

CIRCULAR Economy in the Food Sector.

**Seminar on EU Packaging and Packaging Waste Regulation
(PPWR)**

13-14 July

CONTEXT

Why we are here



The regulation

The EU Packaging and Packaging Waste Regulation (PPWR) applies from 12 August 2026. It is binding on all packaging placed on the EU market, including imports.



The risk

For Sri Lankan food exporters, packaging that does not meet EU design, recyclability and recycled-content requirements becomes a direct market-access risk.



The response

Under the CIRCULAR project, Expertise France is running a two-day awareness seminar to move exporters from awareness to practical preparedness.

AGENDA

Day 1

- 09:10 – 09:30 am ● Overview of survey results and needs
- 09:30 – 10:05 am ● PPWR Overview I - Context and strategic implications
- 10:05 – 10:20 am ● *Coffee break*
- 10:20 – 10:55 am ● PPWR Overview II - Key evolutions for packaging and implementation timeline
- 10:55 – 11:35 am ● Interactive Session - Mentimeter tool to assess understanding of key PPWR requirements
- 11:35 am – 12:20 pm ● Legal, regulatory and compliance frameworks
- 12:20 – 01:20 pm ● *Lunch break*

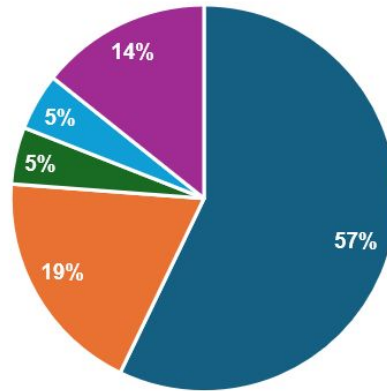
AGENDA

Day 1

- 01:20 – 01:50 pm ● Legal, Regulatory and Compliance Frameworks - Q & A Session
 - 01:50 – 03:00 pm ● Extended Producer Responsibility (EPR) and potential impacts for businesses
 - 03:00 – 03:15 pm ● *Coffee break*
 - 03:15 – 04:00 pm ● Interactive Session - Mentimeter tool to assess understanding of EPR requirements
- Day 1 Wrap-Up and Way forward

Overview of the survey analysis and needs

Stakeholders composition



- Food / Beverage / FMCG Exporter to the EU
- Local Plastic Packaging Manufacturer / Converter
- Trade Association / Chamber Representative
- Consultant / Ecosystem Service Provider
- Other Industry Supply Chain Roles

Strategic overview

Value chain and european markets

The commercial scope of these actors spans primary **Sri Lankan export pillars, specifically tea and herbal infusions, coconut-based products, seafood, processed foods, beverages, spices, and corrugated packaging systems.**

These goods are destined for **highly competitive European markets, with heavy concentrations in Germany, the United Kingdom, France, Italy, Belgium, the Netherlands, Poland, Austria, and Spain.**

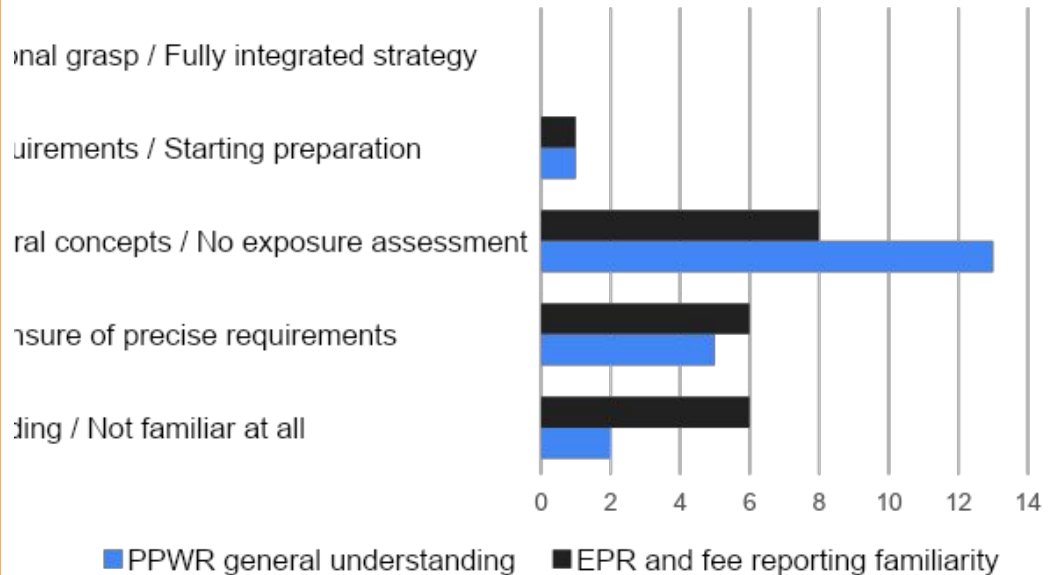
This widespread geographic exposure highlights **the systemic risk that non-compliance poses to the broader national export economy.**

Current levels of regulatory awareness and understanding

Understanding of implementing EU PPWR and EPR mechanisms

The Sri Lankan export ecosystem operates under a superficial layer of awareness. When asked to rate their understanding of the impending EU **PPWR** on a scale from one to five, **more than 60% of respondents clustered at a score of three.**

This knowledge deficit becomes even more acute regarding **EPR mechanisms and fee reporting**. Nearly 60% of stakeholders scored themselves at a one or a two on this scale, admitting to an absolute lack of familiarity or extreme uncertainty regarding how these financial mechanisms function



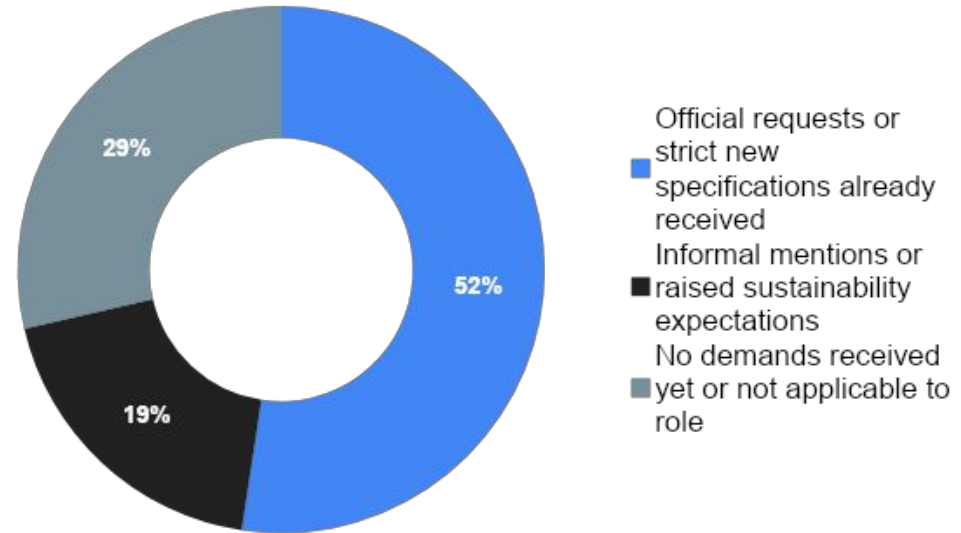
Supply chain dynamics and buyer pressures

Status of proactive compliance requests from EU buyers

A substantial portion of exporters reported that their European buyers, distributors, or brand owners have already issued formal demands, updated technical specifications, or explicit requests for Declarations of Conformity aligned with the 2026–2030 targets.

Only a small minority of respondents, primarily those in strictly localized or specialized consulting positions, reported no proactive buyer engagement.

It emphasizes that compliance is rapidly becoming a mandatory prerequisite for maintaining access to European retail networks.



Material dependencies and operational bottlenecks

Sri Lankan companies face severe structural constraints

Stakeholders report extensive use of **rigid plastics, flexible low-density polyethylene pouches, paper, cardboard, glass, and highly problematic multi-layer composite aluminium laminates**. When considering a transition to fully recyclable or bio-based alternatives, companies face severe structural constraints.

The single greatest operational barrier cited across the food and beverage sectors is the absolute necessity of **maintaining strict food safety standards, hygiene, and critical barrier properties against moisture and oxygen**.

Because Sri Lankan goods undergo extended maritime transit to reach European ports, any alteration in packaging material that compromises shelf-life could lead to catastrophic commercial losses. Furthermore, exporters are restricted by a severe **lack of local suppliers capable of providing high-quality, certified compliant raw materials**, leaving them dependent on expensive imported alternatives that damage their cost-competitiveness.

Institutional knowledge gaps and technical challenges

The challenges are highly specific and operationally complex

In the legal and auditing spheres, firms are highly concerned **about liability management, penalties, the structured drafting of Declarations of Conformity, and the compilation of technical evidence files to satisfy European customs authorities.**

Packaging manufacturers point out that alternative eco-designed materials often lack the required machinability on existing production lines, meaning that **switching materials could require massive capital expenditure to upgrade factory machinery.**

Additionally, stakeholders highlighted severe domestic testing constraints, noting that **Sri Lankan laboratories currently lack the advanced capabilities and accredited facilities required to perform mandatory testing, such as identifying minimum impurity detection levels or verifying the absence of per- and polyfluoroalkyl substances (PFAS), creating an expensive reliance on international testing houses.**

PPWR Overview I - Context and strategic implications

PPWR Overview I - Context and strategic implications

European Directive and Regulation - What are the differences?



Regulation

A legislative act that **does not require transposition into national law** and applies uniformly across all Member States.



Directive

A piece of legislation that imposes an **obligation to achieve a specific result** but does not specify the means to do so. Member States must transpose it into national law.

And PPWR?

... with Member States being granted **some leeway**

PPWR Overview I - Context and strategic implications

Delegated act and implementing act: what's the difference?

Delegated act

A legally binding act adopted by the Commission to **supplement or amend certain non-essential elements** of a legislative act.

- The Commission consults **experts**, including those designated by each Member State, before adopting such an act.
- The **Parliament and the Council** must not have objected to it.

Implementing act

A legally binding act that enables the Commission to **set detailed rules** for the uniform application of EU legislation.

- The Commission consults a **committee** in which all EU countries are represented.
- The committee enables EU countries to **monitor the Commission's work** and delivers an opinion.

PPWR

Both types of acts apply depending on the measure

PPWR Overview I - Context and strategic implications

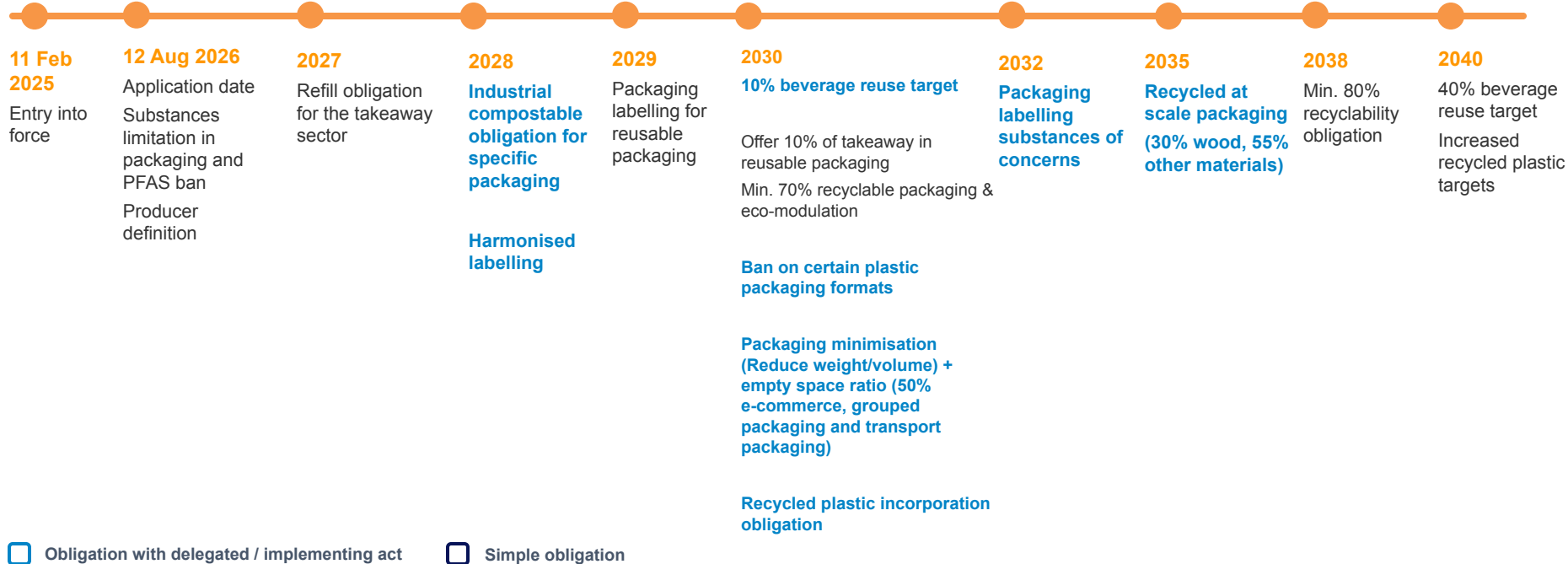
Scope and aims

Scope
Art 2 → All packaging (B2C and B2B) and packaging materials
All packaging waste



PPWR Overview I - Context and strategic implications

PPWR obligation timeline



PPWR Overview I - Context and strategic implications

PPWR and ESPR (1/2)

What is the Ecodesign for Sustainable Products Regulation (ESPR)?

