) within and outside the scope of the requirements can be viewed in Annex 1 of the Regulation.

Q34. Can we use MÖBIUS LOOP for labelling Li-ion battery?

Yes, a company can use the Möbius Loop on a product or packaging, however it is NOT mandatory across the entire European Union.

Please note, if a company chooses to use the Möbius Loop, it must ensure that the claim is truthful and not misleading to consumers.

Q35. What is the labelling and packaging requirement for the rechargeable integrated and non-integrated batteries?

We're answering your question assuming it relates to the EU.

Although a detailed clarification of all labelling and packaging requirements in the EU requires a much detailed analysis, the following are the basic labelling requirements under the Batteries Regulation (EU) 2023/1542.

They apply to all rechargeable batteries, including portable batteries, LMT, electric vehicle and industrial batteries.

Separate Collection Symbol (a crossed-out wheeled bin symbol)

Chemical Symbol of cadmium or lead - printed beneath the crossed-out wheeled bin if the battery exceeds specific thresholds

CE conformity marking - affixed to the battery, packaging, or accompanying documents.

The following general labelling requirements will become mandatory from August 18, 2026.

Manufacturer Identity: name, registered trade name, or registered trademark, and a postal and electronic address.

Battery Category: and information identifying the battery.

Manufacturing Information: the place of manufacture (geographical location of a battery manufacturing plant) and the date of manufacture (month and year).

Weight, Capacity, and Chemistry: The weight, the capacity (expressed in Ah or mAh), and the battery chemistry.

Hazardous Substances: Any hazardous substances present (other than mercury, cadmium, or lead) and the appropriate extinguishing agent.

Critical Raw Materials: Critical raw materials contained in the battery (if the concentration is >0.1% by weight).

Traceability and Digital Information

1. As of February 18, 2027, all batteries must be marked with a QR code to provide access to:
 - The Declaration of Conformity and due diligence report (for all batteries).
 - The Battery Passport (for larger batteries).

2. As of February 18, 2027, each LMT battery, each industrial battery with a capacity greater than 2 kWh and each electric vehicle battery placed on the market or put into service shall have an electronic record ('battery passport').

3. Carbon Footprint Declaration

18 February 2025 or 12 months after the date of entry into force either of the delegated act - for EV batteries;

18 February 2026 or 18 months after the date of entry into force either of the delegated act - for rechargeable industrial batteries;

18 August 2028 or 18 months after the date of entry into force either of the delegated act - for LMT batteries;

18 August 2030 or 18 months after the date of entry into force either of the delegated act - for rechargeable industrial batteries with external storage.

4. From 18 August 2031, industrial batteries with a capacity greater than 2 kWh, except those with exclusively external storage, electric vehicle batteries and SLI batteries that contain cobalt, lead, lithium or nickel in active materials shall demonstrate the percentage of recycled cobalt, lead, lithium, and nickel present in the active materials.

Packaging Requirements

For all batteries and accumulators - if the battery is too small, the symbol must be on the packaging and accompanying documents.

Shipment of used batteries: In accordance with Annex XIV, in order to distinguish between used and waste batteries, where the holder, meaning the natural or legal person in possession of the used batteries or the waste batteries, claims that it intends to ship or is shipping used batteries and not waste batteries, that holder shall be required to have available the following to substantiate that claim:

(d) appropriate protection against damage during transportation, loading and unloading, in particular through sufficient packaging and appropriate stacking of the load.

In addition, packaging must comply with existing international transport regulations for dangerous goods, such as UN 38.3 for lithium batteries, which mandates specific testing, labelling and packaging standards to ensure safe transport.

Q36. What is classified as "non-reusable"?

There is no specific definition for non-reusable packaging within the EU's packaging regulations, however 'single-use packaging' means packaging which is not reusable packaging and definitions and criteria for reusable packaging are set out in Article 11 of the PPWR.

Q37. What is the regulation/standard number for the Saudi draft regulation?

The Saudi Arabian Draft is available [here](#).

It does not yet have a Regulation number but it does have a WTO reference number, which is G/TBT/N/SAU/1286/Add.1.

Q38. For the US, are there going to be other PRO options besides the CAA?

Yes, for the 7 states that have enacted packaging EPR laws so far, Circular Action Alliance is the only PRO option.

Q39. What are the penalties for producers who do NOT submit reports? Will compliant producers have to continue paying large fees because non-compliant producers are not submitting reports?

Regarding reporting under California's packaging EPR programme, failure to report may result in financial penalties amounting to a maximum of \$50,000 per violation/per day.

I would recommend contacting either CalRecycle or Circular Action Alliance for more information about how non-compliance affects compliant producers.

Q40. Is it looking like the labels have to be in color only?

The JRC published the prototype designs in the [following report](#).

Colour is discussed frequently in the report as a method to enhance recognition and visibility. However, page 169 states that the "labels may use colours to indicate material categories but should also work in monochrome/black-and-white (primarily using pictograms and text)."

So, it seems that using colour will be optional.

Q41. Re PPWR labelling and article 12(9); are we right to interpret as needing to remove the Green Dot from packaging from February 2027? We are getting push back on this from distributors in Portugal and Spain.

This would be my understanding, as during the drafting of the Regulation the EU repeatedly cited the Green Dot symbol as potentially misleading to consumers, who may believe that packaging bearing such a symbol is always recyclable.

Q42. Is the recycling labeling required for B2B in California?

SB 343 applies broadly to any product or packaging, for which a deceptive or misleading claim about recyclability is made, regardless of whether it is B2B or B2C. Due to the broad scope, it applies to both B2B and B2C.

