

Webinar

Navigating the EU Packaging Regulation: Expert Insights and Analysis

May 5th, 2026





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Meet the Team



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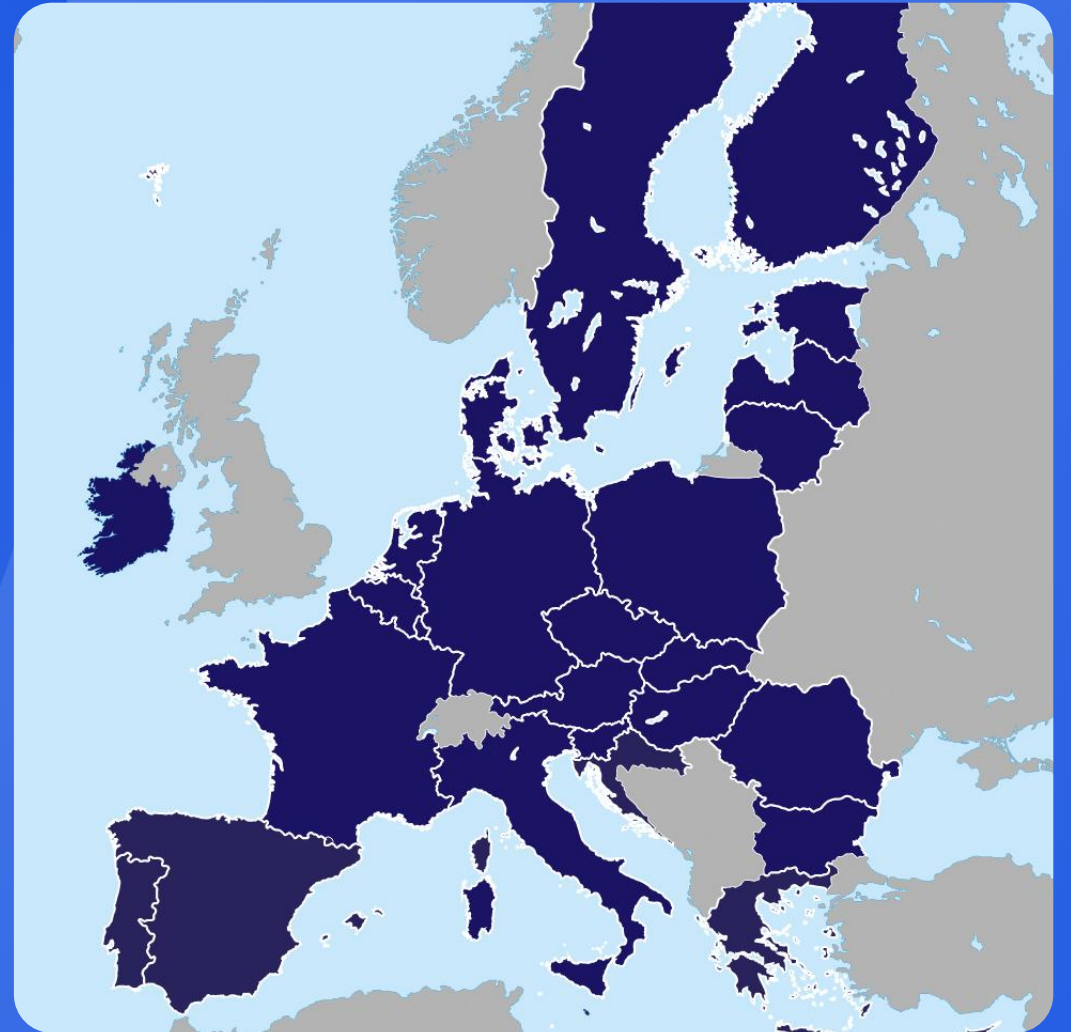
— Agenda

- 01** Current implementation status of the PPWR.
- 02** Common customer questions, based on EU Guidance and FAQ documents.
- 03** Operational/interpretive gaps needing further clarification.
- 04** Implementation trends among Member States.



