

EUROPEAN PPWR REGULATION

Key points to anticipate
the new packaging
obligations

01/09/2026



PPWR in brief

Definition

PPWR means Packaging and Packaging Waste Regulation: the European regulation on packaging and packaging waste. It harmonises rules across the European Union, reduces the environmental impact of packaging and accelerates the circular economy.

SCOPE All packaging placed on the European market is concerned, including packaging imported from outside the European Union.

2050
carbon neutrality
targeted

100%
of packaging
concerned

8
structuring measures

Packaging waste reduction target per capita

2030
-5 %

2035
-10 %

2040
-15 %

2050 target

The trajectory aims for carbon neutrality for packaging by 2050.

Key PPWR timeline milestones

An operational view of the main milestones to include in the packaging roadmap.



Watch point: distinguish fixed requirements from details still dependent on delegated/implementing acts or harmonised standards.

First actions to launch now

Objective: move from regulatory understanding to a system of evidence, monitoring and decision-making.

1 Map packaging

List packaging by category: sales, grouped, transport, e-commerce, service, primary production.

2 Qualify the EPR scope

Identify what falls under professional, household or mixed packaging, then determine the company's role.

3 Secure documentation

Request from suppliers the material evidence, tests, declarations and information required for the technical file.

4 Assess PPWR gaps

Check substances, recyclability, minimisation, void ratio, reuse, labelling and format restrictions.

5 Quantify impacts

Estimate contributions, financial support, compliance costs and potential optimisation gains.

6 Build the roadmap

Prioritise actions for 2026–2030: compliance, data, procurement, eco-design, alternatives and internal governance.

Recommended deliverable: a single PPWR dashboard linking packaging references, suppliers, roles, evidence, deadlines and corrective actions.

Source: EU Regulation 2025/40

Clarify the company's role

Role qualification determines compliance, evidence to be retained and EPR obligations.

Supplier

Provides the manufacturer with the necessary information and evidence.



Manufacturer

Assesses compliance, compiles the Annex VII file and signs the EU declaration.



Producer / EPR

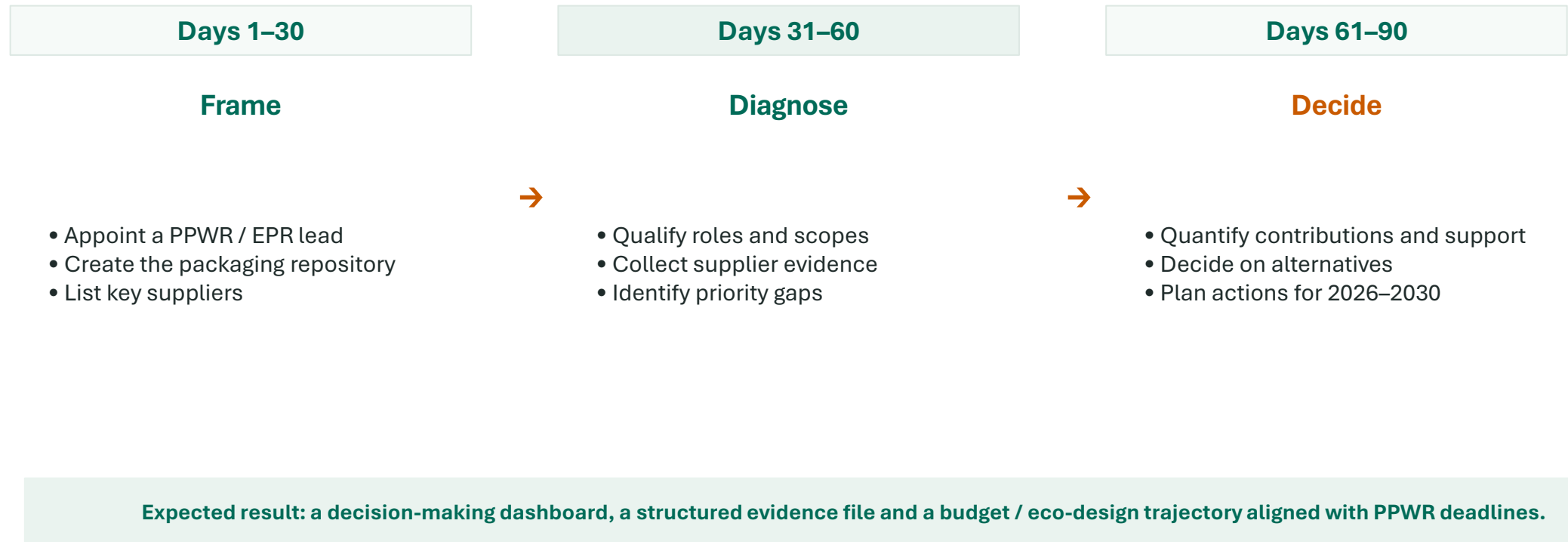
Finances and organises end-of-life according to its placing-on-the-market situation.

Key point for Professional Packaging EPR: the producer places a packaged product on the market for the first time; it must guarantee packaging compliance and, where applicable, manage and finance waste.

Categories to qualify: transport and primary production = Professional; service/household = Household; sales and grouped = Professional or Household depending on use.

Company roadmap: 90 days to get started

A short plan to move from a regulatory topic to operational packaging governance.



Who does what?

