



Version 2.0

Summary of the  
Packaging and Packaging  
Waste Regulation [PPWR]

## Table of Contents

<b>Introduction to the PPWR</b>	<b>3</b>
What is the PPWR?	3
Where do we stand?	3
What comes next?	3
<b>Key highlights of the PPWR for Royal LC Packaging</b>	<b>4</b>
Extended Producer Responsibility	4
Requirements for substances in packaging	4
Recyclable packaging	4
Minimum recycled content in plastic packaging	5
Bio-based plastic	6
Compostable packaging	6
Reuse	6
Labelling	7
Restrictions on the use of certain types of packaging	7

## Introduction into the PPWR

### What is the PPWR?

The [PPWR](#) is a European Union (EU) regulation to reduce packaging pollution and create a circular economy for packaging. Once in force, it will apply across all the EU countries for any packaging, including imported packaging. It sets targets to reduce packaging waste overall, mandates specific requirements for packaging sustainability (recyclability, recycled content, reuse, packaging minimisation etc.), and ensures that Extended Producer Responsibility [EPR] schemes are rolled out across all European Union member states.

### Where do we stand?

**The PPWR has been adopted by the European Parliament!** On 24 April 2024, the PPWR was passed with a large majority: 476 votes in favour and 129 against. This indicates that after tumultuous negotiations, many parliamentarians believe it was time to move forward with the compromise text. The compromise text is the result of extensive trilogue negotiations between the [European Parliament](#), [European Council](#), and [European Commission](#). The [initial proposal](#) was made on 30 November 2022 by the European Commission.

### What comes next?

The PPWR underwent lawyer-linguistic review and translation into all EU languages. The final package was approved December 2024 by the European Council and European Parliament. **With this timeline, the PPWR will become EU-wide law in mid-2026.**

The PPWR defines many new targets and requirements for packaging. Many of the finer details of these requirements still must be clarified by the European Commission. The PPWR sets various requirements and timelines by when the European Commission must publish these *delegated acts*.

**IMPORTANT NOTE:** This summary is made available by Royal LC Packaging for educational purposes and to give general information on the PPWR. It is not a legal interpretation.

## Key highlights of the PPWR for Royal LC Packaging

### Extended Producer Responsibility (EPR)

**The legislation reinforces the principle of Extended Producer Responsibility (EPR), compelling producers to pay for the management, disposal, and recycling of packaging waste.** This responsibility covers the financial and organisational aspects of collecting, sorting, treating, and recycling packaging materials throughout their lifecycle. EPR schemes are aimed at promoting waste reduction at the source, encouraging producers to design packaging that is easier to recycle.

EPR obligations are currently different across the European Union. This has led to significant differences in the approach and scope. The PPWR seeks to at least partially harmonise this by setting common responsibilities for companies and producer responsibility organisations including:

- public reporting and a database of all participating companies
- common packaging categories
- and shared criteria for eco-modulation (fee increases/decreases for recyclability and recycled content)

The PPWR also reinforces the existing directive [2008/98/EC](#), stating that EPR systems must at least cover the costs of the waste collection, infrastructure, operation, transport and treatment of waste in public collection systems, as well as litter clean-up costs. It can be expected that the EPR fees payable by packaging users will increase substantially in most countries. This will incentivise reduction and reuse of packaging. As the PPWR will introduce discounts for recyclable packaging and packaging including recycled content this will also be promoted.

### Requirements for substances in packaging (Article 5)

**The PPWR imposes new limitations on the presence of hazardous materials in packaging,** to minimise the health risks and environmental impact. A new limit is set for the presence of heavy metals in packaging, effective immediately. From 2028 (18 months after entry into force of the regulation), the regulation sets specific concentration limits for the presence of non-polymeric PFAS. By the end of 2026, the European Commission is requested recommend further restrictions.

### Recyclable Packaging (Article 6)

**The PPWR requires that all packaging placed on the market must be recyclable by 2030.** This initiative is part of a larger effort to ensure that packaging entering the market does not end up as waste but rather as part of a material loop that is continuously reused. To define recyclability, the European Commission must adopt delegated acts to establish Design-for-Recycling criteria for each packaging type (e.g., PP flexible, PP rigid, PET bottles etc.). The criteria should categorise packaging into recycling performance grades A-C, considering the ability of packaging to be correctly sorted and available recycling technologies. Packaging that does not meet the

requirements to achieve at least Grade C will no longer be allowed in the market. It must also be specified exactly how manufacturers must perform the recyclability performance assessment. From 2038, only performance grades A-B will be considered recyclable, with packaging in grade C banned.