EU PPWR 2026

Updates and Common Queries



Packaging and Packaging Waste Regulation (PPWR)

An Introduction

- **12 August 2026:** General application date of the PPWR
- Over 20 compliance deadlines from 2026 until 2040

Late 2025/2026 Updates:

- December: Proposed Environmental Omnibus - Suspension of Authorised Rep Requirement for EPR
- January: JRC labelling report to support Article 12
- February: Pallet strap exemption from re-use requirements adopted
- March: Guidance and FAQ documents published



Article 15 and the DoC - August Deadline

Manufacturer's Obligations

- **Article 15(1)**
 - Only place packaging compliant with Articles 5-12 on the market. Most of these Articles apply at a later date.
- **Article 15(5) Traceability Provision:**
 - Article 15(5): packaging shall bear a type, batch or serial number or other element allowing its identification. This info may be placed in a document accompanying the product "where the size or nature of the packaging" does not allow such identification.
 - FAQ provides no guidance on this - it simply says that the manufacturer "can choose freely among these" options.
 - Blue Guide, Section 4.2.2.5 - The identification on the packaging may not be moved to the accompanying document "on purely aesthetic or economic grounds".

Declaration of Conformity

Who is Responsible and What is Required?

Who is Responsible?

- The manufacturer is responsible for preparing the DoC. Suppliers are not required to provide the DoC - the supplier is only required to provide the manufacturer with "all the information and documentation necessary to demonstrate conformity" (Article 16).

What is Required?

- The DoC states the fulfilment of the requirements found in Articles 5-12.
- It shall follow the model structure set out in Annex VIII, contain the elements set out in Annex VII and be continuously updated.

Declaration of Conformity

Who is Responsible and What is Required?

Additional Considerations

- DoC is to be drafted for each “packaging type” and “should be drafted at the level where packaging has the same characteristics in view of the applicable requirements and the packaged products” - Page 43 of FAQ
- A DoC is to be signed by an individual working for the manufacturer or the authorised representative. The employee’s function shall also be indicated. It may be signed by a manufacturer established outside the EU.



Declaration of Conformity

Relationship with Other EU Regulations and Directives

Article 39(3):

- “Where packaging or the packaged product are subject to more than one Union act requiring an EU declaration of conformity, a single EU declaration of conformity shall, **where appropriate**, be drawn up in respect of all such Union acts.”
- The declaration may consist of a dossier made up of the individual DoCs.

It advises the manufacturer to draw up a single DoC to ensure access to information for market surveillance purposes and to reduce the administrative burden placed on the manufacturer.

However, a degree of flexibility is permitted. If the manufacturer deems it to be inappropriate to draw up a single DoC, the Regulation allows separate DoCs to be prepared.

Article 12 - Labelling Requirements

JRC Final Report - January 2026

- Final report contains proposed labelling designs for consumer waste sorting labelling requirement under Article 12(1).
- Last May, concerns had been raised by stakeholders in relation to potential single-market barriers caused by the proposed labels.
- The JRC have reiterated their preference that both text and colour on labels: "Text should therefore be included by default and omitted only where clearly justified by technical, economic, or regulatory constraints".
- At the same time, they acknowledge difficulties in translating text across all Member States.
- Next steps: Implementing act to be published by the Commission by 12th August 2026.

Article 12 - Labelling Requirements

Figure A- 5. Final label proposal (colour without text).



Source: Author's elaboration.



Unresolved Gaps

What Aspects of the PPWR Need More Clarity?



PFAS Restrictions

No Harmonised Testing, No Transitional Relief

- From 12 August 2026, food-contact packaging containing PFAS at or above specified limit values is prohibited from being placed on the EU market → **no harmonised EU methodology** currently exists for PFAS testing.
- Stepwise approach recommended by Commission but not legally binding → risks **divergent enforcement** by Member States on identical packaging.
- **No transitional period:** existing non-compliant stock cannot be placed on the market after 12 August 2026.
 - Sell-through not allowed → may lead to costly reworking, write-offs, or disposal.



Recyclability of Packaging

Technical Criteria Still to Follow

- From 12 August 2026, all packaging placed on EU market must be recyclable, but the delegated act that will fully define design-for-recycling criteria is not due until 1 January 2028.
 - **Transition window:** producers have to comply with the obligation before the full harmonised methodology for proving compliance is ready.
- In the interim, the Commission has pointed to the existing **EN 13428:2004** standard, which was designed for the Packaging Directive framework.
 - Standard does not grant presumption of conformity under PPWR; **conformity assessment deferred** until delegated act is established.



Minimum Recycled Content in Plastic Packaging

Exemption Uncertainties Remain

- Certain exemptions are **evidence-heavy**: must prove in technical documentation that no suitable recycling technology exists or that none is available at industrial scale → significant documentation burden.
- Reliance on **implementing and delegated acts**: recycled content methodologies, third-country equivalence (including assessment, verification and certification requirements), and technology criteria to be published by 1 December 2026.
- **Compressed timeline**: 2028 derogation review for non-PET food-contact plastics comes only shortly before, or alongside, full application of the recycled content regime from 2030.



