



EU Packaging and Packaging Waste legislation

Unfolding the new packaging rules for agri-food operators supplying the EU markets

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Today's webinar



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- ❑ Brief introduction to AGRINFO
- ❑ Part I: EU packaging rules
 - Scope
 - Replacing previous rules (Directive [94/62/EC](#)) with the **new Packaging and Packaging Waste Regulation (PPWR)** [2025/40](#)
 - Overview of most relevant new obligations
- ❑ Part II: Practical implications of the new packaging rules
 - On all actors
 - On producers in non- EU countries
- ❑ Questions and answers

Further questions? e-mail: agrinfo@colead.link



Towards a fair, healthy and environmentally friendly food system: supporting compliance with regulatory and non-regulatory measures of the European Union (EU)



Implemented by COLEAD, a not-for-profit private sector organisation that manages development programmes in the agriculture and food sector (mainly in African, Caribbean and Pacific States) funded by donors, amongst which the EU is the most important.

An open access portal that provides up-to-date information on all recent and upcoming changes to EU rules that have an impact on agri-food and fish value chains

While AGRINFO is an EU-funded programme, this presentation does not reflect the views of the European Commission

Why AGRINFO?

Monitor

EU introduces approx.
180 new or changes to
agri-food rules every
year

Consolidate



Simplify

provides clear,
accessible
explanations of what
rules are changing,
why and implications

The website

www.agrinfo.eu

REPORTS ON:

- What ´s happening
- When
- Why
- Implications
- Recommended Actions
- Background & Resources

The screenshot shows the AGRINFO website homepage. At the top, there is a navigation bar with the AGRINFO logo, a home icon, and links for 'About AGRINFO', 'Search', 'Helpdesk', 'Subscribe', 'Publications', 'Links', and 'Webinars'. A language dropdown menu is set to 'EN'. Below the navigation bar is a large banner image of blueberries with a green overlay containing the text 'Webinar: New EU packaging and packaging waste rules (PPWR)'. Underneath the banner, a headline reads 'THE LATEST ON EU AGRI-FOOD POLICIES IMPACTING LOW- AND MIDDLE-INCOME COUNTRIES'. A translation notice is present: 'Traductions : sélectionner la langue dans la barre de menu ci-dessus ; puis, resélectionner la langue dans chaque rapport AGRINFO.' followed by similar instructions in Spanish and Portuguese. A central grid of six green buttons offers quick access to 'AGRINFO Publications', 'EU reports on non-compliance', 'Ongoing Consultations', 'AGRINFO Explainers', 'Search AGRINFO Reports', and 'Pesticide MRL Tracker'. Below this is a 'Latest Reports' section with a pagination control showing 'Showing 1 to 10 of 702 results' and a list of report titles. The first report is 'French national MRL measures on carbendazim, thiophanate-methyl, glufosinate, and mancozeb' dated 14 Jan 2026. The second is 'Temporary increased official controls on foods from certain countries – January 2026 update' dated 15 Jan 2026. On the right side, there is a 'What is AGRINFO?' section with a video thumbnail and an 'AGRIINFO TOOLS' section with a grid of tool icons. At the bottom right, there is a 'Subscribe' button for newsletters.

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LATEST

New Regulations or policies under development



Sustainability/Due diligence

European Commission launches review of:

- [Corporate Sustainability Due Diligence Directive](#)
- [Corporate Sustainability Reporting Directive](#)



Common Agricultural Policy

European Commission sets out its Vision for Agriculture and Food for 2025–2029

[Read](#)



Common Fisheries Policy

EU and Côte d'Ivoire Fisheries Partnership Agreement – allocation of fishing opportunities

[Read](#)

New Regulations coming into force and application dates



Food safety controls

European Commission updates the list of countries that can export animal products to EU. Affected countries: Armenia, Belize, Brazil, Costa Rica, Cuba, Honduras, Kazakhstan, Nigeria, Tanzania, Thailand, Tunisia. Applies from **16 March 2025**

[Read](#)



Plant health controls

EU updates frequency rates of import controls for certain plants. Applies from **1 March 2025**

[Read](#)

01.

Part I: EU Packaging Rules

Packaging and Packaging Waste
Regulation [2025/40](#)



Is this packaging?

What do EU packaging rules cover?

primary / sales packaging	in direct contact with the product
secondary / grouped packaging	bundles multiple packaging units at the point of sale (sold as such or used for stocking)
tertiary / transport packaging	protects products for safe shipping and handling, e.g. shipping containers, transit packaging, and boxes, incl. e-commerce packaging
disposable tea, coffee, or other beverage bags	intended to be used and disposed of together with the product (permeable & non-permeable)
service packaging	designed and intended to be filled at the point of sale to dispense the product
food contact material (packaging sub-type)	<ul style="list-style-type: none">• materials in contact with food/drinks• materials used in food processing



Why were new rules needed in 2023?

Packaging waste increase



Specific rules applied in EU Member States



Ban the use of plastic packaging in specific cases



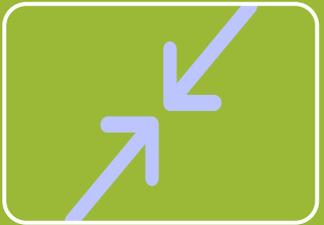
Set targets for reusable containers



Define and promote the sale of products in bulk

Objectives of the new EU packaging rules

New rules were published on 11 February 2025

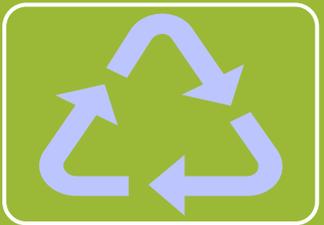


Prevent the generation of packaging waste by

Reducing the (packaging) quantity

Restricting unnecessary single-use packaging

Requiring reusable and refillable packaging solutions



Boost (high quality) recycling by

Requiring packaging to be designed for recycling

Harmonisation of sorting labels

Reducing substances of concern / hindering recycling



Reduce the need for primary materials by

Making recycled plastics content obligatory

Minimising packaging and reducing void space

This matters to all actors in the agri-food chain because:

- Many requirements are obligatory
- Compliance with those requirements decides on access to EU market
- Responsibility to prove compliance is on mainly on producers of packaged products = "manufacturers" (brands)

The new EU paradigm

Reduce – Reuse – Recycle – Harmonise

1

Prevention (Art 43) and Reuse (Art 11, 26, 27, 29 & 30)

2

Full recyclability of all packaging by 2030 (Art 6)

3

Recycled content targets for plastic packaging (Art 7)

4

Compostable plastic packaging (Art 9)

5

Labelling - Deposit Return Systems - Waste Collection

PPWR: Where are we?

