

Webinar

Navigating Global Packaging Regulations: Expert Insights and Analysis

24 September, 2025



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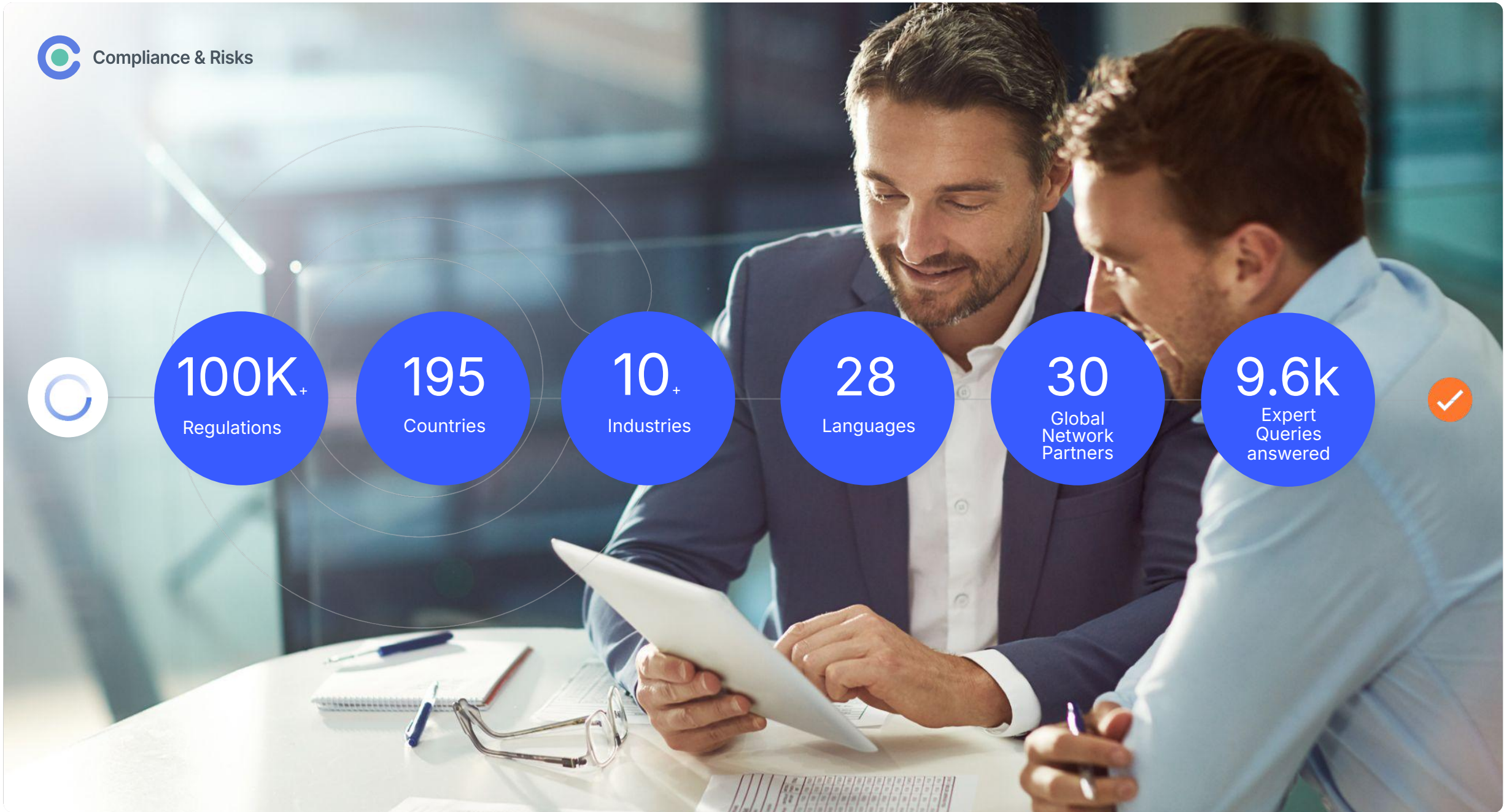
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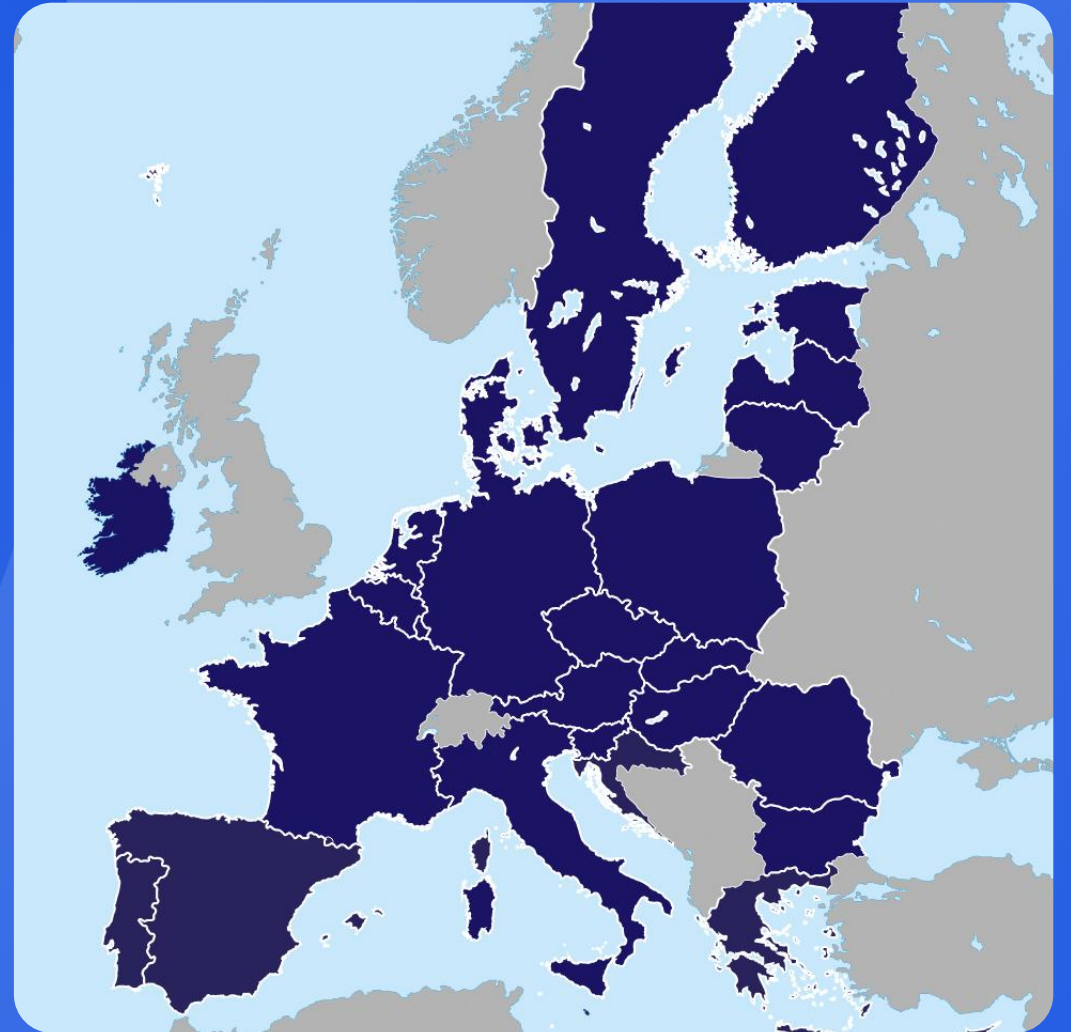
Agenda