SUPPLIER

- Provides packaging/materials to a manufacturer
- ✓ Send compliance information and documents.
- ✓ Provide technical documentation for Articles 5 to 11.

MANUFACTURER

- Manufactures packaging or a packaged product
- ✓ Demonstrate packaging compliance.
- ✓ Prepare, retain and provide Annex VII technical documentation.
- ✓ Take corrective measures if needed.

PRODUCER

- Manufacturer, distributor or importer placing a packaged product on the market first
- ✓ Provide the declaration of conformity and guarantee compliance.
- ✓ Finance and manage waste under Professional Packaging EPR.

ANNEX VII Annex VII defines the technical documentation file and declaration of conformity to be prepared before placing on the market.



Packaging concerned

TYPE OF PACKAGING	CATEGORY
Transport	Professional packaging
Primary production	Professional packaging
Service and household	Household packaging
Sales	Professional and household
Grouped packaging	Professional and household

KEY POINT Packaging qualification determines EPR obligations and responsible actors.

The 8 structuring measures

1 Hazardous substances
Article 5

2 Recyclability
Articles 6, 7 and 52

3 Minimisation & void space
Articles 10 to 24

4 Reuse
Article 11

5 Labelling
Article 12

6 Declaration of conformity
Article 15

7 Targeted bans
Article 25

8 Professional packaging EPR
Article 45



1

Hazardous substances or substances of concern

12 August 2026	Compliance with the maximum heavy metal content and PFAS limits in food-contact packaging.
1 January 2027	Adjustment of the list of substances of concern according to the European Commission's assessment.
12 August 2028	Compliance with applicable requirements for substances of concern.
1 January 2030	Mandatory labelling of substances of concern.

WATCH POINT The PFAS thresholds and list are still indicated as pending in the working source.

2 Recyclability: from Design for Recycling to Recycling at Scale

DISTINCTION Packaging may be designed to be recyclable even if a collection and recycling stream is not yet available at scale.

DEADLINE	REQUIREMENT	PLACING ON THE MARKET
2030	100% of packaging designed to be recyclable	Possible from 70% — grades A, B and C
2035	Member State measures to reach recycling targets	Scale-up of recycling at scale
2038	Strengthened requirement	Possible from 80% — grades A and B

Recycling targets presented in the source sheet

STREAM	2025	2030
General packaging	65 %	70 %
Paper-cardboard	75 %	85 %

3 Packaging minimisation & void space

PRINCIPLE Objective: reduce packaging to the strictly necessary weight and volume.

1 January 2028	Sales packaging	Reduction to the necessary minimum, except reusable packaging.
By 1 January 2030	Grouped, transport, e-commerce	Maximum void space rate of 50%.
1 January 2030	All packaging concerned	Maximum minimisation of weight and size.

- The void space calculation methodology is expected in 2028.
- Considered as void space: EPS, bubble wrap, paper shreds, etc.
- False bottoms, double walls and excessive thickness are prohibited.

4

Reuse and European labelling harmonisation

CATEGORY	2030	2040
Transport in the EU	40 %	70 %
Transport and sales between sites in the EU	100 %	100 %
Grouped packaging	10 %	25 %

EXCEPTIONS Exceptions cited: cardboard, PE film and strapping, certain flexible food-contact packaging and packaging designed for heavy or large products.

European labelling harmonisation

LABELLING Implementation announced by 12 August 2028 at the latest. Transport packaging is excluded. A QR code option is mentioned.

- The harmonised signage remains under review in the source.
- Indicating the percentage of recycled material is not mandatory.



6

Declaration of conformity

OBLIGATION From 12 August 2026, the manufacturer must establish its declaration of conformity. Without it, the packaging can no longer be placed on the market.

The declaration must notably cover:

- ✓ Substances of concern
- ✓ Recycled content in plastics
- ✓ Minimisation and void space
- ✓ Labelling

- ✓ Recyclability
- ✓ Compostability
- ✓ Reuse
- ✓ Other applicable requirements

7 Targeted bans from 2030

PPWR 2030 • SINGLE-USE PACKAGING

Targeted bans to accelerate reduction at source

1

PROMOTIONAL
Promotional grouped packaging
Except where needed for handling

2

FRUIT & VEGETABLES
Unprocessed fruit and vegetables < 1.5 kg
Subject to the planned exemptions

3

HORECA
Food and beverages consumed on site in individual portions
Focus on single-use plastic

4

LIGHTWEIGHT BAGS
Very lightweight plastic bags
Use heavily restricted

Key takeaway: paper and cardboard are not concerned, except where they contain more than 5% plastic.

8

Professional Packaging EPR

RESPONSIBILITY The producer is responsible for managing and financing professional packaging waste, notably through eco-contributions.

Reflexes to put in place

- Precisely identify the company's role: supplier, manufacturer, producer, importer or distributor.
- Map packaging placed on the market and its EPR category.
- Centralise compliance evidence and technical documentation.
- Prepare declarations and anticipate changes in labelling, recyclability, reuse and minimisation.

Preparation checklist

ACTION	OWNER	STATUS
Map packaging references	To be defined	☐ To be launched
Collect supplier documents	To be defined	☐ To be launched
Structure the Annex VII file	To be defined	☐ To be launched
Assess recyclability and void space	To be defined	☐ To be launched
Prepare harmonised labelling	To be defined	☐ To be launched
Organise the declaration of conformity	To be defined	☐ To be launched

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