12 August 2026

Implementation starts

To ~ 2030

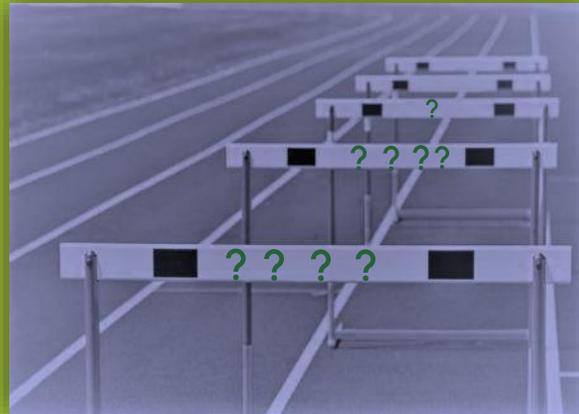
Implementation phase

First obligations to be met

Finetuning of technical rules

From ~ 2030

Sustainability requirements and reuse targets kick in



2030

2035

2040

It is a long-distance race...

Most relevant rules



Substances of Concern (SoC)

- Minimized throughout life cycle (incl. recycling)
- Substances regulated under EU chemicals legislation, PFAS, microplastics



Design for Recycling

- By 2030 all packaging designed for recycling
- Per material category
- Recyclability Performance Grade Scoring
- By Jan 2028 criteria available



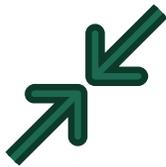
Recycled Content for plastic part of packaging

- By 2030: 10% (food)
By 2040: 25% (food)
- Per packaging type per manufacturing plant per year
- By Dec 2026 calculation method available



Compostable / biodegradable packaging

- By 12 Feb 2028, mandatory for tea & coffee bags and fresh fruit & vegetable labels
- Compatible with EU standard
- Compostable material used for other applications must be also recyclable
- Exempt from recycled content obligation



Packaging Minimisation

- By 2030, packaging designed with minimum weight and volume (performance criteria)
- By 2028 sales packaging minimized
- By 2030, empty space ratio of sales, transport and grouped packaging max 50%
- By Feb 2028, calculation method established



Reuse for transport packaging

- By 2030: 40%
By 2040: 90%
- Each company in the EU must fulfill these targets
- EXPECTED exemption for plastic pallet wraps and straps (Q2 2026)



Reuse for beverage packaging

- By 2030: 10% binding
By 2040: 35% aspirational
- Final distributors/ retailers must prove compliance
- **Exemptions** for highly perishable beverages (milk, juices)

Labelling

- By 12 Feb 2028 mandatory: EU sorting label, compostable label
- By 12 Feb 2029: EU reuse label
- By Jan 2030: SoC identification on primary packaging
- Voluntary: bio-based plastic content, recycled plastic content
- Additional QR code



Bans of certain packaging formats by 2030

- Single-use plastic packaging for fresh fruit & vegetables less 1,5 kg
- Single-use plastic grouped packaging (shrink wrap)
- Single-use plastic sachets for sugar, condiments, coffee creamer, seasoning
- Single-use packaging for cosmetics etc. in hotels
- Very lightweight plastic carrier bags

Requirements for substances in packaging (Art 5)

Minimise Substances of Concern with “unacceptable risk to human health and the environment”



Food Contact packaging Non-food contact packaging

PPWR text

- By 12 August 2026, all packaging must comply with existing and new thresholds
- The presence must be minimised, incl in waste management, reuse and recycled materials
- Covers heavy metals, microplastics. PFAS only in food-contact materials
- SoC/PFAS content must be disclosed in technical documentation (Annex VII)

Work in Progress

- By 31 Dec 2026, the EU Commission must publish a report on the presence of substances of concern in packaging and packaging components
- By 12 Aug 2030, option for EU Commission to amend PFAS obligations
- By 12 August 2033, the EU Commission must assess whether this obligation needs to be amended

Risks and potential impacts on business

- Higher transparency / evidence
- Increased costs (analysis, reporting)
- Limited testing capacities
- Uncertainty of testing methods
- No EU-standardised method for PFAS testing
- Disproportionate on Food Contact Materials (FCM)

Thresholds for Substances of Concern

Existing:

- Sum of the concentrations of **lead, cadmium, mercury and hexavalent chromium** resulting from substances present in packaging or packaging components **shall not exceed 100 mg/kg.**

New:

- **Food-contact packaging** shall not be placed on the market if it contains per- and polyfluorinated alkyl substances (PFAS) in a concentration equal to or above the limit values
- Microplastics mentioned regarding their release during waste management

For more information on [new EU rules on PFAS \(and bisphenol A\)](#):

- Recording of AGRINFO webinars available in EN, FR, ES, PO
- Frequently Asked Questions document

Currently the PFAS restriction proposes limits of

- 25 ppb ($\mu\text{g}/\text{kg}$) for individual PFAS
- 250 ppb ($\mu\text{g}/\text{kg}$) for the sum of all PFAS in articles

<https://agrinfo.eu/book-of-reports/agrinfo-webinar-new-eu-rules-on-bisphenol-a-and-pfas/>

Design for Recycling (DfR)

By 2030, all packaging must be designed for material recycling (Article 6)

PPWR text

- By 2030, all packaging must be designed for recycling
- New packaging design criteria are consolidated in a scoring scheme: recyclability performance grades
- The performance grade will determine the fees for waste management paid by the producer
- Packaging manufacturer must provide information
- (Most) compostables must also be recyclable

Work in Progress

- By 2028, the EU Commission must define the **Design-For-Recycling Criteria** for 30 packaging categories (Annex II Table 1) and the method to **calculate recyclability performance grades**
- The EU Standardisation Organisation (CEN) and the Joint Research Centre provide technical support
- Many private sector guidelines are already in place



Flexible plastic and composite packaging



Beverage cartons



All recycle ready formats (glas, metal, PET)

Risks and potential impacts on business

- Increased investments in recycle-ready formats
- Shift towards recyclable packaging materials
- Increasing waste management fees for composite packaging
- Compostable packaging challenge

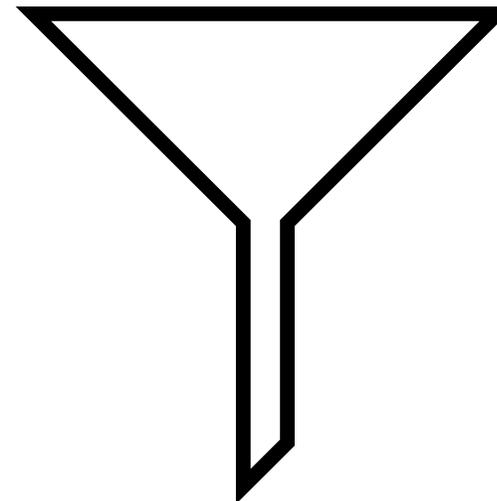
How recyclability assessment will work in practice

Proving compliance will be different before and after 2030

Existing rules prevail
“packaging recoverable in form of material recycling”
PPWD, essential requirements, enforced by national authorities and Standard EN 13430:2004



Recyclability criteria
Substances of Concern
Existing Recycling Technologies



Recyclability Grade

- A >95%
- B >80%
- C >70%

Per category
glass, paper/cardboard,
composite paper packaging,
steel, Al, Plastic PET rigid, wood,
cork, textile etc.

