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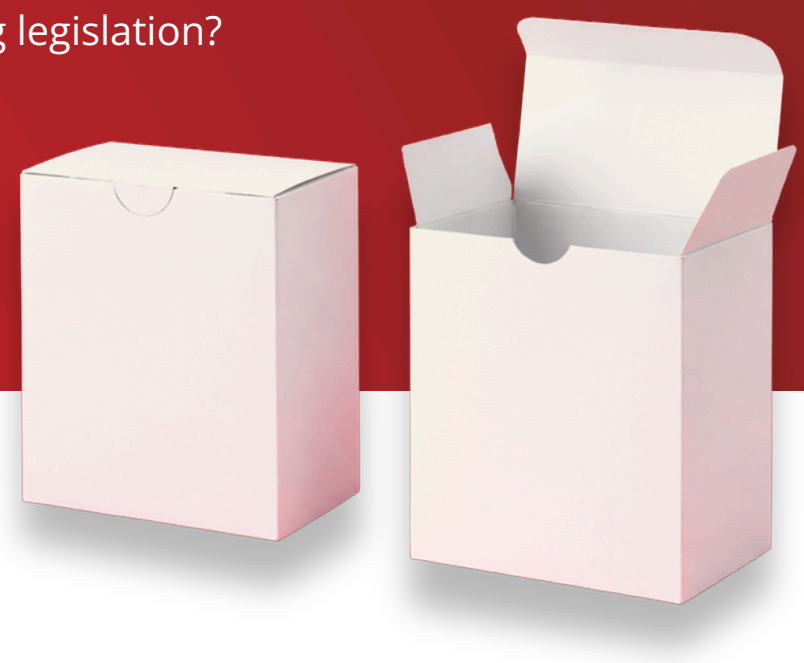
PPWR – THE NEW EU PACKAGING REGULATION

What is changing in packaging legislation?



Act early. Stay ahead.

The new **EU Packaging and Packaging Waste Regulation (PPWR) 2025/40** introduces significant changes for companies that manufacture, use or place packaging on the market. The Regulation entered into force on 11 February 2025 and will apply directly in all EU Member States from 12 August 2026. As an EU Regulation, it is legally binding without requiring transposition into national law. In Germany, it will apply alongside the German Packaging Act (VerpackG).

Its objective is to significantly reduce packaging waste, improve the recyclability of packaging, strengthen the circular economy, restrict hazardous substances, enhance consumer information and establish harmonised packaging requirements across the European Union.

The following information represents an excerpt of the PPWR. The interpretations derived from it are not legally binding. Although the information has been prepared with great care, we accept no liability for its accuracy or completeness. If in doubt, please consult your legal adviser for guidance specific to your individual circumstances.

Status: June 2026

ROLES AND RESPONSIBILITIES

The PPWR defines clear responsibilities throughout the entire packaging value chain – from production to recycling.

ALLOCATION OF ROLES UNDER THE PPWR

Supplier

Any natural or legal person supplying packaging or packaging materials to a producer.

Producer

Any natural or legal person manufacturing packaging or a packaged product, or having packaging or a packaged product designed or manufactured under its own name or trademark.

Importer

Any natural or legal person established within the Union that places packaging or packaged products from a third country on the market.

Manufacturer

Any producer, importer or distributor that fulfils one of the following criteria:

- **First placing on the market of transport packaging, service packaging or primary production packaging** within the Member State in which it is established;
- **First placing on the market of products** packaged in packaging other than those referred to above, in particular sales packaging and grouped packaging;
- **Direct sale** of transport packaging, service packaging, primary production packaging or packaged products to end users in an EU Member State from another country (EU or non-EU);
- **Unpacking** packaged products without being the end user of those products, unless another party fulfils the manufacturer criteria referred to above for those products.

Distributor / Retailer

Any natural or legal person in the supply chain making packaging or packaged products available to other distributors, retailers or end users, with the exception of the producer or importer.