The ESPR entered into force on 18 July 2024. In the words of the European Commission, **the ESPR is “the cornerstone of the Commission’s approach to more environmentally sustainable and circular products”**. It sets out a framework for the establishment of ecodesign requirements (both information and performance requirements).

Under the ESPR, **delegated acts will impose requirements related to specific priority product groups regarding, for instance, product durability, reusability or reparability**. Products will need to be accompanied by a Digital Product Passport (DPP), a digital identity card for products, components, and materials, which will store relevant information to support products’ sustainability, promote their circularity and strengthen legal compliance.

PPWR Overview I - Context and strategic implications

PPWR and ESPR (2/2)

How could the ESPR overlap or interact with the PPWR?

As set out under its recital (9), **the PPWR complements the ESPR, under which packaging is not addressed as a specific product category.** However, according to the same recital, **“it is possible for delegated acts adopted on the basis of [the ESPR] to establish additional or more detailed requirements for packaging for specific products, in particular in relation to packaging minimisation where the design or re-design of products can lead to packaging that is environmentally less impactful”.**

Some obligations introduced by the ESPR, such as the DPP, may affect the packaging of a product, if the data carrier is placed on the packaging. **Information such as CE markings, batch or serial numbers and the manufacturer’s or importer’s identification and contact details may also feature on packaging.**

PPWR Overview I - Context and strategic implications

PPWR and SUPD (1/2)

What is the Single Use Plastic Directive (SUPD)

Businesses that place on the market single-use plastic packaging should keep in mind that the SUPD applies to their activities in addition to the PPWR.

Some key features of the SUPD:

- The SUPD requires Member States to prohibit certain SUP products and to take measures to achieve an **ambitious and sustained reduction in the consumption of SUP products**.
- The SUPD also **sets targets regarding recycled content and collection**. SUP beverage bottles which are manufactured from PET will have to contain **at least 25% of recycled plastic from 2025 and 30% from 2030 onwards for all SUP beverage bottles (not limited to PET), calculated as an average for all such beverage bottles placed on the market on the territory of a Member State**.
- Pursuant to the SUPD, EU Member States must ensure a **separate collection for recycling of 77% of the SUP bottles placed on the market by 2025 and 90% of the SUP bottles placed on the market by 2029**.

PPWR Overview I - Context and strategic implications

PPWR and SUPD (2/2)

How could the SUPD overlap or interact with the PPWR?

Although the SUPD is a *lex specialis* in relation to the PPWR, the latter directly modifies some provisions of the SUPD. Article 67 PPWR foresees a number of amendments to the SUPD, including the introduction of new bans in Part B of the SUPD Annex.

If one of the two pieces of legislation is more restrictive than the other, the stricter rule should be followed. This is the case for instance of the bans included in Annex V of the PPWR.

In case of conflict, it could be argued that the SUPD is more specific and should therefore prevail (unless the PPWR clearly intends to amend the SUPD, in which case there is no actual conflict).

However, companies that believe that they are subject to conflicting and equally binding legal rules should probably seek legal advice before taking a position.

The SUPD will have to be reviewed by 3 July 2027. A public consultation took place recently.

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PPWR Overview I - Context and strategic implications

PPWR and EU deforestation regulation (EUDR)

What is the EUDR and how it could interact with PPWR ?

In the case of a producer selling packaging to manufacturers (to protect the final product - not to be sold as a final product to consumers), the text **"not including packaging material used exclusively as packaging material to support, protect or carry another product placed on the market"** in Annex I under Wood HS code 4415 should be understood as follows:-

If any of the concerned packaging is **placed on the market or exported as a product in its own right (i.e. standalone packaging)**, rather than as packaging for another product, it is covered by the Regulation and therefore due diligence requirements apply.

If packaging, as classified under HS code 4415, is used **to 'support, protect or carry' another product, it is not covered by the Regulation.**

Packaging material used exclusively to support, protect or carry another product placed on the market is not a relevant product within the meaning of Annex I of the Regulation, regardless of the HS code under which they fall. User manuals accompanying shipments also fall under this exemption unless they are purchased in their own right.

PPWR Overview I - Context and strategic implications

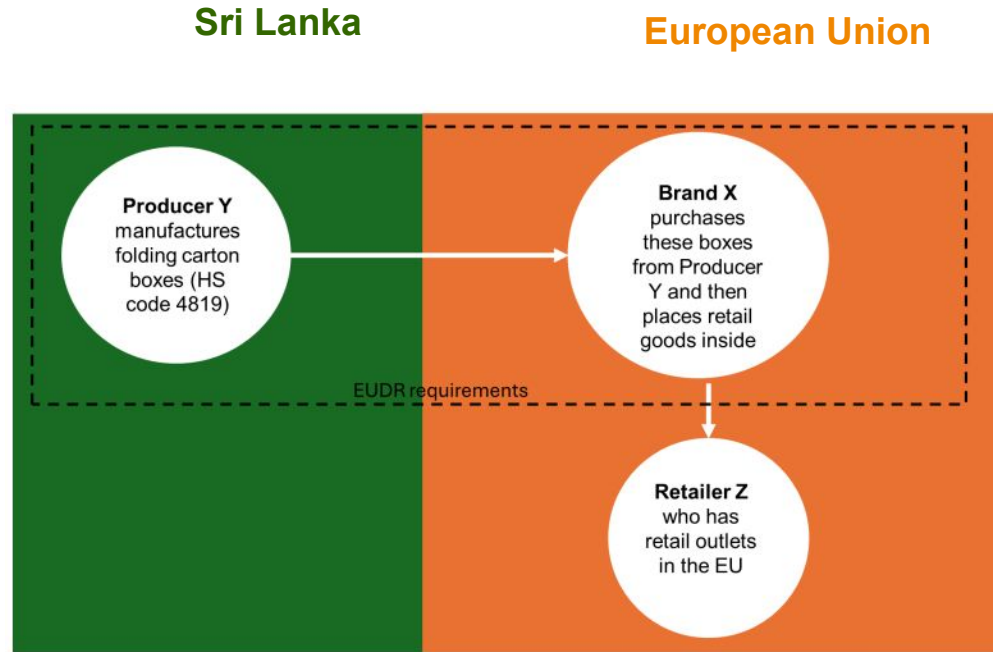
PPWR and EU deforestation regulation (EUDR)

Concrete example

Producer Y manufactures folding carton boxes (CN code 4819) in Sri Lanka.

Brand X purchases these boxes from Producer Y, imports them from Sri Lanka into the EU, and then places retail goods inside them (e.g. food product, which have CN codes outside of scope of Annex 1).

Brand X then sells that product to Retailer Z who has retail outlets in the EU



PPWR Overview II - Key evolutions for packaging and implementation timeline

Session Overview

01

PPWR – quick recap

Regulation (EU) 2025/40 - scope, dates, obligations

04

Recyclability timeline

Ban milestones: 2026 to 2038

02

Why it matters for you

Sri Lankan exporters: market access risk

05

PFAS and compostability

Deadlines - Aug 2026.Feb 2038

03

The 5 pillars

Recyclability, Recycled Content, Reuse, Labelling, Waste Prevention

06

Sri Lanka implications

Tea bags, spice pouches, compliance obligations

What is PPWR? The Regulation at a Glance

The Regulation

- Full name: Regulation (EU) 2025/40 on packaging and packaging waste
- Entered into force: 11 February 2025
- Replaces EU Packaging Directive 94/62/EC
- General application: 12 August 2026
- Applies to ALL packaging placed on the EU market - imports included
- Covers all packaging formats: primary, secondary, transport, e-commerce

Key Obligations

Recyclability:

Packaging must meet grade A, B or C

Recycled content:

Minimum % of post-consumer recycle

Reuse targets:

Percentage of reusable packaging by year

Labelling:

Harmonised EU pictogram from Aug 2028

Waste prevention:

Reduce per-capita waste vs 2018 baseline

PFAS ban:

No PFAS in food contact packaging from Aug 2026

Why PPWR Matters for Sri Lankan Exporters

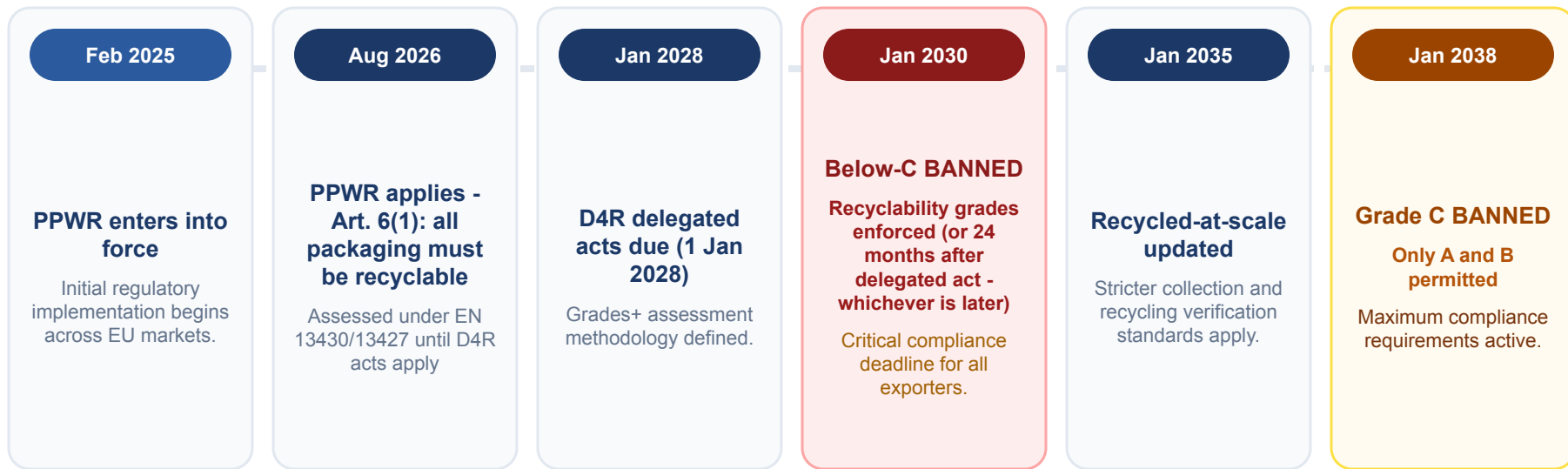
PPWR applies to ALL packaging placed on the EU market - this means every Sri Lankan exporter selling into Europe MUST comply.

Sri Lanka's Key Exports to EU	Packaging Risks Under PPWR	Why Act Now (2026)
● Ceylon tea ● Cinnamon and spices ● Black pepper ● Dried fruit and coconut ● Processed sauces ● Apparel (transport packaging)	● Multi-layer pouches: likely Grade C or below ● Tea bag fibres: must be compostable by 12 Feb 2028 ● PFAS in food wrappers: banned Aug 2026 ● No recycled content in most current formats ● Non-compliant = EU market access blocked	● PPWR is in force from Aug 2026 ● Packaging redesign takes 12-18 months ● Supply chain changes need lead time ● EU buyers and customs require PPWR documentation. Documentation must be held 5-10 years ● Expertise France identified Sri Lanka for PPWR awareness

PPWR - The 5 Technical Pillars

1 Recyclability	2 Recycled Content	3 Reuse	4 Labelling	5 Waste Prevention
Grade A/B/C + ban timeline Below-C banned by 2030; Grade C by 2038	PCR targets by 2030 & 2040 10–35% from 2030, 25–65% from 2040	Targets by packaging type Reusable share set per format	Harmonised EU pictogram Common EU labels from Aug 2028	-5% by 2030 Per-capita waste vs 2018 baseline
	PCR only (not PIR) Post-consumer resin, not post-industrial	2030 and 2040 milestones Targets staged across the decade	Digital Data Carrier/QR (Art 12)	-10% by 2035 Continued reduction target
D4R criteria Design-for-recycling delegated acts	Food contact exemptions Limited food-contact carve-outs	Intra-company 100% In-house transport packaging	Mandatory from Aug 2028 Applies to packaging EU-wide	-15% by 2040 (vs 2018) Cumulative cut from 2018

Pillar 1 - Recyclability Ban Milestones 2026-2038



Key Takeaway

Recyclability is a 2026 obligation, not a 2030 one. From 12 Aug 2026 all packaging must be recyclable (Art. 6(1))
- assessed the old way, under EN 13430, with no grade attached. From 1 Jan 2030 the grading system (Art. 6(2)) bites: below Grade C is BANNED. "Recycled at scale" is a separate test from 2035. Audit now, redesign takes 12-18 months.

