

PPWR regulation (EU) 2025/40 on packaging and packaging waste

What is the PPWR regulation?

Packaging plays a fundamental role in protecting products, enabling transport and ensuring consumer safety. However, the increasing volume of packaging waste, low levels of reuse and insufficient recycling rates have become significant environmental challenges in the EU. To address these challenges and support the transition towards a circular economy, the European Union adopted **the Regulation (EU) 2025/40 on packaging and packaging waste (PPWR)**.

The PPWR replaces the previous **Packaging and Packaging Waste Directive 94/62/EC** and introduces directly applicable, harmonised requirements for all packaging placed on the EU market. Unlike a directive, which requires national transposition, a regulation applies uniformly across all EU Member States. The regulation covers all packaging and packaging waste, regardless of the material used or whether the packaging is produced inside or outside the EU.

The PPWR entered into force on **11 February 2025** and will generally become applicable from **12 August 2026**. Its objectives are to prevent unnecessary packaging, reduce packaging waste generation, promote reuse and recycling, improve resource efficiency and contribute to the EU's climate neutrality objectives.

Sustainability requirements

The PPWR introduces extensive sustainability requirements covering packaging design, material composition, recyclability, recycled content, waste prevention and reuse.

Requirements for substances in packaging

Packaging must be designed and manufactured so that hazardous substances are kept as low as possible. This applies not only during use, but also during recycling, waste treatment, disposal, and to prevent environmental pollution such as microplastics.

From **12 August 2026**, food-contact packaging must comply with strict **PFAS ("forever chemicals") limits**, restricting the use of substances that may pose risks to human health and the environment.

In addition, the combined concentration **of lead, cadmium, mercury, and hexavalent chromium** in packaging and packaging components must not exceed **100 mg/kg**.

Recyclable packaging

One of the central principles of PPWR is that all packaging placed on the EU market must become recyclable.

Packaging must:

- be designed for material recycling;
- be capable of being collected, sorted and recycled at scale;
- achieve required recyclability performance levels defined under future EU rules.

The Regulation introduces a harmonised **Design for Recycling (DfR)** framework, under which packaging will be assessed against EU-wide recyclability criteria. To measure performance, packaging will be assigned a **recyclability grade (A, B or C)**.

From **1 January 2030**, packaging must achieve at least **Grade C** to be placed on the market.

From **1 January 2038**, only packaging achieving **Grade A or B** will be allowed.

In addition to being designed for recycling, packaging must also be shown to be **recycled at scale**. By 2030, the European Commission will establish a methodology to assess whether packaging is being effectively collected and recycled across the EU using existing infrastructure. This will be based on actual recycling volumes and recycling performance data.

Minimum recycled content in plastic packaging

PPWR introduces mandatory recycled content requirements for plastic packaging to increase demand for recycled materials and reduce dependence on virgin fossil-based plastics.

By 2030, plastic packaging must contain the following minimum levels of recycled content:

- **30%** for PET food-contact packaging (excluding beverage bottles)
- **10%** for other food-contact plastic packaging
- **30%** for single-use plastic beverage bottles
- **35%** for all other plastic packaging

By 2040, these requirements increase to:

- **50%** for PET food-contact packaging
- **25%** for other food-contact plastic packaging
- **65%** for single-use plastic beverage bottles
- **65%** for all other plastic packaging

The recycled content must originate from post-consumer plastic waste and be processed using recycling technologies that comply with EU sustainability requirements or equivalent standards in third countries.

Packaging minimisation

The PPWR introduces requirements to prevent unnecessary packaging and reduce packaging waste generation. To reduce unnecessary packaging and packaging waste, the PPWR requires that, **from 1 January 2030**, all packaging be designed using the **minimum weight and volume necessary** to perform its intended function, while still ensuring product protection, safety and performance.

Packaging must be designed so that:

- its weight and volume are limited to the minimum necessary;
- unnecessary empty space is avoided;
- excessive packaging components are eliminated.

By 12 February 2027, the European Commission will develop common EU standards that explain how companies must measure and prove that their packaging has been reduced to the minimum weight and size necessary for its purpose.

Restrictions on certain packaging formats

From **1 January 2030**, certain packaging formats considered unnecessary or wasteful will be prohibited from being placed on the EU market.

Examples include packaging formats that create avoidable waste where more sustainable alternatives exist. Some limited exemptions may apply, particularly for micro-enterprises where reuse systems are not yet technically or economically feasible.