Packaging Waste Management Operator

Collection, sorting and recycling of packaging waste.

1. Origin & Production
2. Market Entry
3. Trade & Use

Illustration: Karl Knauer KG

ROLES AND RESPONSIBILITIES

Supplier
Provides material and specification documentation for the packaging so that the producer can carry out the conformity assessment procedure using this information.

Producer
Primarily responsible for the compliance of packaging under its control and required to carry out the relevant conformity assessment procedures for various obligations under the Regulation.

Distributor / Retailer
Verifies labelling, registration and the identification of producers and importers.

KEY COMPLIANCE REQUIREMENTS

Technical Documentation and Conformity Assessment
The producer must assess the PPWR requirements applicable to the packaging and prepare technical documentation containing all relevant packaging information, standards and evidence demonstrating compliance with the PPWR. This documentation serves as the basis for the conformity assessment procedure and must clearly demonstrate compliance with the applicable requirements. Packaging compliance must be documented and made available to the competent authorities upon request.

EU Declaration of Conformity
Through the EU Declaration of Conformity, the producer confirms compliance with all applicable PPWR requirements.

Packaging Labelling
Packaging must carry the required producer information. This includes producer identification, such as the trade name, postal address and, where applicable, electronic contact details of the producers and importers responsible for the packaging.
In addition, an identification mark must be affixed to ensure the traceability of the packaging (e.g. type, batch or serial number). **Reusable packaging** must be marked in a way that informs users about its reusability and clearly distinguishes it from single-use packaging.

KEY REQUIREMENTS AT A GLANCE

Article 5
12 August 2026

Restrictions on hazardous substances

Restrictions apply in particular to substances of concern, chemical substances and food-contact materials (e.g. lead, cadmium, mercury and hexavalent chromium).

Article 6
1 January 2030 onwards

Recyclability becomes the standard

Packaging must be designed to enable efficient recycling in accordance with clearly defined EU criteria.

Article 7
1 January 2030 onwards

Increased use of recycled content

Minimum recycled content requirements will become increasingly important, particularly for plastic packaging.

Article 10
1 January 2030

Less is more

Packaging must be reduced to the minimum necessary in terms of volume, weight and material usage.

Article 11
11 February 2025*

Reuse is gaining importance

Reuse and reusable packaging targets will be introduced for selected sectors.

Article 12
12 August 2028

Transparency becomes mandatory

Harmonised EU labelling for packaging materials and disposal instructions, as well as digital information requirements.

*** retroactively applicable to all packaging first placed on the EU market from 11 February 2025 onwards**

Article 15
12 August 2026

Producer obligations

Producers are responsible for packaging compliance and labelling.

Article 16
12 August 2026

Supplier obligations

Suppliers must provide relevant information, such as technical drawings and evidence of compliance with substance restrictions.

Article 19
12 August 2026

Distributor obligations

Distributors verify registration, labelling and producer and importer identification.

TIMELINE OF KEY REQUIREMENTS*

11.02.2025
- Reusable Packaging
  Article 11

12.08.2026
- Compliance with substance requirements
  Article 5
- Producer obligations (Technical Documentation, EU Declaration of Conformity, Producer Identification, Recyclable Packaging)
  Article 15

12.08.2028
- New EU labelling requirements for sorting and disposal instructions
  Article 12**

01.01.2030
- Packaging minimisation
  Article 10
- Recyclable Packaging
  Article 6**
- Minimum Recycled Content
  Article 7**

* The timeline is highly simplified and does not reflect the full complexity of the PPWR.
** Subject to potential changes in implementation dates.

What does this mean for your business?

- ☑ Review existing packaging thoroughly
- ☑ Align materials and packaging designs with future requirements
- ☑ Assess recyclability and resource efficiency
- ☑ Establish processes and compliance documentation at an early stage

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Questions? Get in touch with us.

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