Recycled Plastic Content (Art 7)

Boosting secondary material uptake for plastics



Non-PET Food-contact
materials (PP, PE)



PET

PPWR text

- Binding targets for r-content in **plastic part** in packages
 - Food: 10% by 2030, 25% by 2040
 - Non-Food: 35% by 2030, 65% by 2040
- Recyclates made from post-consumer plastic waste, according to EU standards
- Exemption for plastic part < 5% of total weight of package, infant food, compostable packaging
- Packaging producers must report per packaging format as average per manufacturing plant and year

Work in Progress

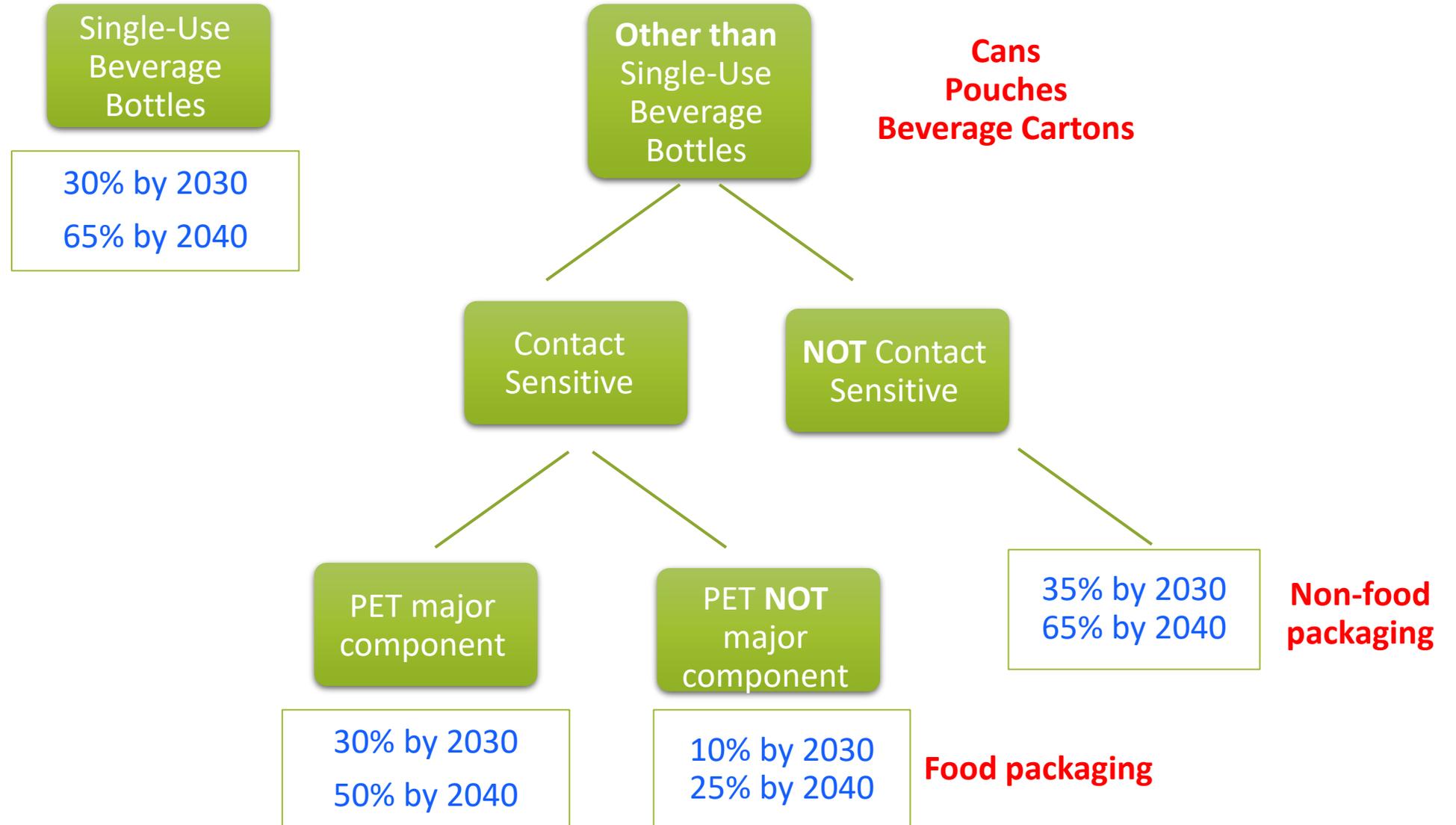
- By 31 Dec 2026, the EU Commission must publish a calculation method
- By 1 Jan 2028, the EU Commission must re-assess the availability (quantity, price) resulting in potential derogations for specific sectors
- By 12 Feb 2028, the EU Commission is expected to decide if bio-based polymers may substitute recycled polymer content

Risks and potential impacts on business

- Impact depends on product: non-food requires higher amounts but different r-polymers than food
- General challenges: analysis, traceability and reporting particularly for imported packaging
- Availability of recycled polymers, potential competition for recyclates incl shortage
- Technical details determine the economic viability of recyclers

Recycled plastics content

The product determines the obliged amount of recycled plastic content



Compostable / biodegradable packaging (Art 9)

New obligations for packaging made of biodegradable plastic polymers and other biodegradable materials

PPWR text

- By 12 Feb 2028, sticky labels and single use permeable tea & coffee bags must be industrially compostable (EU standard)
- In addition, EU Member States can oblige a) this packaging to be home compostable and b) other packaging formats (lightweight plastic carry-bags) to be compostable
- All packaging which is not obliged to be compostable must be also recyclable

Work in Progress

- The EU Standardisation Organisation (CEN) revises the compostable packaging standard to reflect the scientific and technological developments



All other
compostable
packaging



Sticky labels
Tea/coffee bags

Risks and potential impacts on business

- Material shift on sticky labels (bananas, vegetables) and tea/coffee bags
- Decreasing compostables use in other applications
- Diverging implementation in EU Member States

