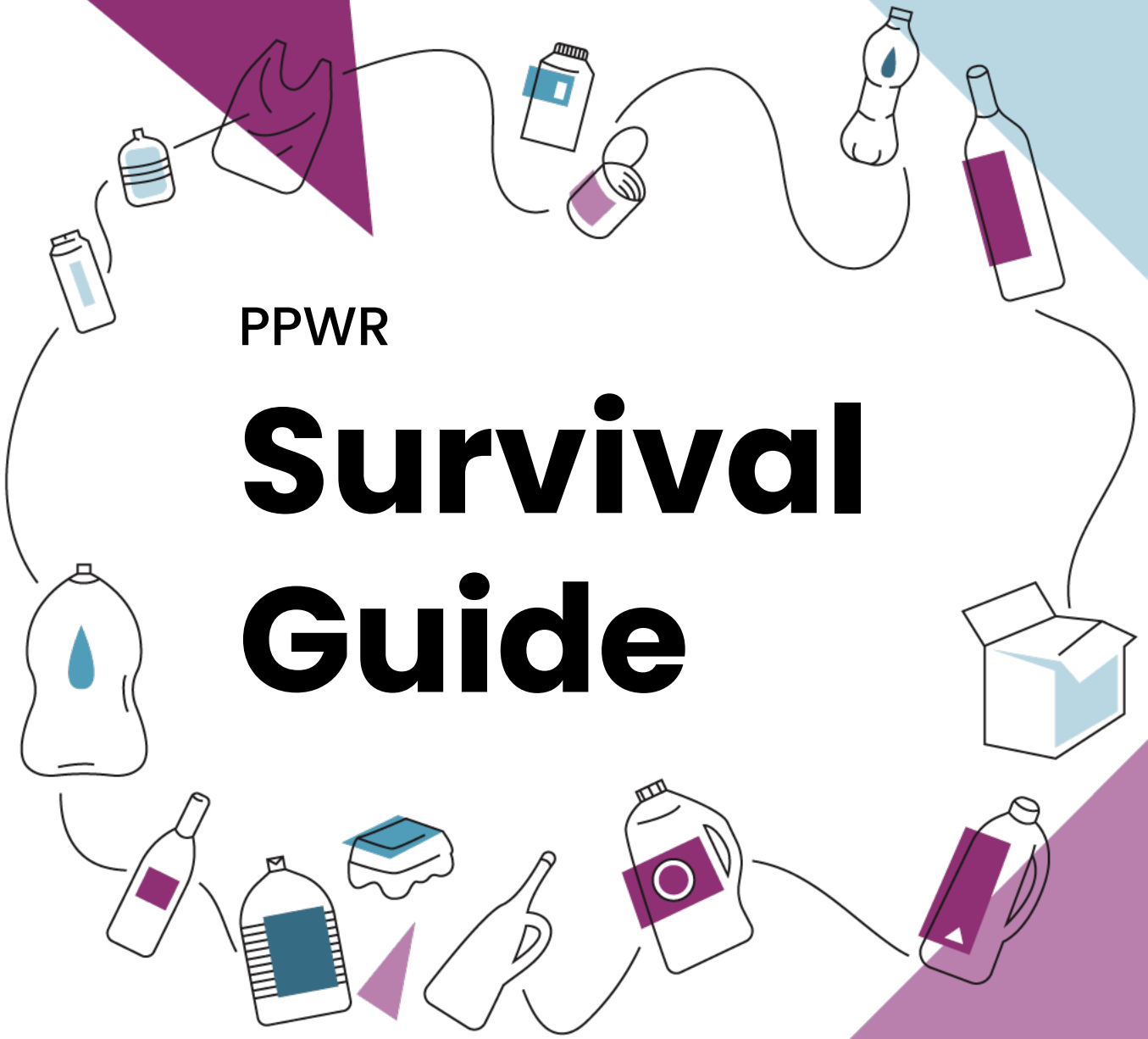
PPWR

Survival Guide



europen
SHAPING A SUSTAINABLE FUTURE FOR PACKAGING

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Disclaimer

This presentation aims to provide an overview of some* of the requirements included in the Packaging and Packaging Waste Regulation (PPWR) published in the EU Official Journal on 22 January 2025.

The presentation should not be relied upon as legally binding or for compliance with the Regulation (in this regard, please refer to the full text of the Regulation).

Please note that the deadlines related to the different provisions indicated with the symbol "±" represent an estimation of their timing of application and are based on the PPWR's date of entry into force on 11 February 2025. When the deadlines are indicated as "NA", the text did not provide a clear date of application. The assumption is, in those cases, that they will apply from the date of application of the PPWR, i.e. 18 months following the entry into force of the Regulation (12 August 2026). The dates of application of the provisions are sorted in chronological order.

For further background, please note that in 2026, the EU Commission issued a set of guidance documents in the form of a PPWR Guidance Notice and a Frequently Asked Questions (FAQ) document.

**Non-exhaustive*

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Contents

- Introduction
- Glossary
- Timeline
- A deep-dive into the new PPWR
- Overview of requirements for economic operators
- Overview of deadlines for secondary legislation and non-legislative acts
- Overview of review and sunset clauses
- Overview of obligations for Member States, waste management operators and competent authorities

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Introduction

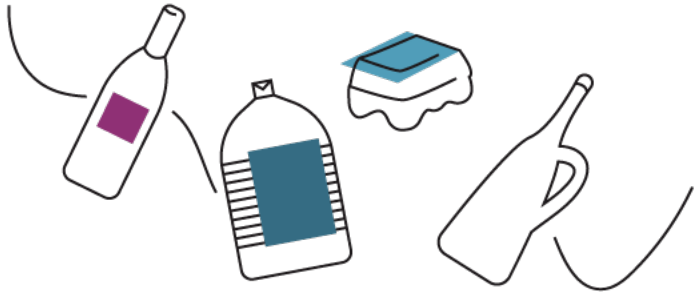
"Navigate the complexities of the new EU packaging legislation effortlessly. Our survival guide is a compass to sustainability in a shifting regulatory environment."

– Hans van Bochove, Chairman, EUROPEN



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Glossary



EIF
Entry into force

IAs
Implementing Acts

DAs
Delegated Acts

D4R
Design for recycling

EC
European Commission

EPR
Extended Producer Responsibility

DRS
Deposit and return systems

SoC
Substances of concern

Sunset clause
Measure within a statute, regulation or other law that provides for the law to cease to be effective after a specified date, unless further legislative action is taken to extend it

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Timeline

Q1 2025



- 22 January: Publication of the final text in the EU Official Journal
- 11 February: Entry into force on the 20th day following the publication in the Official Journal

March 2026



- 30 March: Publication of PPWR guidance documents

June 2026



- 6 June: Publication of the PPWR Guidance Notice in the EU Official Journal

August 2026



- 3 August: Update of the FAQ document
- 12 August: Start of application of the new PPWR (18 months following the date of entry into force)

Mid-2026 onwards

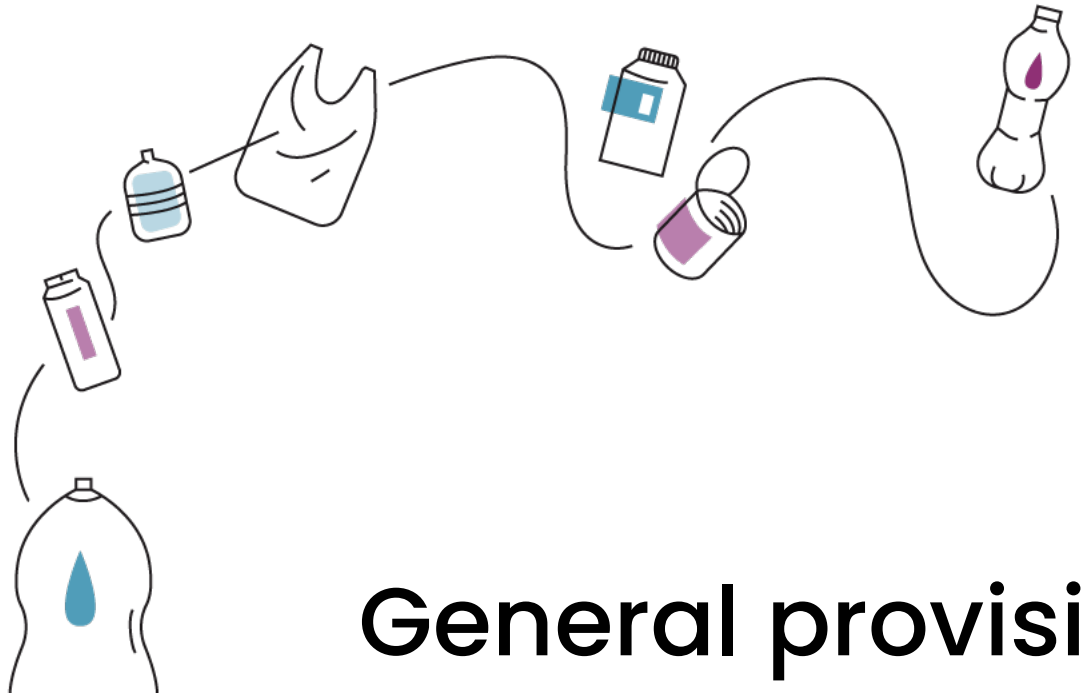


- Development of secondary legislation and implementation of the Regulation

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A deep-dive into the new PPWR

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General provisions

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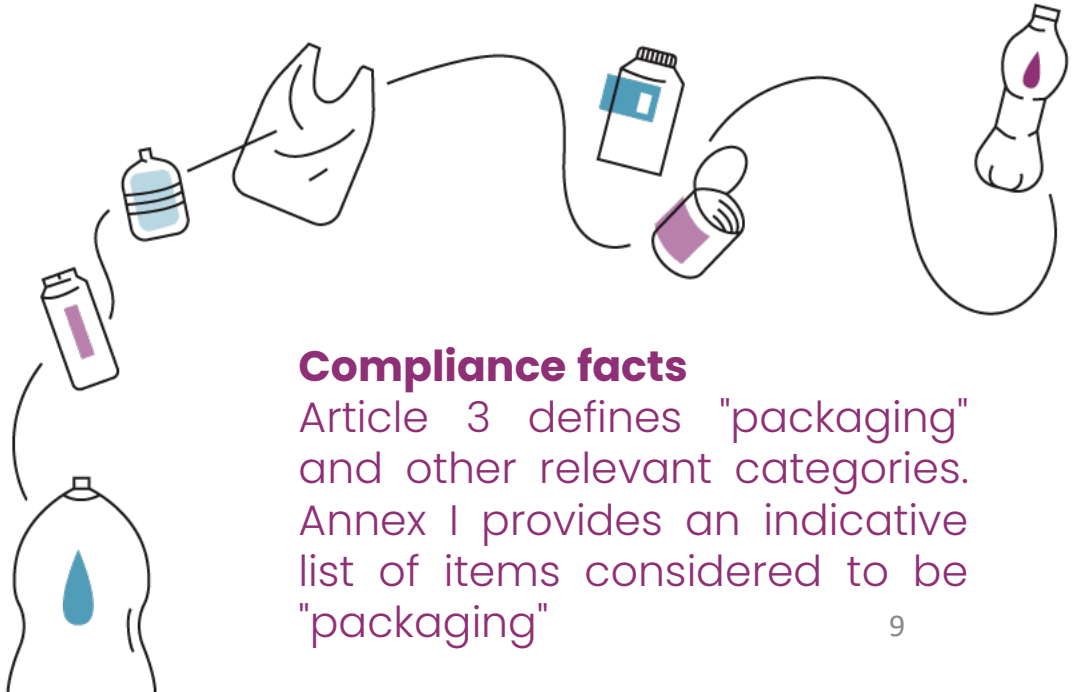
Scope of the new requirements - Article 2

The Regulation aims to apply to all packaging (B2C and B2B) and packaging materials, as well as to all packaging waste.

The text establishes **sustainability and information requirements**, as well as measures on packaging waste prevention and extended producer responsibility.

It also aims at **contributing to the efficient functioning of the internal market** by setting harmonised rules on packaging.

The Regulation will apply without prejudice to the Waste Framework Directive's requirements applicable to the management of hazardous waste, as well as Union requirements on safety, health and hygiene of packaged products or transport requirements. In case of conflict, the Directive on transport of dangerous goods prevails.



Compliance facts

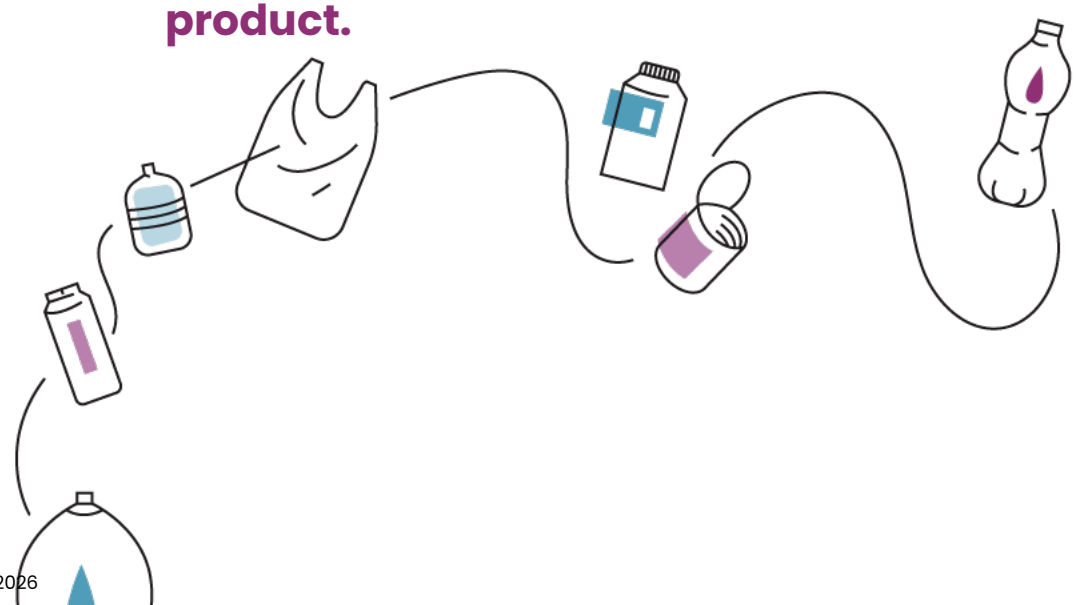
Article 3 defines "packaging" and other relevant categories. Annex I provides an indicative list of items considered to be "packaging"

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Placing in the market - Article 3

Article 3 of the Regulation distinguishes between **'making available on the market'**, **'placing on the market'** and **'making available on the territory of the Member State'**.

NB: the three definitions clarify that the reference to packaging comprises both **empty packaging or packaging with a product.**



Article 3(9) defines* **making available on the market** as any supply of packaging, empty or with a product, for distribution, consumption, or use on the Union market in a commercial activity, with or without payment.

Article 3(10) defines* **placing on the market** as the first making available of packaging, empty or with a product, on the Union market.

Article 3(11) defines* **making available on the territory of a Member State** as any supply of packaging, empty or with a product, for distribution, consumption or use on the territory of a Member State in a commercial activity, with or without payment.

* For the full and official definition, please refer to the original text.

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Internal market - Article 4

Repealing Directive 94/62/EC on packaging, the Regulation will be **directly applicable in all EU Member States**, fostering the adoption of harmonised rules on packaging and contributing to the functioning of an internal market for packaged goods.

The retention of the **internal market legal basis** (Art. 114 TFEU) should limit the possibility to maintain or introduce national measures on the grounds of environmental protection.