1. Specific aspects of the EU Packaging and Packaging Waste Regulation (PPWR)
2. A focus on Portugal's packaging labelling system
3. Recent developments in US state packaging EPR programmes
4. Recyclability labelling obligations in California under Senate Bill 343
5. Reporting requirements under Canada's Federal Plastics Registry and a status update on proposed Plastic Recycled Content and Labelling Rules
6. Key updates to the UK's Extended Producer Responsibility (EPR) scheme for packaging
7. Saudi Arabia's latest revision to its draft Technical Regulation on packaging
8. Insights into India's evolving Plastic Waste Management Rules



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European Union PPWR



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Packaging and Packaging Waste Regulation (PPWR)

A short introduction

- **12 August 2026:** General application date of the PPWR
- **Over 20** compliance deadlines from 2026 until 2040
- Comprehensive - ambitious targets and many new obligations placed upon economic operators.
- However, many question marks still exist - Awaiting the publication of delegated and implementing acts.



Article 12 - Labelling Requirements

Current status of Article 12 labelling requirements

- **12th August 2028:** Harmonised material composition labelling
- **12th August 2029:** Harmonised reusable packaging labelling
- **Articles 12(6) and 12(7):** Provide for the preparation of implementing acts by the Commission to expand upon the above labelling requirements.
- **Joint Research Centre (JRC):** Work is ongoing to develop consumer sorting labels - Prototype labels have been published.
- However, concerns have been raised by stakeholders in relation to potential single-market barriers caused by the proposed labels.

Article 12 - Labelling Requirements



Article 12 - Labelling Requirements

Impact on national packaging labelling requirements

- **Article 12(8):** Economic operators shall not provide or display labels that are likely to mislead or confuse end users with respect to sustainability requirements. Commission guidelines being prepared.
- EU Commission position is very clear - infringement procedures have been launched against France and Spain.
- It is almost a certainty now that the national packaging labelling requirements will be repealed over the coming years.

Article 15 - Manufacturer's Obligations

Article 15(6) - Indication of name, trade name, trademark, and postal address

6. Manufacturers shall 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. Where that is not possible, the required information shall be provided as part of the information through the QR code or other type of standardised, open, digital data carrier as referred to in Article 12(1), (2), (4) or (5) or in a document accompanying the packaged product. The postal address shall indicate a single point at which the manufacturer can be contacted.

Article 15 - Manufacturer's Obligations

What is meant by "indicate a single point of contact"?

- Not defined in the PPWR itself.
- Guidance can instead be found in the EU's Blue Guide - a non-binding document providing guidance on EU product rules and harmonisation legislation.
- **Page 57 states:**
 - A single point of contact is where the manufacturer can be contacted, in particular by market surveillance authorities;
 - Only 1 single point of contact is allowed for each product. It need not be the manufacturer's actual address. It can be the address of the authorised representative or customer services.
 - A website address may be given in addition to, but not instead of a postal address.
- Blue Guide was most recently updated in 2022 so does not consider QR codes.

Article 15 - Manufacturer's Obligations

Does the "electronic means of communication" need to be a "single point"?

- The PPWR does not require the "electronic means of communication" to be "a single point of contact".
- Therefore, it may be acceptable to provide a link to a homepage URL on your website which then requires extra steps for the user to find the contact details.
- Remember, the postal address must still be provided separately. The postal address must provide a single contact point which is indicated:
 - on the packaging itself;
 - in the QR code;
 - or in the accompanying documentation if neither of the first two options are possible.



Portugal Packaging Labelling



Decree-Law 152-D/2017

Article 28(5) - Packaging labelling option for non-reusable packaging

Packers whose packaging is managed within the scope of the Integrated Packaging and Packaging Waste Management System (SIGRE) must adopt **one** of the following measures:

1. labelling of non-reusable primary and secondary packaging, indicating the colour of the correct recycling bin where packaging waste must be placed;
2. the provision of information on the destination of packaging waste by any appropriate means, namely in the instructions for use of the packaged product or at points of sale.

So, companies may choose to provide information in the instructions or at points of sale instead of adopting labels.

Decree-Law 152-D/2017

Choosing Option 1 - Packaging Labelling

If a company wishes to label non-reusable packaging to inform the consumer as to which waste receptacle is appropriate, then the labelling must comply with the instructions published by the Portuguese Environment Agency (APA). The instructions state:

- The labelling must either contain a symbol indicating the green, blue or yellow recycling bin or with a phrase stating "place in the green/blue/yellow bin";
- If the packaging contains different materials, then companies must mark the packaging with symbols and/or phrases indicating the respective bins;
- If a lid or stopper must be removed from or kept on the packaging prior to disposal, then the consumer must be informed about this via the symbol/phrase;
- The labelling must be in Portuguese; and
- Consideration should be given to providing the instructions in Braille.