Q43. Are B2B in scope for California and Canada?

In California, SB 54 and SB 343 both apply broadly to both B2C and B2B packaging.

In Canada, Phase 1 reporting under the Federal Plastics Registry applies solely to materials in household/residential waste streams - therefore applying to B2C only.

Q44. PPWR - do we already have some targets that we need to comply with for the obligations that we are missing delegated or implementing acts?

In instances where a requirement is to be supplemented by a delegated act, the entry into force date falls after the deadline for the release of the supporting legislation.



11. Conclusion

The analysis of global packaging regulations reveals a landscape of increasing complexity, characterized by an accelerating global trend toward Extended Producer Responsibility (EPR) and mandatory, detailed labeling.

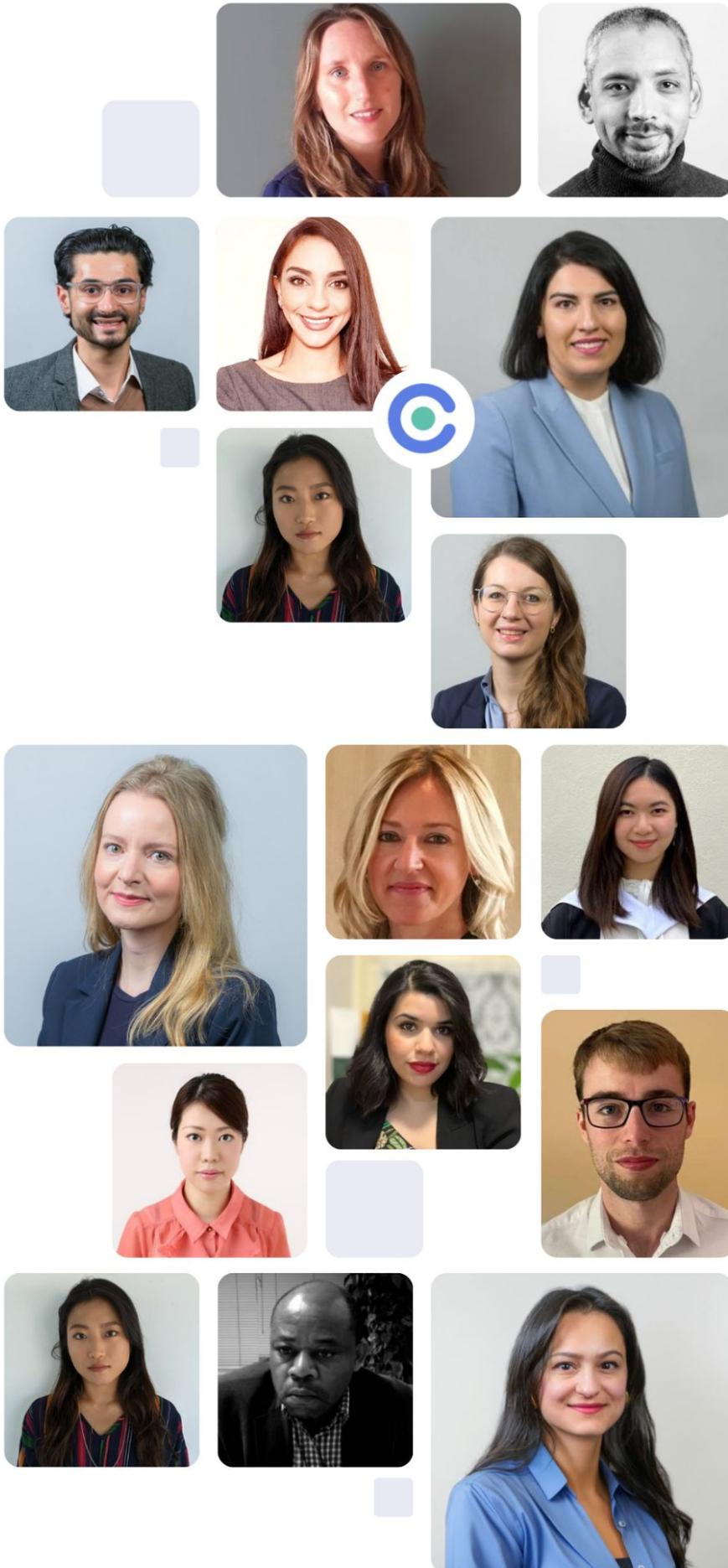
Jurisdictions worldwide are actively legislating to shift the cost and operational responsibility of packaging waste management onto producers and to combat greenwashing through transparency.

Key developments such as the EU's expansive PPWR, with compliance dates stretching to 2040, and California's definitive "Truth in Recycling" Act, which establishes a clear legal standard for recyclability claims by October 2026, demonstrate the critical need for proactive compliance strategies.

Furthermore, the mandatory reporting under Canada's Federal Plastics Registry, the full implementation of the UK's EPR scheme, and the continuous evolution of rules in major markets like India underscore that compliance is no longer a static requirement but an ongoing, strategic process.

For global companies, staying informed of precise deadlines, such as the November 2025 California PRO reporting and the phased EPR rollouts in US states, and anticipating regulatory shifts, such as the proposed regulations in Saudi Arabia, is essential for mitigating risk and ensuring sustained market access.

The path forward requires a unified approach to packaging strategy, leveraging expert insights to navigate this ever-changing world.



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CUSTOMERS WORLDWIDE

195

COUNTRIES COVERED

100,000+

REGULATIONS