Pillars 2–5: What Else Changes (At a Glance)

2 · Recycled Content

Minimum PCR in plastic packaging, from 2030

~10–35% (2030) → 25–65% (2040), by format

Post-consumer only; food-contact waiver where 1935/2004 safety would breach

3 · Reuse

Reuse targets for transport & grouped packaging (2030/2040)

Intra-company transport packaging: 100% reusable from 2030

Lighter for most food exporters — often your EU buyer's duty

4 · Labelling

Harmonised EU material + sorting pictogram from Aug 2028

QR / digital data carrier (not the ESPR product passport)

Replaces national labels — one EU design

5 · Waste Prevention

Per-capita packaging-waste cuts vs 2018 baseline

–5% (2030), –10% (2035), –15% (2040)

Falls on member states — drives less/lighter packaging

PFAS Ban in Food Contact Packaging - August 2026

EFFECTIVE 12 AUGUST 2026 - PFAS ban applies to food contact packaging in the EU

What are PFAS?

Per- and polyfluoroalkyl substances - synthetic chemicals used to make packaging grease/water resistant. Also known as 'forever chemicals' due to environmental persistence.

The PPWR Threshold

Three thresholds apply:

- Any individual non-polymeric PFAS ≥ 25 ppb
- Sum of all non-polymeric PFAS ≥ 250 ppb
- Total PFAS including polymeric ≥ 50 mg/kg

All **THREE** must be met to confirm compliance

Affected Packaging Types

Greaseproof food packaging, microwave popcorn bags, fast-food wrappers, pizza boxes with grease barrier, coffee cup liners, some paper/board food contact materials.

Sri Lanka - Specific PFAS Implications

- Cinnamon and spice packaging: must comply with EU food contact material rules AND PFAS restrictions from Aug 2026
- Tea packaging: if wrappers contain PFAS for moisture resistance, these must be eliminated before Aug 2026
- Exporters acting as EU importers: must verify manufacturer conformity and hold Declaration of Conformity (DoC) copies
- Testing: commission independent PFAS testing of all food contact packaging used in EU exports

Food Packaging Through the Lens of PPWR

Material-by-material compliance outlook for common food packaging formats

MATERIAL	FORMAT EXAMPLES	RECYCLABILITY	RISK	ACTION REQUIRED
FLEXIBLE PLASTIC	Pouches, sachets, wrappers	Grade C or below	HIGH	Switch to mono-material PP or PE with barrier coating
PAPER & BOARD	Cartons, boxes, bags	Grade A (if PFAS-free)	LOW	Confirm PFAS-free coatings; remove plastic liners
GLASS	Jars, bottles	Grade A	VERY LOW	Assess caps/closures separately
ALUMINIUM	Cans, foils, lids	Grade A	LOW	Check D4R separability for laminated foil
RIGID PLASTIC (PET)	Trays, pots, bottles	Grade B achievable	MEDIUM	Switch dark-pigmented trays to clear/natural colour

Compostable Packaging - Which Formats Are Mandated

PPWR Article 9: Selected packaging formats MUST be industrially compostable by 12 Feb 2028

Mandatory Compostable Formats

Tea bags

Must be industrially compostable by 12 Feb 2028 - directly affects Ceylon tea exporters

Filter coffee pods

Single-use pods/capsules with filter material - compostable by 12 Feb 2028

Fruit and vegetable stickers

PLU (price look-up) stickers on fresh produce - compostable by 12 Feb 2028

What Is Industrial Compostability?

- Breaks down in industrial composting facilities (50-60 degrees C) - NOT home composting
- Must meet EN 13432 standard for compostable packaging
- Does NOT mean biodegradable - must go to correct waste stream
- Must be clearly labelled as industrially compostable with harmonised EU mark
- Standard plastic packaging CANNOT claim compostability
- Bioplastics: only if they meet EN 13432 - not all bioplastics qualify

Session Summary

Key Takeaways

Critical Deadlines (2026)

- **PPWR (EU) 2025/40:** Applies from 12 August 2026 - ALL packaging on EU market must comply.
- **PFAS Ban:** Effective 12 August 2026 in food contact packaging.

Recyclability & PCR Targets

- **Recyclability Grades:** Grades A/B/C enforced from 2030; below-C banned; Grade C banned from 2038.
- **Recycled Content:** PCR only targets: 10-35% from 2030, rising to 25-65% from 2040.

Compostability Mandate

- **Tea bags MUST be compostable:** Industrially compostable by 12 Feb 2028.
- **Ceylon Tea:** This represents a direct, major obligation for Ceylon tea exporters.

Compliance & Action Required

- **Redesign Urgently Needed:** Multi-layer laminates (spice pouches, sachets) likely Grade C or below.
- **DoC Documentation:** Declaration of Conformity required before placing on EU market; must be retained 5-10 years.

Legal, regulatory and compliance frameworks

Legal, regulatory and compliance frameworks

What the session will cover

- Analysis of the sustainability requirements (article 5-12) and other key obligations
- Enforcement across Member States - examples of national adaptation
- Non compliance risks



Funded by
the European Union

Interactive Session - Klaxoon tool to assess understanding of key PPWR requirements

Legal, regulatory and compliance frameworks

General obligations (1/2)

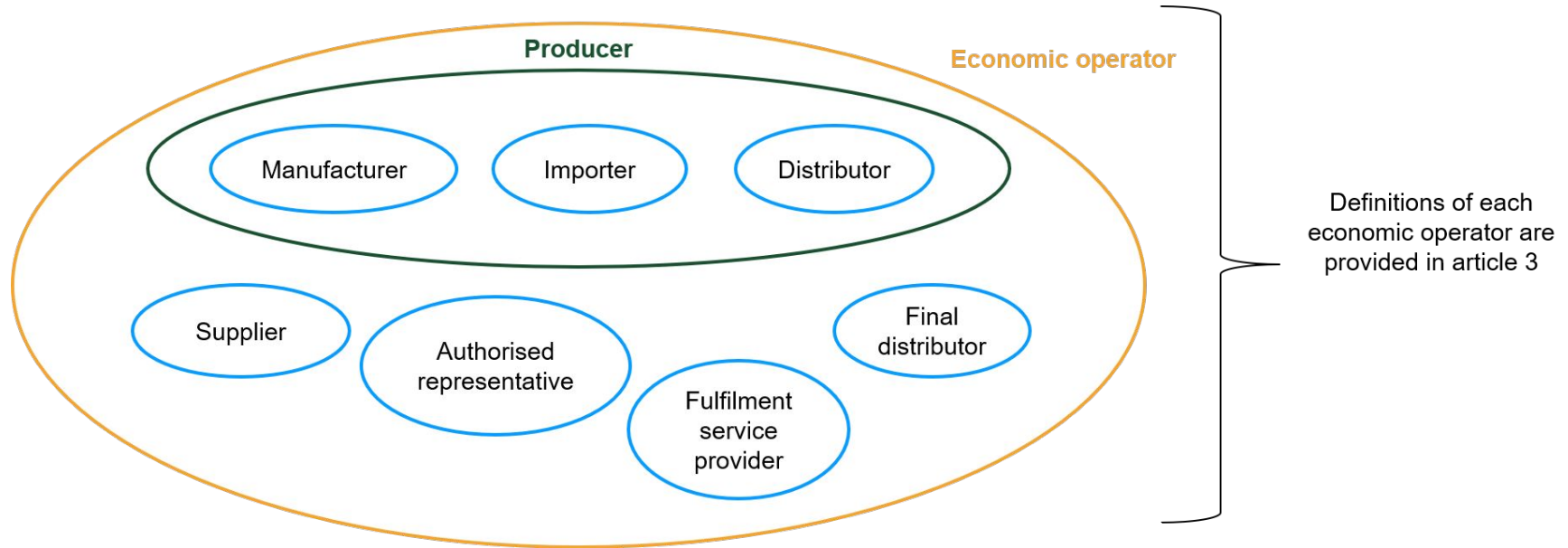
All packaging placed on the market shall comply with PPWR's requirements

Mandatory proof of compliance for economic operators: carry out a conformity assessment procedure and draw up technical documentation

PPWR **distinguishes each actor of the packaging supply chain** and provides specific obligations for each economic operator

Legal, regulatory and compliance frameworks

General obligations (2/2)



Legal, regulatory and compliance frameworks

Importers obligation (1/2)

Article 18 PPWR

Market access condition

Shall **only place on the market packaging which is in conformity** with the requirements set out in Article 5 to 12

Before placing packaging on the market

Before placing packaging on the market, shall ensure:

- the **conformity assessment procedure** (Article 38) has been **carried out** and the technical documentation (Annex VII, required under Art. 5 to 11) has been drawn up by the manufacturer;
- the **packaging is labelled** in accordance with Article 12;
- the packaging is **accompanied by the required documents**;
- the **manufacturer has complied with the requirements** set out in Article 15.5 and 15.6.

Legal, regulatory and compliance frameworks

Importers obligation (2/2)

Article 18 PPWR

Information to be provided

- Shall **indicate on the packaging their name and their registered trade name or registered trademark** as well as the postal address, and, where available, the electronic means of communication, where they can be contacted.
- Where that is not possible, required information to be provided via the data carrier or in a document accompanying the packaged product.

To prove compliance

Shall **keep a copy of the EU declaration of conformity** and ensure the technical documentation referred to in Annex VII can be made available for:

- 5 years from the date SU packaging was placed on the market
- 10 years from the date reusable packaging was placed on the market

Upon a reasoned request from a national authority, shall provide all the information and documentation necessary to demonstrate the conformity of the packaging, including the technical documentation. That information and documentation shall be provided in electronic form and, on request, in paper form within 10 days of receipt of the request from the national authority.

Legal, regulatory and compliance frameworks

Suppliers obligation

Article 16 PPWR

Information to be provided

Shall **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 PPWR, including the technical documentation referred to in Annex VII and required under Articles 5 to 11.

Information and documentation to be provided in paper or electronic form.

Legal, regulatory and compliance frameworks

Cases in which manufacturers' obligation apply to importers and distributors

Article 21 PPWR

An importer or a distributor shall be considered a manufacturer and **shall be subject to the obligations of the manufacturer under Article 15:**

- **where they place packaging on the market under their own name or trademark**
- **or modify packaging already placed on the market in a way that could affect compliance** with the relevant requirements of the Regulation;
- if the natural or legal person which has the packaging designed or manufactured under its own name or trademark **falls under the definition of microenterprise**, and the provider of the packaging is located in the EU

Legal, regulatory and compliance frameworks

The Regulation introduces key **substances of concerns limitation by 12 August 2026**:

- Packaging placed on the market shall be so manufactured that the presence and concentration of substances of concerns is minimised
- Interdiction to put food-contact packaging on the EU market when containing defined PFAS concentration values.

 **Market access condition compliance will need to be demonstrated in the technical documentation**

Legal, regulatory and compliance frameworks

Substances in packaging

Article 5 PPWR

3 provisions :

- minimising the presence and concentration of substances of concern (SoC);
- banning food contact packaging containing PFAS in a concentration equal to or above certain limits values ;
- limit for the sum of the concentrations of lead, cadmium, mercury and hexavalent chromium.

Obligation for who?

For the **manufacturer** who **shall demonstrate the compliance** with these previous provisions in the **technical documentation** drawn up in accordance with Annex VII, through a **written declaration of conformity**.