Compostable / biodegradable packaging [Art 9]

New obligatory rules for packaging made of biodegradable plastic polymers and other biodegradable materials

Use of compostable materials obliged for the below applications



If companies decide to use compostable materials for other applications, the materials need to be compostable AND recyclable

Examples:



Packaging minimisation (Art 10)

EU legislation tackling double walls, false bottoms and unnecessary layers of packaging

PPWR text

- By 1 Jan 2030, all packaging weight and volume must be reduced to the minimum (Art 10, Annex IV) without impeding its functionality
- Targeted packaging features: double walls, false bottoms and unnecessary layers of packaging
- Exempt: packaging design that is protected or a shape which is a trademark or products with protected geographical indication under EU law

Work in Progress

- In Feb 2027, the EU Standardisation Organisation (CEN) will start to prepare or update harmonised standards to calculate packaging minimisation



Glass bottles



Heavier plastic bottles



Flexible lightweight packaging (pouches)
Beverage cartons

Risks and potential impacts on business

- Material/packaging shift in high-impact sectors (spirits, cosmetics)
- “Trickle down effect” for non-EU producers. Brand owners need to invest in new packaging formats

Targeted formats



Reduction of excessive packaging (Art 24)

EU legislation limits **empty space ratio** in sales packaging, grouped – transport- and e-commerce packaging

PPWR text

- By 12 Feb 2028, **sales packaging** empty space must be minimized. Total internal volume of sales packaging vs volume of the packaged product
- By 1 Jan 2030, empty space ratio **max 50%** for **grouped, transport or e-commerce packaging**. Total volume vs volume of packaging contained therein
- Space filled with bubble wrap etc. counts as empty. Air between/ within packed food or protective gases are not

Work in Progress

- By 2028, the EU Commission defines the method to calculate the empty space ratio.



Grouped & transport, e-commerce packaging



Sales packaging



Primary packaging for food and beverages

Risks and potential impacts on business

- Impact depends on calculation method and availability (cost, amount) of innovative packaging
- “Trickle down effect” for non-EU producers. Brand owners to invest in new packaging formats for transport and sale

Targeted formats



Reuse targets for transport packaging (Art. 29.1-5)

Mandatory reuse obligations will impact exports to the EU in cases the transport packaging is not changed

PPWR text

- By 1 Jan 2030, 40% of transport packaging reusable; 100% reusable for transports between sites of one operator or within a Member State
- By 1 Jan 2030, 10% for grouped packaging outside of sales packaging
- By 2040: 70% aspirational

Work in Progress

- Exemption of single use plastic pallet straps and wraps (100% & 40% target)
- By Feb 2027, determination of a minimum number for the rotations for reusable packaging



Transport from the first warehouse in the EU on



Plastic pallet strips and wraps (tbc)



Cardboard, big bags, jute bags in contact with food

Risks and potential impacts on business

- “Trickle down effect” for non-EU producers: targets apply when import procedures are completed / first warehouse
- Reorganization of transport packaging in little time
- Risk of disruption of transport packaging supply

Applies to (closed list): pallets, foldable plastic boxes, boxes, trays, plastic crates, intermediate bulk containers, drums, pails, canisters, including flexible formats or pallet wrappings or straps for stabilisation and protection of products put on pallets during transport

Exempt: flexible packaging in food contact (e.g. big bags, jute bags) and cardboard transport packaging

Reuse targets for alcoholic & non-alcoholic beverages [Art 29.6]

Reuse obligations exempt dairy, wine and potentially juices

PPWR text

- 2030: at least 10% binding
2040: 35% aspirational
- Except milk (beverages), highly perishable beverages, grape and aromatized wine
- Reported by final distributor (>100 m²)
- Calculated by total number of units of sales
- Various options to get exemptions

Work in Progress

- By 30 June 2027, the EU Commission must publish the calculation method
- By 2034, the EU Commission will review the target and decide on obligatory 2040 targets
- Member States can define higher national reuse targets



Nectars
Pouches, Beverage
cartons



Juices
Cans, PET



Milk, wine
Glas

Risks and potential impacts on business

- Imported beverages likely to fall in the 90% non-reusable part
- Exemption for juices confirmed mid-2027
- All producers will finance the creation of re-use schemes via the waste management fees
- Consumer preference for reusable formats

Labelling (Art 12)

EU-harmonised labels intend to facilitate distribution across the EU single market

PPWR text

- By 12 Aug 2028, packaging must carry a sorting label and compostable packaging must be labelled as such.
- By 12 Feb 2029, reusable packaging must be labelled as such
- By 1 Jan 2030, packaging must disclose substances of concern (SoC)
- Voluntary labels: recycled and bio-based content
- Visual label or QR code