Indeed, possible national measures should withstand a test of proportionality, be non-discriminatory and should not obstacle trade or the free movement of packaged goods.

Despite the move from a Directive to a Regulation and the preservation of the Internal Market legal basis, the Regulation will allow the adoption or retention of national packaging measures (see next slide)



Compliance facts

Article 4 clarifies that Member States shall not prohibit, restrict or impede the placing on the market of packaging that complies with the Regulations' requirements

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Internal market - deviations from Single Market principles*

ARTICLE 4(3)

- Member State allowed to maintain or introduce additional national sustainability or information requirements, as long as those do not conflict with those laid down in the Regulation

ARTICLE 12(9)

- Packaging included in a EPR scheme may be identified by means of a national symbol but only with a digital marking
- EC to adopt guidelines to clarify aspects that can mislead consumers or other end users

ARTICLE 25(2 and 6)

- Member States may maintain packaging bans adopted prior to 1 January 2025 for formats and uses listed in Annex V but made from other materials
- EC to adopt guidelines explaining Annex V (by 12 February 2026)

ARTICLE 29(15 and 16)

- Member States allowed to set higher reuse targets and to establish additional targets for the beverage sector
- All reuse targets are minimum targets and can be overshot ("at least")

ARTICLE 33(6)

- Member States allowed to set targets for economic operators going beyond the minimum target (10%) set for re-use offer in the take-away sector

ARTICLE 43 (1 and 7)

- Packaging waste prevention targets are minimum targets and can be overshot ("at least")
- Member States allowed to introduce waste prevention measures exceeding the minimum 5%-10% and 15% targets

ARTICLE 51(2c)

- Member States allowed to require manufacturers or final distributors to make available in reusable packaging products other than those covered by Article 29

ARTICLE 70(4)

- Member States allowed to maintain packaging bans in the formats and uses of point 2 and 3 of Annex V until 1 January 2030. Article 4(3) does not apply in the meantime until this date

*Non-exhaustive

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Sustainability requirements

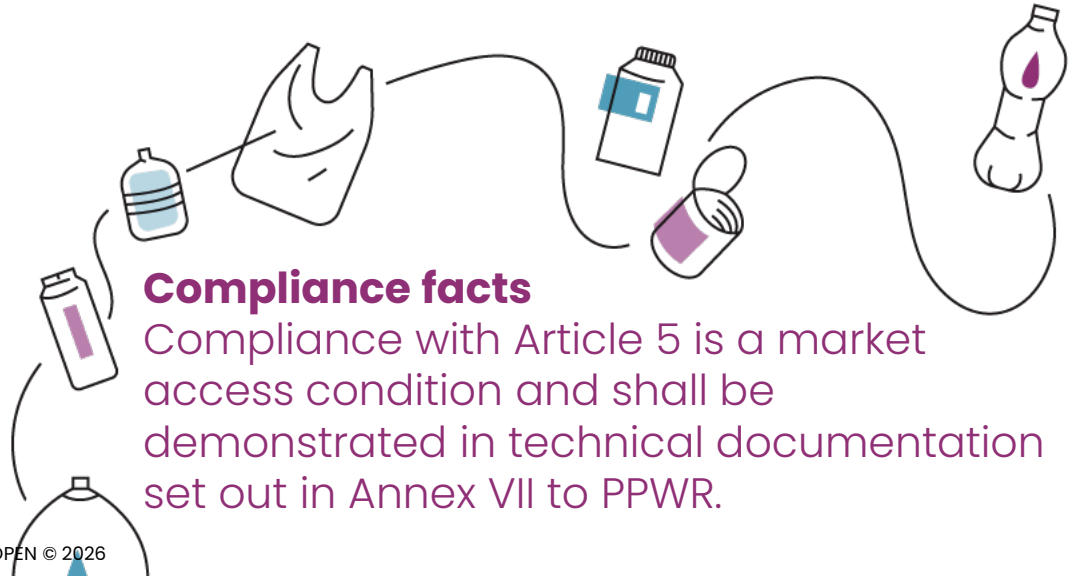
Substances in packaging

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Substances in packaging - Article 5

From 12 August 2026, **food contact packaging will be banned if containing PFASs in a concentration equal to or above given limit values** (see next slide).

Overall, **packaging** placed on the EU market **shall be manufactured minimising the presence and concentration of SoC.**



Compliance facts

Compliance with Article 5 is a market access condition and shall be demonstrated in technical documentation set out in Annex VII to PPWR.

By 31 December 2026, EC assisted by ECHA, to prepare a report on the presence of SoC in packaging and packaging components, to determine the extent to which they negatively affect re-use and recycling or impact chemical safety*.

The report shall be submitted to the co-legislators and consider appropriate follow-up measures, incl. a possible REACH restriction for SoC affecting human health or the environment or their restriction via D4R criteria when affecting reuse or recycling of packaging**.

By 12 August 2033, EC to evaluate whether Article 5 and D4R criteria have contributed to minimising the presence and concentration of SoC.

* If a Member State considers that a substance negatively affects re-use and recycling of packaging, it shall supply that information to the EC and ECHA by 31 December 2025.

** Member States may request to the EC to consider restricting the use of SoC that potentially negatively affect the reuse and recycling of materials in packaging for reason that are not related to chemical safety, as part of the delegated acts defining D4R criteria. Such requests shall be documented and be evaluated by the EC and results presented to the Committee assisting it with the adoption of secondary legislation.

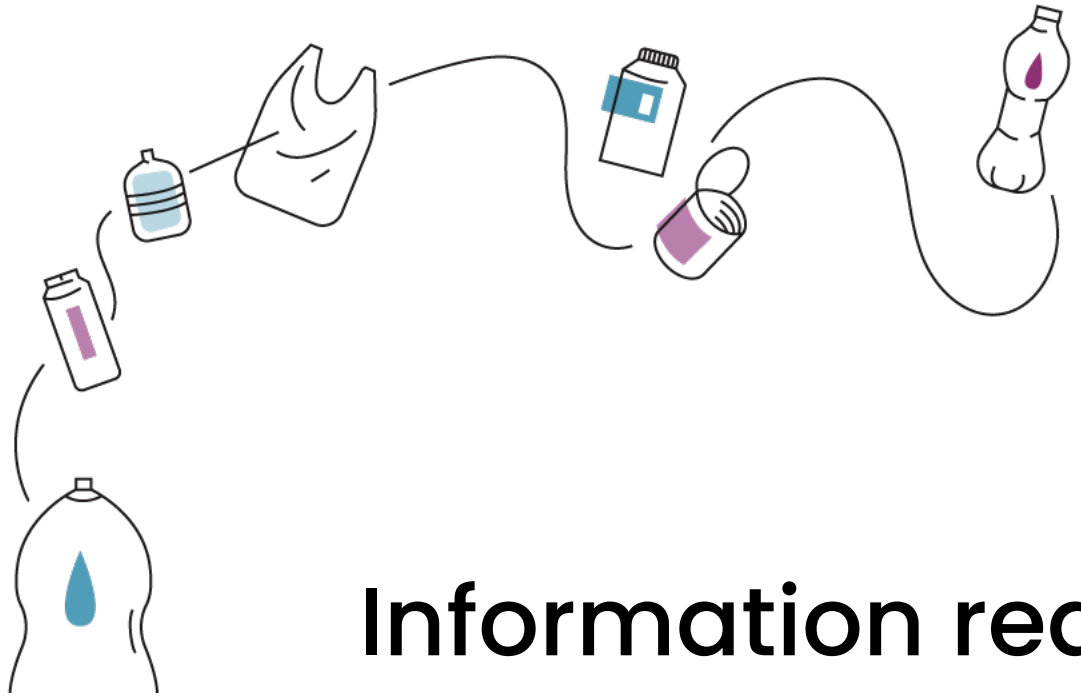
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Substances in packaging - Article 5 (continued)

OBLIGATION	DEADLINE	OBLIGATED PARTY	ADDITIONAL MEASURES
Ban of food contact packaging containing PFASs* in a concentration equal to or above the following limit values: 1. 25 ppb for any PFAS as measured with targeted PFAS analysis (polymeric PFASs excluded from quantification); 2. 250 ppb for the sum of PFASs measured as sum of targeted PFAS analysis, optionally with prior degradation of precursors (polymeric PFASs excluded from quantification); and 3. 50 ppm for PFASs (polymeric PFASs included). If total fluorine exceeds 50 mg/kg the manufacturer, importer or downstream user shall upon request provide to the manufacturer or the importer a proof of the quantity of fluorine measured as content of either PFASs or non-PFASs.	From 12 August 2026	Manufacturer	By 12 August 2030, EC to assess the need to amend or repeal the requirement to avoid overlaps with PFASs restrictions or prohibitions set out in other EU pieces of legislation (REACH, POPs, FCM Regulations)
The sum of the concentrations of lead, cadmium, mercury and hexavalent chromium resulting from substances in packaging, or its components, shall not exceed 100 mg/kg. NB: Without prejudice to REACH or FCM restrictions	Not specified – In principle from 12 August 2026	Manufacturer	EC allowed to adopt delegated acts to lower the indicated sum of the concentrations (100 mg/kg) and determine conditions under which such concentration level shall not apply, as well as exempted packaging categories under specific conditions

* Article 5(5) specifies that, for the purpose of PPWR, PFAS consist of any substance that contains at least one fully fluorinated methyl (CF3-) or methylene (-CF2-) carbon atom (without any H/Cl/Br/I attached to it), except substances that only contain the following structural elements: CF3-X or X-CF2-X', where X = -OR or -NRR' and X' = methyl (-CH3), methylene (-CH2-), an aromatic group, a carbonyl group (-C(O)-), -OR'', -SR'' or – NR''R'''; and where R/R'/R''/R''' is a hydrogen (-H), methyl (-CH3), methylene (-CH2-), an aromatic group or a carbonyl group (-C(O)-).

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Information requirements

Labelling & claims

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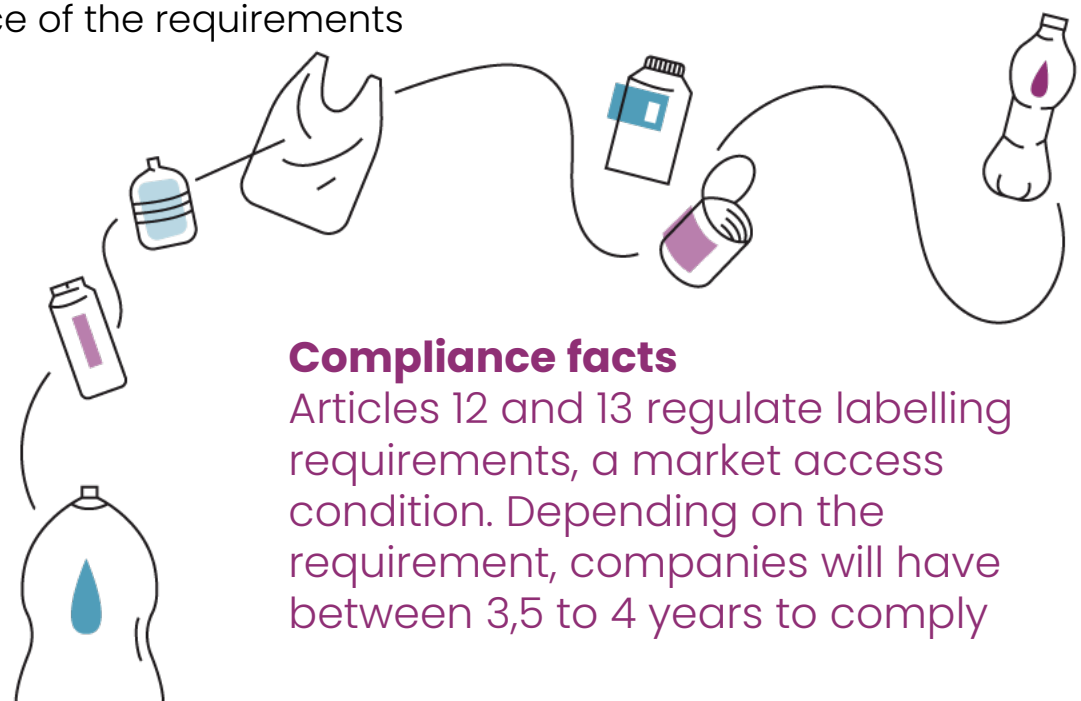
Labelling - Article 12

The Regulation introduces **harmonised labelling and marking requirements** for different packaging formats.

Harmonised label on material composition to facilitate consumer sorting and **labelling of waste receptacles** across the EU will hopefully contribute to higher collection and recycling rates, supporting the objective of recycling packaging at scale from 1 January 2035.

New harmonised marking will also inform end-users about **packaging reusability** and, potentially, on the **share of recycled content and bio-based plastic content**. While national DRS and EPR symbols will still be allowed, the latter will have to be provided via digital markings only.

The Commission will establish the label specifications, including when provided through digital means, in secondary legislation. Packaging manufactured or imported before the application of the marking requirements for sorting, DRS, reusable packaging and packaging containing recycled content, may be marketed for a period of 3 years after the entry into force of the requirements



Compliance facts

Articles 12 and 13 regulate labelling requirements, a market access condition. Depending on the requirement, companies will have between 3,5 to 4 years to comply

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Labelling - Requirements

OBLIGATION	DEADLINE	OBLIGATED PARTY	SECONDARY LEGISLATION
Packaging shall be marked with a harmonised label containing information on its material composition. Information on the destination of each separate component may be given digitally NB: obligation does not apply to transport packaging (except e-commerce) or packaging part of a DRS. Additional specifications for compostable packaging	From 12 August 2028 or 24 months from the EiF of the relevant implementing acts	Economic operators	By 12 August 2026: ▪ EC to adopt implementing acts establishing a harmonised label and specifications for the labelling requirements, including where provided through digital means ▪ EC to adopt implementing acts to establish a harmonised label and a methodology for identifying the material composition of packaging by means of digital marking technologies
Reusable packaging to bear a label informing users of its reusability. Further information on reusability to be made available through a QR code or other digital data carrier NB: the obligations shall not apply to open loop systems which do not have a system operator	From 12 February 2029 or 30 months from the EiF of the relevant implementing act	Economic operators	By 12 August 2026, EC to adopt implementing acts establishing a harmonised label and specifications for the labelling requirements, including where provided through digital means
If packaging is marked with a label informing on the share of recycled content or biobased content, label and, where applicable, the QR code to comply with the specifications laid down in the relevant implementing act and be based on the methodology pursuant to Article 7(8) NB: this marking is voluntary	From 12 August 2028 or 24 months from the EiF of the relevant implementing act	Economic operators	By 12 August 2026, EC to adopt implementing acts establishing a harmonised label and specifications for the labelling requirements, including where provided through digital means

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Labelling - Requirements and other clauses

OBLIGATION	DEADLINE	OBLIGATED PARTY	SECONDARY LEGISLATION
Packaging subject to DRS (Article 50(1)) to be marked with a harmonised label established in implementing act NB: National DRS symbols will also be allowed, physically, on packaging	From 12 August 2028 or 24 months from the EiF of the relevant implementing act	Economic operators	By 12 August 2026, EC to adopt implementing acts establishing a harmonised label and specifications for the labelling requirements, including where provided through digital means
National extended producer responsibility markings still enabled but can only be mandated via digital means NB: EPR symbols shall be clear and not mislead the consumers / end users as to packaging recyclability or reusability	By 12 February 2027	Economic operators	
Packaging containing substances of concern to be marked using standardised, open, digital technologies	From 24 months from the EiF of the relevant implementing act	Economic operators	By 1 January 2030, EC to adopt implementing acts establishing the methodology to identify SoC by means of digital marking.
Prohibition to provide or display labels, marks, symbols or inscriptions that are likely to mislead or confuse consumers / end users with respect to the sustainability requirements for packaging, other packaging characteristics or packaging waste management options, for which harmonised labelling has been laid down in PPWR	NA	Economic operators	EC to adopt, where appropriate, guidelines to clarify aspects that are likely to mislead or confuse consumers or end-users