Decree-Law 152-D/2017

What about Option 2?

As a reminder, Option 2 allows companies to provide packaging waste disposal information to consumers by *"any appropriate means, namely in the instructions for use of the packaged product or at points of sale"*.

The APA have published guidance last February whereby they state that there are "various means" to achieve compliance with Option 2, including via:

- The packer's website;
- A QR code placed on the packaging; or
- Information placed in the instruction manual of the packaged product.



USA



US EPR for Packaging: State Level - Enacted

Washington: Producer Responsibility for Packaging and Paper Products, Senate Bill 5284

EIF - 17 May 2025

Oregon: Recycling Modernization Act, Senate Bill 582

EIF - 1 Jan 2022

California: Plastic Pollution Producer Responsibility Act, Senate Bill 54

EIF - 1 Jan 2023

Colorado : Producer Responsibility for Statewide Recycling, House Bill 22-1355

EIF - 10 Aug 2022

Minnesota: Packaging Waste Reduction Act, House File 3911

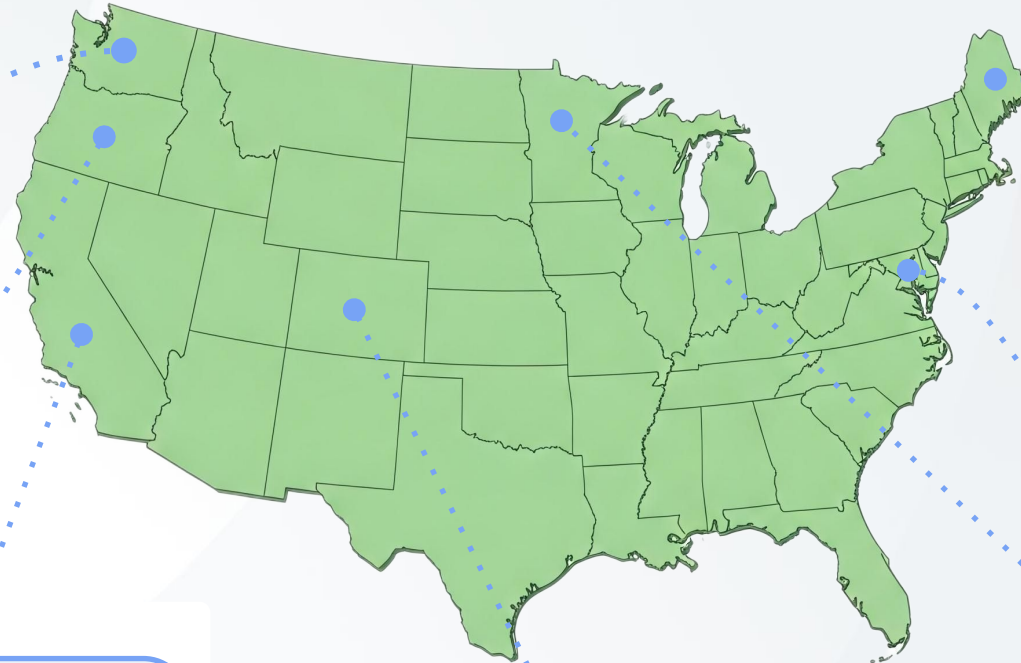
EIF - 1 Aug 2024

Maine: Stewardship Program for Packaging, House Paper 1146

EIF - 18 Oct 2021

Maryland: Packaging and Paper Products Producer Responsibility, Senate Bill 901

EIF - 1 June 2025



Updates on State Programme Implementation

- **Oregon:** implementation began on July 1, 2025; lawsuit was filed to challenge the constitutionality of the state's law that has created its Extended Producer Responsibility Program on July 30.
- **Maine:** formal rulemaking is expected to be initiated in September for the Packaging Materials Type List.
- **Minnesota:** producers were required to join PRO by July 1, 2025.
- **Colorado:** producer fees due January 1, 2026.
- **Washington & Maryland:** producers shall register with PRO by July 1, 2026.