Legal, regulatory and compliance frameworks

Focus on PFAS limitations - article 5

Food-Contact Packaging

25 ppb

For any PFAS as measured with targeted PFAS analysis

(polymeric PFAS excluded from quantification)

250 ppb

For the sum of measured PFAS (targeted analysis)

Where applicable with prior degradation of precursors (polymeric PFAS excluded from quantification)

50 ppm

For PFASs (including polymeric PFAS)

If total fluorine exceeds 50 mg/kg, the manufacturer, importer, or downstream user must provide proof of the fluorine quantity to draw up the technical documentation.



How to comply?

- **No differentiation** between intentionally added and unintentionally present PFAS.
- **Limits apply to the whole packaging unit**, including associated inks, varnishes, glues, and adhesives.
- **More information and knowledge** expected from the ongoing Commission and ECHA-led study.
- **Compliance with EN 13428** does not provide a presumption of conformity.

Legal, regulatory and compliance frameworks

Article 5 PPWR

Focus on others limits of substances

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**
- without prejudice to the restrictions on chemicals set out in Annex XVII to REACH Regulation or, where applicable, to the restrictions and specific measures on food-contact materials and articles in FCM Regulation

EC is **allowed to adopt delegated acts to lower the indicated sum of the concentrations** and determine conditions under which such concentration level shall not apply, as well as exempted packaging categories under specific conditions

Legal, regulatory and compliance frameworks

The Regulation introduces key **recyclability obligations (article 6) by 2030 and at scale by 2040** :

- **From 1 January 2030 all packaging shall be recyclable**, in line with the design for recycling criteria to be established in delegated acts by 1 January 2028
- **From 1 January 2035 packaging will also have to be recycled at scale**, in line with conditions to be detailed in implementing acts by 1 January 2030

 **Market access condition compliance will need to be demonstrated in the technical documentation (Annex VII)**

Legal, regulatory and compliance frameworks

Recyclability

Article 6 PPWR

Legal conditions for recyclability

(a) Designed for recycling: it is designed for material recycling, which enables the use of resulting secondary raw materials that are of sufficient quality when compared to the original material that they can be used to substitute primary raw materials,

(b) Collected separately, sorted and recycled : when it becomes waste, it can be collected separately, sorted into specific waste streams without affecting the recyclability of other waste streams and recycled at scale.

Exemptions

No recyclability assessment is needed to place on the market for:

- Sales packaging made from cork, lightweight wood, textile, ceramics, rubber, porcelain, and wax
- Contact-sensitive packaging of medical devices & medicinal packaging
- Contact-sensitive packaging for infant formula, follow-on formula, and baby food
- Packaging used for the transport of dangerous goods

EPR fees for sales packaging made from exempted materials

The exempted sales packagings will be subject to EPR fees modulated on their level of recyclability

Legal, regulatory and compliance frameworks

Recyclability

Article 6 PPWR

How to comply?



Manufacturer duty

The **manufacturer is solely responsible** for carrying out the mandatory assessment of packaging recyclability.



For integrated components

Assessment **must encompass all integrated components**.

Mechanical Stress:

Separate assessments are required if components can detach during transport or sorting.

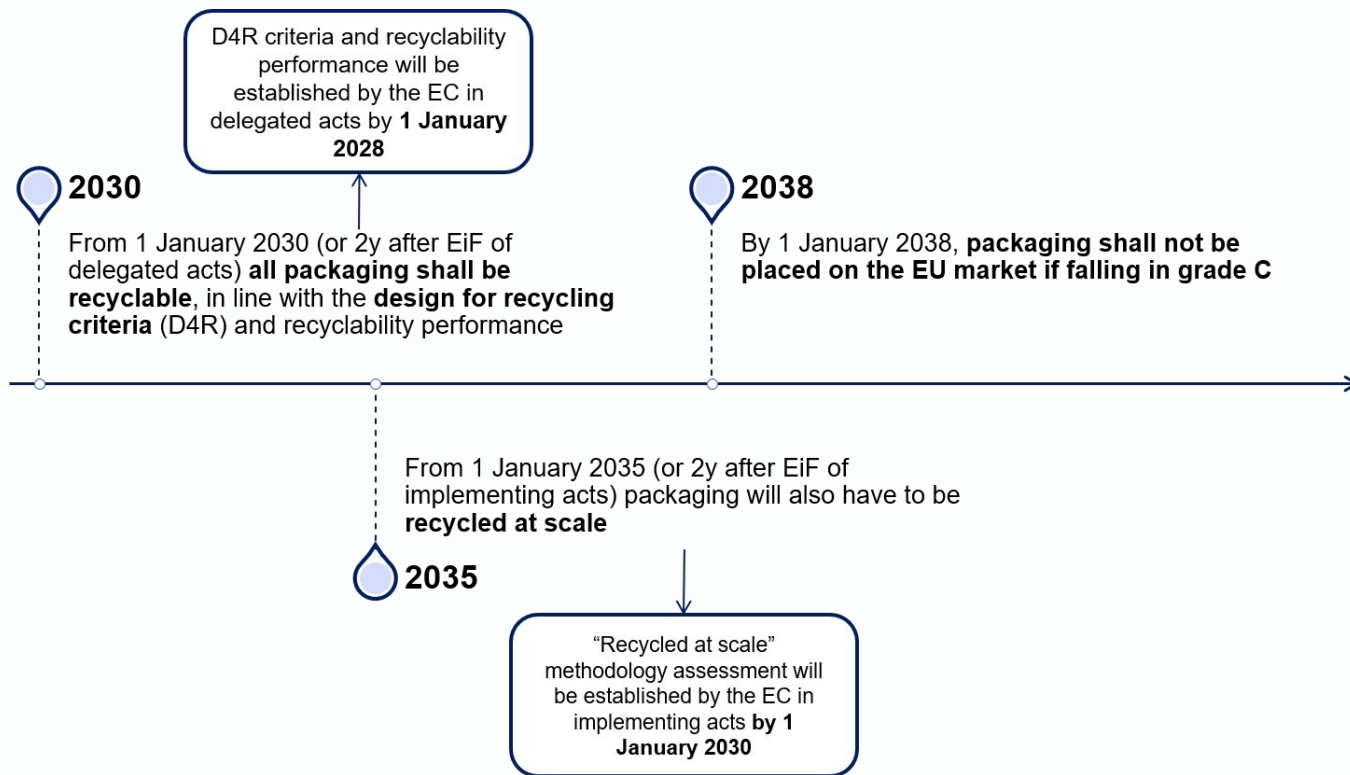


For separate elements

Where a unit of packaging is composed of separate components, the compliance assessment shall be carried out for each separate component.

Legal, regulatory and compliance frameworks

Recyclability - timeline



Legal, regulatory and compliance frameworks

Further technical provisions to come by 2028 and 2030

D4R and recyclability performance grades for packaging categories

How to perform **recyclability performance assessment and express its result in recyclability performance grades** per packaging unit, in terms of weighting, including material-specific criteria and sorting efficiency, to determine whether packaging is to be considered recyclable

Description, for each packaging category, **of the conditions for compliance with their respective recyclability performance grades**

Framework concerning **eco-modulation of EPR fees** based on the packaging recyclability performance grades (18 months from the EiF of the delegated and implementing acts)



By 1 January 2028

EC shall adopt delegated acts, after taking into consideration standards developed by the European standardisation organisations to establish



EC shall adopt implementing acts to establish



By 1 January 2030

Methodology of **‘recyclable at scale’ assessment** per packaging category

Chain of custody mechanism ensuring that packaging is recycled at scale

Legal, regulatory and compliance frameworks

Elements to take into consideration on design for recyclability (D4R)

- Take into account the **ability of packaging waste to be separated into different material streams for recycling, sorted and recycled**, so that the resulting secondary raw materials are of sufficient quality compared to the original material and can be used to substitute primary raw materials for packaging or other applications where the quality of the recycled material is retained, where feasible;
- Consider **established collection and sorting processes** proven in an operational environment and cover all packaging components
- Take into account **available recycling technologies, their economic and environmental performance**, including the quality of the output, the **availability of the waste**, the energy needed and the emissions of greenhouse gases
- Where appropriate, **identify substances of concern that negatively affect the re-use and recycling of materials** in the packaging in which they are present
- Where appropriate, **impose restrictions on the presence of substances of concern**, or of groups of such substances, in packaging or packaging components for reasons not relating primarily to chemical safety, such restrictions may also serve to reduce unacceptable risks to human health or the environment (without prejudice to existing regulations setting restrictions on chemicals)

Table 4 of Annex II also sets a non-exhaustive list of parameters to be taken into account - e.g. additives, labels, inks, etc.

Recyclability performance grades and D4R

From 2030, recyclability performance is based on D4R for each packaging unit.

Packaging recyclability shall be expressed in the recyclability performance grades A, B, C

2030		2035			2038		
Recyclability performance grade	Design for recycling (DfR) Assessment of recyclability per unit, in terms of weighting	Recyclability performance grade (for DfR)	Design for recycling (DfR) Assessment of recyclability per unit, in terms of weighting	Recyclability performance grade (for recycled-at-scale assessment)	Recyclability performance grade	Design for recycling (DfR) Assessment of recyclability per unit, in terms of weighting	Recyclability performance grade (for recycled-at-scale assessment)
Grade A	higher or equal to 95 %	Grade A	higher or equal to 95 %	Grade A RaS	Grade A	higher or equal to 95 %	Grade A RaS
Grade B	higher or equal to 80 %	Grade B	higher or equal to 80 %	Grade B RaS	Grade B	higher or equal to 80 %	Grade B RaS
Grade C	higher or equal to 70 %	Grade C	higher or equal to 70 %	Grade C RaS	Grade C CANNOT BE PLACED ON THE MARKET	higher or equal to 70 %	Grade C RaS
TECHNICALLY NON-RECYCLABLE	lower than 70 %	TECHNICALLY NON-RECYCLABLE	lower than 70 %	NOT RECYCLED AT SCALE (below thresholds of Article 3(1), point (39).	TECHNICALLY NON-RECYCLABLE	lower than 70 %	NOT RECYCLED AT SCALE (below thresholds of Article 3(1), point (39).

From 2035, the **new factor of ‘recycled-at-scale’** shall be added to the **assessment of the packaging recyclability.**

Consequently, a new assessment shall be carried out based on the quantity (weight) of the material effectively recycled from each of the packaging categories in accordance with the methodology established.

Notion of « recyclable at scale »

Definition of 'packaging recycled at scale' (Article 3(39)) means packaging waste which is collected separately, sorted and recycled in installed infrastructure, using established processes proven in an operational environment which ensure at Union level an annual quantity of recycled material under each packaging category listed in table 2 Annex II, equal to or greater than 30% for wood and 55% for all other materials, it includes packaging waste that is exported from the Union for the purpose of waste management and which can be considered to meet the requirements of Article 53(11).

Methodology of 'recyclable at scale' assessment shall be established by the EC by 1 January 2030, per packaging category and based on at least the following elements (implementing act):

- **quantities of packaging per packaging category** placed on the market in the Union as a whole and in each Member State
- **quantities of recycled packaging waste** per packaging category in the Union as a whole and in each Member State

This methodology may update the overall recyclability performance grades.

Chain of custody mechanism ensuring that packaging is recycled at scale, at least based on :

- technical documentation referring to the quantity of collected packaging waste that is sent to sorting and recycling facilities;
- a verification process that allows manufacturers to obtain the necessary data from the downstream operators ensuring that packaging is recycled at scale.

Possible further review by EC:

- **assess the granularity of data** that need to be reported for the recycled-at-scale methodology → EC shall adopt delegated acts to amend indicative list of packaging materials and categories (Table 2 Annex II) and recyclability performance grades (Table 3 Annex II)
- By 2035, on the basis of developments in sorting and recycling technologies, **may review the minimum thresholds for packaging to be considered recycled at scale** and, where appropriate, present a legislative proposal to revise the thresholds.

The case of « innovative packaging »

Definition of “**innovative packaging**” (article 3(46)): means 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;

From 1 January 2030, **innovative packaging not complying with the recyclability requirements may be made available on the EU market for a period of max. 5 years** from the end of the calendar year in which it was placed on the market.

Before placing innovative packaging on the market, economic operator shall notify the competent authority and include :

- Technical details demonstrating that the packaging is innovative packaging
- Timeline for reaching the recycled-at-scale requirements in terms of collection and recycling of the innovative packaging

The information shall be made available to the Commission and the national authorities carrying out market surveillance.

Considered as innovative:
competent authority shall inform the Commission accordingly.

Considered as not innovative: the economic operator shall comply with the existing design for recycling criteria.