VARIATIONS	DEROGATIONS	EXHAUSTION OF STOCKS
•Possibility to affix label on grouped packaging when needed due to the nature or size of the packaging, as well as to provide them via an electronically readable code or other data carrier	•Article 12 does not apply to immediate and outer packaging of (veterinary) medicinal products, (in vitro) medical devices if there is no space on the packaging or the label could jeopardise safe use of medicinal products	•Packaging manufactured/imported before the EiF of the requirements for sorting instructions, reusable, DRS packaging or packaging containing recycled content may be marketed for a period of 3 years

Labelling - Article 13

OBLIGATION	DEADLINE	OBLIGATED PARTY	SECONDARY LEGISLATION
Harmonised labels for separate collection to be affixed, printed or engraved on all waste receptacles NB: obligation does not apply to receptacles covered by a DRS	By 12 August 2028 or 24 months from the EiF of the relevant implementing act	Member States	By 12 August 2026, EC to adopt implementing acts to establish harmonised labels and specifications for the labelling of waste receptacles



Secondary legislation

The JRC's EU Policy Hub has started work on Waste Sorting Labels for packaging and waste receptacles

TIMELINE AND NEXT STEPS:

- 1st stakeholders' workshop on 15 March
  Workshop report & insights ▶ End of May (delayed)
- 2nd stakeholders' workshop in October 2024
- 3rd and conclusive workshop in February 2025

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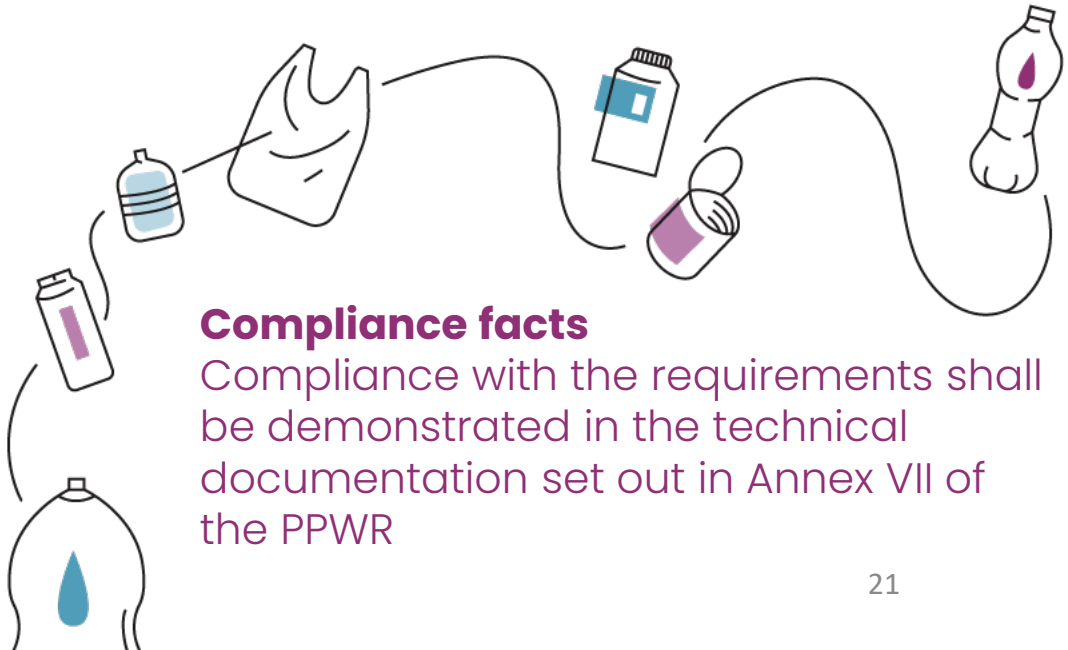
Claims - Article 14

According to Article 14 of the PPWR, **environmental claims on packaging** regarding legal requirements set out in PPWR may be made by economic operators if:

- those are made in relation to packaging properties exceeding the PPWR minimum requirements, in accordance with the set criteria, methodologies and calculation rules and
- when those specify that they relate to the packaging unit, part of the packaging unit or to all packaging placed on the EU market by the economic operator

While PPWR is the primary legislation applicable to packaging, the Empowering Consumers Directive and the future Green Claims Directive also regulate unfair commercial practices and substantiation of claims.

While the interplay between PPWR and the Green Claims Directive is to be clarified, pending the Directive's approval, Recital 73 of PPWR already mentions that the Empowering Consumers Directive complements the requirements of the PPWR.



Compliance facts

Compliance with the requirements shall be demonstrated in the technical documentation set out in Annex VII of the PPWR

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Sustainability requirements

Recyclability

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Recyclability - Article 6

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, a concept defined in Article 3 of PPWR, in line with conditions to be detailed in implementing acts by 1 January 2030

By 1 January 2030, packaging will not be allowed on the EU market unless recyclable within grades A, B or C.

By 1 January 2038, packaging shall not be placed on the EU market if falling in grade C

Packaging recyclability will be expressed in performance grades A (higher or equal to 95%), B (higher or equal to 80%) or C (higher or equal to 70%). EPR fees will be modulated based on packaging recyclability.



Compliance facts

Recyclability is a market access condition and will have to be proved in technical documentation as set out in Annex VII of the PPWR

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Recyclability – Definition and application of the requirements

By 1 January 2028, EC to adopt delegated acts to establish D4R, the recyclability performance assessment and express its result in recyclability grades per packaging unit, in terms of weighting, and the framework of EPR fees modulation

By 1 January 2030, EC to adopt implementing act to establish the methodology for the "recycled-at-scale" assessment per packaging category listed in Table 2 of Annex II

From 1 January 2030 or 2 years after the date entry into force of the delegated acts establishing D4R criteria, packaging to be designed for recycling

From 1 January 2030 or 2 years after entry into force of the delegated acts defining D4R criteria, packaging no longer allowed on the market unless it is recyclable within grades A, B or C (higher or equal to 70%)

From 1 January 2035 or 5 years after the date entry into force of the implementing acts defining the methodology to assess recyclability at scale, packaging to be recycled at scale

From 1 January 2038, packaging no longer allowed on the market unless it is recyclable within grades A or B (higher or equal to 80%)

By 1 January 2035, EC to review the exceptions under paragraph 11, the appropriateness of their continuation and, where appropriate, present a legislative proposal

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Recyclability – Zoom in on D4R and recyclability at scale

By 1 January 2028

Delegated acts establishing design for recycling criteria and recyclability performance grades, as well as a framework for the modulation of EPR financial contributions

- D4R criteria and performance grades will have to consider several aspects, e.g. the ability of packaging waste to be separated into different recycling streams, the presence of substances of concern that negatively affect reuse or recycling. Such substances may also be restricted via delegated acts, as appropriate.
- The EC is empowered to adopt D4R criteria for additional packaging categories or to create sub-categories within those listed in Table 1 of Annex II.
- Economic operators will have to comply with any new or updated D4R criteria within 3 years of the date of EiF of the relevant delegated act.
- 18 months from the EiF of the delegated acts, EPR fees to be modulated according to the recyclability performance grades

By 1 January 2030

Implementing acts establishing the methodology for the "recycled-at-scale" assessment per packaging category listed in Table 2 of Annex II, supplementing Table 3 of Annex II with thresholds for the recycled-at-scale assessment

- The methodology shall at least be based on the quantities of packaging placed on the Union market and in each Member State; the quantities of recycled packaging waste in the Union and in each Member State; a chain of custody mechanism ensuring that packaging is recycled at scale.
- 18 months from the EiF of the implementing acts, EPR fees to be modulated according to recyclability performance grades
- By 2035, EC allowed to review the minimum thresholds for packaging to be considered recycled at scale as per Article 3(38) and where appropriate, present a legislative proposal to revise them

Table 1 of Annex II = Indicative list of packaging materials, types and categories referred to in Article 6.

Table 2 of Annex II = Indicative list of packaging materials and categories referred to in Article 6

Table 3 of Annex II = Recyclability performance grades

Article 3(39): 'packaging waste recycled at scale' 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).

Recyclability – Innovative packaging, derogations and compliance

INNOVATIVE PACKAGING

- 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
- When this derogation is used and before the innovative packaging is placed on the market, the economic operator shall notify the competent authorities, provide all technical details proving the innovative nature of the packaging and an indicative timeline to reach the recycled-at-scale requirements
- EC to monitor the impact of the derogation and, where appropriate, adopt a legislative proposal to amend it

➢ The definition of innovative packaging is provided in Article 3(46)

DEROGATIONS

- Article 6 does not apply to:

➢ Immediate packaging of medicinal products (for human and veterinary use)*
➢ Contact-sensitive packaging of medical devices (incl. in vitro diagnostics devices), of infant formula and follow-on formula, of processed cereal-based food and baby food, and of food for special medical purposes
➢ Outer packaging of medicinal products (for human and veterinary use)*
➢ Packaging used to transport dangerous goods
➢ Sales packaging made from lightweight wood, cork, textile, rubber, ceramic, porcelain or wax
➢ EC mandated to review, by 1 January 2035, the above derogations, assess the appropriateness of their continuation and, where appropriate, present a legislative proposal

COMPLIANCE

- Compliance with the requirements will have to be demonstrated in technical documentation as set out in Annex VII to the Regulation (Conformity assessment procedure)
- The compliance assessment shall include all integrated components of a packaging
- A separate assessment shall be done for integrated components that may become separated through mechanical stress during transportation or sorting
- A separate assessment shall also be carried out for each separate component in a packaging

➢ The definitions of integrated and separate component are provided in Article 3(43) and 3(44), respectively

* See relevant definitions in Directive 2001/83/EC and Regulation (EU) 2019/6

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Sustainability requirements

Recycled content

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Recycled content - Article 7

By 2030 and 2040, any plastic part of packaging will have to contain a minimum percentage of recycled content, at different levels depending on whether the packaging is or not contact-sensitive.

By 12 February 2028, **the EC will review the state of development of bio-based plastic packaging**. Based on such review, it will, where appropriate, present a legislative proposal to

- lay down sustainability requirements for bio-based feedstock in plastic packaging,
- lay down targets to increase the use of bio-based feedstock,
- introduce the possibility to achieve the targets of Article 7 by using bio-based plastic feedstock, in case suitable recycling technologies for food contact packaging complying with the requirements laid down in Regulation (EU) 2022/1616 are not available.

The targets are set per packaging type and format and will be calculated as an average per manufacturing plant and year.

The methodology for the calculation and verification of the targets will be adopted by the EC by 31 December 2026 and economic operators will have to comply with it by 1 January 2029 or 2 years after the methodology's adoption.



Compliance facts

Recycled content is a market access condition and compliance will have to be demonstrated in technical documentation as set out in Annex VII

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Recycled content - Requirements

Packaging format	By 2030 or 3 years from EiF of implementing act establishing methodology for calculation and verification of the targets	By 2040
- Contact sensitive packaging		
a) Made from PET as a major component, except SU plastic beverage bottles	30%	50%
b) Made from plastic materials other than PET, except SUP beverage bottles	10%	25%
c) Single-use plastic beverage bottles	30%	65%
d) Other plastic packaging	35%	65%

NB: EPR fees may (*voluntary*) be modulated based on the percentage of recycled content in packaging. The modulation shall consider sustainability criteria and environmental costs of the recycling technologies

For the purposes of the Article, recycled content shall be recovered from post-consumer plastic waste that:

- Has been collected within the Union pursuant to PPWR, or national SUPD transposition rules and WFD or has been collected in a 3rd country in accordance with standards equivalent to those provided in those EU legislations, and
- Has been recycled in installations located in the EU to which the Industrial Emissions Directive (IED) applies or has been recycled in a 3rd country installation to which equivalent rules apply. This latter condition shall only apply if also applicable to an installation located in the Union.

- By 31 December 2026, the EC shall adopt implementing acts establishing a methodology for the calculation and verification of the % of recycled content, possibly incl. via 3rd party audits.

Article 3(48) defines 'post-consumer plastic waste' as waste, as defined in Article 3(1) of Directive 2008/98/EC, that is plastic and that has been generated from plastic products that have been supplied for distribution, consumption or use and placed on the market of a Member State or of a third country.

- By 31 December 2026, EC to adopt delegated acts supplementing Regulation with sustainability criteria for plastic recycling technologies

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Recycled content - Derogations and other clauses

DEROGATIONS

- Article 7 does not apply to:
  - ➢Immediate and outer packaging of medicinal products (for veterinary and human use)*
  - ➢Contact-sensitive plastic packaging of medical devices (incl. in vitro diagnostics devices), and devices destined for research use and investigation, of food intended for infants and young children, of food for special medical purposes, and packaging of drinks and food typically used for young children
  - ➢Compostable plastic packaging
  - ➢Packaging used to transport dangerous goods
  - ➢Packaging of supplies, components, and immediate packaging components for the manufacturing of medicinal products (for veterinary and human use)
  - ➢Food contact plastic packaging in case recycled content poses a threat to human health and results in non-compliance with the general FCM Regulation
  - ➢To any plastic part representing less than 5% of the total weight of the whole packaging unit

* See relevant definitions in Directive 2001/83/EC and Regulation (EU) 2019/6

SAFETY CLAUSE

- EC empowered to adopt delegated act to adjust set recycled content targets, where justified by lack of availability or excessive prices of recycled plastics that can have adverse effects on human or animal health, security of food supply or the environment. Delegated act to be adopted only in exceptional cases.

REVIEW CLAUSE

- By 12 February 2032, EC to present a report reviewing the implementation of the 2030 targets and evaluating the feasibility of the targets set for 2040. Where appropriate, legislative proposal to amend Article 7, in particular the 2040 targets.
- By 12 February 2032, EC to review the situation regarding the use of recycled packaging materials in packaging other than plastic and assess the appropriateness of setting measures or targets for the use of recycled content in such other packaging via legislative proposal.

COMPLIANCE

- Compliance will have to be demonstrated by economic operators in technical documentation as set out in Annex VII (Conformity assessment procedure).
- The definitions of economic operators in Article 3(12) comprises manufacturers, suppliers of packaging, importers, distributors, authorized representatives, final distributors and fulfilment service providers.

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Sustainability requirements

Compostability

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Compostable packaging - Article 9

By 12 February 2028, several packaging formats will have to be compostable (according to specific conditions) to be allowed on the EU market.

Article 9 also foresees the possibility for Member States to require that certain formats are only allowed on their national market if compostable.

In addition, the article empowers the EC to analyse whether compostability should be mandated for additional packaging formats and, where appropriate, present a legislative proposal (no timeline attached and voluntary, *may*)

By 12 February 2026, EC to request the European standardisation organisations to prepare or update harmonised standards laying down detailed technical specifications of the requirements on compostable packaging.

By the same date, EC to request the European standardisation organisations to also prepare harmonised standards including technical specifications of the requirements on home compostable packaging of certain packaging formats.