California: SB 54 - Packaging Producer Responsibility Act, Implementing Rules

What is the status of the draft Implementing rules?

- **March 2025:** rulemaking process restarted following Governor direction.
- **August 22, 2025:** revised draft released for consultation period (45 days).
- **October 7, 2025:** consultation period ends. If major changes are made, another revised draft will be released for a shorter consultation period (15 days).
- **Mid to late 2026:** final approval expected and shall take effect.



California: SB 54 - Packaging Producer Responsibility Act, Implementing Rules

What revisions were made to the draft rules?

- **Clarified definitions:** "covered material", "food service ware", "producer identification";
- **Refined exclusions:** medical products, reusable/refillable packaging;
- **Extended exemption periods:** small producers and materials with "unique challenges" from 1 to 2 years;
- **Reporting:** data reporting increments changed from monthly to annual increments; and
- **Eco-modulated fees:** can be implemented 2 years after PRO plan is adopted.

California: SB 54 - Packaging Producer Responsibility Act, Implementing Rules

CalRecycle issued updated guidance documents:

- *Covered Material Categories (CMC)*
- *CMC Producer Reporting Guidelines*
- *Source Reduction Producer Reporting Guidelines*

Key dates for producers:

- **September 15:** CAA reporting portal opens.
- **November 15:** first supply report due on 2023 data.



California: SB 343 - Truth in Recycling Act

What does this mean for labelling in California?

- Targets greenwashing by focusing on limiting misleading **recyclability claims** and use of the **chasing arrows symbol**.
- Products and packaging may only display recyclability claims/symbols if:
 - collected by curbside programmes covering at least 60% of CA population;
 - accepted by recycling facilities serving at least 60% of state programmes;
 - used as feedstock for new products/packaging
- Producers must substantiate recyclability claims based on official data.



California: SB 343 - Truth in Recycling Act

- **April, 2025:** CalRecycle published final findings for the material characterisation report.
 - Triggered **18-month** transition period.
 - **October 4, 2026:** a product or package that shows the chasing arrows symbol, a resin code in chasing arrows, or any claim that it is recyclable will be considered misleading unless the item is actually recyclable.
- **August, 2025:** CalRecycle issued new guidance documents:
 - minor update to Table 2 of the Final Findings Report re. cartons; and
 - FAQ document to assist manufacturers re. recyclability criteria, labelling restrictions, enforcement roles, and compliance timelines.