Work in Progress

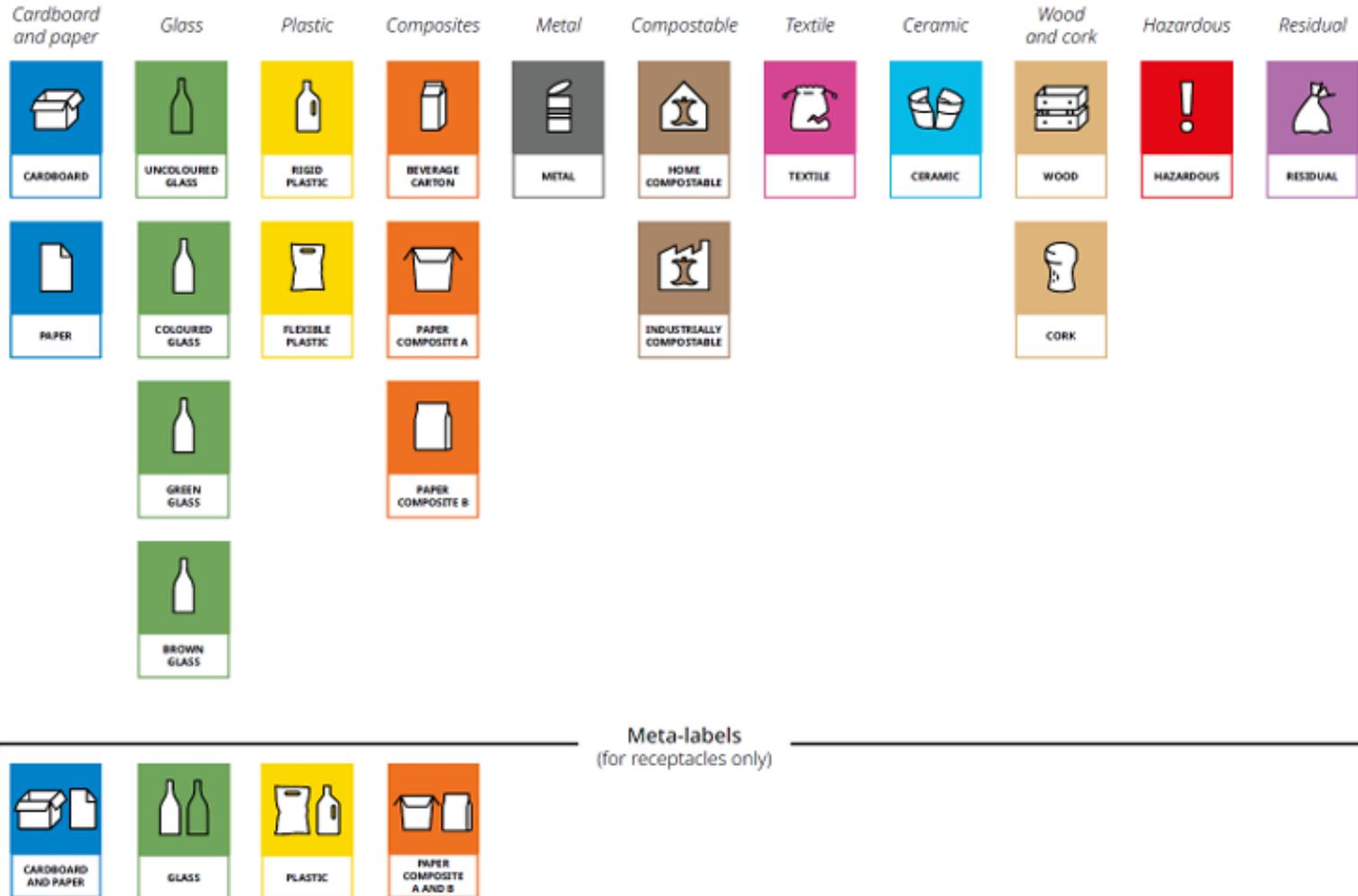
- By 12 Aug 2026, the EU Commission decides on pictograms for sorting labels
- By 1 Jan 2030, the EU Commission decides on the identification of SoC.

Risks and potential impacts on business

- Simplification for businesses (one harmonized label)
- Investments in label changes
- The sorting labels decide in which waste stream the packaging ends up after use (some are more expensive)

Proposed sorting labels

Figure ES 1. Final label proposal (colour and text)



Might be still subject to change till 12 Aug 2026!

Restrictions on use of certain packaging formats (Art 25)

EU-wide bans on „unnecessary“ and harmful packaging



(Flexible) single-use plastic packaging; food service & accommodation



Fresh fruit & vegetable packaging



Paper-based packaging

PPWR text

- From 1 Jan 2030, formats and uses listed in **Annex V** are prohibited.
- Most relevant for food:
 - Single-use *plastic* packaging for fresh fruit and vegetables below 1,5 kg (nets, bags, trays, containers). Exemptions possible.
 - Single-use *plastic* packaging for condiments, preserves, sauces, coffee creamer, sugar, and seasoning in accommodation and food services

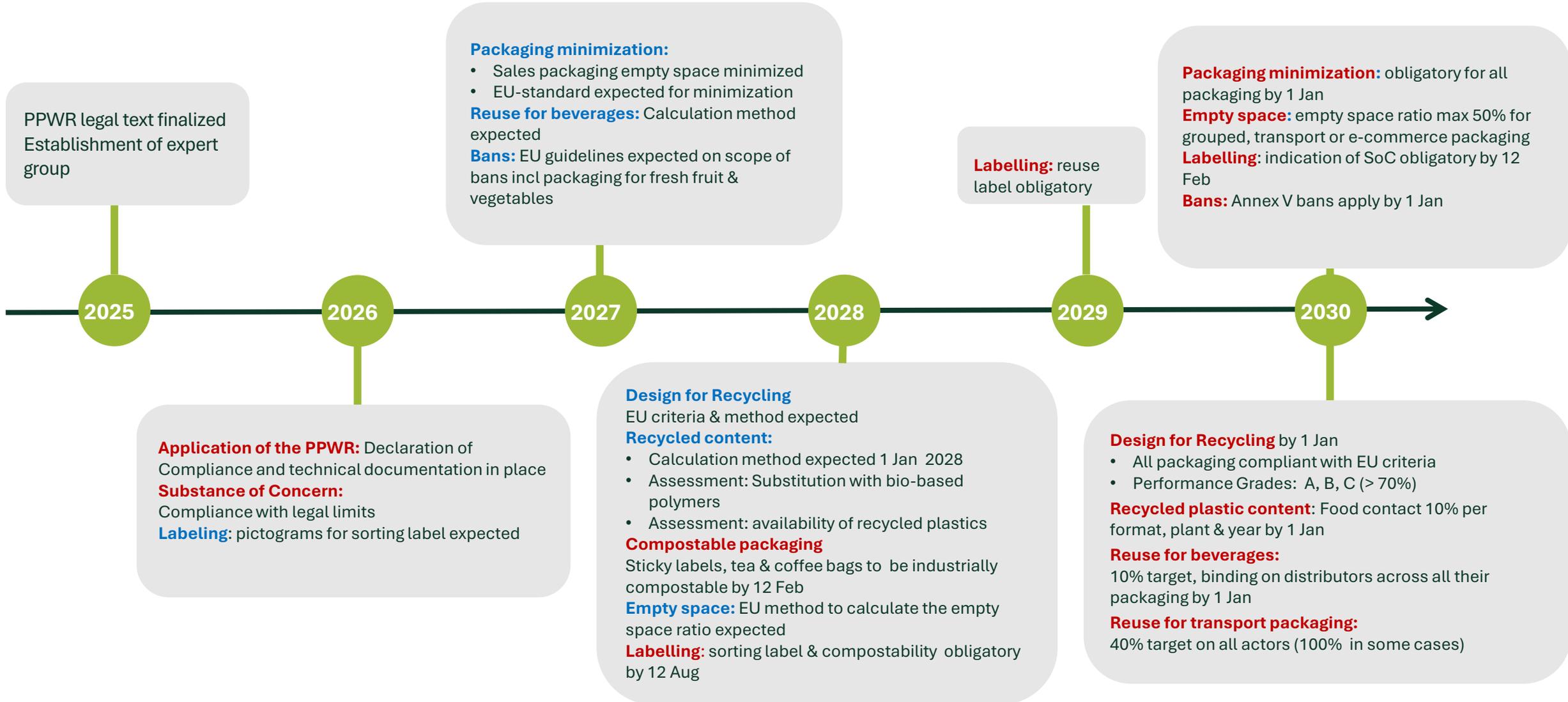
Work in Progress

- By 12 Feb 2027, the EU Commission publishes guidelines with examples and provide a **non-exhaustive list of fruits and vegetables that are excluded from the bans.**
- By 12 Feb 2032, the EU Commission must assess the positive environmental impact of the restrictions

Risks and potential impacts on business

- Investments in alternative packaging for fresh fruits below 1,5 kg
- Resources to prove eligibility for exemptions (avoid water or turgidity loss, microbiological hazards or physical shocks, oxidation or risk commingling organic fruits & vegetables)

Timeline summary (non-exhaustive)



What are the trends in packaging innovation?