Compliance facts

Compostability is a market access condition for certain packaging formats. Compliance shall be demonstrated by manufacturers or importers in technical documentation, as set out in Annex VII

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Compostable packaging - continued

OBLIGATION	FORMATS IN SCOPE	DEADLINE	OBLIGATED PARTY
Be compostable in line with the standard for composting in industrially controlled conditions in bio-waste treatment facilities and be compatible, where required by the Member States, with home composting standards (to be defined in harmonised standards, by 1 year after EiF of the Regulation) NB: The requirement applies by way of derogation from Article 6(1) on recyclability	a) Permeable tea, coffee or other beverage bags or soft after-use system single-serve units that contain tea, coffee or another beverage and which are intended to be used and disposed of together with the product b) Sticky labels attached to fruit and vegetables NB: In scope of Article 9(1) and without prejudice to the possibility in Article 9(2) for Member States to mandate the compostability requirement for additional formats.	By 12 February 2028	Manufacturers/ Importers
Member States may mandate that additional packaging formats are made available on their market for the first time only if they are compostable NB: The requirement applies by way of derogation from Article 6(1) on recyclability. Furthermore, it applies where Member States allow waste with similar biodegradability and compostability properties to be collected together with bio-waste.	a) Non-permeable tea, coffee or other beverage system single-serve unit intended for use in a machine and which is used and disposed of together with the product (composed of material other than metal) b) Lightweight and very lightweight plastic carrier bags c) Additional packaging formats for which Member States required, prior to the date of application of the PPWR (± Q4 2024+18 months), that they are compostable. NB: Article 25 does not apply to formats described in Art. 9.2(b), above described as point c).	NA and depending on national requirements	Manufacturers/ Importers

*NB: Article 9(1) and (2) apply without prejudice to Article 6(1) on recyclability. However, Article 9(3) requires that, by 3 years from the EiF of the Regulation (Q1 2028), packaging made of biodegradable plastic polymers and other biodegradable materials allow material recycling in accordance with Article 6, and without affecting the recyclability of other streams.

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Sustainability & other requirements

Minimisation & prevention

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Packaging minimisation - Article 10

By 1 January 2030, packaging placed on the EU market shall be designed so that its weight and volume is reduced to the minimum necessary to ensure its functionality, considering its shape and material.

Packaging not compliant with the performance criteria of Annex IV and packaging with characteristics that are aimed at increasing perceived volume (incl. double-walls, false bottoms, unnecessary layers) shall not be placed on the market.

The Article lists a few derogations (see next slide).

Annex IV refers to the methodology for packaging minimisation assessment, incl. a list of performance criteria such as product protection, packaging manufacturing processes, logistics, etc.

Essential requirements for minimisation under the PPWD will continue to apply until 31 December 2029 (Article 70(1)(b)).



Compliance facts

Packaging minimisation is a market access condition. Compliance shall be demonstrated by manufacturers or importers in technical documentation, as set out in Annex VII

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Packaging minimisation - Derogations and other clauses

DEROGATIONS

•Article 10 does not apply to:

➢Packaging designs protected by a Community design under Regulation (EC) 6/2002

➢Design rights falling under Directive 98/71/EC

➢Packaging whose shape is a trademark falling under Regulation (EU) 2017/1001 or Directive (EU) 2015/ 2436

➢Packaged products or beverages belonging to geographical indications protected under EU law for wine and spirit drinks or covered by a quality scheme as referred to in Regulation (EU) 1151/2012

NB: the above exemptions only apply to design and trademarks protected as of the date of EiF of the Regulation, and only if the minimisation requirements affect the novelty or individual character of the packaging, or affect the trademark preventing to

STANDARDISATION

- By 12 February 2027, EC to request the European standardisation organisations to prepare or update, as appropriate, harmonised standards laying down the methodology for the calculation and measurement of compliance with the minimisation requirements.
- For most common packaging types and formats (not further specified), the standards should specify max. adequate weight and volume limits and if appropriate, wall thickness and max. empty space.

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Obligations related to excessive packaging- Article 24

By 1 January 2030, or 3 years from the EiF of the implementing acts defining the methodology to calculate the empty space ratio, a max. 50% empty space ratio will be allowed in grouped packaging, transport packaging or e-commerce packaging.

By 12 February 2028, 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.

Article 24(3) clarifies the meaning of 'empty space' and 'empty space ratio'. Article 24(4) provides the meaning of 'empty space' for sales packaging.



Compliance facts

The requirements apply respectively to economic operators filling grouped packaging, transport packaging or e-commerce packaging, and to economic operators filling sales packaging

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Excessive packaging - Methodologies and other clauses

METHODOLOGIES

- By 12 February 2028, EC empowered to establish the methodology for the calculation of the empty space ratio for grouped packaging, transport packaging and e-commerce packaging. That methodology shall consider special packaging characteristics, among others, irregular shapes, packaging containing more than one sales unit or liquid products, possible damage and space needed to attach shipment labels.
- For sales packaging of products subject to settlement during transport or where headspace is needed to protect food, compliance shall be assessed as the pack-fill level at the point of filling. It is clarified that air or protective gases between or within packed foodstuff shall not be considered as empty space.

DEROGATIONS

- Economic operators using sales packaging as e-commerce or using reusable packaging within a system for reuse are exempted from complying with the max. 50% empty space ratio. They should however comply with the minimisation requirements set out in Article 10.

REVIEW CLAUSE

- By 12 February 2032, EC to review the 50% empty space ratio and the related exemptions and assess the possibility to establish empty space ratio for sales packaging, particularly for toys, cosmetics, do-it-yourself kits and electronic products.

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Packaging waste prevention - Article 43

The PPWR introduces the following Member State **packaging waste prevention targets:**

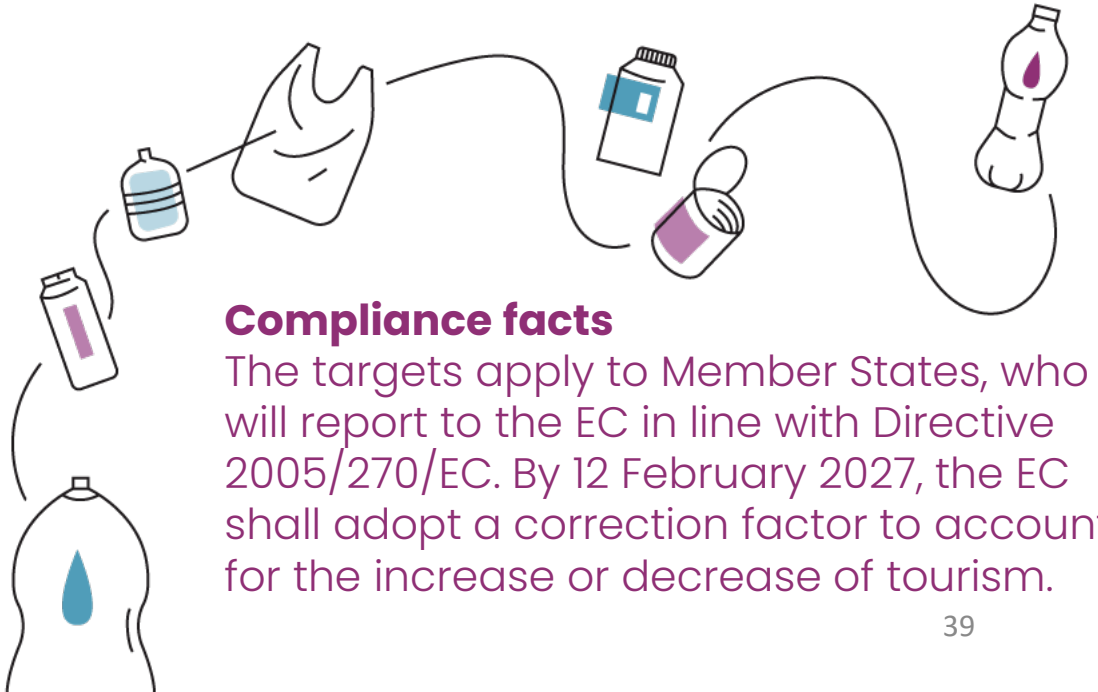
- At least 5% by 2030
- At least 10% by 2035
- At least 15% by 2040

Targets are set per capita, as compared to the packaging waste generated in 2018. Member States may, by 2025, request the EC to use another base year than 2018, under the condition that there is substantiated evidence justifying the request.

In achieving the targets, **Member States shall endeavour to reduce the amount of plastic packaging waste generated.** By 12 February 2032, the Commission shall review the targets and assess the need to include specific targets for certain packaging materials, by legislative proposal.

Member States shall implement measures aimed at reaching the PPWR waste prevention objectives, such as economic instruments or other incentives, and additional measures to those specified in PPWR.

They may also introduce packaging waste prevention measures that exceed the minimum targets set by the Regulation (i.e. 5%, 10% and 15%).



Compliance facts

The targets apply to Member States, who will report to the EC in line with Directive 2005/270/EC. By 12 February 2027, the EC shall adopt a correction factor to account for the increase or decrease of tourism.

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Packaging restrictions – Article 25 and Annex V

From 1 January 2030, the packaging formats listed in Annex V to the Regulation will no longer be allowed on the EU market

By 12 February 2032, EC to assess the positive environmental impact of the restrictions and their derogations, considering the availability of alternative packaging solutions meeting safety and hygiene requirements applicable to contact-sensitive packaging.

Based on this assessment, **EC to review Article 25 and Annex V** and assess the appropriateness of introducing new restrictions, the relevance of maintaining the set exemptions and derogations and, where necessary, present a legislative proposal.

Member States may maintain packaging bans adopted prior to 1 January 2025 for packaging in the formats and for the purpose listed in Annex V, but made from materials not listed in Annex V.

Under specific conditions, Member States may also exempt micro-enterprises from the ban applicable to SUP packaging for foods and beverages filled and consumed within HORECA premises (Annex V, point 3).



Compliance facts

Failure to comply with the requirements of Article 25 is subject to penalties

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Packaging restrictions -Annex V

	Packaging format	Restricted use	Illustrative example
1.	Single-use plastic grouped packaging	Plastic packaging used at the point of sale to group goods sold in bottles, cans, tins, pots, tubs, and packets designed as convenience packaging to enable or encourage consumers to purchase more than one product. This excludes grouped packaging necessary to facilitate handling.	Collation films, shrink wrap
2.	Single use plastic packaging for unprocessed fresh fruit and vegetables	Single use plastic packaging for less than 1.5 kg pre-packed fresh fruit and vegetables. Member States may set up exemptions to this restriction if there is a demonstrated need to avoid water loss, or turgidity loss, microbiological hazards or physical shocks, oxidation, or if there is no other possibility to avoid commingling of organic fruits and vegetables with non-organic fruits and vegetables in compliance with requirements in Regulation EU 2018/848, on organic production and labelling of organic products, on certification or labelling, without entailing disproportionate economic and administrative costs.	Nets, bags, trays, containers
3.	Single use plastic packaging	Single use plastic packaging for foods and beverages filled and consumed within the premises in the HORECA sector, which include all eating areas inside and outside a place of business, covered with tables and stools, standing areas, and eating areas offered to the end users jointly by several economic operators or third party for the purpose of food and drinks consumption. Establishments in the HORECA sector that do not have access to drinking water are exempted.	Trays, disposable plates and cups, bags, boxes
4.	Single use plastic packaging for condiments, preserves, sauces, coffee creamer, sugar, and seasoning in HORECA sector	Single use plastic packaging in the HORECA sector, containing individual portions or servings, used for condiments, preserves, sauces, coffee creamer, sugar and seasoning, except in the following cases: A) such packaging is provided together with take-away ready-prepared food intended for immediate consumption without the need of any further preparation; B) such packaging is required to ensure safety and hygiene in establishments where there is a medical requirement for individualised care, such as hospitals, clinics, nursing homes.	Sachets, tubs, trays, boxes
5.	Single use accommodation sector packaging intended for an individual booking	Single use packaging for cosmetics, hygiene and toiletry products for the use in the accommodation sector, as described in NACE Rev. 2 – Statistical classification of economic activities, intended for an individual booking only and intended to be discarded before the next guest arrives.	Shampoo bottles, hand and body lotion bottles, sachets around bar soap
6.	Very lightweight plastic carrier bags	Very lightweight plastic carrier bags, except for very lightweight plastic carrier bags required for hygiene reasons or provided as sales packaging for loose food when this helps to prevent food wastage.	Very thin bags provided for bulk groceries

By 12 February 2027, the EC shall publish guidelines, in consultation with Member States and EFSA, explaining Annex V in more detail, incl. examples of packaging formats in scope, any exemptions, and providing an exemplificative list of fruits and vegetables which are exempted.



Obligations of economic operators

Reuse & refill

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Reuse and refill - Articles 29 to 33

The PPWR will introduce **reuse targets for packaging used for different applications**, such as for transport and beverages, **from 1 January 2030 and 2040** (see next slide).

The text also foresees specific **derogations** and Member States will be allowed to exempt economic operators from the reuse obligations for a period of 5 years based on several conditions. The EC is also empowered to adopt additional exemptions.

In addition to reuse targets, Articles 32 and 33 of the Regulation introduce **refill and reuse obligations for final distributors operating in the take-away sector.**

Member States are allowed to set higher reuse targets for economic operators, as well as to require manufacturers or final distributors to make available in reusable packaging products other than those covered by Article 29.

By 12 February 2027, EC to adopt delegated act setting a minimum number of rotations for reusable packaging for packaging formats most frequently used in reuse, considering hygiene and other requirements, such as logistics.

By 1 January 2034, EC to review the implementation of the 2030 targets and evaluate the feasibility of achieving the targets set for 2040.