Extended Producer Responsibility

Registration and Reporting Still Undefined

- The Commission was expected to publish implementing act on EPR registration and reporting formats by early 2026 → this has not yet materialised.
- Implementing act expected to establish:
 - The **registration format** in national registries
 - The exact **reporting format**
 - The expected **granularity** of reported data and covered **packaging types and categories**; and
 - The thresholds for **simplified versus detailed** reporting.



Key Takeaways

A Framework Taking Shape, Piece-by-Piece

- Upcoming **implementing/delegated acts** will provide clarify current grey areas:
 - Harmonised labelling formats, design-for-recycling criteria, recycled content calculation methodology, etc.
- **Gaps in scope:** not all packaging use cases clearly addressed; case-by-case interpretation.
- **Evolving guidance:** intention for FAQ to be a “living” document signals continued regulatory refinement and integration of stakeholder response.
- Look to additional EU framework documents to help inform compliance decisions i.e. **EU Blue Guide**.
- **Preparation is key:** packaging decisions made now will largely determine future compliance as requirements continue to evolve.





Compliance & Risks

PPWR and National Implementations



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PPWR Rollout

As a regulation, the **PPWR is directly applicable in all EU member states.**

However, since several legal measures within the PPWR require supplementary national legislation, businesses must ensure compliance with **both** the Regulation and the relevant national implementations.

EU member states must also repeal any existing national legislation that conflicts with the PPWR.

Keep an eye out for our upcoming whitepaper on **Member State implementations of the PPWR.**

What EU States 'Need' to Legislate Under the PPWR?

- Competent authorities for surveilling compliance
- Appropriate waste management measures on their territory for compostable packaging
- Authorisations for PRO's
- Penalties for non-compliance with the Regulation - by **12 February 2027**
- Mandatory collection targets - by **1 January 2029**



What EU States 'Can' Legislate Under the PPWR?

- Provide exemptions to certain reuse obligations.
- Retain existing systems for the management of household and commercial packaging.
- Establish higher minimum waste prevention targets than the PPWR e.g., higher recycling or reuse targets.
- Establish EPR costs for waste treatment, such as cleaning and transport fees.
- Establish eco-modulation criteria for calculating producer fees.
- Expand deposit and return systems to include packaging other than beverage containers.
- Require the appointment of authorised representatives.
- Make membership of a PRO mandatory.
- Allow final distributors to form groups for the purposes of fulfilling their obligations under Article 29.6 on beverage container reuse targets.

