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Statement – Information on Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR)

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1. General Information

Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR) was published on 22 January 2025 and replaces Directive 94/62/EC. Unlike the previous directive, the PPWR is a directly applicable EU regulation, meaning its requirements apply uniformly across all Member States without national transposition.

The PPWR aims to:

- reduce packaging waste at the source
- ensure all packaging is reusable or recyclable
- restrict hazardous substances in packaging
- harmonise labelling and conformity requirements
- strengthen extended producer responsibility (EPR)

The first obligations of the PPWR become applicable on 12 August 2026, with additional requirements phased in between 2027 and 2035.

2. Key Definitions and Responsibilities

The PPWR introduces three central economic actors with distinct obligations: Supplier, Manufacturer, and Producer. These terms have specific legal meanings under the PPWR.

Supplier

A supplier is any natural or legal person who provides packaging or packaging materials to a manufacturer (Art. 3(1)(16) PPWR).

A supplier is not someone who sells packaging to retailers, distributors, or customers in third countries—unless they act as a manufacturer.

Supplier obligations

Suppliers must provide the manufacturer with all information and documentation necessary to demonstrate the conformity of the packaging. This information may be provided in paper or electronic form (Art. 16(1) PPWR).

Manufacturer

A manufacturer is the natural or legal person who:

- has packaging or packaged products designed or manufactured by another party under its own name or trademark, or
- manufactures packaging or packaged products itself,
- with the intention of placing them on the EU market (Art. 3(1)(13)).

a) Contract manufacturing If Company A commissions Company B to produce packaging under A's name or trademark, Company A is the manufacturer, unless it is a micro-enterprise. It does not matter if B's name also appears on the packaging.

The decisive factor is: Who takes responsibility for placing the packaging on the EU market?

b) No contract manufacturing If no contract manufacturing exists, the manufacturer is:

- the maker of the empty packaging or
- the filler (the one who fills the packaging),

depending on who can assess the conformity of the packaging in its final form (Art. 15(2)).

Examples:

- **Transport packaging** (e.g., pallets, crates): the maker of the empty packaging is the manufacturer.
- **Flexible packaging** (e.g., stretch film): final form is reached only when applied → the filler is the manufacturer.
- **Sales and grouped packaging**: only considered "packaging" once filled → the filler is the manufacturer.

There can only be one manufacturer per packaging item.

Manufacturer obligations may be transferred to an importer or distributor (Annex 4 PPWR).

Producer (Extended Producer Responsibility – EPR)

A producer is the natural or legal person who bears the extended producer responsibility (EPR) for packaging waste in the EU (Art. 44–47 PPWR).

There is one producer per Member State where the packaging becomes waste.

Producer determination

- a) Packaging becomes waste in the EU Only then does a producer exist under the PPWR.
- b) Domestic supply chain: The producer is the manufacturer, importer, or distributor established in that Member State who first makes available:
 - packaged products, or
 - empty transport, service, or primary production packaging.
- c) Cross-border supply chain: If packaging is supplied directly to end users across borders, the producer is the company established in another EU Member State or a third country that first makes the packaging available domestically.
- d) If no manufacturer exists, the producer may be the company that unpacks packaged products without being the end user.

According to the definitions set out in the PPWR, our organisation is, in the majority of cases, classified as a supplier of packaging materials. We therefore implement and comply with all obligations applicable to suppliers under the regulation.

3. PPWR Obligations – Timeline Overview:

PPWR Obligation	Obligated Party	Effective From
Article 5 – Substance limits (incl. PFAS in food packaging)	Manufacturer	12 Aug 2026
Article 15 – Conformity assessment & EU DoC	Manufacturer	12 Aug 2026
Article 16 – Information obligations	Supplier	12 Aug 2026
Article 19 – Verification	Distributor	12 Aug 2026
Articles 26–31 – Reuse requirements & reporting	Economic operators	12 Aug 2026; reporting from 1 Jan 2030
Article 45 – EPR obligations	Producer	12 Aug 2026
Article 47 – Authorisation of PROs	Producer / PRO	12 Aug 2026
Article 44 – Registration & quantity reporting	Producer / PRO	Registration: 12 Aug 2027; reporting approx. 1 Jun 2029
Article 24 – Empty space restriction	Fillers / economic operators	12 Feb 2028 (sales) / 1 Jan 2030 (grouped/transport/e-commerce)
Article 9 – Compostable packaging	Manufacturer	12 Feb 2028
Article 12 – Pictogram labelling	Manufacturer	12 Aug 2028 (earliest)
Article 67(5) – SUPD extension	Economic operators	12 Feb 2029
Article 6 – Recyclable packaging	Manufacturer	1 Jan 2030 / 1 Jan 2035
Article 7 – Recycled content	Manufacturer	1 Jan 2030 / 1 Jan 2040
Article 10 – Packaging minimisation	Manufacturer / Importer	1 Jan 2030
Article 25 – Bans (Annex V)	Economic operators	1 Jan 2030
Article 8 – Bio-based plastics	Manufacturer	Not yet mandatory
Article 11(2) – Reuse of packaging	Economic operators	Not yet mandatory