Compliance facts

Targets apply to economic operators and final distributors and shall be calculated for the period of a calendar year. Article 30 provides specific rules on the calculation of the targets

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Reuse targets - Targets and specific derogations

Application	Obligated party / Packaging format	From 1 January 2030 [From 1 January 2040]	Specific derogations
Transport (see derogations)	Economic operators / Transport or sales packaging used to transport goods within the Union, as listed in Article 29(1), incl. e-commerce, in the forms of pallets, foldable plastic boxes, boxes, trays, plastic crates, intermediate bulk containers, pails, drums and canisters of all sizes and materials, incl. flexible formats or pallet wrappings or straps NB: Operators using transport or sales packaging used for transporting products, as listed in Article 29(1), within the EU between different sites on which it performs its activity; or between any of the sites on which it performs its activity and the sites of any other linked or partner enterprise shall fulfil 100% reuse targets from 2030*. The same applies to operators using transport packaging or sales packaging used for transportation, as listed in Article 29(1), to delivering products to another economic operator within the same Member State.	At least 40% [shall endeavour to use at least 70%]	Transport packaging or sales packaging: (a) used for the transportation of dangerous goods; (b) used for the transportation of the large-scale machinery, equipment and commodities for which packaging is custom-designed; (c) in flexible format, used for transportation, that is in direct contact with food and feed, and food ingredients; (d) in the form of cardboard boxes.
Grouped (see derogations)	Economic operators / Grouped packaging in the form of boxes, excl. cardboard, outside of sales packaging to group products and create a stock-keeping or distribution unit	At least 10% [shall endeavour to use at least 25%]	Cardboard boxes
Beverages (see derogations)	Final distributor – Economic operators / Alcoholic and non-alcoholic beverages in sales packaging NB: The final distributor shall contribute in a fair proportion to the achievement of the targets by packaged products manufactured under its brand. EC to publish guidelines to explain in more detail the products in scope by 2 years from the EiF of PPWR (Q1 2027). Article 29(9) also foresees an obligation for final distributors to take back, free of charge, all reusable packaging made available on the market by them within a specific system for reuse. End users shall be able to return the packaging at the location where packaging is handover to them or in immediate proximity. The final distributor shall fully redeem any deposit associated to the packaging. Finally, Member States may allow final distributors to form pools to meet their reuse obligations, under certain conditions. The EC will, by 1 January 2028, supplement the Regulation to establish detailed conditions and reporting requirements for pooling arrangements.	At least 10% [shall endevour to use at least 40%]	• Highly perishable beverages, milk and milk products, and their dairy analogies • Grapevine products, aromatised wines, and similar products • alcohol-based spirituous beverages • If final distributors have a sales area of not more than 100 m2 (sales area threshold can be modified by EC via delegated acts) • If final distributors' sales area is located in an island with a population density of less than 54 persons/ Km2 (at Member States' discretion)

* Interpretation to be confirmed/ clarified by the co-legislators

Reuse - Horizontal derogations and other clauses

HORIZONTAL DEROGATIONS

•Article 29 does not apply to economic operators that, during a calendar year, made not more than 1000 kg of packaging available on the market within the territory of a Member State (threshold can be modified by EC) and complied with the definition of micro-enterprise

•Member States may also exempt economic operators for a period of 5 years (renewable), under the conditions that:

- the exempting Member State exceeds by 5% the recycling targets per material to be achieved by 2025 and is expected to exceed by 5% the 2030 targets;
- the exempting Member State is on track to achieve its waste prevention targets and can demonstrate to have reached at least 3% waste prevention by 2028 (compared to a 2018 baseline);
- the economic operators have adopted a corporate waste prevention and recycling plan that contributes to achieving the PPWR waste prevention and recycling objectives of the Regulation

•EC is empowered to adopt, via delegated acts:

- Exemptions when economic operators encounter economic constraints related to compliance with the targets
- Exemptions in case of hygiene and food safety issues preventing the achievement of the targets
- Exemptions in case environmental issues prevent the attainment of the targets

METHODOLOGIES*

- By 30 June 2027, EC to adopt implementing acts establishing detailed calculation rules and methodology regarding the reuse targets
- The attainment of the targets shall apply from 1 January 2030 or 18 months after the date of EiF of the implementing acts, whichever is the latest

REPORTING

- Economic operators shall report to competent authorities data concerning the attainment of the reuse targets for each calendar year
- The report shall be submitted within six months after the end of the reporting year for which the data are collected, and it should be first done for the year starting on 1 January 2030
- The competent authorities mandated to establish electronic systems for the reporting and allowed to request additional information to prove the reliability of reported data

REVIEW CLAUSES

- By 1 January 2034, EC to review the implementation of the 2030 targets and evaluate the feasibility of the 2040 targets.
- By 12 February 2027, EC to establish a European Observatory on reuse

*NB: In relation to Article 29(6) and 33, Article 30 also specifies that the final distributor or manufacturer, as appropriate, shall calculate for each target separately: the total number of units of sales or total volume of beverages in reusable packaging within a system for reuse made available in a Member State in a calendar year.

Refill obligation & reuse offer for the take-away sector - Articles 32 & 33

PROVISION	OBLIGATION	DEADLINE	OBLIGATED PARTY	DEROGATIONS
Article 32	Provide a system for consumers to bring their own containers to be filled AND Inform consumers at the point of sale about the possibility to obtain products in refillable containers provided by the consumer	By 12 February 2027	Final distributors conducting business in the HORECA sector • making available in take-away packaging hot or cold beverages • making available in take-away packaging ready-prepared food	NA
Article 33	Provide to consumers the option of packaging within a system for reuse AND Inform consumers at the point of sale about the possibility to obtain products in reusable formats NB: products filled in reusable packaging shall be offered at no higher price and under no less favourable conditions that SU options.	By 12 February 2028	Final distributors conducting business in the HORECA sector • making available on the territory of a MS for take away in take away packaging cold or hot beverages or ready-prepared food	Final distributors if they fall within the definition of micro enterprise
Article 33(5)	Shall endeavour to offer 10% of products for sale in a reusable packaging format NB: Member States allowed to set targets going beyond 10%	From 2030	Economic operators	



Packaging & waste management
Extended Producer Responsibility

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Extended Producers Responsibility

± By Q1 2026

By 12 February 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 mid-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

*NB: registration in the register is a pre-condition for producers to place packaging on the Market

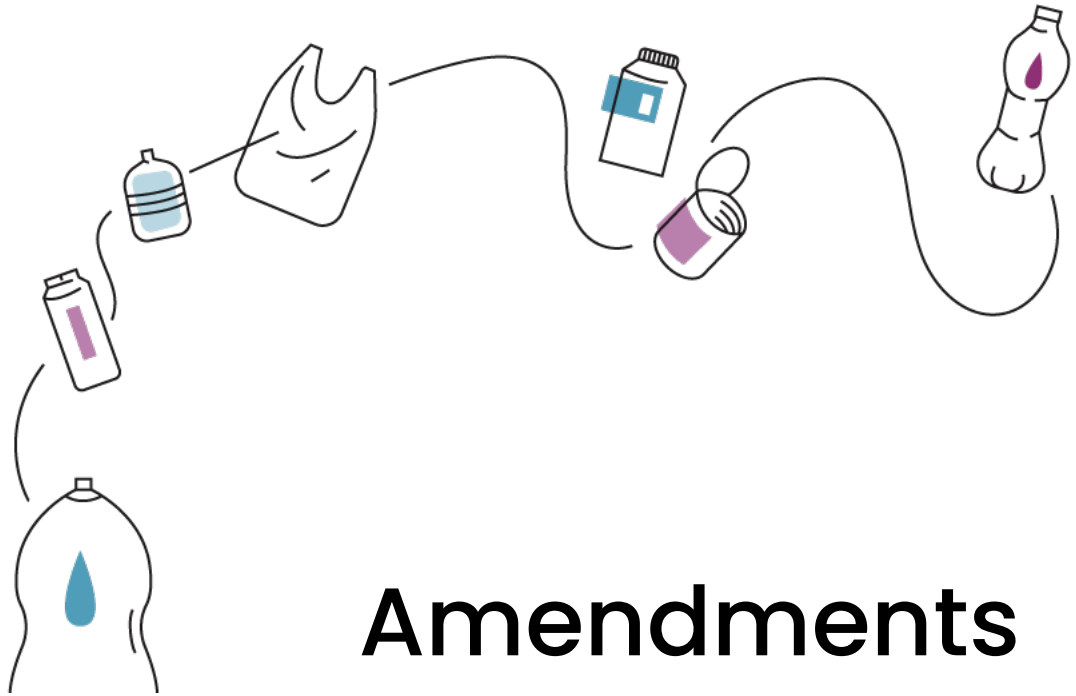
- In addition to the costs referred to in Article 8a(4) of the WFD, EPR fees to cover:
  - The costs of waste receptacles' labelling
  - The costs of compositional surveys of collected mixed municipal waste
  - Possibility for Member States to establish litter clean-up costs (Recital 124)
- Member States to ensure that EPR schemes and DRS dedicate a minimum share of their budget to financing reduction and prevention actions.
- Modulation of EPR fees based on packaging recyclability performance grades (mandatory) and recycled content (voluntary)



Compliance facts

The Packaging and Packaging Waste Directive (2018) mandated Member States to ensure that EPR schemes are established for all packaging by 31 December 2024

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Amendments

Interplay with the SUPD

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Amendments to the Single-Use Plastics Directive (SUPD) - Article 67

Article 67 of the PPWR introduces amendments to the SUPD. While, as a rule, the SUPD remains a *lex specialis*, this principle does not apply in relation to the following:

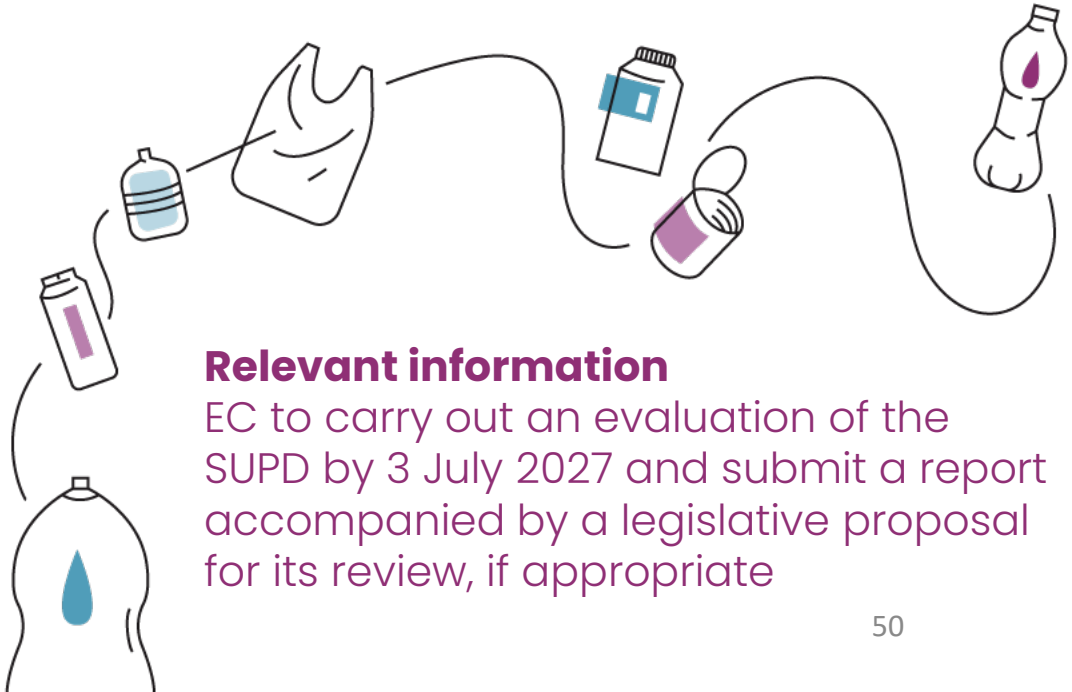
a) The **Commission's guidelines on Article 25 and Annex V** of PPWR will prevail when in conflict with the consumption reduction measures foreseen for SUP packaging for food and beverages in the HORECA sector

b) The **SUPD recycled content targets** for beverage bottles and related rules on reporting are repealed as of 1 January 2030

c) A **ban** on SUP food and beverage containers and cups for beverage made of XPS is added to the SUPD Annex - Part B

d) Additional (new) **bans** are also added to the SUPD: shrink wrap used in airports or train stations for protection of luggage, chips of polystyrene and other plastics used to protect packaged goods during transport and handling, and multi-pack plastic rings used as grouped packaging

NB: The bans mentioned in points c and d will apply from 4 years from the EiF of PPWR (Q1 2029).



Relevant information

EC to carry out an evaluation of the SUPD by 3 July 2027 and submit a report accompanied by a legislative proposal for its review, if appropriate



Obligations of economic operators

Manufacturers, suppliers, importers & distributors

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Obligations of economic operators - Articles 15, 16, 18 & 19

Packaging will be required to fulfill the PPWR's sustainability requirements to be placed on the EU market.

To prove **packaging's compliance with the PPWR**, economic operators placing packaging on the market (see more details in next slides) will need to carry out a **conformity assessment procedure** and draw up **technical documentation,** that they will need to keep for a number of years and present to market surveillance authorities when requested.

The definitions of "manufacturer", "supplier", "importer" and "distributor" are provided in Article 3 of the PPWR, paragraphs 14, 16, 17 and 18.



Compliance facts

These obligations are not linked to specific dates of application in the PPWR provisional agreement, meaning they might apply as early as from 12 August 2026.

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Obligations of economic operators - Articles 15, 16, 18 & 19

	MANUFACTURERS' OBLIGATIONS	IMPORTERS' OBLIGATIONS
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 carry out* the conformity assessment procedure referred to in Article 38, and shall draw up technical documentation referred to in Annex VII ▪ In case the packaging's conformity may be affected, shall carry out* a re-assessment in accordance with the procedure specified in Article 38 and Annex VII * *or have it carried on their behalf*	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.
Information to be provided	Shall ensure that 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	
	▪ Shall indicate on the packaging or on a QR code or another data carrier their name, registered trade name or registered trademark as well as the postal address, and where available, the electronic means of communication, where they can be contacted ▪ When that is not possible, required information to be provided as part of the information through the digital data carrier referred to in Article 12.2 or the data carrier referred to in Article 12.5, or in a document accompanying the packaged product.	▪ 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 EU declaration of conformity and technical documentation referred to in Annex VII 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	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.	

Obligations of economic operators – Articles 15, 16, 18 & 19

SUPPLIERS' OBLIGATIONS	DISTRIBUTORS' OBLIGATIONS
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.	Before making packaging available on the market, shall verify that: ▪ the producer, that is subject EPR obligations, is registered in the register of producers referred to in Article 44; ▪ the packaging is labelled in accordance with Article 12; ▪ the manufacturer and the importer have complied with the requirements set out in Article 15.5 and 15.6 and Article 18.3 respectively.
	▪ Where considers or has reason to believe that the packaging is not in conformity with the requirements set out in Articles 5 to 12, or that the manufacturer or importer is not complying with those applicable requirements, shall not make the packaging available on the market until it has been brought into conformity or until the manufacturer or importer complies. ▪ If the packaging was made available on the market with the packaged product already, shall make sure that the corrective measures necessary to bring that packaging into conformity, to withdraw it or recall it, as appropriate, are taken. (and immediately inform market surveillance authorities)
	Upon a reasoned request from a national authority, shall provide that authority with all the information and documentation to which they have access and that is relevant for demonstrating the conformity of the packaging with the applicable requirements set out in Articles 5 to 12. That information and documentation shall be provided in electronic form and, on request, in paper form.

- *NB: According to Article 21, 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, then the **provider of the packaging** shall be considered the **manufacturer** for the purpose of this Article.*

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Conformity of packaging – Articles 35 to 39

Presumption of conformity

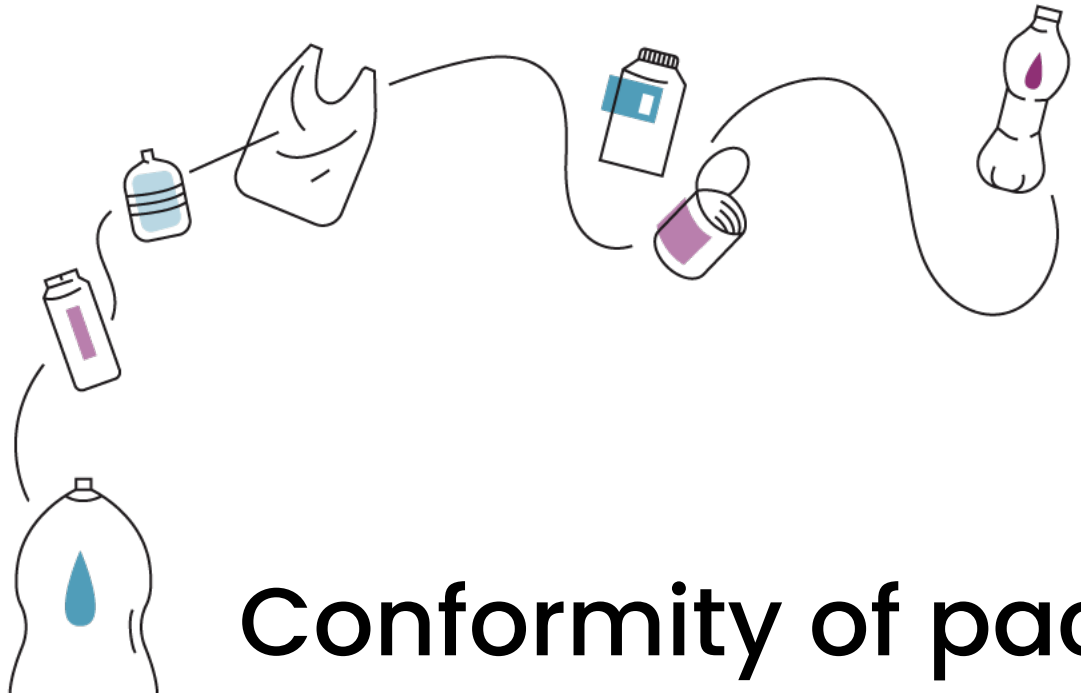
- For the purposes of compliance and verification of compliance of packaging with the requirements set in Articles 5 to 12, 24 and 26 of the PPWR, tests, measurements and calculations shall be made using reliable, accurate and reproducible methods, which take into account the generally recognised state-of-the art methods, and whose results are considered to be of low uncertainty.
- Packaging in conformity with harmonised standards that have been published in the EU Official Journal shall be presumed to be in conformity with the requirements covered by those standards set out in Articles 5 to 12, 24 and 26.

