



PACKAGING AND PACKAGING WASTE REGULATION (PPWR)

Mandatory
●●● Priority

Short description of the Regulation EU 2025/40

The **Packaging and Packaging Waste Regulation (PPWR)** seeks to minimize material use and packaging waste, promoting a circular and sustainable economy. As part of the European Circular Economy Action Plan (CEAP), it mandates that affected companies comply with harmonized EU standards for packaging, labeling, and reporting.

The application scope concerns all packaging, including packaged products and packaging waste, regardless of usage (transport or sales), origin, and material, throughout its entire life cycle. The key packaging requirements set out by PPWR are:

Sustainability requirements:

- ▶ **Substances in packaging (Art. 5):** substances of concern to be minimized in packaging; quantitative restrictions on heavy metals and PFAS; concerns packaging components and their disposal (secondary materials, emissions, etc.).
- ▶ **Recyclability (Art. 6):** required for all packaging; assessment methodology defined in delegated acts; stepwise increase of recyclability performance grades;⁰¹ stepwise limitation of low-grade packaging availability; derogations for compostable packaging (Art. 9).
- ▶ **Recycled content in plastic packaging (Art. 7):** minimum thresholds phased in.

- ▶ **Packaging minimization (Art. 10):** by 2030, weight and volume to be reduced to minimum necessary to ensure functionality. The empty space ratio must be minimized as much as possible by 2028 for sales packaging, and not exceed 50% by 2030 for grouped, transport, and e-commerce packaging (Art. 24).⁰²
- ▶ **Reusable packaging (Art. 11):** requirements for reusable packaging; reusability targets for various packaging elements in 2030/2040 (Art. 29). Micro-enterprises that make less than 1,000 kg of packaging available are not obliged to fulfill re-use targets (derogation applies for that year; Art. 29(13)).
- ▶ **Plastic packaging:** minimum recycled content (from PCR⁰³) limits phased in by 2030/2040 (Art. 7). By 2028 biodegradable plastics must be designed for material recycling (Art. 9).

Labeling requirements (Art. 12):

- ▶ By 2026: Packaging must bear a type, batch or serial number, or other element allowing its identification, and the name, trademark, and postal address of the manufacturer/importer.
- ▶ By 2028: Packaging must have a standardized digital marker (e.g., QR code) and harmonized labeling detailing i.a., material composition, recycled content, compostability, and reusability.



Affected market players

- ▶ **Importer:** Places packaging from a third country on the market (Art. 3(17)).
- ▶ **Distributor:** An entity other than an importer or manufacturer that makes packaging available on the market (Art. 3(18)).
- ▶ **Manufacturer:** Manufactures packaging or a packaged product or has packaging or a packaged product designed or manufactured under its own name or trademark (Art. 3(13)).⁰⁴



Application timeline

11.02.2025 Regulation in force
12.08.2026 Application of regulation

Subsequent supplementation with details through delegated and implementing acts. Stepwise increase of the minimum requirements.

Disclaimer: Some dates mentioned in this module may be subject to change due to implementing acts.

⁰¹ Recyclability grades are based on "Design for Recycling" (DfR) criteria. DfR refers to the design of packaging that ensures recyclability through established, operationally proven processes. Grades: A = DfR ≥95 wt%, B = DfR ≥80 wt%, C = DfR ≥70 wt%.

⁰² Filling material is considered empty space.

⁰³ Post-consumer plastic waste

⁰⁴ Other special cases conceivable



Role of chemical distributors

To comply with the PPWR regulation as a chemical distributor, you must understand your packaging usage and your formal PPWR role (distributor, importer, or manufacturer) when handling packaging, including packaged products. Additionally, you must determine whether you are considered the producer of the packaging. The following flowchart and detailed implementation steps provide guidance on achieving PPWR compliance.

- 1 Create a packaging item catalog for inventory analysis of all packaging used
- 2 Identify the producer for each item and, if applicable, fulfill producer obligations
- 3 Assess your status quo based on information collected in steps 1 and 2

- 4 Fulfill obligations according to your assigned role (distributor, importer, or manufacturer)

4a Distributor & importer obligations	4b Additional importer obligations	4c Manufacturer obligations
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- 5 Report on required information according to your role and obligations

Packaging of dangerous goods under the CLP Regulation⁰⁵

In the case of dangerous goods, the packaging, in particular the materials used, is also regulated under the CLP Regulation. In general, packaging must comply with both PPWR and CLP.