Elimination of unnecessary or problematic packaging	Materials shift towards	Reuse and refill	Measures to increase collection, sorting and recycling
<ul style="list-style-type: none">• Less Plastic• Less metallised films, multilayer materials, non-recyclable labels• Mini (50 ml) bottles• PVC, plastic windows, plastic trays• Carbon black packaging, opaque PET bottles	<ul style="list-style-type: none">• Recycled plastics• Bio-based plastics• Mono-materials (PP, PE, PET)• Paper-based packaging• Compostable packaging for obliged applications	<ul style="list-style-type: none">• Reuse in transport packaging TBC• Reusable glass & PET (water, beer)• Refillable liquid cleaning products, fabric softeners, dishwashing liquids, shampoos and shower gel• Plain water via reusable containers and jugs• Introduce bulk dispensers in retail	<ul style="list-style-type: none">• “Design for Recycling” guidelines to influence EU recyclability criteria• Extended producer responsibility (EPR) even more important• Reversed logistics programmes (Deposits)

02.

Part II: Practical implications of the new rules

Practical implications for all actors

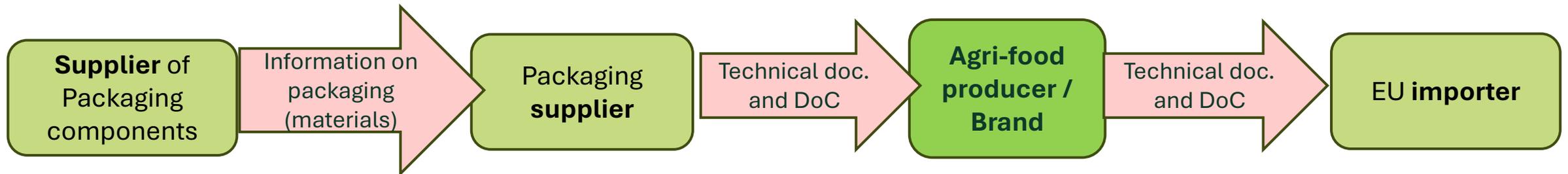
- From 12 August 2026, information and documentation necessary to prove the conformity of the packaging and the packaging materials must be passed along the value chain in form of **a Declaration of Conformity (DoC) and technical documentation**
- The following requirements must be met: recyclability (according to on existing standards), SoC/PFAS obligations
- Role and Responsibilities along the value chain:
 - a) Packaging supplier must**
 - Complete an internal control procedure to ensure that all the sustainability requirements are met
 - Draw up technical documentation (template Annex VII)
 - Pass this information on to its clients / brand owners
 - b) Manufacturer** (producer of packaged products / trademark is on the package)
 - Put the required information in the format of a DoC (Annex VIII)
 - Keep the DoC available for 5 years (ca be delegated to third party)
 - Keep DoC updated

More clarification with the EU Commission notice (expected Q1 2026)

PPWR conformity requirements - flow

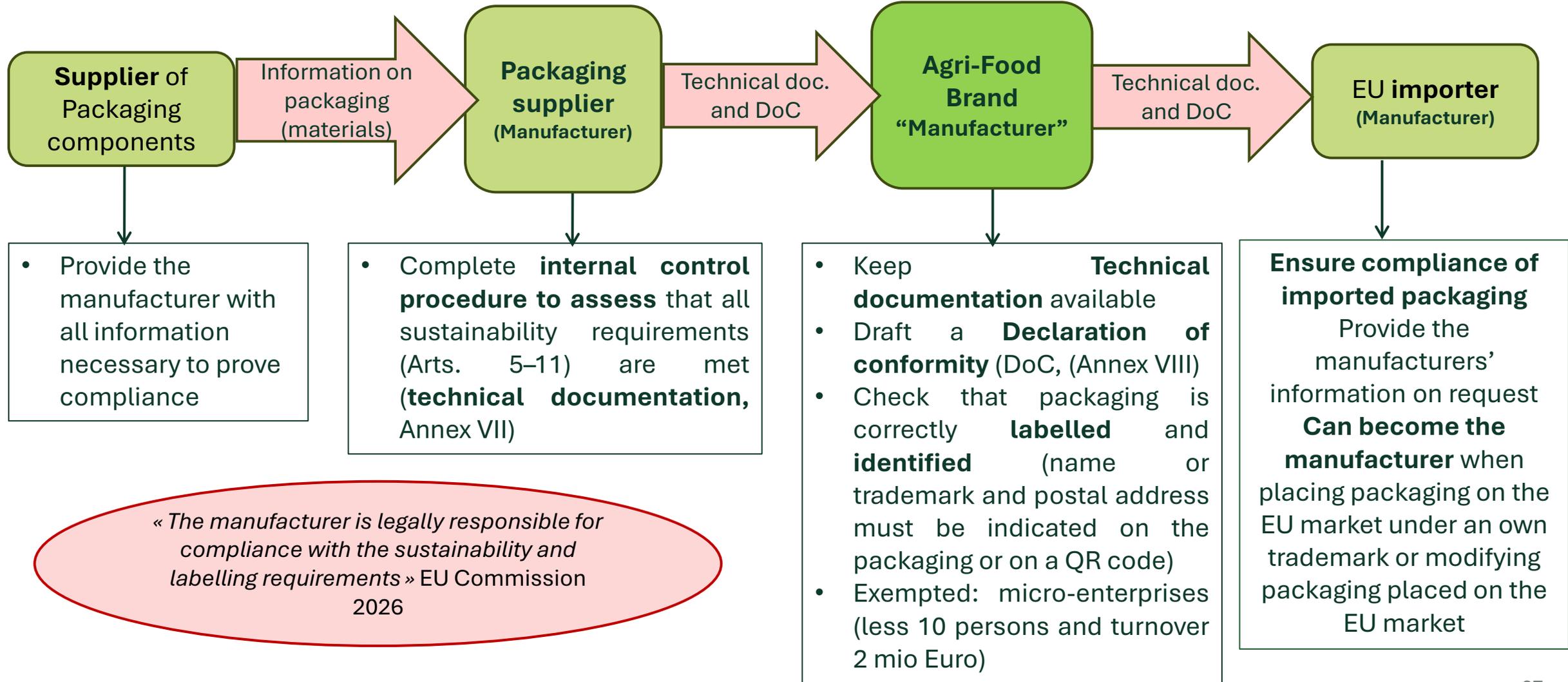
Shared tasks but final responsibility sits with the producer of the packaged products (trademark owner)

- **All** supply chain operators must share information to prove compliance with the PPWR.
- One **Declaration of conformity (DoC)** per packaging/packaged product to continuously update (e.g. change in packaging)



Key documents:
Technical documentation (Annex VII) and
Declaration of conformity (Annex VIII)

PPWR conformity requirements – follow the trademark!