- Possibility for the EC to establish, via implementing acts, common specifications for the requirements set out in Articles 5 to 12 and Article 26(provided certain conditions are fulfilled, see Article 37.2)
- Packaging in conformity with those common specifications shall be presumed to be in conformity with the requirements set out in Articles 5 to 12 and Article 26

Conformity assessment procedure & EU declaration of conformity

- The conformity assessment of packaging with the requirements set out in Articles 5 to 12 shall be carried out in accordance with the procedure set out in Annex VII of the PPWR
- The EU declaration of conformity shall state that the fulfilment of the requirements set out in Articles 5 to 12 has been demonstrated. It shall have the model structure provided in Annex VIII, contain the elements specified in the module set out in Annex VII, and be continuously updated.
- Where packaging or a 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 shall state the Union acts concerned and their publication references. It may be a dossier made up of relevant individual EU declarations of conformity.

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Conformity of packaging
Enforcement & market surveillance

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Formal non-compliance - Article 62

What non-compliance of an economic operator with the PPWR means

a. the EU declaration of conformity has not been drawn up;
b. the EU declaration of conformity has not been drawn up correctly;
c. the QR code or data carrier referred to in Article 12 do not provide access to the information required in accordance with that Article;
d. the technical documentation referred to in Annex VII is not available, is not complete or contains errors;
e. the information referred to in Article 15(6) or Article 18(3) is absent, false or incomplete;
f. any other administrative requirement set out in Article 15 or Article 18 is not fulfilled;
g. the requirements on restrictions on uses of certain packaging formats or on excessive packaging set out in Articles 24 and 25 are not complied with;
h. in relation to reusable packaging, the requirements on the establishment, operation or participation in a system for re-use referred to in Article 27 are not fulfilled;
i. in relation to refill, the information requirements set out in Article 28(1) and (2) are not fulfilled;
j. the requirements on the refill stations set out in Article 28(3) are not fulfilled;
k. the re-use targets in Article 29 are not achieved;
l. the refill obligations in Article 32 and re-use offer obligations in Article 33 are not fulfilled;
m. the requirements on recyclable packaging set out in Article 6 are not fulfilled;
n. the requirements on minimum recycled content in plastic packaging set out in Article 7 are not fulfilled.

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Enforcement and market surveillance - Articles 58, 59, 60 & 62

Steps	Non-compliant packaging	Non-compliant packaging presenting a risk to the environment or human health	Compliant packaging presenting a risk to the environment or human health
1	Where a Member State finds that a packaging is non-compliant with the PPWR (for any reason referred to in Article 62), it shall require the economic operator to put an end to the non-compliance concerned.	If they have sufficient reason to believe that a packaging presents a risk, without undue delay, market surveillance authorities to carry out evaluation of the packaging against requirements of the PPWR that are relevant to the risk.*	
2	Where the non-compliance referred to in the previous slide, points a to f, persists, the Member State concerned shall take all appropriate measures to prohibit the packaging being made available on the market or ensure that it is recalled or withdrawn from the market.	If the market surveillance authorities' evaluation finds the packaging is not compliant with the PPWR, economic operator shall take appropriate and proportionate corrective measures without delay, within a reasonable period prescribed by the market surveillance authorities, to bring packaging in compliance with the PPWR. Those corrective measures shall be taken for all packaging made available on the market throughout the EU.	Where a Member State finds that, although packaging is in compliance with the PPWR's sustainability requirements (Article 5 to 12), it presents a risk, the Member State shall require the economic operator without delay, within a reasonable period prescribed by the market surveillance authorities, to take all appropriate measures to ensure packaging no longer presents a risk, to bring it into conformity, to withdraw it from the market, or to recall it. Those measures shall be taken for all packaging made available on the market throughout the EU.
3	Where the non-compliance referred to in the previous slide, points g to k, persists, the Member State concerned shall apply the rules on penalties applicable to infringements of the PPWR. NB: Penalties applicable to infringements of the PPWR are to be defined by each Member State according to Article 68.	Where market surveillance authorities consider that non-compliance is not restricted to their territory, they shall inform the EC and the other Member States of the results of their evaluation and of actions requested to economic operator.	The Member State shall immediately inform the European Commission and the other Member States of its findings and actions taken.
4		If corrective measures are not taken within the period prescribed by the market surveillance authorities, or if non-compliance persists, market surveillance authorities to take measures to: • Prohibit the making available of the packaging on their national market • Withdraw the packaging from that market • Or recall it	• Without any delay, the EC shall consult the Member State and relevant economic operator to evaluate the national measures taken. On the basis of the results of this evaluation, EC to adopt implementing act determining whether the national measure is justified or not and, where necessary, propose appropriate measures.
5		If objections are raised against a Member State's conclusion of non-compliance of a packaging, EC to consult the Member State and relevant economic operator to evaluate the national measures. If the national measures are considered unjustified, Member State to withdraw them.	

** in case of risk to human health concerns relating to contact sensitive packaging subject to specific legislation aimed at protecting human health, the surveillance authorities shall not evaluate but alert the authorities competent for controlling those risks*



Final provisions

Repeal, transitional provisions & evaluation

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Repeal, transitional provisions and evaluation*

The PPWD will be repealed from 12 August 2026.

However, the following transitional provisions will apply

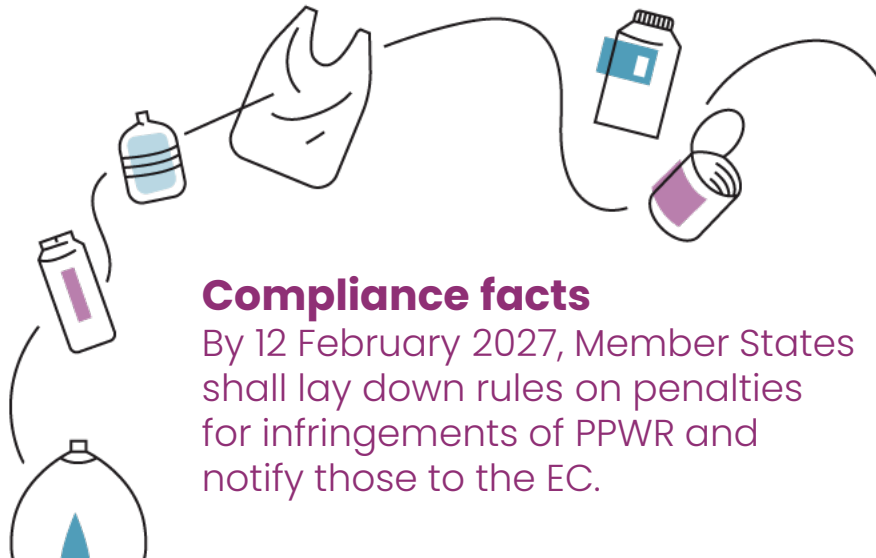
- Article 8(2) of PPWD related to alphanumerical codes applies until 30 months from the EiF of the implementing act defining sorting instructions and other marking requirements.
  =~Q2 2029
- Article 9(1) and (2) of PPWD, related to packaging requirements specific to the manufacturing and composition of packaging (minimisation), apply until 31 December 2029

Article 5(2) and (3) of PPWD (reuse) and Article 6(1) (d) and (e) and 6a of PPWD (recovery and recycling) applies until the last day of the calendar year 2028

- Articles 12(3a), (3b), (3c) and (4) of PPWD (reporting by Member States) apply until 31 December 2027. This is at the exception of requirements related to the transmission of data to the EC which applies until 31 December 2029
- Decisions 2001/171/EC (conditions for a derogation for glass packaging in relation to the heavy metal concentration levels) and 2009/292/EC (conditions for a derogation for plastic crates and plastic pallets in relation to the heavy metal concentration levels) remain in force and apply until the adoption of the delegated acts adopted pursuant to Article 5(7) PPWR
- Member States are allowed to maintain national bans on packaging in the formats and for the purposes listed in point 2 and 3 of Annex V (SUP packaging for unprocessed fresh fruit and vegetables and SUP packaging for foods and beverages filled and consumed within the premises in the HORECA sector) until 1 January 2030. Article 4(3) (additional national requirements not to conflict with those set out in the Regulation) shall not apply in the meantime.

The PPWR's entry into force is on the 20th day following its publication in the OJ (11 February 2025) and it applies from 12 August 2026.

Article 69 foresees the evaluation of the PPWR by 12 August 2034, including its contribution to the internal market and the improvement of the environmental sustainability of packaging.



Compliance facts

By 12 February 2027, Member States shall lay down rules on penalties for infringements of PPWR and notify those to the EC.

Overview of requirements for economic operators

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Disclaimer

The following section lists in a succinct manner the different requirements of economic operators included in the PPWR. The tables, however, do not capture derogations. They should therefore be read in conjunction with the previous chapter, “A deep-dive into the new PPWR”.

Please note that the deadlines related to the different provisions indicated with the symbol “±” represent an estimation of their timing of application and are based on the PPWR’s date of entry into force (11 February 2025). The exact timing of application of certain measures therefore remains to be confirmed.

When the deadlines are indicated as “NA”, the text did not provide a clear date of application. The assumption is, in those cases, that they will apply from the date of application of the PPWR, i.e. 18 months following the entry into force of the Regulation (from 12 August 2026). The dates of application of the provisions are sorted in chronological order.

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Requirements for economic operators

Article	Deadline	Requirement
Article 11.1– Reusable packaging	From 11 February 2025	Packaging placed on market shall be considered to be reusable where it fulfills conditions of Article 11.1.
Article 5.5 – Substances in packaging	From 12 August 2026	Food contact packaging shall not be placed on the market if it contains per- and polyfluorinated alkyl substances (PFASs) in a concentration equal to or above the indicated limit values
Article 32.1a/b – Refill obligation for takeaway sector	By 12 February 2027	A final distributor that conducts its business activity in the HORECA sector and make available on the territory of a Member State: ▪ in take-away packaging cold or hot beverages ▪ in take-away packaging for ready-prepared food … shall provide a system for consumers to bring their own container to be filled
Article 9.1– Compostable packaging	By 12 February 2028	Packaging referred to in Article 3(1f)(permeable tea, coffee or beverage bags) and sticky labels affixed to fruit and vegetables shall be compatible with standard for composting in industrially controlled conditions in bio-waste treatment facilities and with home-composting standards (when required by Member States)
Article 9.3 – Compostable packaging	By 12 February 2028	Packaging other than that referred to in paragraphs 1 and 2, including packaging made of biodegradable plastic polymers and other biodegradable materials, shall be designed for material recycling in accordance with Article 6
Article 24.4 – Excessive packaging	By 12 February 2028	Economic operators who fill sales packaging shall ensure that empty space is reduced to the minimum necessary for ensuring the packaging functionality, including product protection

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Requirements for economic operators

Article	Deadline	Requirement
Article 33.1 – Reuse offer for takeaway sector	By 12 February 2028	A final distributor conducting its business activity in the HORECA sector and making available on the market on the territory of a Member State • in take-away packaging cold or hot beverages or • ready-prepared food intended for immediate consumption without the need of any further preparation filled into a container at the point of sale for take-away … shall give consumers the option of packaging within a system for re-use
Article 12.1– Labelling	From 12 August 2028, or 24 months from IA EIF, whichever is the latest	Packaging (except transport packaging and packaging part of a DRS, but including e-commerce packaging) shall be marked with a harmonised label containing information on its material composition in order to facilitate consumer sorting
Article 12.1 – Labelling	From 12 August 2028, or 24 months from IA EIF, whichever is the latest	For packaging referred to in Article 9.1 and, where applicable 9.2, material composition label shall indicate that the material is compostable, that it is not suitable for home composting, and that compostable packaging is not be discarded in nature
Article 12.1 – Labelling	From 12 August 2028, or 24 months from IA EIF, whichever is the latest	Packaging subject to DRS as referred to in Article 50(1) shall be marked with a clear and unambiguous label
Article 12.1 - Labelling	From 12 August 2028, or 24 months from IA EIF, whichever is the latest	Packaging placed on the market containing substances of concern shall be marked by means of standardised, open, digital-marking technologies

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Requirements for economic operators

Article	Deadline	Requirement
Article 12.4 – Labelling	From 12 August 2028, or 24 month from IA EIF, whichever is the latest	Where packaging to which Article 7 applies is marked with a label containing information on the share of recycled content, label shall comply with the specifications laid down in the relevant implementing act adopted pursuant to Article 12(6) and shall be based on the methodology established pursuant to Article 7(8)
Article 7.11– Recycled content	By 1 January 2029, or 24 months from IA EIF, whichever is the latest	The calculation and verification of the percentage of recycled content contained in packaging under paragraph 1 shall comply with the rules laid down in the implementing act adopted pursuant to in paragraph 8
Article 12.2 – Labelling	From 12 August 2029, or 30 months from IA EIF, whichever is the latest	Reusable packaging shall bear a label informing users that the packaging is reusable. Further information on reusability, including the availability of a local, national or Union-wide re-use system and information on collection points, shall be made available through a QR code or other type of standardised, open, digital data carrier
Article 6.3 – Recyclable packaging	From 1 January 2030 or 24 months from DAs EIF, whichever is the latest	Packaging shall not be placed on the market unless it is recyclable within recyclability performance grades A, B or C (See Annex II, Table 3)
Article 6.2a – Recyclable packaging	From 1 January 2030 or 2 years from DAs EIF, whichever is the latest	Packaging shall be designed for material recycling

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Requirements for economic operators

Article	Deadline	Requirement
Article 6.10 – Recyclable packaging	From 1 January 2030	Innovative packaging not complying design for recycling requirements may be made available on the market for up to 5 years from the end of the calendar year in which it was placed on the market
Article 7.1 – Recycled content	By 1 January 2030, or 3 years from IA EIF	Any plastic part of packaging placed on the market shall contain recycled content recovered from post-consumer plastic waste, per packaging type and format, calculated as an average per manufacturing plant and year
Article 10.1 – Packaging minimisation	By 1 January 2030	The manufacturer or importer shall ensure that the packaging placed on the market is designed so that its weight and volume is reduced to the minimum necessary to ensure its functionality taking account of the shape and material from which the packaging is made of
Article 12.7– Labelling	By 1 January 2030	Packaging placed on the market containing substances of concerns shall be marked using standardised, open, digital marking technologies, and shall include at least the name and concentration of the substance of concern present in each material in a packaging unit
Article 24.1 – Excessive packaging	By 1 January 2030, or 3 years from IAs entry into force	Economic operators who fill grouped packaging, transport packaging or e-commerce packaging shall ensure that the maximum empty space ratio is 50%
Article 25.1 – Packaging restrictions	From 1 January 2030	Economic operators shall not place on the market packaging in the formats and for the uses listed in Annex V
Article 28.5 – Refill	From 1 January 2030	Final distributors with a sales area of more than 400m2 shall endeavour to dedicate 10% of that sales area to refill stations for both food and non-food products