The European Commission will publish guidance by **2027** clarifying which packaging formats are affected and will review the restrictions by **2032** to assess their environmental impact and consider additional restrictions if needed.

Reusable packaging requirements and re-use systems

Companies placing **reusable packaging** on the market must ensure that it is supported by a functioning **reuse system** that enables the packaging to be collected, returned, cleaned and reused multiple times. In practice, reusable packaging is not considered compliant simply because it has been designed for reuse; it must operate within an established system that keeps the packaging in circulation and prevents it from becoming waste after a single use.

To support this, companies must:

- Participate in one or more approved reuse systems.
- Ensure reusable packaging is returned and collected after use.
- Clean, inspect and recondition packaging before it is reused.
- Return packaging through designated collection points where closed-loop systems operate.

Re-use targets

The PPWR introduces mandatory **re-use targets** to reduce reliance on single-use packaging and promote circular packaging systems. These targets require companies to gradually increase the share of packaging that is collected, returned and reused within established re-use systems. The requirements apply to key packaging categories, with higher targets from **2030** and further increases from **2040**.

Packaging type	From 2030	From 2040
Transport	40% reusable	70% reusable
Grouped packaging	10% reusable	25% reusable
Beverage packaging	10% reusable	40% reusable

Labelling, marking and information requirements

The PPWR introduces harmonised EU-wide labelling rules to help consumers correctly sort packaging waste and improve recycling performance.

From 12 August 2028 (or later depending on implementing acts), packaging must display a harmonised label indicating its material composition. Labels will use clear pictograms to help consumers identify the correct disposal route.

Additional requirements include:

- **Compostable packaging** must indicate that it is compostable and whether it is suitable for home composting.
- **Reusable packaging** must be labelled as reusable and provide further information through a QR code or digital data carrier.
- Packaging containing **recycled content** may display information on recycled content levels using a harmonised format.
- Packaging subject to **deposit return schemes (DRS)** must carry a clear deposit-return label.

To ensure consumers receive accurate and consistent information, the PPWR also introduces rules on **environmental claims**. Companies may only make claims such as "**recyclable**", "**contains recycled content**", or "**reusable**" where the packaging exceeds the applicable PPWR requirements

General requirements for economic operators

PPWR introduces obligations for different actors involved in the packaging supply chain, including manufacturers, importers and distributors.

Register of producers & Extended producer responsibility (EPR)

The PPWR requires companies that place packaging or packaged products on the market to **register in the national producer register of each Member State** where they first place packaging on the market or unpack packaging without being the end user.

- **By 12 February 2026:** The European Commission will establish a harmonised registration and reporting format for producer registers.
- **Within 18 months after those rules enter into force:** Member States must establish or update their national producer registers.
- **By 1 June each year:** Producers must report packaging data for the previous calendar year to the relevant national register.

As part of their **Extended Producer Responsibility (EPR)** obligations, producers are financially responsible for the collection, sorting and treatment of packaging waste. Companies operating across multiple EU markets will need to carefully evaluate their registration and reporting obligations in each country.

Register of producers & extended producer responsibility (EPR)

Before placing packaging on the market, manufacturers must:

- Carry out a **conformity assessment** to verify that the packaging complies with all applicable PPWR requirements.
- Prepare **technical documentation** demonstrating compliance, including packaging specifications, materials, applied standards, assessment methodology and supporting test results.
- Issue an **EU Declaration of Conformity** confirming that the packaging meets the applicable regulatory requirements.

Manufacturers must retain the technical documentation and Declaration of Conformity for **5 years for single-use packaging** and **10 years for reusable packaging**, and make them available to authorities upon request.

Obligations for manufacturers

Manufacturers are companies that produce packaging or packaging components and place them on the EU market under their own name or trademark.

Manufacturers are responsible for ensuring that packaging complies with PPWR requirements before it is placed on the market.

Their responsibilities include:

- ensuring packaging design complies with **sustainability requirements**;
- maintaining **technical documentation**;
- carrying out **conformity assessments**;
- ensuring **correct labelling**;
- providing information required by authorities.

Obligations for importers

Importers are companies established in the EU that place packaging produced outside the EU market onto the EU market. Importers must verify that manufacturers located outside the EU have fulfilled relevant PPWR obligations.

Their responsibilities include:

- checking **conformity documentation**;
- ensuring **required information and labels** are available;
- preventing non-compliant packaging from entering the EU market;
- cooperating with authorities when required.