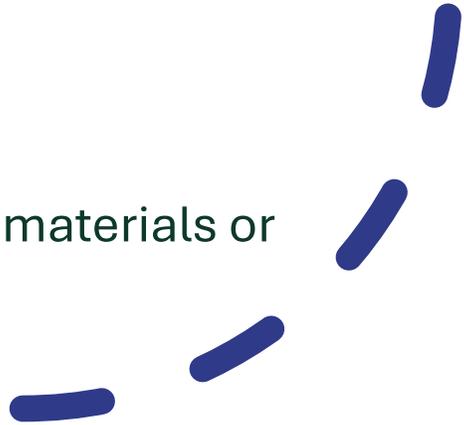


Implications for producers of packaged agricultural products

Opportunities

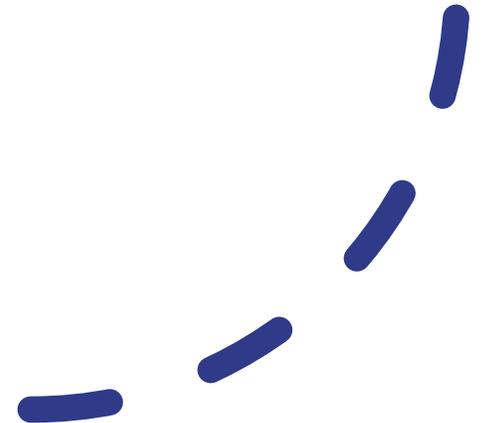
- Harmonised EU-rules
- Availability of information about the packaging you are using
- More innovative, sustainable packaging on the market makes it easier to satisfy EU-consumer expectations (but most likely the new solutions are not cheaper)

Major concerns

- Local supply and testing capacities (SoC, recycled content...)
 - Technical details still « work in progress »
 - Administrative burden
 - Higher costs for reporting, tests, innovative materials or shifts in packaging
- 

And now? Recommendations

- Reach out to national governments via your trade / industry associations to ensure awareness of the upcoming rules
- Reach out to your packaging suppliers and ask for the technical documentation needed to prove conformity by 12 August 2026



Further information



THE LATEST ON EU AGRI-FOOD POLICIES IMPACTING LOW- AND MIDDLE-INC

AG00157 | 27 Jan 2023, Revised on 30 Jul 2025

New EU packaging rules explained

Plastics | Packaging

View full report → | View short version →

Summary

New European Union (EU) rules on packaging and packaging waste, including design and waste management, are set by the packaging and packaging waste Regulation [2025/40](#) (PPWR).

This Regulation aims to:

- avoid and reduce packaging waste, and stimulate reuse
- make all packaging on the EU market recyclable in an economically viable way
- increase the recycling of packaging materials, especially plastic, and their reuse.

The new rules set stricter sustainability, labelling, and conformity requirements on all food packaging, which will also apply to suppliers of packaged food to the EU market who are based outside the EU. Some key requirements are as follows.

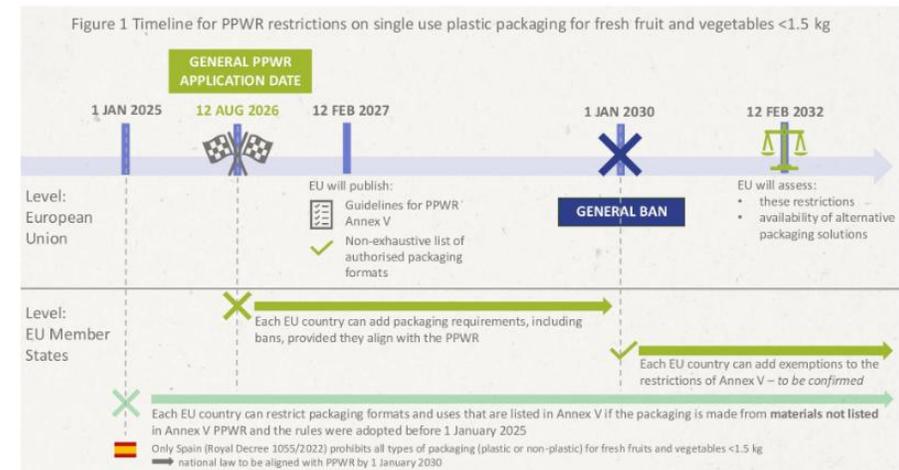
<https://agrinfo.eu/book-of-reports/new-eu-packaging-rules-explained/>

Table 2
Limits on concentrations of PFAS in packaging

Type of polyfluorinated alkyl substances (PFAS)	Limit
Any PFAS as measured with target PFAS analysis (polymeric PFAS excluded)	25 parts per billion (ppb)
Sum of PFAS measured as sum of targeted PFAS analysis	250 parts per billion (ppb)
PFAS (polymeric PFAS included) ^[1]	50 parts per million (ppm)

[1] If total fluorine (F) exceeds 50 mg F/kg, the manufacturer, importer, or downstream user of packaging must, if requested, demonstrate proof that the fluorine is measured as content of either PFAS or non-PFAS.


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03.