EC to monitor the impact of the derogation and, where appropriate, adopt a legislative proposal to amend it

Legal, regulatory and compliance frameworks

PPWR – an opportunity for alternative material ?

Ambition

Even if PPWR sets strict requirements regarding recyclability, which can possibly affect development of alternatives fibers, **the aim of PPWR is also to encourage innovation:**

- 'innovative derogation' (article 6(10));
- voluntary recycled content incorporation on others material than plastic;
- many provisions empowers EC to adopt complemented acts in order to adapt to innovation in next decade.;
- eco-modulation on recyclability of packaging.

Biggest challenges

- The key challenge for voluntarily adopting alternative packaging solutions lies in **demonstrating that they are both recyclable at scale and environmentally less impactful** (by continuing recyclability tests).
- Ultimately, the political challenge will be to **integrate these alternatives into the standards and future revisions of the PPWR.**

Legal, regulatory and compliance frameworks

The Regulation introduces key **recycled content obligations (article 7) by 2030 and 2040** :

- Any plastic part of packaging will have to contain a minimum percentage of recycled content target calculated as an average per manufacturing plant and year
- Exemptions are considered

 **Market access condition compliance will need to be demonstrated in the technical documentation (Annex VII)**

Legal, regulatory and compliance frameworks

Recycled content targets - article 7

By 2030 and 2040, minimum **mandatory recycled content** :

- For **any plastic part of packaging placed on the market** for specific categories of plastic packaging (≠ from SUPD perimeter where targets applied to beverage bottles including caps and lids)
- Recovered from **post-consumer plastic waste**, per packaging type and format (cf. Table 1 of Annex II), **calculated as an average per manufacturing plant and year***
- But does not apply for **"any plastic part representing less than 5% of the total weight of the whole packaging unit"**.

By 31 December 2026: EC shall adopt implementing acts establishing methodology for the calculation and verification, possibly through 3rd party audits (≠ SUPD calculation method)

Legal, regulatory and compliance frameworks

Article 7 PPWR

Recycled content targets

Packaging Type	2030 Target	2040 Target
Contact-sensitive PET (excl. beverage bottles)	30%	50%
Contact-sensitive other plastic (excl. beverage bottles)	10%	25%
Single-use plastic bottles	30%	65%
Other plastic packaging	35%	65%

Key Conditions

- **PCR vs PIR:** Only post-consumer recyclate qualifies. Post-industrial (PIR) does not count.
- **Methodology:** EC to adopt by Dec 2026; compliance required from Jan 2029.
- **Food Safety:** Target waived if PCR violates Regulation (EC) 1935/2004 rules.

By 1 January 2028, EC will assess the need for additional derogations from the 10% and 35% recycled content targets set for 2030 or additional derogations for specific plastic packaging. Where appropriate, EC to adopt delegated acts

Legal, regulatory and compliance frameworks

Article 7 PPWR

Exemptions of recycled content targets



Baby Food & Infant Formula

Food packaging intended for infants and young children



Medical & Pharmaceutical

Immediate and outer packaging of medicinal products
Medical devices



Dangerous Goods

Packaging used to transport dangerous goods



Compostable Plastics

Packaging made of compostable plastic materials



Minor Plastic Components

Plastic parts representing <5% of total packaging weight



Food Contact Breach Risk

Where PCR inclusion would breach Reg. (EC) 1935/2004

Legal, regulatory and compliance frameworks

Article 7 PPWR

Requirements of the origin of the materials



1. Collection Standards

Has been collected within the Union or in a third country in accordance with standards for separate collection of the Union law.

Aims to promote high-quality recycling equivalent to those referred to in PPWR and Waste Framework Directive and Single-Use Plastic Directive



2. Recycling Facilities

Has been recycled in an installation located within the Union or in a third country with equivalent regulations.

The country applies rules concerning the prevention and reduction of emissions into **air, water, and land for the recycling operation** equivalent to those concerning emissions limits and environmental performance levels of Union law.

By 31 December 2026, the Commission shall adopt **implementing acts establishing the methodology for assessing, verifying and certifying, including through third-party audit**, the **equivalence of the rules** applied in cases where the recycled content recovered from post-consumer plastic waste **is recycled or collected in a third country**.

Legal, regulatory and compliance frameworks

Labelling and claims on recycled content

Provisions regarding labelling and claims on recycled content incorporation. Article 12(4) frames the voluntary use of labelling on recycled content:

- By 12 August 2026, EC shall adopt, in implementing acts, methodology to establish a harmonised label and specifications for the labelling requirements and formats, including where provided through digital means
- Packaging concerned by recycled content will have to comply with these requirements if economic operators want to communicate on the share of recycled content.

For any claims, remember it shall comply with the revised Directive 2005/29/EC.

Legal, regulatory and compliance frameworks

The Regulation introduces key **compostability requirements** :

- **for specific packaging formats** (tea bags, coffee pods, fruit and vegetables stickers)
- allows **Member States flexibility on the standard required** (home / industrially compostable) and allows to **maintain already required compostability domestic obligations before the entry into force of PPWR**

 **Market access condition compliance will need to be demonstrated in the technical documentation (Annex VII)**

Legal, regulatory and compliance frameworks

Mandatory compostable formats - article 8

Mandatory Compostable Formats by 12 February 2028

Obligation for manufacturer and importer to design compostable packaging for specific formats:

Tea bags

Must be industrially compostable - directly affects Ceylon tea exporters

Filter coffee pods

Single-use pods/capsules with filter material

Fruit and vegetable stickers

PLU (price look-up) stickers on fresh produce

Industrial Compostable Requirements

- Must meet EN 13432 standard for compostable packaging
- Breaks down in industrial composting facilities (50-60°C) - NOT home composting
- Does NOT mean biodegradable - must go to correct waste stream
- Must be clearly labelled as industrially compostable with harmonised EU mark
- Standard plastic packaging CANNOT claim compostability
- Bioplastics: only if they meet EN 13432 - not all bioplastics qualify

Member States may require home-composting standards

Recycling Deadline Requirement

By 12 February 2028, packaging other than compulsory compostable, including packaging made of biodegradable plastic polymers and other biodegradable materials, shall be designed for material recycling without affecting the recyclability of other waste streams.

Legal, regulatory and compliance frameworks

The Regulation introduces key **reduction measures** to decrease the volume and weight of packaging placed on the EU market:



Packaging Minimisation

Article 10

Introduction of strict sustainability and design minimisation requirements.



Excessive Packaging

Article 24

Measures to avoid double walls, false bottoms, and unnecessary empty space.



Specific Formats Bans

Article 25

Bans and restrictions on certain single-use and excessive packaging formats.

Legal, regulatory and compliance frameworks

Packaging minimisation - article 10



Effective Date

1 January 2030

Principle

Mandatory Design minimisation

By 1 January 2030, manufacturers and importers **shall ensure** that all packaging placed on the market is designed so that its **weight and volume are reduced to the minimum necessary** to ensure its functionality, taking account of the shape and material from which the packaging is made.

Packaging with double walls, false bottoms and other characteristics aimed only at increasing the perceived product volume should **not be placed on the market**, as such packaging does not meet the requirement for packaging minimisation.

Packaging minimisation - article 10

Exemptions 1

- **Packaging protected by design rights pursuant to EU law before the entry into force of the PPWR.**
 - The packaging design is protected by a **Community design**,
 - The packaging **shape is a trademark**, including trademarks registered under international agreements having effect in one of the Member States,
 - The design rights and trademarks are protected before 11 February 2025
 - The **minimisation requirements would affect the packaging design in a way that it would alter its novelty or its individual character**, or would affect the trademark in a way that the trademark is no longer capable of distinguishing the marked product.

Exemptions 2

- The packaged products or beverage belonging to a **Protected Geographical Indication** protected under EU law (such as Regulation (EU) No 1308/2013 for wine, Regulation (EU) 2019/787 for spirit drinks or Regulation (EU) 2023/2411 for craft and industrial products, **or is covered by a quality scheme** as referred to in Regulation (EU) 2024/1143.

PPWR Overview I - Context and strategic implications

Packaging minimisation - article 10

Methodology & timeline

Deadline for Commission Request

12 February 2027

The Commission shall request the European standardisation organisations to prepare or update harmonised standards.

These standards will lay down the **methodology for calculation and measurement** of compliance with packaging minimisation requirements.

Standard Specifications

For most common packaging types and formats, standards should specify:

- **Maximum adequate weight** and volume limits
- **Wall thickness** limits (where appropriate)
- **Maximum empty space** allowed

PPWR Overview I - Context and strategic implications

Packaging minimisation - article 10

Refer to the methodology in Annex IV

1. Performance Criteria

First consider the performance criteria based on the following:

- **Product protection & safety**
- **Packaging manufacturing** processes
- **Logistics** (transport, storage, distribution)
- **Packaging functionality** & usability
- **Information requirements** (labeling, consumer info)
- **Hygiene and safety** standards
- **Legal requirements** (regulatory compliance)
- **Recycled content, recyclability** and re-use

2. Minimisation Assessment

Second evaluate and determine minimum volume and weight:

- **(a) Assessment Outcome:** Describe results, including detailed calculations of the minimum necessary weight and volume.
- **(b) Design Requirements:** Identify specific requirements preventing further reduction without compromising packaging functionality.
- **(c) Supporting Evidence:** Provide test results, market research, or studies used to substantiate the assessment.

PPWR Overview I - Context and strategic implications

Packaging minimisation - article 10

Technical Documentation (Annex VII)

Proof of compliance must contain the following elements:

- (a) Technical Specifications:** Explanation of specs, standards, and conditions used to assess packaging against performance criteria (Annex IV).
- (b) Design Requirements:** Identification of specific design requirements which prevent further reduction of packaging weight or volume.
- (c) Testing & Simulations:** Any test results, studies, or other sources (modeling/simulations) used to determine the minimum necessary weight or volume.

Reusable Packaging

Specific compliance rules:

- Assessment of compliance must fully take into account the unique **characteristics of reusable packaging**.
- Must meet the requirements set out in **Article 11** in the first place.

PPWR Overview I - Context and strategic implications

Packaging minimisation - article 10

Measure as of 1 Jan. 2030

By 1 January 2030, the **manufacturer or importer shall ensure** that packaging placed on the market is designed so that its weight and volume is **reduced to the minimum necessary** to ensure functionality, taking account of shape and material.

Definitions

Assessment:

Manufacturers must demonstrate:

- Packaging is minimised.
- Proof is in technical docs.

Calculation Methodology:

Drafted by European standardisation bodies.

Exemptions

- ✓ Packaging protected by **design rights** before PPWR entry.
- ✓ Products with **Protected Geographical Indication**.
- ✓ Products covered by a **quality scheme** (if design/trademark is affected).



Market access condition: Compliance must be demonstrated by manufacturers or importers in the DoC.

PPWR Overview I - Context and strategic implications

Excessive packaging - article 24



Effective Date

**1 January
2030**

Principle

Obligation related to excessive packaging

By 1 January 2030, or 3 years from the entry into force of the implementing acts adopted, whichever is the latest, **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 %**.

PPWR Overview I - Context and strategic implications

Excessive packaging - article 24

Exemptions

The maximum 50% empty space ratio requirement does not apply to economic operators in the following scenarios:

- Using **sales packaging** as e-commerce packaging
- Using **reusable packaging** within a system of re-use

PPWR Overview I - Context and strategic implications

Excessive packaging - article 24

Methodology & timeline

Deadline for Implementing Acts publication

12 February 2028

The Commission shall adopt implementing acts to establish the methodology for the calculation of the empty space ratio of 50%.

Definition of empty space

(a) empty space shall mean the **difference between the total volume** of grouped packaging, transport packaging or e-commerce packaging **and the volume of sales packaging contained therein**;

(b) **empty space ratio** shall mean the ratio of the empty space as defined in point (a) and the total volume of the grouped packaging, transport packaging or e-commerce packaging.

Space filled by filling materials, such as paper cuttings, air cushions, bubble wraps, sponge fillers, foam fillers, wood wool, polystyrene or Styrofoam chips, shall be considered as empty space.

PPWR Overview I - Context and strategic implications

Excessive packaging - article 24



Effective Date

**1 January
2028**

Principle

Obligation related to excessive packaging

Economic operators filling sales packaging will also have to ensure that the empty space is reduced to the minimum necessary to ensure packaging functionality.

Space filled by filling materials, such as paper cuttings, air cushions, bubble wraps, sponge fillers, foam fillers, wood wool, polystyrene or Styrofoam chips, shall be considered as empty space.