Obligations for distributors

Distributors are companies or individuals involved in supplying packaging or packaged products on the market but are not considered manufacturers or importers. Before making packaging available on the market, distributors must verify that:

- The responsible producer is **registered under the relevant Extended Producer Responsibility (EPR) scheme**.
- The packaging is **correctly labelled** in accordance with PPWR requirements.
- The **manufacturer and importer have fulfilled their identification and contact information obligations**.

Return & collection systems and deposit return schemes (DRS)

The PPWR requires Member States to establish systems for the **return, separate collection and recycling of packaging waste**, supporting both high-quality recycling and packaging reuse.

By 1 January 2029:

- Member States must set mandatory collection objectives and ensure collection systems support PPWR recycling and recycled content targets.
- Member States must achieve **90% separate collection** of single-use plastic beverage bottles and metal beverage containers up to 3 litres.
- Deposit Return **Schemes (DRS)** must be in place for these beverage containers unless a Member State qualifies for an exemption.

These measures are intended to improve recycling performance, increase the availability of recycled materials and support the EU's transition to a circular packaging economy.

PPWR implementation timeline

Packaging and Packaging Waste Regulation (EU) 2025/40

Year	Packaging and Packaging Waste Regulation (EU) 2025/40
2025	22 Jan: PPWR published. 11 Feb: PPWR enters into force. Key obligations: • Requirements on substances of concern introduced. • Conformity assessment and Declaration of Conformity
12 th Aug. 2026	Key obligations: • HORECA businesses must accept refill containers brought by customers. • National Producer Registers in force. • Requirements on substances of concern introduced applicable. • Conformity assessment and Declaration of Conformity applicable

2027	Key obligations: • 12 Feb: Certain stickers and permeable packaging for tea, coffee, fruit and vegetables must be industrially compostable and recyclable. • 12 Feb: HORECA businesses must offer reusable packaging options. • 12 Aug: Packaging minimisation requirements apply. • 12 Aug: Harmonised packaging and waste-bin labels introduced
2028	Key obligations: • 1 Jan: Minimum post-consumer recycled content (PCR) requirements become mandatory for plastic packaging. • 1 Jan: Member States must establish collection systems and targets that support recycling objectives and recycled content requirements. • 1 Jan: Beverage packaging must achieve 90% separate collection; Deposit Return Systems (DRS) are required where this target is not met. • 12 Feb: Reusable packaging must carry dedicated reuse labels and consumer information. • 12 Feb: Certain single-use plastic packaging formats are banned, including XPS food and beverage packaging, luggage shrink wrap, plastic protective chips for transport, and plastic rings used for multipacks.
2029	Key obligations: • 1 Jan: All packaging placed on the EU market must be recyclable. • 1 Jan: Ban on packaging that is less than 70% recyclable by weight. • 1 Jan: Plastic packaging must contain minimum levels of post-consumer recycled content (PCR). • 1 Jan: Packaging must be minimised to the minimum weight and volume necessary for its function, with empty space generally limited to 50%. • 1 Jan: Restrictions on certain packaging formats and unnecessary packaging become applicable. • 1 Jan: Retailers with large sales areas should dedicate 10% of retail space to refill stations for food and non-food products. • 1 Jan: Mandatory re-use targets apply to transport packaging, grouped packaging and certain beverage packaging. • 31 Dec: Packaging waste generated per capita must be reduced by 5% compared with 2018 levels.

2030	Deadline date! • Implementation and enforcement of key PPWR obligations relating to recyclability, recycled content, reuse and packaging minimisation.
2035	Key obligations: • 1 Jan: Packaging must be recyclable at scale across the EU. • 31 Dec: Packaging waste per capita reduced by 10% compared with 2018.
2040	Key obligations: • Reduction of packaging waste generated per inhabitant: 15% compared to 2018

Conclusion

The PPWR marks a fundamental shift in packaging regulation across the EU. The first requirements become applicable on **12 August 2026**, while the majority of requirements will apply progressively through **2030 and beyond**.

Although some of the key deadlines are still several years away, compliance will require changes to packaging design, supply chains, data collection, reporting processes and producer responsibility arrangements. In addition, many important **implementing acts and delegated acts are still to be adopted**, meaning that the regulatory framework will continue to evolve over the coming years.

For companies placing packaging on the EU market, the time to act is now. Early preparation provides the opportunity to assess impacts, build internal capabilities and gradually adapt packaging portfolios and compliance processes, rather than facing costly and time-pressured changes closer to the deadlines