

EU PACKAGING AND PACKAGING WASTE REGULATION (PPWR)

Stay compliant as EU packaging requirements become mandatory

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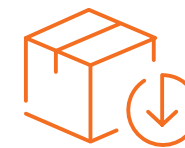
The EU Packaging and Packaging Waste Regulation (Regulation (EU) 2025/40, PPWR) came into force on February 11, 2025. It marks a significant shift for manufacturers, retailers and brands, replacing directive-based guidance with directly applicable legal requirements and introducing stricter controls across the packaging life cycle.

PPWR repeals and replaces Directive 94/62/EC, establishing a harmonized regulatory framework across all EU Member States. The general application date is August 12, 2026, including the enforcement of requirements on substances of concern (SoC) and per- and polyfluoroalkyl substances (PFAS), though some obligations will be phased in over time.

New EU packaging rules affect everyone. Now is the time to ensure compliance.



Objectives



Reduce packaging waste



Ensure recyclability



Limit hazardous substances



Scale reuse systems

Key challenges

- ✓ Complex, evolving regulation
- ✓ Tight timelines and phased deadlines
- ✓ Major packaging redesign for recyclability
- ✓ Meeting recycled content (PCR) targets
- ✓ Strict PFAS and substance restrictions
- ✓ Supply chain traceability and transparency
- ✓ Limits on over-packaging and empty space
- ✓ Shift to reuse and new business models
- ✓ High testing and validation requirements
- ✓ Significant compliance and enforcement risk



Key requirements and compliance deadlines

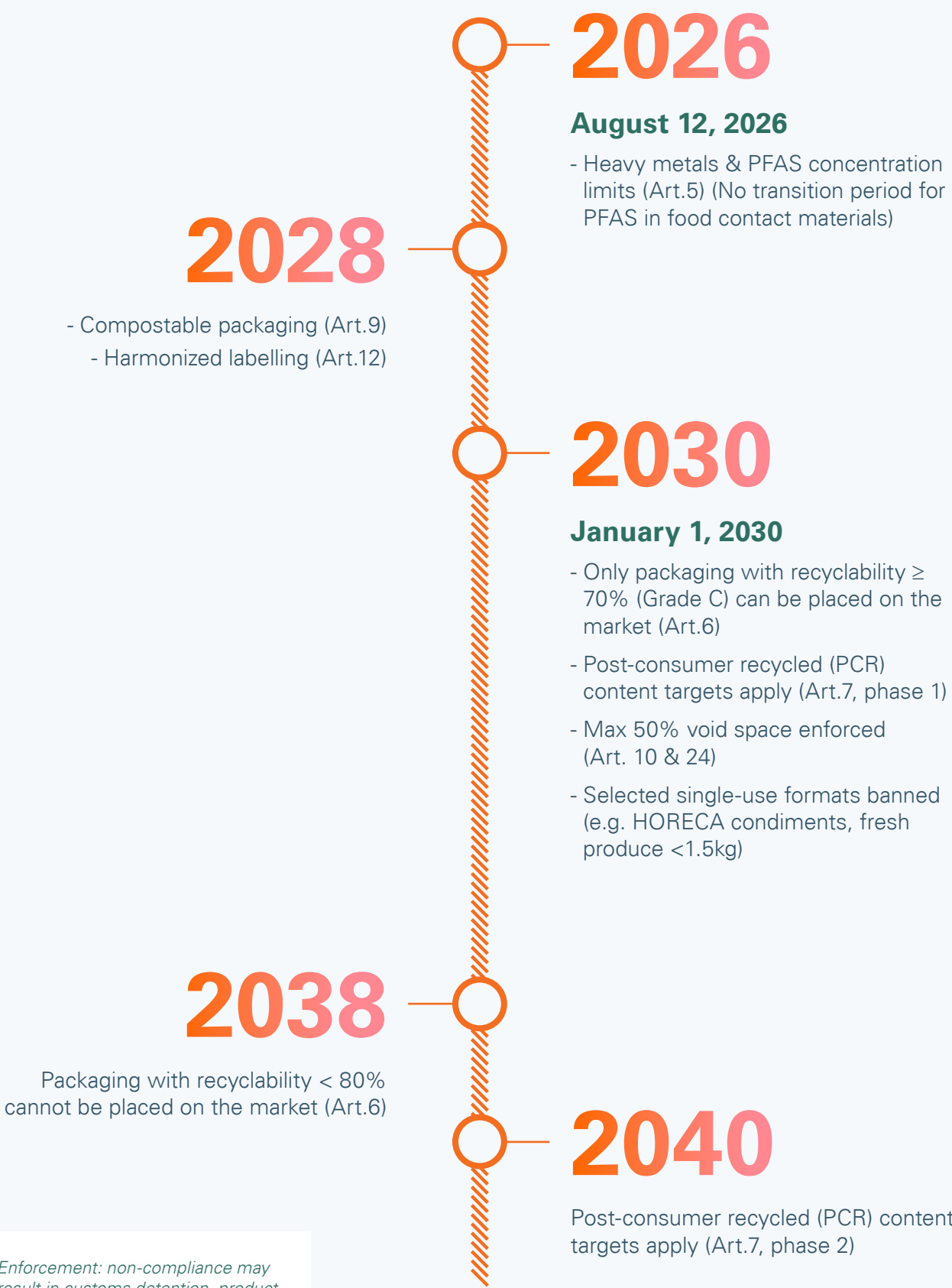
The table below outlines the key obligations, technical limits and compliance deadlines for economic operators.