PPWR Overview I - Context and strategic implications

Excessive packaging - article 24

For sales packaging for products that are subject to **settlement during transportation or where headspace is required to protect the food product**, or other products that present these characteristics:

(a) compliance shall be assessed as the pack-fill level at the time of filling;

(b) **air between or within packed foodstuff** or protective gases shall not be considered as empty space.

PPWR Overview I - Context and strategic implications

Excessive packaging - article 24



Effective Date

1 January 2028

Obligation related to excessive packaging

Economic operators filling sales packaging will also have to ensure that the empty space is reduced to the minimum necessary to ensure packaging functionality.



Effective Date

1 January 2030

Obligation related to excessive packaging

By **1 January 2030**, or 3 years from the entry into force of the implementing acts adopted, whichever is the latest, **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 %**.



Obligation to be proven in the technical documentation

Obligation that is subject to financial sanctions defined by Member States

Legal, regulatory and compliance frameworks

Packaging formats bans - article 25



Effective Date

1 January 2030

Principle

Interdiction of certain listed packaging formats

The packaging formats listed in Annex V will no longer be allowed on the EU market.

Legal, regulatory and compliance frameworks

Packaging formats bans - article 25

Guidelines from the Commission

- By **12 February 2027**, the Commission shall publish guidelines, in consultation with Member States and the European Food Safety Authority, which explain Annex V in more detail, including examples of the packaging formats in scope

Member State flexibility

- Member states are allowed to exempt **SMEs** to comply with this obligation.



Obligation that is subject to financial sanctions defined by Member States

Legal, regulatory and compliance frameworks

Packaging formats bans - Annex V

Packaging format	Examples
Single-use plastic grouped packaging used at the point of sale, designed as convenience packaging to encourage consumption.	Collation films, shrink wrap
Single-use plastic packaging for unprocessed fresh fruit and vegetables less than 1,5 kg	Nets, bags, trays, containers
HORECA Packaging • Single-use plastic packaging for food and drink filled and consumed on the premises. • Single-use plastic packaging for individual portions, condiments, jams, sauces, coffee cream, sugar and seasonings.	• Trays, disposable plates and cups, bags, boxes • Sachets, tubs, trays, boxesSachets, tubs, trays, boxes
Single-use accommodation sector packaging intended for an individual booking for cosmetics, hygiene and toiletry	Shampoo bottles, hand and body lotion bottles, sachets around bar soap
Very lightweight plastic carrier bags	Very thin bags provided for bulk groceries

Legal, regulatory and compliance frameworks

The Regulation introduces key **labelling obligations** to better inform consumers with different level of legal requirements:

- **Labelling as a sustainability requirements** to better inform consumers - article 12
- **Labelling as a manufacturer obligation** - article 15

⚠ Obligations (article 12+ 15) subject to financial sanctions defined by Member States
Article 12 is a market access condition: Compliance must be demonstrated by manufacturers or importers in the DoC.

Legal, regulatory and compliance frameworks

Obligation to manufacturer - article 15



Effective Date

12 August 2026

Principle

Information on the identification

Manufacturers shall ensure that the **packaging bears a type, batch or serial number** or other **element allowing its identification** or, where the size or nature of the packaging does not so allow, that the required information is provided in a document accompanying the packaged product.

Legal, regulatory and compliance frameworks

Obligation to manufacturer - article 15



Effective Date

12 August 2026

Principle

Information on the manufacturer

Manufacturers shall indicate on the packaging or on a QR code **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.

Legal, regulatory and compliance frameworks

Labelling - article 12



Effective Date

**12 February
2028**

Principle

Harmonised labelling for consumer sorting containing information on its material composition in order to facilitate consumer sorting. The label shall be based on pictograms and be easily understandable

Mandatory labelling on pack

Exceptions

- Transport packaging - except e-commerce packaging
- Packaging that is subject to a deposit and return system

Legal, regulatory and compliance frameworks

Labelling - article 12

Draft version of the label

1.9 Complete set of colour labels with text

Glass	Compostable	Wood and cork	Plastic	Fibre-based composite	Textile	Residual	Metal	Cardboard and paper	Ceramic	Hazardous
 UNCOLOURED GLASS	 HOME COMPOSTABLE	 WOOD	 RIGID PLASTIC	 BEVERAGE CARTON	 TEXTILE	 RESIDUAL	 METAL	 CARDBOARD	 CERAMIC	 HAZARDOUS
 COLOURED GLASS	 INDUSTRIALLY COMPOSTABLE in the EU	 CORK	 FLEXIBLE PLASTIC	 MIXED CANISTER				 PAPER		
 GREEN GLASS	 INDUSTRIALLY COMPOSTABLE in some MS			 OTHER COMPOSITE						
 BROWN GLASS										
Meta-labels (for associated codes)										



Implementing Act publication

By 12 August 2026

The Commission will publish the harmonised label and specification.

Legal, regulatory and compliance frameworks

Labelling - article 12



Effective Date

12 February 2029

Principle

Harmonised labelling for reusable packaging. Further information such as location of collection points, shall be made available through a QR code.

Mandatory labelling on pack + digital

Implementing Act

By 12 August 2026

The Commission will publish the harmonised label and specification.

PPWR Overview I - Context and strategic implications

Overview of the labelling obligations

12 Feb 2027

Digital identification of EPR

by the mean of a QR code
(voluntary).

12 Aug 2028

Harmonised Labels

- **Compulsory:** Sorting instruction label.
- **Voluntary:** Recycled & biobased content, and DRS packaging.

12 Feb 2029

Reusable packaging (compulsory)

Identification of packaging reusability (on-pack + digital).

1 Jan 2033

Substances of concern (compulsory)

Digital disclosure of concerned substances contained in packaging.

Exhaustion of stock: Packaging manufactured/imported before the entry into force of requirements (sorting, reuse, DRS, or recycled content) which does not comply with labelling may be placed on the market for a transition period of **3 years** from the date of entry into force of the obligation.

Legal, regulatory and compliance frameworks

The Regulation introduces key **reuse targets** on specific packaging types - **Article 29**:

- For transport packaging
- For sales packaging
- For takeaway packaging

Failure to comply with the reuse targets (article 29) the economic operator shall be subject to financial sanctions defined by the Member State

Legal, regulatory and compliance frameworks

Reuse targets for transport packaging and sales packaging targets - Article 29

Packaging Category	2030 Target	2040 Target	Notes
Transport packaging (used to transport products)	40%	70%	Key obligation for B2B exporters
Grouped packaging (excl. cardboard boxes)	10%	25%	E.g. shrink wrap, multi-packs
Beverage packaging (excl. milk, wine, spirits)	10%	40%	Final distributors only
Intra-company / intra-MS transport packaging	100%	100%	Fully reusable from 2030

Legal, regulatory and compliance frameworks

Reuse targets exemptions - Article 29

■ Product Exemptions

- Wine & Spirits
- Milk and dairy products
- Highly perishable products
- Placings on the market of less than 1 T/year of packaging in a Member State

■ Operator & Location Exemptions

- Micro-enterprises
- Retail space < 100m²
- Islands with a population under 2,000
- Distributor groupings (up to 5 distributors with max 40% market share)

Legal, regulatory and compliance frameworks

Reuse and refill obligations for takeaway packaging - article 32, 33 & 35

Packaging Category	Obligation	Date of application
HORECA sector Hot or cold beverages in takeaway packaging & ready-prepared food in take-away	Provide a system for consumers to bring their own containers to be filled	12 February 2027
	Give consumers the option of obtaining the products in re-useable packaging within a system for re-use	12 February 2028
	shall endeavour to offer 10 % of products for sale in a reusable packaging format10%	From 2030

Legal, regulatory and compliance frameworks

The Regulation provides many **Member States flexibilities** in implementing some obligations :

- Verify in the legislation whether PPWR offers flexibility
- Check when exporting to a European Union country the domestic law and any additional requirements

Member States are required to notify their draft legislation to the European Commission under the TRIS Procedure

Legal, regulatory and compliance frameworks

TRIS Procedure

Act aligning packaging law and other areas of law with Regulation (EU) 2025/40

Notification Number: 2026/0069/DE (Germany)
Date received: 13/02/2026
End of Standstill: 18/05/2026

Issue of detailed opinion by: European Commission

Draft Text:  

 [Click here for a printable version of this page](#)

Website to refer to :

<https://technical-regulation-information-system.ec.europa.eu/en/notification/27689>

Legal, regulatory and compliance frameworks

Examples of flexibilities for Member States authorised by PPWR

Compostability

- Member States may require **compliance with home-composting** standards.
- Member States may **maintain already defined compostable obligations** before the entry into force of PPWR

Reuse targets

- Member States **may allow producers to form pools** for the purpose of meeting reuse beverage targets.
- Member State may decide to define **higher reuse targets or exempt specific operators**

Restrictions of packaging bans

- Member States **may maintain restrictions** adopted before 1 January 2025 on the placing on the market of packaging in the formats and for the uses listed in Annex V but made from materials than plastic.
- Member states **may exempt SMEs**.

Legal, regulatory and compliance frameworks

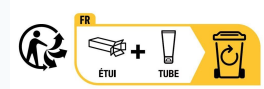
The French case - implementation of PPWR

Draft Law Context

- Still under discussion at the Parliament level
- Amend the Environmental Code to comply with PPWR

Examples

- **Labelling:** deletion of the Triman logo and Info tri labelling obligation for packaging in France UNTIL the entry into force of the Regulation



Example of sanctions: 1% of global turnover (excluding tax) for the last financial year ended

- **Reuse targets:** maintaining more ambitious reuse targets, with 10% of packaging to be reusable by 2027
- **Compostable packaging:** maintaining the home compostable requirements for compulsory compostable packaging

Legal, regulatory and compliance frameworks

The German case - implementation of PPWR

Draft Law Context

- Submitted to the European Commission
- The European Commission asked some clarifications to the German Government
- The German Government justified and modified the law. It can now be published

Examples

- **Recycling targets:** definition of higher targets:
 - 90% by mass for glass
 - 90% by mass for paper, cardboard and carton
 - 90% for ferrous metals (95% from 1 Jan 2028)
 - 90% for aluminium (95% from 1 Jan 2028)
 - 80% by mass for beverage cartons
 - 70% by mass for other composite packaging
 - 75% for plastics (80% from 1 Jan 2030)
- **Reuse targets:** establish reuse targets for certain beverage formats (70% rate) which are higher compared to Article 29 of the PPWR.
- **Recycled content:** require recycled content incorporation to be calculated by mass, effectively anticipating the EU methodology.



Funded by
the European Union

Extended Producer Responsibility (EPR) and potential impacts for businesses

Extended Producer Responsibility (EPR) and potential impacts for businesses

What is EPR ?

EPR is a policy approach that makes producers **responsible** for their products **along the entire lifecycle**, including at the **post-consumer stage**.

An EPR policy is characterised by the shifting of responsibility (physically and/or economically; fully or partially) **upstream to producers**; and the provision of incentives to producers to take into account **environmental considerations when designing their products**.

Governments that embrace the EPR approach use a **suite of policy instruments to shift financial–and sometimes operational–responsibility** of waste management and material recovery from governments to producers.



Extended Producer Responsibility (EPR) and potential impacts for businesses

What impact does EPR have ?