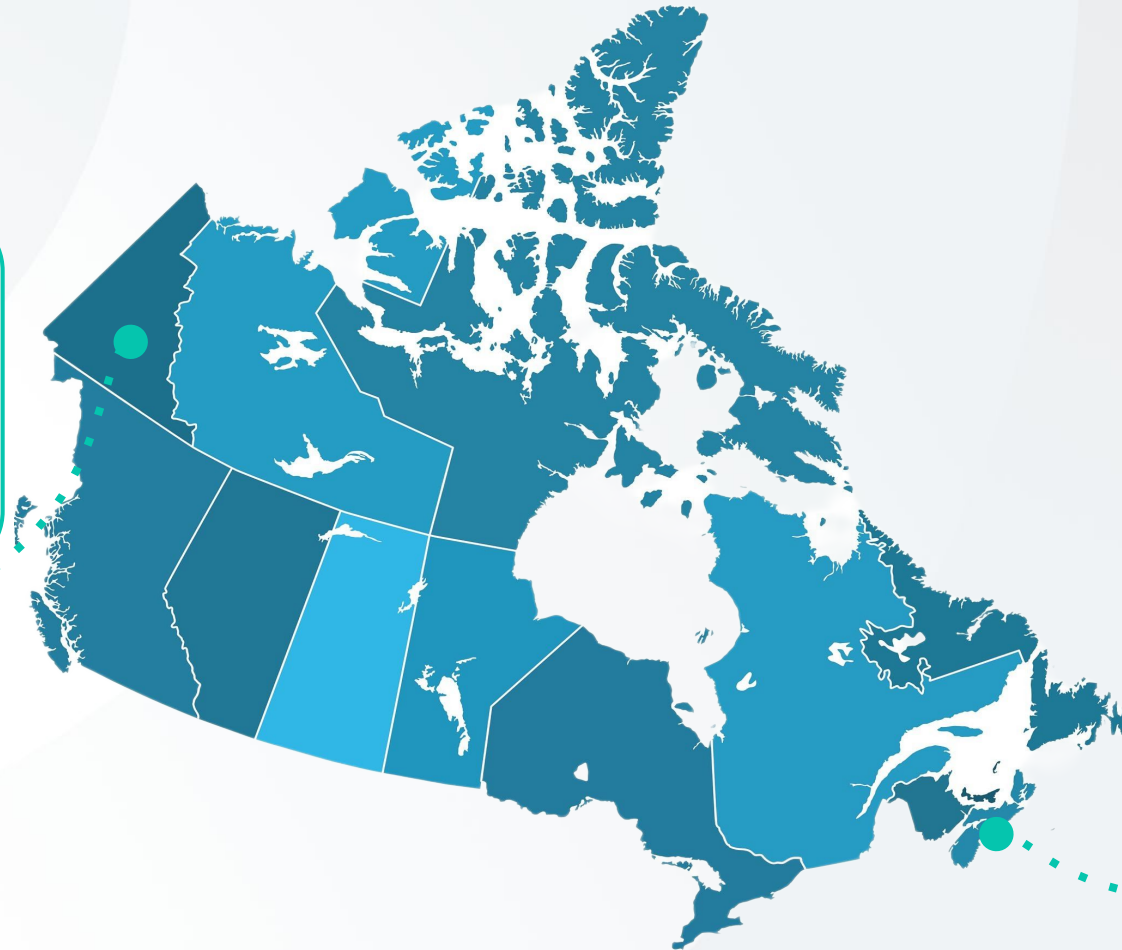
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Canada



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Canada: EPR for Packaging



Yukon: Applies to packing, paper products and single-use products.

- **May 2025:** stewardship plan was approved.
- **November 1, 2025:** implementation of the plan shall commence.

Nova Scotia: Applies to packaging, paper products and packaging-like products including paper, rigid plastic, flexible plastic, glass and metal.

- **2024:** preliminary data reporting began.
- **December 1, 2025:** full implementation (operational phase) is set to start.

Canada: Federal Plastics Registry

Phase 1 Reporting Requirements

Applies to product categories destined for **residential waste streams**:

- **Rigid and flexible plastic packaging** (bottles, containers, wraps, bags);
- **Single-use/disposable plastics items** (straws, utensils, plates); and
- **Electronic and electrical equipment** (TVs, computers, appliances).

September 29, 2025: 2024 data must be reported for each product category:

- Product category and subcategory;
- Resin type (PET, HDPE) and source (bio-based, recycled);
- Quantity (kg) per resin type and category; and
- Calculation methods for determining quantity.



Canada: Federal Plastics Registry

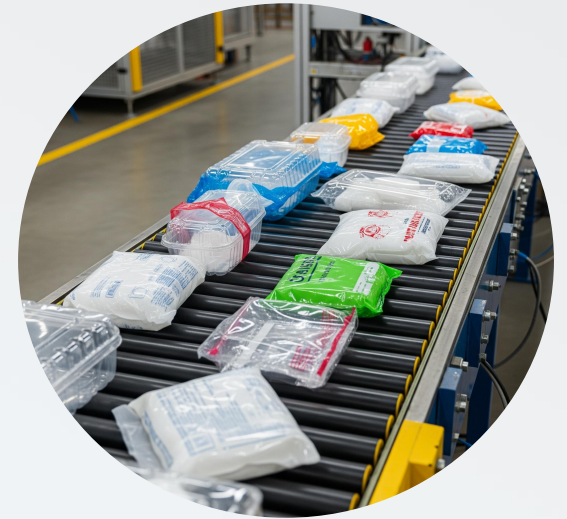
Phase 1 Reporting Requirements cont.