4. Our Organisation's Implementation of the PPWR

To ensure full compliance with the PPWR, we have implemented the following measures:

4.1. Obligations Applicable From 12 August 2026

Supplier Information Obligations (Article 16)

From August 2026, suppliers must provide manufacturers with all information necessary to demonstrate packaging conformity. We already meet this requirement through:

- documented material composition for all packaging materials
- identification of all constituent materials
- assessment of mono- and multi-material structures
- traceability of raw materials through supplier documentation
- integration of this information into our quality management system

This ensures that manufacturers receive complete and reliable data to support their own PPWR compliance, including their EU Declaration of Conformity.

Substance Limits (Article 5)

We support manufacturers in meeting substance restrictions by providing:

- confirmation that our packaging materials do not contain substances of very high concern (SVHCs) above 0.1% w/w
- confirmation that our packaging materials do not contain substances restricted under REACH Annex XVII
- confirmation that heavy metals (lead, cadmium, mercury, hexavalent chromium) do not exceed 100 ppm
- PFAS compliance information, including:
 - no intentionally added PFAS in our materials or processes
 - supplier-based information confirming no PFAS-containing raw materials
 - reliance on the 2025 RI.SE study demonstrating that unintentional PFAS presence does not exceed the 50 mg/kg total fluorine threshold

Based on this, we confirm that our packaging materials contain < 50 mg/kg total fluorine, consistent with EU guidance.

Our compliance statement for Article 5, including substance limits and PFAS-related requirements, is available upon request.

Support for Manufacturer Conformity Assessment (Article 15)

Although the obligation to issue an EU Declaration of Conformity lies with the manufacturer, we provide all necessary technical information to support this process. This includes material composition, recyclability classification, and PFAS compliance information.

4.2. Obligations Applicable From 2027

Registration and Reporting (Article 44)

This obligation applies to producers, not suppliers. We will continue to provide all necessary data to customers who must fulfil these requirements.

4.3. Obligations Applicable From 2028

Compostable Packaging (Article 9)

This requirement applies only to specific packaging types. If any of our supplied materials fall under Article 9 in the future, we will provide the necessary compostability information. At present, this requirement is not applicable to our product portfolio.

Pictogram Labelling (Article 12)

This obligation applies to manufacturers. We will provide material information needed for correct labelling once the harmonised pictograms are finalised.

Empty Space Restriction (Article 24)

This obligation applies to fillers and economic operators, not suppliers. We will support customers with technical data if required.

4.4. Obligations Applicable From 2029

SUPD (Single-Use Plastics Directive) Extension (Article 67(5))

This applies to economic operators placing Single-Use Plastics on the market. We will support customers by confirming whether supplied materials fall under restricted categories.

4.5. Obligations Applicable From 2030

Recyclability Requirements (Article 6)

We support manufacturers in meeting recyclability requirements through:

- our recyclability assessment (A/B/C classification)
- evaluation of material compatibility, separability, and recycling streams
- commitment to align our methodology with upcoming EN standards once published

Packaging is evaluated according to the PPWR recyclability framework:

Class	Recycling Performance	Meaning
A	≥ 95% recyclable	Fully recyclable
B	≥ 80% recyclable	Highly recyclable
C	≥ 70% recyclable	Minimally acceptable recyclable
Below C	< 70%	Not recyclable

Packaging Minimisation (Article 10)

This obligation applies to manufacturers and importers. We will provide technical data (e.g., material thickness, weight) to support minimisation assessments.

Recycled Content Requirements (Article 7)

We support customers by ensuring that recycled PP and PE are only used when fully compliant with food contact legislation. We will align with mandatory recycled content thresholds once they enter into force.

Packaging category	Minimum recycled plastic content by 2030	Target by 2040
Contact-sensitive packaging – PET (food, pharma, cosmetics)	30%	50%
Contact-sensitive packaging – other plastics (incl. PP → rPP)	10%	25%
Single-use plastic beverage bottles	30%	65%
All other plastic packaging (transport, industrial, non-food)	35%	65%

Conclusion

As a supplier, we confirm that:

- we fulfil all PPWR obligations applicable to us from 12 August 2026 onward
- we provide manufacturers with all information required for their own PPWR compliance
- we maintain complete technical documentation supporting conformity, recyclability, and substance compliance
- we monitor regulatory developments and will update our processes as new delegated acts, EN standards, and implementation rules are published

We remain committed to supporting our customers throughout the phased introduction of the PPWR and ensuring that all supplied packaging materials meet the evolving regulatory requirements.