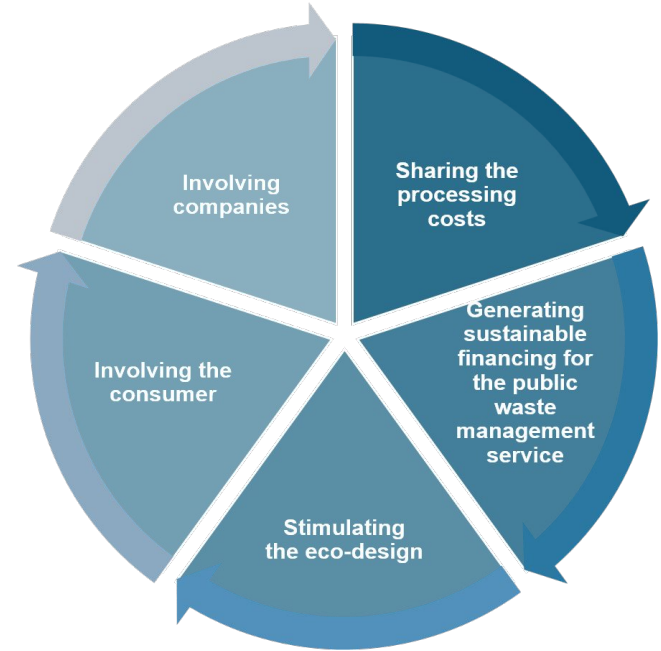
The long-standing experience with EPR (in some product groups up to 30 to 50 years) shows that, it has successfully contributed to:

- improvements in transparency regarding material and financial flows;
- a shift of end-of-life management costs of products from local governments to producers and consumers, whilst ensuring dedicated, ongoing and sufficient funding;
- increases in the volume of separate collection of waste, where this is beneficial;
- increases in material recovery (e.g. recycling) rates

Extended Producer Responsibility (EPR) and potential impacts for businesses

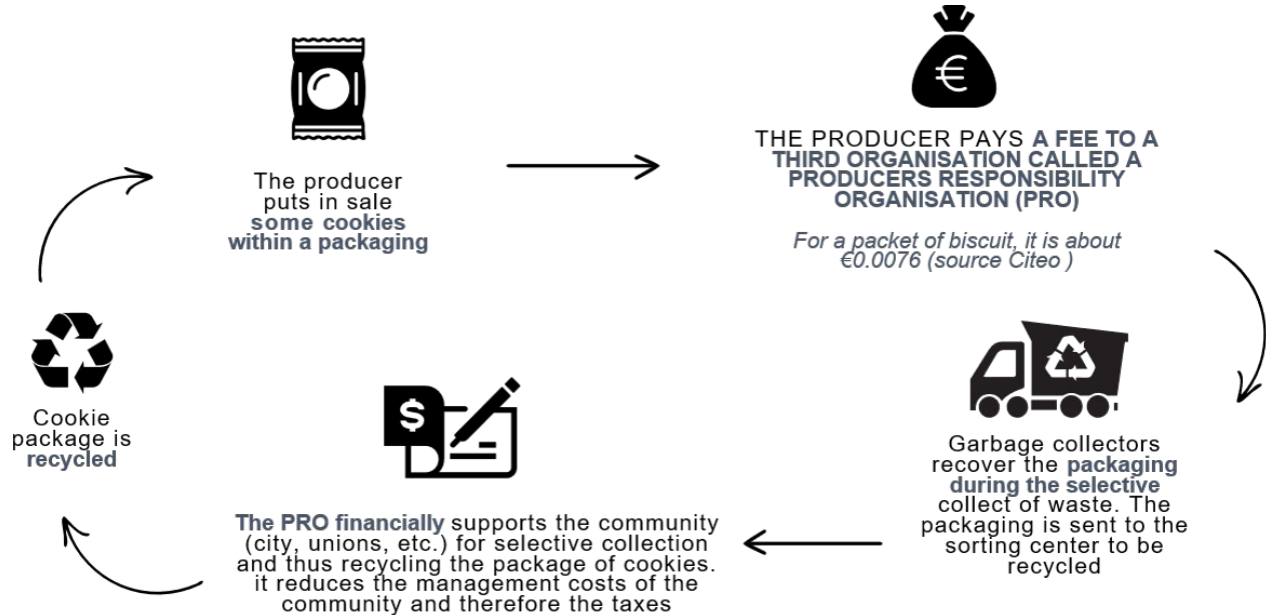
What impact does EPR have ?

By enabling the responsible end-of-life of waste to be implemented and financed, **EPR is a real tool against pollution**, aiming to reduce the littering while **providing qualitative feedstock**.



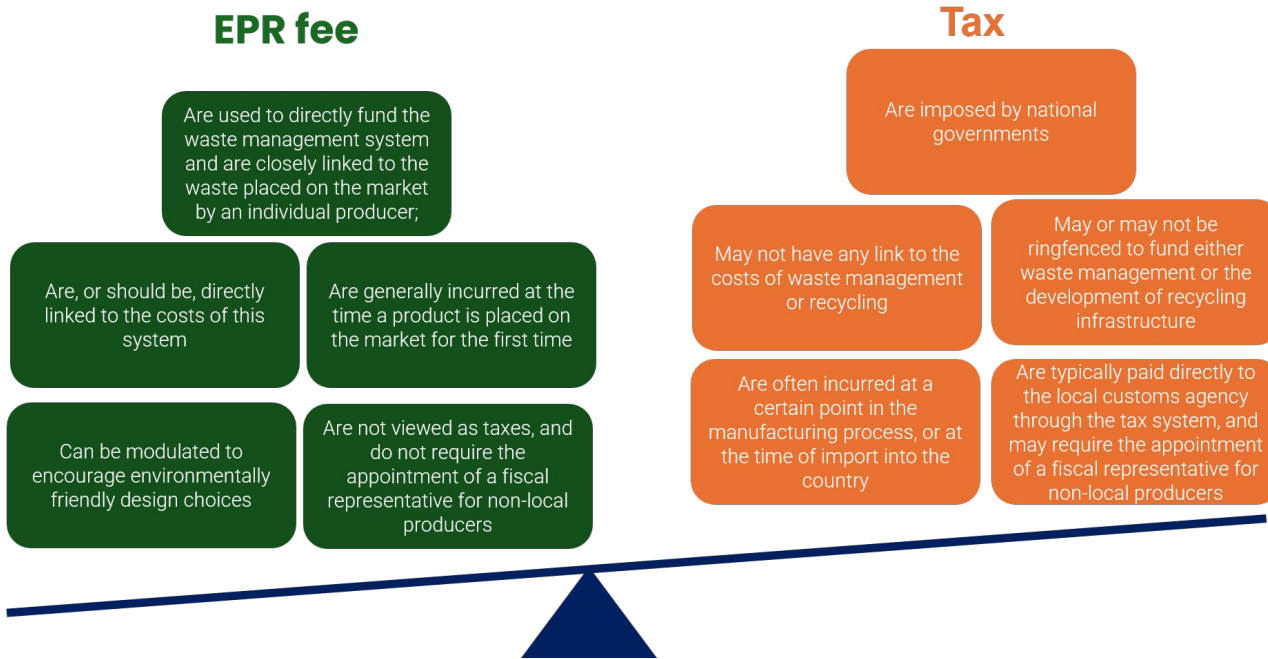
Extended Producer Responsibility (EPR) and potential impacts for businesses

How does it work in practice ?



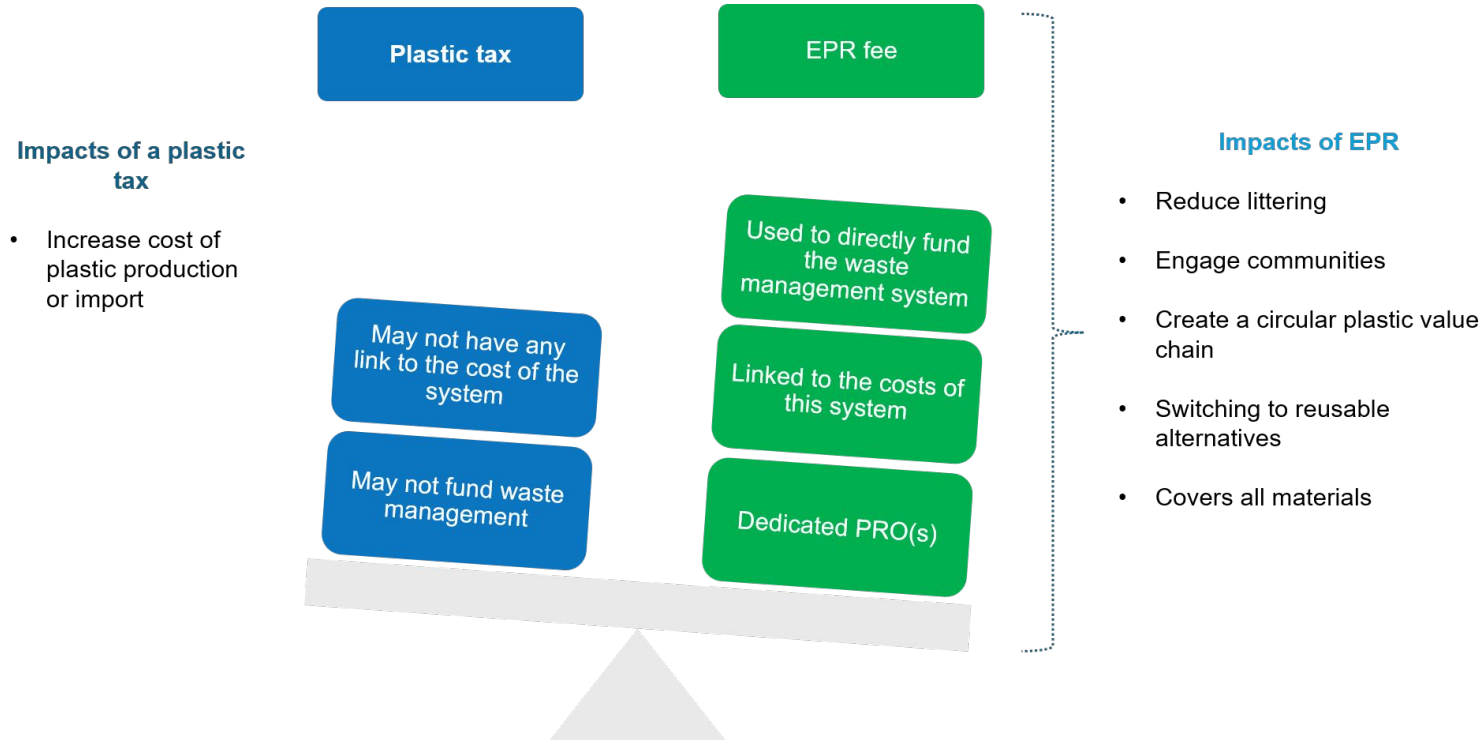
Extended Producer Responsibility (EPR) and potential impacts for businesses