Obligated parties:

- A person that imports, manufactures, and places plastic on the market in Canada (producers, importers, manufacturers, brand owners, retailers, and marketplace facilitators).

Exemptions:

- Persons that manufacture, import, or place on the market less than 1,000 kg of plastic products or packaging per calendar year.
- Industrial, commercial, or institutional waste streams for Phase 1.



Canada: Federal Plastics Registry

Phase 1 Reporting Requirements cont.

- 30 day reporting extension may be granted on case-by-case basis.
- Confidentiality requests may be submitted prior to reporting deadline.
- Producers must retain information used in reports for **3 years** after the reporting deadline (calculations, measurements, etc.).

Penalties:

- Individual: up to **\$25,000** per offense.
- Companies: up to **\$500,000** per offense.
 - *Note: maximum fines **double** for subsequent offences.*
- Liable under CEPA if reporting obligations are not met or false/misleading information is provided.



Canada: Regulatory Framework for Recycled Content and Labelling Rules for Plastics and Certain Single-use Plastics

What is the status of the proposed Framework?

Proposes recyclability and compostability labelling for all consumer facing plastics; and mandatory minimum thresholds of recycled plastic in various categories of plastic packaging.

- **May 2023:** consultation period ended.
- **November 2023:** Federal Court struck down 2021 Order listing “plastic manufactured items” under CEPA.
- **December 2023:** Government filed appeal.
- Listing was legal basis for recycled content and labelling rules.
- Proposed framework now on hold.





UK



UK: EPR for Packaging

Relevant Legislation

The Packaging (Essential Requirements) Regulations 2015

The Plastic Packaging Tax (General) Regulations 2022

The Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024



UK: Updates to Packaging EPR

What Happened in 2025?

The *Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024* entered into force on **1 January 2025**.

Scope

all products made of any materials of any nature to be used for the containment, protection, handling, delivery or presentation of goods, from raw materials to processed goods, from the producer to the user or the consumer, including non-returnable items used for those purposes

Key requirements set out in the Regulations

- Registration
- Reporting
- Payment of fees
- Recycling
- Record keeping
- Certification

Exempted packaging

- reused packaging, other than reused packaging imported into the UK
- any packaging exported from the UK
- packaging in a deposit scheme

UK: Updates to Packaging EPR

What Happened in 2025?

Nine new guidance and policy documents on packaging EPR were released.

What do the Guidelines cover?

- How to assess packaging waste using recyclability assessment methodology (RAM);
- An overview of EPR base fees for packaging in the period 2025 to 2026;
- Revised instructions for compiling and structuring data for packaging EPR submissions;
- Revised instructions for packaging EPR registration and fee payment;
- Instructions on how to assess household and non-household packaging;
- A revised overview of EPR obligations for packaging producers.

Any other upcoming changes?

Yes, numerous Northern Irish, Scottish and Welsh packaging waste regulations are set to be repealed on **1 January 2026** by the 'Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024'.

UK: EPR for Packaging

Upcoming Key Dates

- **30 September annually** - deadline for the submission of applications for accreditation as a reprocessor or exporter
- **From October 2025** - introductory date for waste disposal costs
- **1 October 2025** - deadline for registering a compliance scheme for the 2026 registration year
- **1 October 2025** - deadline for the submission of packaging data for the first half of 2025 (*1 January to 30 June*) by large producers
- **1 April 2026** - deadline for the submission of packaging data for the period 1 January to 31 December by small producers
- **1 April 2026** - deadline for the submission of 'nation data' for the 2025 calendar year





Saudi Arabia



Saudi Arabia: Draft Packaging Regulation

Updates

When was the Draft updated?

A new version of the proposed 'Draft Regulations for Packaging' was notified to the WTO on **21 July 2025**. It was accompanied by a Draft Circular with a list of SASO packaging standards (*43 in total*), which will serve to ensure compliance with the Draft Regulation.

Why was it updated?

The proposed text was revised in order to harmonize it with the provisions of the recently approved 'Technical Regulation on Product Safety'.

What is the proposed date of entry into force?

180 days after the Technical Regulation's official publication.