By 2035 all packaging must also demonstrate to be recycled at scale. By 2030 the European Commission must establish the methodology to assess this based on the actual volume of each packaging type, and proportion which is recycled. A chain of custody process must be established to ensure that packaging manufacturers are able to obtain the necessary data from down-stream operators.

Compliance with these requirements is the responsibility of the packaging manufacturer who must provide technical documentation in accordance with the requirements specified in Annex VII. National EPR systems must adjust the EPR fees paid by packaging users to reflect the recyclability grade.

These requirements are not applicable for packaging of medical products & devices, veterinary products, infant formula & foods, and dangerous hazardous goods. It also does not apply to smaller packaging materials including wood, cork, textile, rubber, ceramic, porcelain, or wax. However, differentiated EPR fees will still be applicable for these materials.

### Minimum recycled content in plastic packaging (Article 7)

**By 2030, any plastic part of packaging must include a minimum percentage of post-consumer recycled content (PCR).** The recycled content should be calculated as an average per packaging type, per manufacturing plant, per year. The recycled materials must come from post-consumer plastic waste collected and recycled within the European Union, or from non-EU countries respecting the same standards for waste collection and environmental performance as in Europe.

	2030	2040
Contact-sensitive packaging with PET as major component (except single-use beverage bottles)	30%	50%
Contact-sensitive packaging made from plastic materials other than PET (except single-use plastic beverage bottles)	10%	25%
Single-use beverage bottles (PET and other materials)	30%	65%
All other plastic packaging not covered by above categories	35%	65%

These targets do not apply to medical products & devices, veterinary products, infant formula & food, and dangerous goods. It also does not apply to food contact packaging if the recycled content poses a threat to human health, or if the plastic component of a packaging is less than 5% of the total weight.

The European Commission is required to develop a methodology for calculation and verification of PCR content by end-2026 to enforce these targets, that may include 3<sup>rd</sup> party verification.

## Bio-based plastic (Article 8)

The PPWR requires the European Commission to publish a report on the possibility of using **bio-based plastic feedstock for packaging**, defining sustainability criteria for bio-based feedstock (e.g., avoiding deforestation and land-use competition), and setting targets for the use of biobased feedstock. This could include allowing companies to use biobased feedstock rather than recycled material for food-contact packaging.

## Compostable Packaging (Article 9)

The PPWR gives a limited scope to compostable plastics, mandating **compostable packaging to be used for a small number of products (e.g., tea and coffee bags)**. Other packaging can be compostable, but must allow recycling without affecting other waste streams, meaning it should be allowed to be processed in existing biowaste streams under industrial composting conditions. The European Commission is requested to update the norm EN13432 to define explicitly the criteria for home composability.

## Reuse (Article 11, Article 26, Article 27, and Article 29)

**From 2030, companies using transport packaging or sales packaging used for transporting products must meet minimum reuse requirements.** This applies to pallets, boxes, trays, plastic crates, IBCs, pails, drums and canisters of all sizes and materials, including flexible formats such as FIBCs.

- By 2030, at least 40% of such packaging is reusable packaging within a system for reuse. This rises to 70% by 2040.
- By 2030, 100% of such packaging that is used between sites of the same company (or any other linked / partner company) must be reusable packaging within a system for reuse.
- By 2030, 100% of such packaging that is used for transportation to another company in the same EU country must be reusable packaging within a system for reuse.

These requirements do not apply to hazardous goods or flexible packaging used for direct food, food ingredients and animal feed contact. Cardboard boxes are also excluded from the reuse requirements, as are micro-enterprises. Individual countries may also postpone the implementation of the reuse targets if the country is overachieving the recycling targets and waste reduction targets applicable to all EU member states.

## Labelling (Article 12)

**Consumer packaging should be clearly labelled with the material composition, recycled and biobased content, sorting requirements, and when relevant information related to its reuse or deposit & return scheme.** Further implementing acts must be developed by the European Commission to establish a methodology for composite packaging and packaging with multiple components. By 2030, the presence of substances of concern must also be included on the label.

The labelling requirement does not apply to transport packaging. However, as material composition will still be a critical input to assess the recyclability grade of packaging products, it will be required in product information.

## Restrictions on the use of certain types of packaging (Article 25)

**From 2030, several packaging formats are banned from the European market,** including single-use plastic packaging for <1,5kg of pre-packed unprocessed fresh fruit and vegetables, single-use plastic packaging in the HORECA sector, and very lightweight plastic carrier bags. Plastic trays, punnets and net bags intended for <1,5kg of unprocessed fruit and vegetables will therefore no longer be allowed.