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Requirements for economic operators

Article	Deadline	Requirement
Article 29.1 – Reuse targets	From 1 January 2030	Economic operators that use transport packaging or sales packaging used for transporting, including for products distributed via e-commerce, products within the territory of the Union*, shall ensure that at least 40% of such packaging in total is reusable packaging within a re-use system * *in the form of pallets, foldable-plastic boxes, boxes, trays, plastic crates, intermediate bulk containers, pails, drums and canisters of* any size or material*, including flexible formats or pallet wrappings or straps for stabilisation and protection of products put on pallets during transport*
Article 29.2 – Reuse targets	From 1 January 2030	Economic operators that use transport packaging or sales packaging used for transporting products, as listed in Art. 29.1, within the territory of the Union between different sites on which the operator performs its activity; or between any of the sites on which the operator performs its activity and the sites of any other linked enterprise or partner enterprise, shall ensure that such packaging is reusable within a re-use system
Article 29.3 – Reuse targets	From 1 January 2030	Economic operators that use transport packaging or sales packaging, as listed in Art. 29.1, used for transporting products, to deliver products to another economic operator within the same Member State shall ensure that such packaging is reusable within a re-use system
Article 29.5 – Reuse targets	From 1 January 2030	Economic operators that use grouped packaging* outside of sales packaging to group a certain number of products to create a stock-keeping or distribution unit shall ensure that at least 10% of such packaging is reusable packaging within a re-use system * *in the form of boxes, excluding cardboard*
Article 29.6 – Reuse targets	From 1 January 2030	Final distributors that make alcoholic and non-alcoholic beverages in sales packaging available on the territory of a Member State to consumers shall ensure that at least 10% of those products are made available in reusable packaging within a re-use system

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Requirements for economic operators

Article	Deadline	Requirement
Article 33.5 – Reuse offer for takeaway sector	From 2030	Final distributors shall endeavour to offer 10% of products for sale in a reusable packaging format (scope of products tbc)
Article 30.1, 30.2, 30.4 - Calculation of reuse targets attainment Article 31.2 – Reporting on reuse targets	From 1 January 2030 or 18 months from EC IAs EIF, whichever is the latest	Economic operators subject to re-use targets under Article 29 shall make calculations to demonstrate the attainment of the targets, and report data to the competent authority within 6 months from the end of the reporting year for which data are collected (starting from 1 January 2030)
Article 6.2b – Recyclable packaging	From 1 January 2035 or 5 years from DAs EIF, whichever is the latest	When it becomes waste, packaging can be collected separately, sorted into specific waste streams without affecting the recyclability of other waste streams and recycled at scale
Article 6.3 – Recyclable packaging	From 1 January 2038	Packaging shall not be placed on the market unless it is recyclable within recyclability performance grades A or B (See Annex II, Table 3)
Article 7.2 – Recycled content	By 1 January 2040	Any plastic part of packaging placed on the market shall contain recycled content recovered from post-consumer plastic waste, per packaging type and format, calculated as an average per manufacturing plant and year
Article 29.1 – Reuse targets	From 1 January 2040	Economic operators that use transport packaging or sales packaging used for transporting products, including for products distributed via e-commerce, within the territory of the Union*, shall endaveour to use at least 70% of such packaging in a reusable format within a re-use system * *in the form of pallets, foldable-plastic boxes, boxes, trays, plastic crates, intermediate bulk containers, pails, drums and canisters* any size or *material, including flexible formats or pallet wrappings or straps for stabilisation and protection of products put on pallets during transport*

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Requirements for economic operators

Article	Deadline	Requirement
Article 29.5 – Reuse targets	From 1 January 2040	Economic operators that use grouped packaging* outside of sales packaging to group a certain number of products to create a stock-keeping or distribution unit shall endeavour to use at least 25 % of such packaging in a reusable format within a re-use system * *in the form of boxes, excluding cardboard*
Article 29.6 – Reuse targets	From 1 January 2040	Economic operators (making available on the market on the territory of a Member State to consumers alcoholic and non-alcoholic beverages in sales packaging) shall endeavour to make at least 40 % of the products are made available in reusable packaging within a re-use system
Article 5.4 – Substances in packaging	NA	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
Article 15.1, 15.2 & 15.3 – Obligations of manufacturers	NA	▪ Manufacturers shall only place on the market packaging which is in conformity with requirements laid down in or pursuant to Articles 5 to 12 ▪ Before placing packaging on the market, manufacturers shall carry out the conformity assessment procedure referred to in Article 38, or have it carried out on their behalf, and draw up the technical documentation referred to in Annex VII ▪ Manufacturers shall keep technical documentation referred to in Annex VII and the EU declaration of conformity for 5 years from the date the single-use packaging was placed on the market, and 10 years from the date the reusable packaging was placed on the market
Article 19.2 – Obligations of distributors	NA	Before making packaging available on the market, distributors shall verify that: ▪ the producer, that is subject to the obligations on EPR for the packaging, is registered in the register of producers referred to in Article 44; ▪ the packaging is labelled in accordance with Article 12; ▪ the manufacturer and the importer have complied with the requirements set out in Article 15(5) and (6) and Article 18(3) respectively

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Requirements for economic operators

Article	Deadline	Requirement
Article 5.4 – Substances in packaging	NA	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
Article 15.1, 15.2 & 15.3 – Obligations of manufacturers	NA	▪ Manufacturers shall only place on the market packaging which is in conformity with requirements laid down in or pursuant to Articles 5 to 12 ▪ Before placing packaging on the market, manufacturers shall carry out the conformity assessment procedure referred to in Article 38, or have it carried out on their behalf, and draw up the technical documentation referred to in Annex VII ▪ Manufacturers shall keep technical documentation referred to in Annex VII and the EU declaration of conformity for 5 years from the date the single-use packaging was placed on the market, and 10 years from the date the reusable packaging was placed on the market
Article 19.2 – Obligations of distributors	NA	Before making packaging available on the market, distributors shall verify that: ▪ the producer, that is subject to the obligations on EPR for the packaging, is registered in the register of producers referred to in Article 44; ▪ the packaging is labelled in accordance with Article 12; ▪ the manufacturer and the importer have complied with the requirements set out in Article 15(5) and (6) and Article 18(3) respectively
Article 19.2, 18.7, 21 & 22.2 – Obligations of other economic operators	NA	Obligations applying to manufacturers as per Article 15 shall apply to authorised representatives, importers, importers and distributors, and economic operators
Article 26.1 – Reusable packaging	NA	Economic operators who make a reusable packaging available on the territory of a Member State for the first time shall ensure that a system is in place in that Member State for the re-use of that packaging which includes an incentive to ensure the collection of that packaging and which meets the requirements laid down in Annex VI

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Requirements for economic operators

Article	Deadline	Requirement
Article 27.1 – Systems for reuse	NA	Economic operators that make use of reusable packaging shall participate in one or more re-use systems and shall ensure that the re-use systems within which the reusable packaging can be re-used comply with the requirements laid down in Part A of Annex VI
Article 27.2 – Systems for reuse	NA	Economic operators that make use of reusable packaging shall ensure that packaging is reconditioned in accordance with Part B of Annex VI, prior to offering it again for use by end users
Article 27.4– Systems for reuse	NA	Economic operators that make use of reusable packaging in closed loop systems in accordance with the requirements in Annex VI shall be required to return the packaging to one or more of the collection points identified by the system participants and approved by the system operator
Article 28.1 – Refill	NA	Economic operators who offer the possibility to purchase products through refill shall provide several information to end users as per Article 28.1
Article 28.2 – Refill	NA	Economic operators who offer the possibility to purchase products through refill shall ensure that refill stations comply with the requirements laid down in Part C of Annex VI and with any requirements laid down in other Union legal acts for the sale of products through refill
Article 28.3 – Refill	NA	Economic operators who offer the possibility to purchase products through refill shall ensure that if packaging or containers that do not meet the requirements laid down in Annex VI are offered to the end users at the refill stations, that packaging and those containers are not provided free of charge, or are provided as a part of a deposit and return system

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Requirements for economic operators

Article	Deadline	Requirement
Article 55.1 – Information on prevention and management of packaging waste	NA 55.1(d): as of 12 August 2028, or from the date of application of Article 12	Producers, or producer responsibility organisations, or public authorities appointed by Member States, shall make available information to end users, in particular consumers, regarding the prevention and management of packaging waste with respect to the packaging that the producers supply on the territory of a Member State
Article 44.7 – Register of producers	By 1 June each year	Producers (or their authorised representative, or producer responsibility organisation they entrusted) shall submit to the competent authority responsible for the register, by 1 June for each full preceding calendar year, the information set out in Part B, point 1, of Annex IX
Article 44.8 – Register of producers	By 1 June each year	Where producers (or their authorised representative, or producer responsibility organisation they entrusted) have made available for the first time on the territory of the Member State a quantity of packaging, including the packaging of packaged products of less than 10 tonnes during one calendar year, shall report to the competent authority responsible for the register, by 1 June for each full preceding calendar year, the information set out in Part B, point 2, of Annex IX
Article 44.10 – Register of producers	Annually	Producers (in case of individual fulfilment of EPR obligations), their entrusted producer responsibility organisation (in case of collective fulfilment of EPR obligations), or the re-use system operators (in case where re-use systems are fulfilling EPR obligations) shall report annually to the competent authority for each preceding calendar year the information set out in Part B, point 3 of Annex IX

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Overview of deadlines for secondary legislation and non-legislative acts

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Disclaimer

The following section lists in a succinct manner the different requirements of economic operators included in the PPWR. The tables, however, do not capture derogations. They should therefore be read in conjunction with the previous chapter, “A deep-dive into the new PPWR”.

Please note that the deadlines related to the different provisions indicated with the symbol “±” represent an estimation of their timing of application and are based on the PPWR’s date of entry into force (11 February 2025). The exact timing of application of certain measures therefore remains to be confirmed.

When the deadlines are indicated as “NA”, the final text did not provide a clear date of application. The assumption is, in those cases, that they will apply from the date of application of the PPWR, i.e. 18 months following the entry into force of the Regulation (from 12 August 2026). The dates of application of the provisions are sorted in chronological order.

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Deadlines for secondary legislation and non-legislative acts

Article	Deadline	Requirement
Article 9.6 – Compostable packaging	By 12 February 2026	EC shall request European standardisation organisations to prepare or update harmonised standards laying down detailed technical specifications of the requirements on compostable packaging, and to prepare harmonised standard laying down the detailed technical specifications of the requirements on home compostability of packaging
Article 44.14– Register of producers	By 12 February 2026	EC shall adopt implementing acts establishing the format for registration in, and reporting to, the register and specifying the granularity of data to be provided and the packaging types and material categories to be covered by the information submitted
Article 12.6– Labelling	By 12 August 2026	EC shall adopt implementing acts to establish a harmonised label and specifications for the labelling requirements and formats, including where provided through digital means, for the labelling of packaging referred to in paragraphs 1, 2 and 4
Article 12.7 – Labelling	By 12 August 2026	EC shall adopt implementing acts to establish methodology for identifying the material composition of packaging referred to in paragraph 1 by means of standardised, open, digital-marking technologies
Article 13.2 – Labelling	By 12 August 2026	EC shall adopt implementing acts to establish harmonised labels and specifications for the labelling requirements and formats for the labelling of waste receptacles
Article 5.2 – Substances in packaging	By 31 December 2026	EC shall prepare report on the presence of substances of concern in packaging and packaging components, determining the extent to which they negatively affect the re-use and recycling of materials or impact chemical safety. Report to indicate if they could present an unacceptable risk to human health and the environment. Report to detail findings and consider appropriate follow-up measures

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Deadlines for secondary legislation and non-legislative acts

Article	Deadline	Requirement
Article 7.8 – Recycled content	By 31 December 2026	EC shall adopt implementing acts establishing the methodology for the calculation and verification of the percentage of recycled content recovered from post-consumer plastic waste recycled and collected within the Union
Article 7.9 – Recycled content	By 31 December 2026	EC shall adopt delegated acts in accordance with Article 64 to supplement Regulation with sustainability criteria for plastic recycling technologies
Article 7.10 – Recycled content	By 31 December 2026	EC 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
Article 10.3 – Packaging minimisation	By 12 February 2027	EC shall request European standardisation organisations to prepare or update harmonised standards laying down the methodology for the calculation and measurement of compliance with the requirements concerning packaging minimisation
Article 11.2– Reusable packaging	By 12 February 2027	EC shall adopt delegated act in accordance with Article 64 establishing a minimum number for the rotations for reusable packaging, for the purpose of paragraph 1, point (b), for the packaging formats, which are most frequently used in re-use, taking into account hygiene and other requirements, such as logistics
Article 25.6 – Packaging restrictions	By 12 February 2027	EC shall publish guidelines explaining Annex V in more detail, including examples of the packaging formats in scope, and any exemptions from the restrictions, and provide a non-exhaustive list of fruits and vegetables that are excluded from point 2 of Annex V

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Deadlines for secondary legislation and non-legislative acts

Article	Deadline	Requirement
Article 29.8 – Reuse targets	By 12 February 2027	EC shall publish guidelines on the types of products falling within the scope of Article 29.6 and 29.7
Article 31.7 – Reporting on reuse targets	By 12 February 2027	EC shall establish a European observatory on re-use
Article 43.2 – Prevention of packaging waste	By 12 February 2027	In order to support Member States in achieving the packaging waste prevention targets, by means of implementing acts, EC shall adopt a correction factor to account for the increase or decrease in tourism in relation to the base year 2018
Article 56.7 - Reporting to the Commission	By 12 February 2027	EC shall adopt implementing acts establishing: ▪ rules for the calculation, verification and reporting of data referred to in Article 56.1, points (a) and (c), and 56.2, including the methodology for determining packaging waste generated, and the format for the submission of those data; ▪ the methodology for the calculation of the annual consumption of lightweight plastic carrier bags per capita, and the format for the submission of those data; ▪ the correction factor referred to in Article 43(2) to account for the increase or decrease in tourism in relation to the base year.
Article 30.3 – Reuse targets	By 30 June 2027	EC shall adopt implementing acts establishing the methodology for the calculation of the re-use targets set out in Article 29.
Article 41.1 – Early warning report	At the latest by end of 2027, end of 2032 and end of 2037	EC shall draw up reports on the progress made towards the attainment of the targets laid down in Articles 43 and 52 at the latest three years before each of the deadlines laid down in those Articles

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Deadlines for secondary legislation and non-legislative acts

Article	Deadline	Requirement
Article 6.4 – Recyclable packaging	By 1 January 2028	EC shall adopt delegated acts to establish design for recycling criteria, recyclability performance grades and a framework for the modulation of EPR financial contributions
Article 29.12- Reuse targets	By 1 January 2028	EC shall adopt delegated acts to supplement PPWR by establishing and specifying the detailed conditions and reporting requirements to be applied to the pooling arrangements, taking into account the type and quantity of packaging each final distributor places on the market each calendar year and the location of final distributors
Article 24.2 – Excessive packaging	By 12 February 2028	EC shall adopt implementing acts to establish the methodology for calculation of the empty space ratio referred to in Article 24.1
Article 6.5 – Recyclable packaging	By 1 January 2030	EC shall adopt implementing acts establishing the methodology for the recycled-at-scale assessment per packaging category
Article 12.7 – Labelling	By 1 January 2030	EC shall adopt implementing acts establishing the methodology for identifying substances of concern by means of standardised, open, digital-marking technologies
Article 63.1 – Green public procurement	By 12 February 2030	EC shall adopt implementing acts specifying minimum mandatory requirements for public contracts falling within the scope of Directive 2014/24/EU for packaging or packaged products or for services using packaging or packaged products or Directive 2014/25/EU, in which the packaging or packaged products represent more than 30% of the estimated contract value or of the value of products used by the services that are the object of the contract

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Deadlines for secondary legislation and non-legislative acts

Article	Deadline	Requirement
Article 41.1 – Early warning report	At the latest by end of 2027, end of 2032 and end of 2037	EC shall draw up reports on the progress made towards the attainment of the targets laid down in Articles 43 and 52 at the latest three years before each of the deadlines laid down in those Articles
Article 41.1 – Early warning report	At the latest by end of 2027, end of 2032 and end of 2037	EC shall draw up reports on the progress made towards the attainment of the targets laid down in Articles 43 and 52 at the latest three years before each of the deadlines laid down in those Articles
Article 12.8 – Labelling	NA	EC shall, where appropriate, adopt guidelines in order to clarify aspects that are likely to mislead or confuse consumers or other end users
Article 29.18 – Reuse targets	NA	EC empowered to adopt delegated acts supplementing Regulation by establishing: ▪ exemptions for economic operators additional to those provided for in Article 29, paragraphs 1, 2, 3, 5 and 6 ▪ exemptions for specific packaging formats covered by the targets set out in Article 29, paragraphs 1, 2, 3, 5 and 6 where hygiene and food safety issues prevent the achievement of those targets ▪ exemptions for specific packaging formats covered by the targets set out in Article 29, paragraphs 1, 2, 3, 5 and 6 where environmental issues prevent the achievement of those targets

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Overview of review and sunset clauses

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Disclaimer

The following section lists in a succinct manner the review and sunset clauses mandated to the European Commission following the entry into force of the PPWR. The overview table, however, does not include provisions that enable the European Commission to review certain requirements on a voluntary basis.

