

**QUESTIONS AND ANSWERS**

**New EU rules on  
packaging and packaging  
waste (PPWR)**

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**QUESTIONS FROM AGRINFO  
WEBINARS (FEBRUARY 2026)**

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In February 2026, the AGRINFO programme held two webinar sessions to explain the new rules set by the European Union (EU) on packaging and packaging waste by the Packaging and Packaging Waste Regulation [2025/40](#) (PPWR).

The information in this document aims to provide further clarification on the questions raised during these webinars. The answers are a non-legally binding interpretation of the legislation in force as of February 2026. They may be subject to change as new legislation is adopted or existing rules are amended. Therefore this information does not have legal value, and should be considered guidance only.

## Part I. Scope

*Q1: Must a label stuck to a paper bag (similarly to "sticker on banana") comply with the PPWR requirements?*

Yes, a label attached to a paper bag (which is used as packaging) is considered as packaging – either as a packaging component or ancillary element integrated into a packaging item.

*Q2: Do the PPWR requirements that apply to food packaging also apply to feed?*

Some PPWR requirements only apply to food packaging, for example the per- and polyfluorinated alkyl substances (PFAS) restrictions.

Other PPWR requirements, such as the recycled content targets, apply to contact sensitive packaging which includes packaging for food and feed (as regulated under the Feed Regulation [767/2009](#)).

*Q3: Does the PPWR also apply to non-food products or articles packaged or transported in packaging?*

The PPWR covers all kinds of packaging used in industry, retail, distribution, offices, services, and households – regardless of the packaged product.

## Transport packaging

*Q4: Are cartons and corrugated cardboard boxes containing multiple individual units considered as transport packaging?*

Cartons and corrugated cardboard boxes containing multiple individual units are considered as transport packaging when used to **facilitate handling and transport** of sales units or grouped units (Art. 3 (7) PPWR). Such boxes can also be considered as “grouped packaging” when they group a certain number of sales units **at the point of sale** and are either sold to the end user or used to facilitate shelf restocking or to create a stockkeeping or distribution unit, and they can be removed without affecting the product (Art. 3 (6) PPWR).

*Q5: Are plastic shrink film and sleeves used on pallets considered as transport packaging?*

Shrink film and sleeves used on pallets are considered as transport packaging. Article 29 (1) PPWR lists them as “pallet wrapping and straps used to stabilise and protect products during transport”.



## Part II. Timeline

*Q6: Will the first PPWR requirements (regarding substances of concern in food packaging) apply from 12 August 2026 or are they likely to be delayed?*

To date [February 2026], we have no indication about any delay of the application of the first PPWR requirements.

*Q7: Are there any transitional measures to ensure the placing on the market of stocks of plastic packaging intended for food contact that were manufactured before the PPWR came into force and do not meet the recyclability requirements set out in Article 6 and the recycled content requirements set out in Article 7?*

The new recyclability requirements and obligatory recycled content targets must be met from 1 January 2030 onwards. The PPWR does not include any transitional measure.

## Part III. Requirements

### A. Substances of Concern (SoC)

*Q8: Do all three PFAS limits set by the PPWR have to be mentioned in the technical documents?*

Yes, all PFAS limits need to be mentioned in the technical documentation (Art. 5 (6) PPWR). The technical documentation should therefore include evidence from the packaging suppliers on compliance with the PFAS limits.

*Q9: The technical documents for food contact packaging are provided by the packaging suppliers. Is it the responsibility of the packaging suppliers to provide information about the levels of substances of concern (including PFAS and microplastics) in packaging?*

Yes, it is the responsibility of packaging suppliers to provide all information necessary in the technical documentation (Annex VII PPWR).

*Q10: Do the PFAS limits also apply to animal feed contact packaging?*

PFAS limits apply explicitly to food-contact packaging which does not include feed (Art. 5).

*Q11: Do the SoC requirements also apply to non-packaging materials, such as office papers? These materials could be recycled and used in new packaging products, including for food.*

The PPWR does not set requirements for non-packaging material. Compliance of packaging materials (including recycled packaging) must be provided in the technical information (Annex VII PPWR).

### B. Recycled content

*Q12: Do the recycled content targets apply to all layers of packaging or just to food contact materials?*

Recycled plastic content targets apply to any plastic part of packaging including layers, components, or parts of the packaging unit. This requirement covers contact-sensitive packaging (PET and non-PET), single-use plastic beverage bottles, and all other packaging with a content > 5% plastics – with targeted exemptions



listed in Art 7 (4) PPWR (e.g. infant food). The different levels of recycled content targets depend on the contact-sensitivity of the plastic packaging use.