Questions & Answers

| Thank you



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Annex



PPWR sustainability requirements

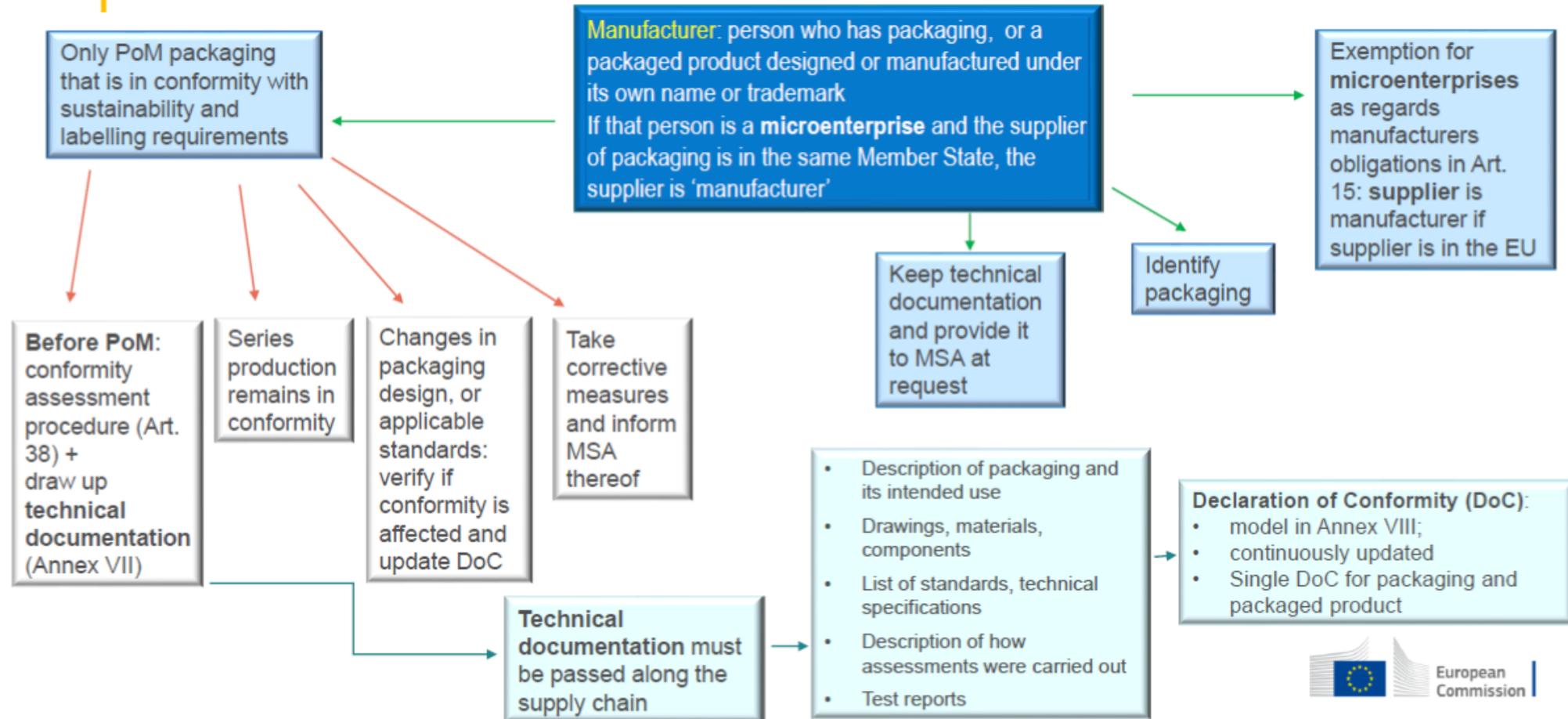
Category	Requirements	From
Substances of concern (SoC) Art. 5	SoC should be minimised and the sum of concentration levels of lead, cadmium, mercury, and hexavalent chromium should not exceed 100 mg/kg	12 August 2026
	Food-contact packaging must not exceed PFAS concentrations as set in Art. 5(5)	
Compostable packaging Art. 9	<ul style="list-style-type: none"> Sticky labels on fruit and vegetables, single use tea and coffee bags must be industrially compostable EU Countries can request: <ul style="list-style-type: none"> This packaging to be <i>additionally home</i> compostable Other packaging formats (lightweight plastic carry-bags, coffee capsules and pods) to be compostable (mandatory) 	12 February 2028
Labelling Art. 12	Packaging will have to be marked with the harmonised label (pictograms) to inform about the composition of packaging material and help consumers to sort recyclable materials	12 August 2028
	Reusable packaging will have to be marked with a label showing its reusability	12 February 2029
Restrictions on use of certain packaging formats Art. 25	Ban of packaging in the formats and for the uses listed in Annex V, including single use plastic packaging for quantities of fresh fruit and vegetables below 1.5 kg	1 January 2030
Packaging minimisation Art. 10	Packaging must be reduced to the minimum volume/weight needed to ensure its functionality	

PPWR sustainability requirements

Category	Requirements	From
Recycled content in plastic packaging Art. 7	Minimum plastic recycling targets apply <u>per component</u> of packaging: <ul style="list-style-type: none"> ○ 30% for PET contact sensitive packaging ○ 10% for contact sensitive packaging other than PET ○ 30% for single use plastic beverage bottles ○ 35% for plastic packaging other than the 3 listed above <ul style="list-style-type: none"> • By 31 December 2026 rules on plastic recyclates incorporated in plastic packaging from outside of the EU will be adopted • Certain food contact materials could be exempted from the due to the lack of available recyclates 	1 January 2030
Recyclability of packaging Art. 6	Packaging must be designed for recycling <ul style="list-style-type: none"> • Methodology for the recyclability performance assessment for all packaging materials is expected by end 2027 • Waste management fee (EPR) to be modulated based on the awarded Recyclability Performance Grade (cf. Annex II table 1 and 4) Packaging with less than 70% recyclability cannot be put on the market	
Bio-based feedstock in plastic packaging Art. 8	Potential proposal for rules based on a review of the state of technological development and environmental performance of biobased plastic packaging	12 February 2028

For ist BCs, SIG qualifies as manufacturer due to the trademak use on the packaging (TBC!)

8.1. Obligations of manufacturers



Surveillance of conformity is a national responsibility

8.4. Market Surveillance enforcement and enforcement by other competent authorities

Market surveillance authorities (MSA): Art. 10 MSR

⇒ authority designated by MS for carrying out market surveillance in the territory of that MS

Formal non-compliance (Art. 62):

If related to identification of packaging or EO, mistakes or lack of documentation on packaging (DoC, technical documentation): EO asked to correct; if the problem persists: prohibition to market/withdrawal

If related to obligations on excessive packaging, packaging bans, establishment and participation in reuse system, compliance with requirements related to refill (information to consumers, refill stations), reuse targets, reuse and refill obligations for take-away: penalties

National or Union Safeguard Procedure (Art. 58, 59): packaging presenting a risk (packaging not in compliance with sustainability requirements, packaging in compliance but a problem with harmonised standards)

Competent authority (Art. 40)

Member States shall designate competent authority for the enforcement of provisions on:

- management of packaging and PW
- waste prevention
- extended producer responsibility
- innovative packaging
- reuse targets
- refill and reuse obligations for take-away
- plastic carrier bags



8.3. Market Surveillance Framework