Please note that the deadlines related to the different provisions indicated with the symbol "±" represent an estimation of their timing of application and are based on the PPWR's date of entry into force (11 February 2025).

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Review and sunset clauses

Article	Deadline	Requirement
Article 7.12 – Recycled content	By 1 January 2028	EC shall assess the need for derogations from the minimum percentages of recycled content laid down in paragraph 1, points (b) and (d), for specific plastic packaging, or the revision of the list of exceptions in paragraph 4 for specific plastic packaging
Article 8.1 & 8.2– Biobased feedstock in plastic packaging	By 12 February 2028	EC shall review state of technological development and environmental performance of biobased plastic packaging and, where appropriate, present legislative proposal (see Article 8.2 for more info)
Article 5.5 – Substances in packaging	By 12 August 2030	EC shall carry out evaluation to assess the need to amend or repeal PFASs maximum limit values to avoid overlaps with restrictions or prohibitions laid down in other Regulations
Article 12.12 - Labelling	Until 3 years from labelling requirements EIF (± between mid-2031 and Q4 2031)	Packaging manufactured in the Union or imported before the deadlines referred in paragraphs 1, 2 and 4, may be made available on the market until 3 years from the date of entry into force of the labelling requirements laid down in those paragraphs
Article 7.14 – Recycled content	By 12 February 2032	EC shall present report reviewing the implementation of the 2030 minimum percentages of recycled content, the feasibility of the achievement of the 2040 minimum percentages and the necessity or pertinence of setting new minimum percentages of recycled content. Report to be accompanied, where appropriate, by legislative proposal to amend Article 7 (in particular 2040 targets)
Article 7.15 – Recycled content	By 12 February 2032	EC shall review situation regarding the use of recycled packaging materials in packaging other than plastics and assess appropriateness of establishing measures, or setting targets, for increasing the use of recycled content in such other packaging, and where appropriate present a legislative proposal

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Review and sunset clauses

Article	Deadline	Requirement
Article 24.6 – Excessive packaging	By 12 February 2032	EC shall review empty space ratio in Article 24.1 as well as the exemptions in Article 24.5, and assess the possibility of establishing empty space ratios for sales packaging, particularly for toys, cosmetics, do-it-yourself kits and electronic products
Article 25.5 – Packaging restrictions	By 12 February 2032	EC shall assess the positive environmental impact of the restrictions and their derogations and, based on this assessment, review Article 25 and Annex V and assess the appropriateness of establishing new restrictions on the use of specific packaging formats, the relevance of maintaining the exemptions and derogations set out in Article 25, and where appropriate, present a legislative proposal
Article 34.5 – Plastic carrier bags	By 12 February 2032	EC shall prepare report on packaging materials other than plastic and, where appropriate, present a legislative proposal setting out reduction targets and measures to achieve these targets
Article 43.9 – Prevention of packaging waste	By 12 February 2032	EC shall review packaging waste prevention targets, assess the need to include specific targets for certain packaging materials, and submit a report to the European Parliament and Council, accompanied, if appropriate, by a legislative proposal
Article 52.4 – Recycling targets and promotion of recycling	By 12 February 2032	EC shall review 2030 recycling targets with a view to increasing them or setting further targets. EC shall submit a report to the European Parliament and to the Council, accompanied, if appropriate, by a legislative proposal
Article 5.9 – Substances in packaging	By 12 August 2033	EC shall carry out evaluation to assess whether Article 5 and the design for recycling criteria have contributed sufficiently to minimising the presence and concentration of substances of concern in packaging materials

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Review and sunset clauses

Article	Deadline	Requirement
Article 29.19– Reuse targets	By 1 January 2034	EC shall present report reviewing: ▪ the implementation of the 2030 targets set out in Article 29, evaluating to what extent these targets lead to solutions fostering sustainable packaging that are effective and easy to implement, ▪ the feasibility of the achievement of the 2040 targets, ▪ the relevance of maintaining the exemptions and derogations of Article 29, ▪ the necessity or pertinence of setting new targets for the re-use and refill of other packaging categories. The report shall include an employment impact assessment. The report shall, where appropriate, be accompanied by a legislative proposal amending this Article, in particular the 2040 targets
Article 69 – Evaluation	By 12 August 2034	EC shall carry out evaluation of the PPWR and of its contribution to the functioning of the internal market and the improvement of the environmental sustainability of packaging
Article 6.12– Recyclable packaging	By 1 January 2035	EC shall review exceptions under Article 6.11, assess the appropriateness of their continuation and, where appropriate, present a legislative proposal
Article 50.11 – Deposit and return systems	By 1 January 2038	EC shall assess the implementation of Article 50 and identify how to maximise the interoperability of the DRS

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Overview of obligations for Member States, waste management operators and competent authorities

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Obligations for Member States, waste management operators and competent authorities

Article	Deadline	Requirement
Article 34.1 – Plastic carrier bags	By 31 December 2025, and subsequently by 31 December each year thereafter	Member States shall take measures to achieve a sustained reduction in the consumption of lightweight plastic carrier bags on their territory. A sustained reduction is considered to be achieved if the annual consumption does not exceed 40 lightweight plastic carrier bags per capita, or the equivalent target in weight
Article 40.1 & 40.3 – Competent authority	NA / By 12 July 2025	Member States shall designate one or more competent authorities responsible for implementation and enforcement of the obligations set out in Chapter VIII and in Article 6(10), 29(1) to (7) and (9), Article 30 to Article 34; and inform the EC, by 5 months from the PPWR EIF, of the names and addresses of the designated competent authorities
Article 52.1 a&b – Recycling targets and promotion of recycling	By 31 December 2025	Member States shall take the necessary measures to achieve the following recycling targets covering the whole of their territory: (a) by 31 December 2025, a minimum of 65 % by weight of all packaging waste generated; (b) by 31 December 2025, the following minimum percentages by weight of the following specific materials contained in packaging waste generated: (i) 50 % of plastic; (ii) 25 % of wood; (iii) 70 % of ferrous metals; (iv) 50 % of aluminium; (v) 70 % of glass; (vi) 75 % of paper and cardboard;
Article 68.1 – Penalties	By 12 February 2027	Member States shall lay down rules on penalties applicable to infringements of the PPWR and to take all measures necessary to ensure that they are implemented
Article 68.3 – Penalties	By 12 February 2027	Member States shall notify EC of rules and measures taken in relation to penalties, and notify it, without delay, of subsequent amendment affecting them
Article 44.1 – Register of producers	Within 18 months of the 1st IA EIF (± mid-2027)	Member States shall establish a register which shall serve to monitor compliance of producers of packaging with the requirements set out in Chapter VIII of PPWR

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Obligations for Member States, waste management operators and competent authorities

Article	Deadline	Requirement
Article 57.1 – Packaging databases	By 12 months from the adoption of IAs referred to in Article 56.7 (± Q1 2028)	Member States shall take the necessary measures to ensure that databases on packaging and packaging waste are established, where not already in place, on a harmonised basis, to enable the reporting to the EC
Article 12.1 – Labelling	From 12 August 2028, or 24 months from IAs EiF	Member States shall ensure that harmonised labels enabling separate collection of packaging waste are affixed, printed or engraved visibly, legibly and indelibly on all waste receptacles for collection of packaging waste
Article 49– Mandatory collection	By 1 January 2029	Member States shall set mandatory collection objectives and take the necessary measures to ensure the collection of the materials listed in Article 52 is consistent with the recycling targets set out in Article 52 and with the mandatory recycled content targets set out in Article 7
Article 50.1 & 50.2– Deposit and return systems	By 1 January 2029	• Member States shall take the necessary measures to ensure the separate collection of at least 90% per year by weight of the following packaging formats made available on the market for the first time in that Member State in a given calendar year: (a) single-use plastic beverage bottles with the capacity of up to three litres; and (b) single-use metal beverage containers with a capacity of up to three litres • To achieve the above, Member States shall take the necessary measures to ensure DRS are set up, to ensure that a deposit has to be charged at the point of sale, and to ensure that the DRS meet the minimum criteria list in Annex X
Article 50.11 – Deposit and return systems	By 1 January 2029 or, at the latest, by 1 January 2035	Member States shall endeavour to ensure that existing DRS comply with the minimum requirements in Annex X when they are first reviewed. If the 90 % target is not achieved by 1 January 2029, existing DRS to comply with the minimum requirements in Annex X at the latest by 1 January 2035

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Obligations for Member States, waste management operators and competent authorities

Article	Deadline	Requirement
Article 67.5– Amendments to Directive (EU) 2019/904 & Article 71 – EIF and application	Applicable from 12 February 2029	Member States shall prohibit placing on the market of the single-use plastic products listed in Part B of the SUPD Annex, amended by the PPWR as follows: ▪ Restrictions listed in paragraphs 7, 8 and 9 of Part B are extended to extruded (XPS) polysterene ▪ New restrictions are added under paragraphs 10, 11 and 12 of Part B: ▪ '(10) shrink wrap that is used in airports or train stations for protection of luggage during transport ▪ (11) chips of polystyrene and other plastics that are used to protect packed goods during transport and handling ▪ (12) multi-pack plastic rings used as grouped packaging as defined in Article 3(1), point 6 of PPWR
Article 6.8 – Recyclable packaging	18 months from EIF of DAs and IAs in para 4 & 5 (± between mid-2029 & mid-2031)	EPR financial contributions paid by producers to be modulated in accordance with the recyclability performance grades
Article 52.1 c & d – Recycling targets and promotion of recycling	By 31 December 2030	Member States shall take the necessary measures to attain the following recycling targets covering the whole of their territory: (c) by 31 December 2030, a minimum of 70 % by weight of all packaging waste generated; (d) by 31 December 2030, the following minimum percentages by weight of the following specific materials contained in packaging waste generated: (i) 55 % of plastic; (ii) 30 % of wood; (iii) 80 % of ferrous metals; (iv) 60 % of aluminium; (v) 75 % of glass; (vi) 85 % of paper and cardboard.

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Obligations for Member States, waste management operators and competent authorities

Article	Deadline	Requirement
Article 43.1 – Prevention of packaging waste	By 2030, by 2035, by 2040	Each Member State shall reduce the packaging waste generated per capita, as compared to the packaging waste generated per capita in 2018 as reported to the EC in accordance with Decision 2005/270/EC, by at least: ▪ 5 % by 2030 ▪ 10 % by 2035 ▪ 15 % by 2040
Article 31.4 – Reporting on reuse targets	NA	Competent authorities shall establish electronic systems through which data on the attainment of reuse targets shall be reported, specifying the formats to be used
Article 31.6 – Reporting on reuse targets	NA	Member States shall make data reported by economic operators on the attainment of reuse targets public
Article 39.5 – EU declaration of conformity	NA	Competent authorities shall endeavour to control the accuracy of at least part of the declarations of conformity per year, assessed on a risk-based approach and take the necessary measures to address non-compliance, such as the withdrawal of non-compliant products from the market
Article 42.1 & 42.2 – Waste management plans and waste prevention programmes	NA	Member States shall include: • in the waste management plans, a dedicated chapter on the management of packaging and packaging waste, including measures taken pursuant to Articles 48, 50 and 52 of the PPWR • in the waste prevention programmes, a dedicated chapter on the prevention of packaging and packaging waste and littering, including measures taken pursuant to Articles 43 and 51 of the PPWR

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Obligations for Member States, waste management operators and competent authorities

Article	Deadline	Requirement
Article 43.4 – Prevention of packaging waste	NA	In order to achieve the packaging waste prevention targets, each Member State shall endeavour to reduce the amount of plastic packaging waste generated
Article 43.5 – Prevention of packaging waste	NA	Member States shall implement measures that aim to prevent the generation of packaging waste and to minimise the environmental impact of packaging
Article 43.6 – Prevention of packaging waste	NA	Member States shall incentivise restaurants, canteens, bars, cafés and catering services to serve their customers, where available, tap water for free or for a low service fee, in a reusable or refillable format
Article 44.13 – Register of producers	NA	Member States shall ensure that the list of registered producers is easily accessible, publicly available and free of charge
Article 47.2 - Authorisation on fulfilment of EPR	NA	Member States shall establish requirements and details of the authorisation procedure on the fulfilment of EPR, and the modalities for verifying compliance, including the information to be provided by producers or producer responsibility organisations
Article 48.1 – Return and collection systems	NA	Member States shall ensure that systems and infrastructures are set up to provide for the return and separate collection of all packaging waste from the end users
Article 48.2 – Return and collection systems	NA	In order to facilitate high-quality recycling, Member States shall ensure that systems and infrastructures for comprehensive collection and sorting are in place to facilitate recycling and to ensure plastic feedstock is available for recycling

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Obligations for Member States, waste management operators and competent authorities

Article	Deadline	Requirement
Article 50.8 – Deposit and return systems	NA	Member States shall endeavour to establish and maintain DRS in particular for single-use glass beverage bottles, and beverage cartons. Member States shall endeavour to ensure that DRS for single-use packaging formats, in particular for single-use glass beverage bottles, are equally available for reusable packaging where technically and economically feasible
Article 51.1 – Re-use and refill	NA	Member States shall take measures to encourage the establishment of re-use systems for packaging with sufficient incentives for return and systems for refill in an environmentally sound manner
Article 51.3 – Re-use and refill	NA	Member States shall ensure that EPR and DRS allocate a minimum share of their budget to financing reduction and prevention actions
Article 56.1, 56.2, 56.3 & 56.4 – Reporting to the Commission	For each calendar year, within 19 months after the end of the reporting year for which the data are collected	Member States shall report (electronically) data to the European Commission for each calendar year (see 56.3 for info on first reporting period)
Article 23 – Information obligations of waste management operators	Annually	Packaging waste management operators shall provide competent authorities the information on packaging waste listed in Table 3 of Annex XII through the electronic registry or registries, in accordance with Article 35(1) of Directive 2008/98/EC

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