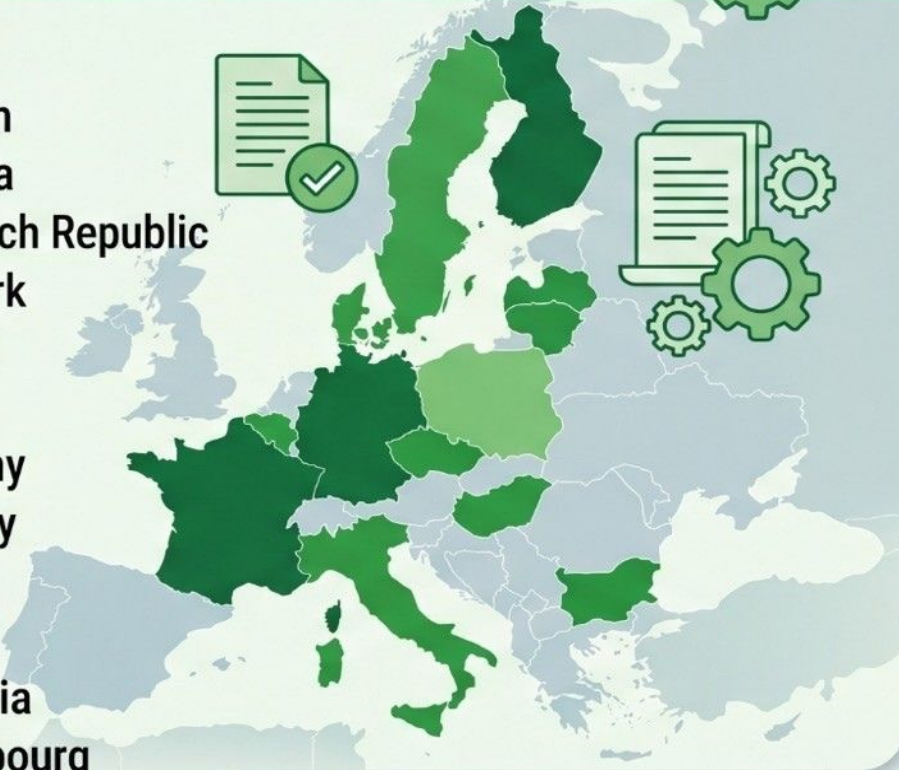
PPWR: Member State Transpositions



14 COUNTRIES HAVE DRAFTED LEGISLATION



-  Belgium
-  Bulgaria
-  the Czech Republic
-  Denmark
-  Finland
-  France
-  Germany
-  Hungary
-  Italy
-  Latvia
-  Lithuania
-  Luxembourg
-  Poland
-  Sweden



13 COUNTRIES HAVE YET TO DRAFT LEGISLATION



-  Austria
-  Croatia
-  Cyprus
-  Estonia



-  Greece
-  Ireland
-  Malta
-  The Netherlands
-  Portugal
-  Romania
-  Slovakia
-  Slovenia
-  Spain



EEA COUNTRIES REVIEWING PPWR FOR EEA AGREEMENT INCORPORATION

-  Iceland
-  Liechtenstein
-  Norway



PPWR in France

No comprehensive proposal in place, however a partial [Draft](#) was proposed in 2025.

Since France has an established EPR system for packaging spread across several pieces of legislation it is anticipated that France will transpose the PPWR via multiple amendments.

The partial Draft proposes:

- A requirement for producers to obtain a unique identifier (*from ADEME*) before placing products subject to EPR schemes on the market
- A requirement for the appointment of authorised representatives for producers based outside of France
- the repeal of national requirements prohibiting the marketing of PPWR compliant packaging not meeting national labelling obligations
- A requirement obliging online marketplaces to ensure packaged products or packaging subject to EPR are compliant with EPR obligations via supporting documentation.

Despite the enactment of the PPWR the new EPR scheme for professional packaging is still scheduled to begin on **July 1, 2026**.

PPWR in Germany

The most recent version of the [German Draft Law](#) to implement the PPWR, was released on **April 15, 2026**.

Subsequently, the Committee on Environment, Climate Protection, Nature Conservation and Nuclear Safety of the German Bundestag will hold a hearing on the draft on **May 6, 2026**. The German Government aims to enact the finalised Law on **August 12, 2026**.

In an effort to reduce bureaucracy and ease businesses into the PPWR, the German Draft Law proposes the retention of many elements of Germany's current EPR system for packaging, including:

- Zentrale Stelle Verpackungsregister (ZSVR) or Central Agency Packaging Register
- 'System participation agreements' and the 'dual system' concept
- The obligation to submit a 'declaration of completeness' to the LUCID Packaging Register

PPWR in Germany

The Draft also proposes the introduction of measures for:

- Expanding the scope of packaging subject to system participation;
- Expanding the duties of the ZSVR;
- Introducing an approval obligation for EPR systems regarding packaging not subject to system participation;
- Extending EPR obligations to producers of packaging not subject to system participation;
- Setting new recycling targets;
- Defining administrative offences.

Retailers selling their 'own brands' or 'imported products' without a domestic intermediary must now register with a system by August 12, 2026, or a sales ban will apply.

PPWR in Poland

A comprehensive [Draft](#) was released in 2025.

Several legislative steps remain before the Draft can be submitted to the Sejm (*consultation comments are currently being reviewed*). The Draft aims to fully repeal existing packaging legislation by **January 1, 2028**.

The Draft includes measures relating to:

- Enacting the polluter pays principle (*moving waste treatment fees from residents to producers*);
- Packaging fees (*packaging fee in 2026 will be 8% of the product fee rate in PLN per kg it will increase to 20% in 2027*);
- Derogation for micro-enterprises from Art. 25(1) on single-use plastic restrictions;
- Mandatory registration in the DoP and packaging volume recording (*paper records must be made available if requested*);
- Authorised representatives;
- Submitting reports (*annual reporting deadlines include; 31 January & 15 March*);
- EPR obligations (*specific obligations are set for businesses within and outside PROs*);
- Derogations to substance limits for lead, cadmium, mercury and hexavalent chromium (*via upcoming Regulation*);
- Penalties (*finest can reach PLN 1000,000*);
- Competent authority (*Voivodeship marshal*).

Questions?



Lets Talk



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