Implementation steps for SMEs⁰⁶

1. Create a packaging item catalog for inventory analysis of all packaging used

- ✓ **Create a catalog**, e.g., in Excel, listing all packaging and packaged products processed within your company. Include information about the product, the packaging, and compliance requirements, i.e., packaging type (transport, sales, or group packaging), plastic content, weight, distribution channel (online/offline), and reusability.
- ✓ **Categorize your role** for each packaging or packaged product item in the catalog.
- ✓ **Check each item** to see if any derogations apply and add the information to the catalog. Selected relevant derogations are:⁰⁷
 - ✓ **Dangerous goods**: Transport packaging⁰⁸ does not need to meet recyclability criteria (Art. 6(11)), minimum recycled material contents in plastic (Art. 7(4)), or re-use targets (Art. 29(4)).
 - ✓ **Transport packaging**: Labeling obligations do not apply (Art. 12(1)), except for e-commerce.

2. Identify the producer for each item and, if applicable, fulfill producer obligations

- ✓ **Identify the producer** for all packaging that you handle.
 - ! Simplified definition⁰⁹: You are considered the producer, ...
 - if you are established in a Member State and make available for the first time from within the territory of that Member State and on that same territory transport packaging, service packaging, or primary production packaging or products packaged in other packaging; or
 - if you are established in a Member State or in a third country and make available for the first time on the territory of another Member State, directly to end users¹⁰, transport packaging, service packaging or primary production packaging or products packaged in other packaging; or
 - if you are established in a Member State and unpack packaged products without being an end user, unless another person is the producer.
 - ! As a chemical distributor, there are a number of potential scenarios where you could be classified as a producer.
- ✓ **Fulfill the producer obligations for packaging** for which you are the producer and have thus extended producer responsibility (EPR).
 - ✓ Register in the national producer register.
 - ✓ Appoint an authorized representative for the extended producer responsibility (EPR) in each Member State where you make packaging or packaged products available for the first time, other than the Member State where you are established.
 - ✓ Pay financial contributions to cover costs for separate collection, transport, treatment, information provision and awareness campaigns, data gathering, labeling of collection containers. Exact costs depend on weight and material.
 - ✓ Make available to end users information regarding the prevention and management of packaging waste, i.e., the end users' role in waste prevention and separate waste collection, re-use arrangements for packaging, and meaning of labels (Art. 55).

⁰⁵ Classification, Labelling and Packaging Regulation (EC) 1272/2008

⁰⁶ Implementation steps are similar for companies of all sizes.

⁰⁷ For other derogations, see in particular Articles 5-12, 15, 25, 29, and 52.

⁰⁸ Packaging designed to prevent product damage during handling and transport, does not include road, rail, ship, or air containers.

⁰⁹ For more information, see Art. 3(15).

¹⁰ An end user does not make the product further available on the market in the form in which it was supplied. The PPWR considers both consumers and professional end users.

- ☑ Implement self-control mechanisms to ensure compliance with extended producer responsibility.
- ☑ Report annually on packaging type and amount made available on the market (Annex IX). The required information may be obtained from the catalog in combination with an Enterprise Resource Planning (ERP) system.
- ⚠ The extended producer responsibility can be delegated (Art. 46) to a producer responsibility organization (PRO) that carries out these obligations, e.g., by an online application with the corresponding organization.

3. Assess your status quo based on information collected in steps 1 and 2

- ☑ Document to-dos in the catalog.
- ☑ Mark items as high, medium or low effort for PPWR implementation and cluster to-dos.

4. Fulfill obligations according to your role (distributor, importer, or manufacturer)

4a. Distributor & importer obligations (Art. 18, 19):