Is there a transition period for compliance?

Yes, 1 year after the Technical Regulation's official publication.



Saudi Arabia: Draft Packaging Regulation

Objectives

The Draft aims to ensure the protection, health and safety of packaging users and consumers, while also preserving the environment, and preventing any associated risks to consumer safety, property, and the environment.



Scope

All packaging products used in the packing, protection, circulation, and display of products, including imported packaging.

Exempted packaging includes:

- Primary and secondary packaging for food, drug, and cosmetic products.
- Packaging at all levels (primary, secondary, and tertiary) for medical devices and medical supplies.
- Food contact packaging subject to the provisions of the Technical Regulation on food safety for tools and equipment used in kitchens.

Saudi Arabia: Draft Packaging Regulation

Requirements

- Design and manufacturing of packaging
- Safety of packaging products
- Reuse and recycling of packaging
- Chemical restrictions in packaging
- Providing product information

Compliance deadlines

There are no compliance deadlines set out in the Draft.





India



India: Plastic Waste Management Rules

Background

Initially entered into force 18 March 2016 but has been amended numerous times since.

Official guidelines have been released however they have yet to be updated to reflect recent changes.

No consolidated version of the Rules has been released.

Objectives

To ensure proper plastic waste management.



India: Plastic Waste Management Rules

Scope

EPR obligations specified in the Rules are applicable to both pre-consumer and post-consumer plastic packaging waste.

Plastic Packaging means packaging material made by using plastics for protecting, preserving, storing, and transporting of products in a variety of ways

Plastic packaging in Scope

- Rigid plastic packaging
- Flexible plastic packaging
- Multi Layered plastic packaging
- Plastic sheet or the like used for packaging as well as carry bags made of compostable plastics

Obligated Parties

- Producers of plastic packaging
- Importers of plastic packaging
- Brand Owners including online platforms/marketplaces and supermarkets/retail chains
- Plastic Waste Processors

India: Plastic Waste Management Rules

Requirements

- Payment of fees for plastic waste management
- Marking & labelling
- Provision of product information
- Registration of producers, recyclers and manufacturers
- Recycling
- Mandatory use of recycled plastic in plastic packaging
- Annual reporting on plastic waste processing/recycling



India: Plastic Waste Management Rules

Labelling Requirements

Plastic packaging shall be affixed with the following information:

- Name and registration certificate number for the producer or importer or brand owner.

Following recent changes this information can be provided via;

- Barcode or Quick Response code printed on the plastic packaging;
- In the product information brochure;

Exemptions are provided for plastic packaging covered under Article 26 of the Legal Metrology Packaged Commodities Rules, 2011, and in respect of plastic packaging cases where it is technically not feasible to print the requisite information.

India: Plastic Waste Management Rules

Labelling Requirements Continued

Recycled plastic packaging shall bear a label, which states 'recycled having [%] of recycled plastic' and a mark conforming to the Indian Standard: IS 14534: 2023.

Plastic packaging made from compostable plastics shall bear a label, which states 'Compostable only under industrial composting' and shall conform to the Indian Standard: IS/ISO 17088:2021.

Plastic packaging made from biodegradable plastic shall bear the label, which states 'Biodegradable in [specify number of days] only in the [specify recipient environment such as soil, landfill, water etc]'

All packaging bags made of plastic raw material are required to be marked with the statement "Not to be used in the manufacture of single use plastic items prohibited under the Plastic Waste Management Rules, 2016 including plastic sheets < 50 micron thickness, non-woven carry bags < 60 GSM, Carry bags < 120 micron thickness";



India: Plastic Waste Management Rules

Compliance Deadlines

- Every person engaged in recycling or processing of plastic waste shall prepare and submit online an annual report in Form-IV by the **30th April** of every year.
- Every manufacturer and importer of plastic raw materials shall prepare and submit online a quarterly report in Form VII by **the last day of month following the quarter** and an annual report by **30th June** of every year.
- Every person engaged in the sale of plastic raw material or an intermediate material used for the manufacture of plastic packaging shall prepare and submit online an annual report by the **30th June** of every year.

Questions?



Lets Talk



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