Article	Requirements	Implementation date
 5. Requirements for substances in packaging	• Presence of SoC must be minimized • For any packaging or packaging components: sum of heavy metals - lead, cadmium, mercury and hexavalent chromium (Cr VI) - must not exceed 100 mg/kg • PFAS in food-contact packaging: prohibited if exceeding 25 ppb (any targeted PFAS), 250 ppb (sum of targeted PFAS) or 50 ppm (total fluorine, including polymeric PFAS)	August 12, 2026
 6. Recyclable packaging	• Packaging must be designed for recycling (DfR) • All packaging must achieve recyclability performance grades: - Grades A, B or C (≥ 70%) - Grades A or B (≥ 80%) from 2038	January 1, 2030 (or 24 months from delegated acts) January 1, 2038 (Grades A/B)
 7. Minimum recycled content in plastic packaging	Recycled content targets: • Contact-sensitive (PET): 30% by 2030 → 50% by 2040 • Contact-sensitive (non-PET): 10% by 2030 → 25% by 2040 • Single-use plastic beverage bottles: 30% by 2030 → 65% by 2040 • Other plastic packaging: 35% by 2030 → 65% by 2040 • Exempted: compostable plastics and plastic parts < 5% of total weight	January 1, 2030 (or 3 years from the date of entry into force of the implementing act, whichever is later)
 8. Biobased feedstock in plastic packaging	• Plastics made from biological resources, irrespective of whether the plastics are biodegradable or non-biodegradable • Establishes sustainability requirements • Introduces usage targets • Allows substitution where food-contact recycling is not feasible	February 12, 2028
 9. Compostable packaging	• Must be compostable (biodegrades under industrially controlled conditions): permeable tea, coffee or other beverage bag or similar packaging and sticky labels affixed to fruit and vegetables	February 12, 2028
 10. Packaging minimization	• Packaging must be minimized (weight, shape and volume) while maintaining function • EU standards defining limits to follow by 12 February 2027	January 1, 2030
 11. Reusable packaging	To qualify as reusable: • Designed for multiple uses • Capable of completing multiple rotations • Fulfils applicable consumer health, safety and hygiene requirements • Can be emptied, unloaded, refilled or reloaded without damage or risk to human health and safety • Capable of being reconditioned while maintaining its ability to perform its intended function • Allows labeling and provision of information • Meets recyclability requirements under Article 6	February 11, 2025

Article	Requirements	Implementation date
 12 & 13. Labeling of packaging & waste receptacles	• Harmonized material-based sorting labels (pictograms) on packaging and matching receptacles • Reusable packaging must carry a label informing users of reusability and a QR code (or equivalent digital data carrier) to track rotations	August 12, 2028 (sorting labels) February 12, 2029 (reusable labels)
 15. Obligations of manufacturers	Manufacturers must: • Prepare an EU declaration of conformity (DoC) • Retain technical documentation: 5 years (single-use), 10 years (reusable) from date of market placement • Ensure packaging carries a type, batch or serial number, or other element allowing its identification • Provide identification details (name, registered trade name or registered trademark, postal address and, where available, electronic contact details) on-pack or digitally (e.g. QR code)	August 12, 2026
 24. Obligation related to excessive packaging	• Maximum 50% empty space ratio* for grouped, transport or e-commerce packaging • Filling materials count as empty space * <i>Empty space ratio = (total volume - sales packaging volume) / total volume</i> • Sales packaging must minimize empty space to functional necessity, including product protection	January 1, 2030 (or 3 years from the entry into force of the implementing acts, whichever is later) 12 February 2028
 44 to 47. Register of producers and extended producer responsibility	• Mandatory registration in each Member State where packaging or packaged products are first made available • Extended producer responsibility (EPR) fees will be eco-modulated based on recyclability performance grades	see also EUNR – European National Registers Packaging Compliance & PPWR in Europe By June 1, 2029 (first reporting year)



Key timelines & enforcement



Enforcement: non-compliance may result in customs detention, product removal, fines (up to 4% of annual turnover) and market restrictions.

How we can help

With a global network of state-of-the-art laboratories and industry experts, our fast and reliable solutions help you achieve, demonstrate and maintain PPWR compliance while optimizing your supply chain and strengthening product credibility for EU market access.

Services include:



Material characterization & performance testing

Validate that alternative and sustainable materials meet required mechanical and functional standards



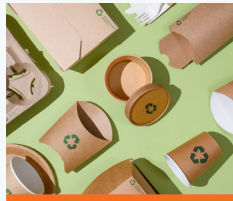
Recyclability assessment

Measure real-world recycling performance in line with international methodologies



Plastic-free identification & biodegradation testing

Confirm claims for paper-based and compostable packaging



Recycled content (PCR) verification

Combine laboratory analysis with on-site audits to ensure data authenticity



Technical advisory and consultancy services

Support with supply chain data collection, technical documentation (TD) compilation and EU Declaration of Conformity (DoC) preparation

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We support your sustainability goals through our four strategic pillars – climate, nature, ESG assurance and circularity. From life cycle assessments to PFAS management, our solutions help you meet evolving regulatory requirements and transition toward compliant, circular packaging systems to build a climate-neutral, nature-positive and pollution-free future.

Explore our **IMPACT NOW for sustainability** solutions.



When you need to be sure

SGS SA
Zugerstrasse 57
6340 Baar
Switzerland

sgs.com/PPWR