- ☑ **Establish control mechanisms for all items in the catalog** to verify the following points and add the information to the catalog:
 - The producer's registration in the national register of producers.
 - Correct labeling via harmonized labels and information availability before an online purchase (Art. 12(5)).
 - ✔ **This requirement does not apply to transport packaging (except for e-commerce) and packaging subject to a deposit and return system (Art. 12(1)).**
 - Compliance of the manufacturer/importer regarding the identification token (e.g., type, batch, or serial number; Art. 15(5)) and identity token¹¹ (e.g., via QR code; Art 15(6), Art. 18(3)).
 - Document further to-dos in the catalog.
- ☑ **Ensure transport conditions do not jeopardize sustainability and labeling requirements** while the packaging is under your responsibility.
- ☑ **Inform the market surveillance authorities** if packaging that has been made available on the market might not conform to sustainability requirements.
- ☑ **Comply with re-use targets for transport packaging and sales packaging** used for transporting (Art. 29):¹²
 - ✔ **Does not apply to cardboard boxes or packaging of dangerous goods.**
 - ⚠ A total of 40% (70%) must be reusable by 2030 (2040) within a re-use system.
 - ⚠ If transport occurs in the same Member State or between different sites or linked enterprises in the EU, the corresponding packaging must be fully reusable by 2030.
- ☑ **Comply with re-use targets for grouped packaging**¹³ in form of boxes (Art. 29(5)):
 - ✔ **Does not apply to cardboard.**
 - ⚠ 10% (25%) must be reusable by 2030 (2040).
- ⚠ Information regarding customers and suppliers must be provided to market surveillance authorities upon request (Art. 22). The information should be available for 5 years for single use packaging and 10 years for reusable packaging. The information may be obtained from an Enterprise Resource Planning (ERP) system.
- ⚠ Be aware that if you modify packaging in a way that could affect compliance or place it under your own name or trademark on the market, manufacturer obligations apply to you (Art. 21).

4b. Additional importer obligations (Art. 18)

- ☑ Establish additional control mechanisms to verify that the manufacturer has met all compliance criteria for the packaging:
 - ☑ Acquire the declaration of conformity and the technical documentation from the manufacturer.
 - ☑ Verify that the sustainability requirements (Art. 5-11) have been met by checking the technical documentation provided by the manufacturer.
 - ☑ Verify correct labeling of all packaging (Art. 12).
- ☑ Provide your name, registered trade name/trademark, and postal address on the packaging or on a QR code or other standardized, open, digital data carrier.
- ☑ Keep documentation of the EU declaration of conformity for 5 years for single-use and 10 years for reusable packaging.
- ☑ Document your compliance and further to-dos in the catalog.

¹¹ Includes name, registered trade name/trademark, and postal address

¹² Amongst others, pallets, foldable plastic boxes, boxes, trays, plastic crates, intermediate bulk containers, pails, drums and canisters, stabilization straps or pallet wrappings

¹³ Packaging that groups a certain number of sales units at the point of sale

4c. Manufacturer obligations (Art. 15)

- ✓ Carry out the conformity assessment procedure for all produced packaging types before placing **sustainability-compliant** and **correctly labeled** packaging on the market (Art. 38):
 - ✓ Establish the technical documentation (c.f. Annex VII).
 - ✓ Draw up a written declaration of conformity for each packaging type (Art. 39; template: Annex VIII); keep it for 5 years for single-use and 10 years for reusable packaging.
 - ✓ Provide the technical documentation and the declaration of conformity to business partners.
 - ✓ Document your compliance and to-dos in the catalog.
- ! Significant efforts are expected to align existing packaging with PPWR requirements.
- ✓ Make packaging identifiable (e.g., via type, batch, or serial number).
- ✓ Provide your name, registered trade name/trademark, and postal address on the packaging or on a QR code or other standardized, open, digital data carrier.
- ✓ Potentially appoint an authorized representative who performs tasks specified in the mandate (e.g., data provision for authorities; Art. 17) and add the information to the catalog.

5. Report on required information according to your role and obligations

- ✓ **Producers (or authorized representatives for the EPR or producer responsibility organizations):** Report annually to the competent national authority on the provided packaging (Annex IX).
- ✓ **Distributors, importers, and manufacturers (or authorized representatives of manufacturers):** By 2030, report annually to the competent national authority on the achievement of your re-use targets.
- ✓ **Upon request by the competent authority:** Provide technical documentation, the declaration of conformity, and information regarding economic operators that have supplied you with or to which you supplied packaging or packaged products.



Checks & penalties

- ▶ Penalties and fines have not yet been defined (expected in 2027).
- ▶ Market surveillance authorities will require economic operators to bring non-compliant or dangerous packaging into compliance, withdraw, or recall it.



Further reading

- ▶ [Template for the EU declaration of conformity in Annex VIII of the PPWR](#)
- ▶ [Euopen PPWR Survival Guide](#)
- ▶ [Euopen Factsheet for extended producer responsibility \(EPR\) for used packaging](#)
- ▶ [Recorded Webinar on the PPWR by the EC](#)