Compliance with minimum percentage of recycled content requirements must be proven by the packaging supplier disclosing that the recycled content is recovered from post-consumer plastic waste. Compliance must be reported per manufacturing plant and year, as an average per packaging type and format (not per packaging unit).

*Q13: What tolerance is given to operators who have a stock of packaging made from non-recyclable material?*

The PPWR does not include transitional measures, which means that from 1 January 2030 onwards, recyclability must be proven according to the new PPWR design for recycling criteria and recyclability performance grades. These are currently under development with support of European standardisation organisations. The European Commission is due to publish the new criteria and method to calculate performance grades by 1 January 2028.

## C. Recyclable packaging and design for recycling

*Q14: What are the criteria for packaging to be considered recyclable according to the PPWR?*

From 1 January 2030 onwards, recyclability must be proven in line with the new PPWR design for recycling criteria and recyclability performance grades. These are currently under development with the support of European standardisation organisations. The European Commission is due to publish the new criteria and method to calculate performance grades by 1 January 2028.

*Q15: Is there a tool that facilitates the assessment of packaging recyclability in relation to the criteria defined by the European Commission?*

The criteria defined by the European Commission are still under development and will be published by 1 January 2028. Meanwhile, existing rules set by the Packaging and Packaging Waste Directive [94/62/EC](#) prevail, which require “packaging to be recoverable in form of material recycling” and set “essential requirements”. Compliance is theoretically enforced by national authorities based the European standard 13430:2004 which defines requirements for packaging material recycling and presents a framework for self-assessment to determine whether the requirements have been met. It also provides practical guidance in assessing recyclability.

*Q16: Are there any exemptions for plastic packaging with technological and/or innovative features?*

Packaging which presents innovative features resulting in significant improvement in the core function of packaging and that has demonstrable environmental benefits are given additional 5 years to comply with the recyclability requirements (Art. 6 (10) PPWR).

The economic operator (most likely the packaging supplier who then transfers the information to the brand owner [manufacturer]) must submit a notification to the Commission and the competent authority before placing the innovative packaging on the market (Art. 6 (10) PPWR). The innovative features must be justified, especially as regards the use of new materials, by a significant improvement in the functions of the packaging and in overall demonstrable environmental benefits. A recycling path must be explained in the technical documentation accompanying the packaging (Art. 3 (46) PPWR).



*Q17: Should exporters focus on compostable/biodegradable packaging models in long-distance trade considering that it is often logistically and economically impractical to return packaging from the EU back to Africa?*

The reuse of transport packaging applies only within the EU and from the first EU warehouse onwards. The PPWR does not mandate transport packaging (from non-EU countries) to be reusable when it is placed on the market outside of the EU.

## D. Compostable packaging

*Q18: Will the requirements for compostable packaging apply to imported products from non-EU countries?*

Yes, the requirements for compostable packaging also apply to imported packaged products placed on the EU market by 12 February 2028 (Art. 9 PPWR).

## E. Labelling

*Q19: For packaging with different parts (e.g. a bottle with a cap and a sticker) that might be recycled differently, must each part of the package carry their own waste sorting pictogram – i.e. a pictogram for the cap, another for the label, etc.?*

The PPWR distinguishes between packaging parts that remain attached to the main packaging and are normally discarded with the packaging (integrated components) and parts that must be removed or are discarded separately (separate components) (Art. 3 PPWR). The final labelling will depend on the EU harmonised sorting label which is being developed.

Clarification on how to use the sorting labels for integrated or separate components of packaging should be provided by 12 August 2026, when the EU Commission publishes the methodology for identifying the material composition of packaging for sorting labels.

*Q20: What happens if a boxed product is exported to the EU and it is wrapped in a polyethylene plastic bag? Should the bag indicate that it is recyclable?*

A polyethylene plastic bag used to export a product to the EU is considered as transport packaging (Art. 3 (7) PPWR). Consequently, it needs to be recyclable by 1 January 2030 according to the new PPWR criteria (Art. 6).

*Q21: Are there any exceptions or derogation on packaging labelling for multilanguage products with limited space?*

The PPWR allows the use of QR codes for additional information in multiple languages.