The distinction between an EPR fee and a tax



Extended Producer Responsibility (EPR) and potential impacts for businesses

EPR fee vs plastic tax

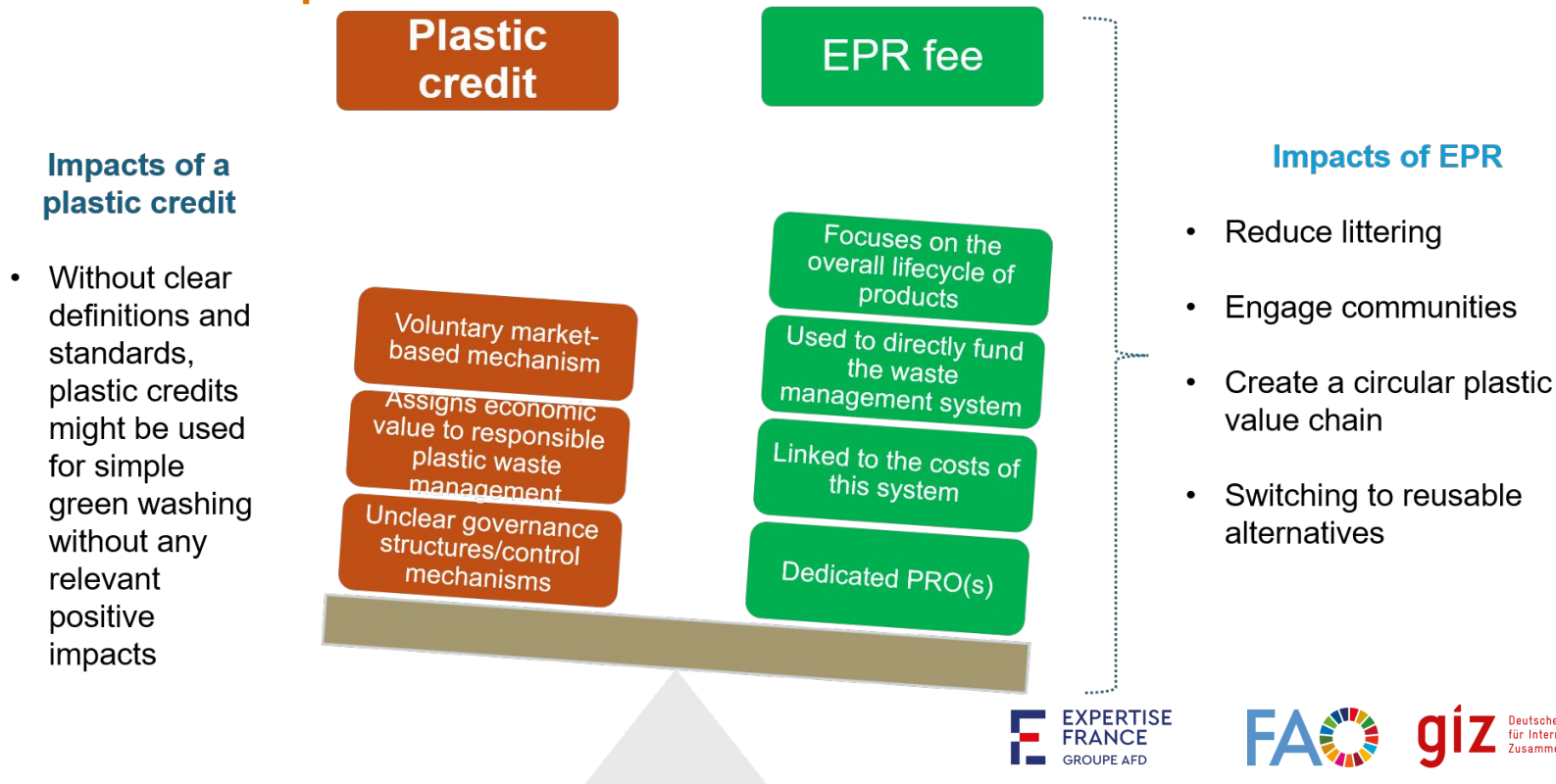


Extended Producer Responsibility (EPR) and potential impacts for businesses



Funded by
the European Union

EPR fee and plastic credit



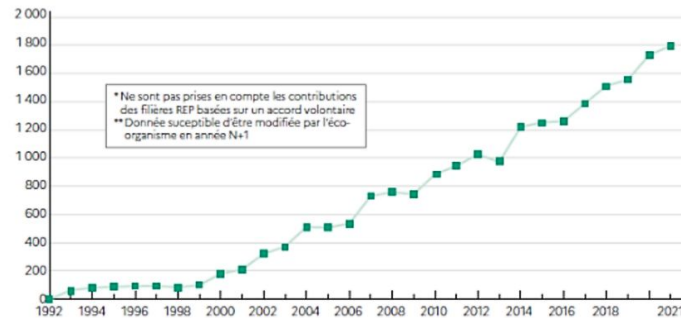
Extended Producer Responsibility (EPR) and potential impacts for businesses

Evolution of tonnages and contributions in France

Evolution of tonnages
supported by the EPR
sectors

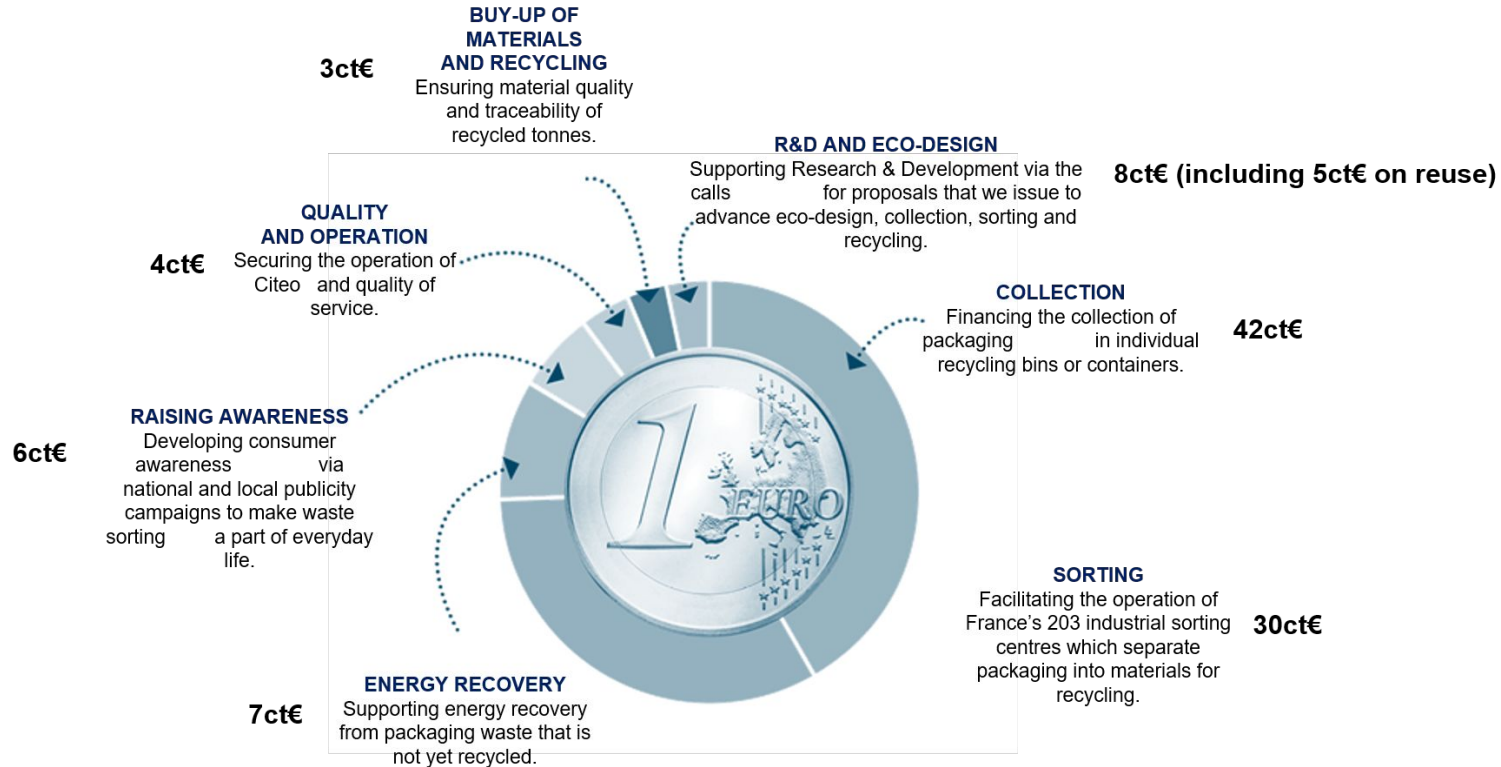


Evolution of
contributions perceived
by the regulated EPR
sectors



Extended Producer Responsibility (EPR) and potential impacts for businesses

Distribution of the budget - french example with Citeo



Extended Producer Responsibility (EPR) and potential impacts for businesses

PPWR measures

By August
2026

EC to adopt implementing acts establishing the format for registration in and reporting to the register, including the granularity of reported data and covered packaging types and categories

By the end of
2027

By 18 months from implementing acts EiF, Member States to establish a register which shall serve to monitor compliance of producers of packaging with EPR requirements

NA

Obligation for packaging producers/ PROs/ authorised representative to register in the register of producers by submitting application in each Member State where they make packaging or packaged products available for the 1st time

Registration in the register is a pre-condition for producers to place packaging on the Market

Extended Producer Responsibility (EPR) and potential impacts for businesses

Recycled content - article 7

Voluntary ecomodulation

The financial contributions paid by producers in order to comply with their extended producer responsibility obligations as laid down in Article 45 **may be modulated based on the percentage of recycled content used in the packaging.** Any such modulation shall take into account sustainability criteria of the recycling technologies and the environmental costs for the purposes of recycled content.

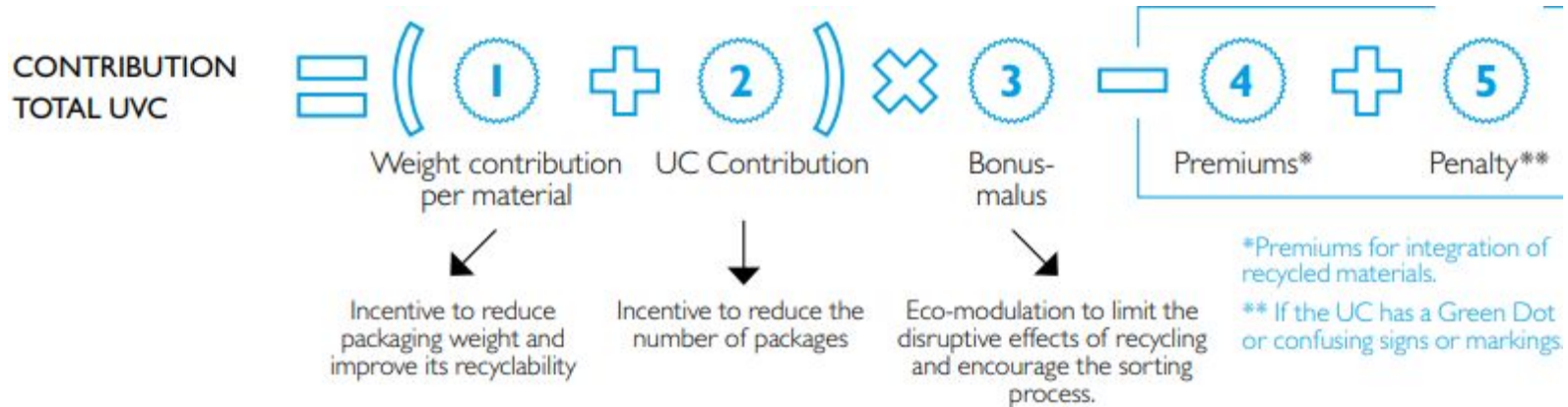
Recyclability - article 6

Compulsory ecomodulation

Regarding **financial contributions paid by producers** in order to comply with their extended producer responsibility obligations as laid down in Article 45 in respect of packaging referred to in paragraph 11, point (g), of this Article, **Member States shall take into account the technical feasibility and economic viability of recycling of that packaging.**

Extended Producer Responsibility (EPR) and potential impacts for businesses

Fee modulation example



Extended Producer Responsibility (EPR) and potential impacts for businesses

To summarise (1/2)

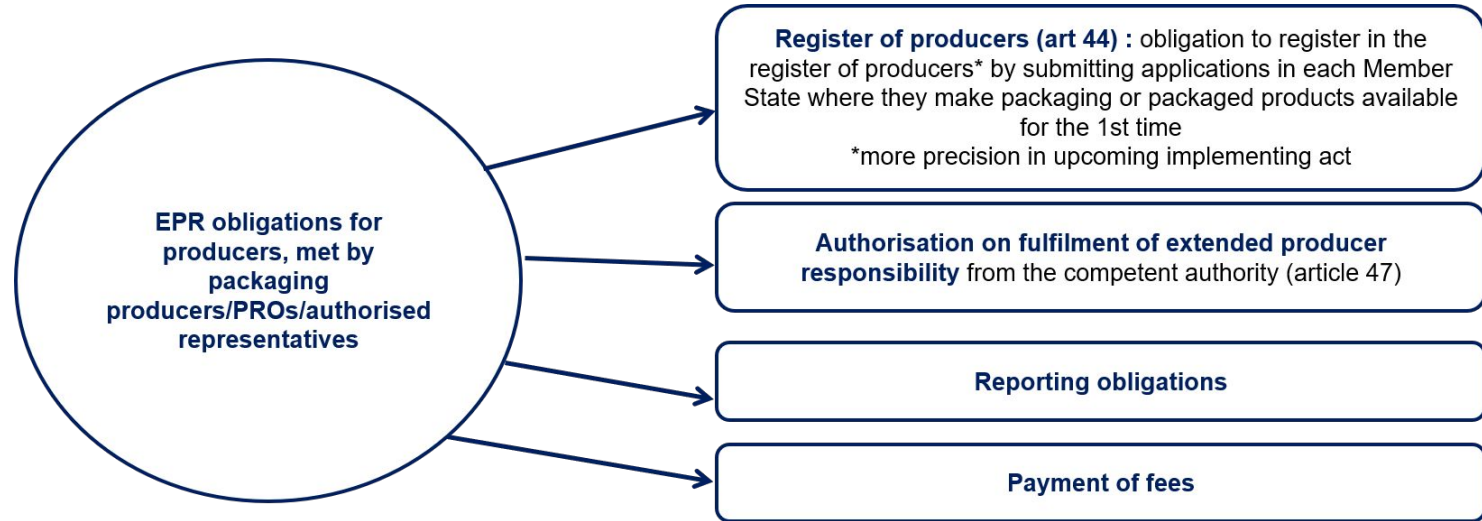
As of 31 December 2024, **all MS shall have established EPR schemes for packaging**. Producers can fulfill EPR obligations

- **individually**;
- or by joining a **PRO** in a collective scheme. PPWR added that Member States may adopt measures to make entrusting the EPR obligations to a PRO mandatory (article 46).

Aim of PPWR is to **standardise EPR requirements** across Member States.

Extended Producer Responsibility (EPR) and potential impacts for businesses

To summarise (2/2)





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Day 1 Wrap-Up and Way forward