*Q22: Can existing national waste sorting schemes such as the Green Dot trademark still be used in their current form until the labelling implementation date of February 2028? Can they only be used in QR form after this date?*

Once EU sorting labels apply uniformly throughout the EU, it is possible that the use of any other label will be banned. The PPWR aims to protect consumers from misleading and confusing information about the characteristics and appropriate end-of-life treatment of packaging for which labels will be specifically developed to be applied by all EU countries.



*Q23: In cases where the primary packaging does not include information in the language of the country where the product is sold, a sticker with information in the required language must be placed on the packaging. Must this sticker comply with PPWR requirements and, if so, which ones?*

Packaging must comply with the labelling requirements set in Art. 12 PPWR. Additional information can be provided via a QR code. The conformity assessment must be based on the technical information.

## Part IV. Compliance

*Q24: What information must be included in the Declaration of Conformity (DoC) by 12 August 2026 in addition to information about SoC?*

Annex VIII PPWR lists all the information that must be included in the DoC. By 12 August 2026, packaging must comply with the SoC limits and the existing rules of European Standard 13430:2004 for packaging material recycling. European Standard 13430:2004 includes a framework for self-assessment to determine whether the requirements have been met. This information must be included in the technical documentation (Annex VII PPWR).

*Q25: Who needs to draft the DoC for products imported into the EU?*

In most cases, the product manufacturer (brand owner / operator using the packaging) based outside the EU must perform a conformity assessment based on the technical information received from the packaging supplier and then issue and sign the DoC. The importer must ensure that the DoC exists and is available before placing the packaged product on the EU market. (Arts. 17, 18, and 38 PPWR).

*Q26: Is the DoC provided by the packaging supplier enough to prove compliance or must the product manufacturer prepare a new DoC?*

The product manufacturer must perform a conformity assessment based on the technical information received from the packaging supplier and then issue and sign the DoC. The packaging supplier is not issuing a DoC, only providing the technical information. In other words: the manufacturer is responsible for the conformity assessment, while the packaging (materials) suppliers must provide the information/documentation (Arts. 38 and 39, Annexes VII and VIII PPWR).

*Q27: Must EU importers of raw material for food supplements accompany every bag, drum, label used by their non-EU suppliers with a DoC and technical documentation?*

The packaging suppliers must provide all the information and documentation (in paper or digital format) to demonstrate the conformity of the type of packaging. The manufacturers (in most cases the brand owner/producer of the packaged product) must conduct the conformity assessment using the information provided by the packaging suppliers. The manufacturers must also ensure that every sale of the packaged product carries information about the packaging format. Hence, to our understanding, manufacturers do not need a conformity assessment per sales unit but per type of packaging (similarly to the obligation of the packaging suppliers).

*Q28: The DoC will add a lot of bureaucracy for companies. Would any other options be considered, e.g. QR codes?*

The PPWR requires that the DoC exists and can be made available to authorities (Art. 39 PPWR). As the DoC must not be physically printed on packaging, it can be made shared electronically / via a digital data carrier.



*Q29: Must companies prove to the regulatory body that they have assessed the feasibility of reducing packaging waste?*

Product manufacturers must assess packaging minimisation and document it. This must be included in the technical documentation (Annex VII PPWR). Article 10 (4) PPWR lists all the information required to prove compliance. Until a revised harmonised standard is adopted, Standard EN 13428:2004 can be used to demonstrate compliance.

*Q30: How will the EU evaluate compliance of each shipment entering its territory?*

Importers must ensure that packaging from non-EU countries complies with the PPWR requirements (using a DoC and the technical information) before placing it on the EU market. This documentation must be available on request of market surveillance authorities. Hence, the importer is the first compliance checkpoint for imported packaged products (Art. 17 PPWR). Customs authorities will cooperate with market surveillance authorities to stop non-compliant packaging (Art. 61 PPWR). The PPWR includes digital cooperation means, such as Information and Communication System on Market Surveillance (ICSMS) and Customs Risk Management (CRMS), to identify non-compliant packaging entering the EU.

*Q31: What are the legal or financial consequences if products do not meet the recycling criteria by 2030?*

Non-recyclable packaging cannot be sold in the EU market after 1 January 2030. From 2030 onwards, packaging must meet recyclability grades A–C; from 2038 packaging must achieve at least grade B (Art. 6.3 PPWR). EU Member States are responsible for applying penalties for non-compliance.



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