Packaging and Packaging Waste Regulation

Regulation (EU) 2025/40 — entered into force 11 February 2025
Full regulation can be found here: https://eur-lex.europa.eu/eli/reg/2025/40/oj/eng

On 11 February 2025, the Packaging and Packaging Waste Regulation (PPWR) entered into force, with most obligations applying from **12 August 2026**. This legislation aims to reduce packaging waste, make more packaging circular, stimulate the use of recycled raw materials, restrict harmful substances, and create **one harmonised European market for packaging.**

This legislation affects the **entire packaging value chain** — from packaging suppliers like SP Packaging, to our customers, to our own suppliers. That is why we consider it important to actively inform you about it, as the law also requires under Article 16.

What does the PPWR mean for our cooperation?

The PPWR introduces obligations for producers, suppliers, importers, and every other link in the packaging chain, and its effects will become more visible over the next few years. Although the specific obligations differ per party, we share **joint responsibility** for reaching the targets set for 2030.

As a supplier, our part in that shared responsibility is set out in Article 16: providing the manufacturer with the information and documentation needed to demonstrate the conformity of the packaging, so they can draw up their Declaration of Conformity. As SP Packaging we can help with this.

Much of the PPWR is still being worked out through further guidance and secondary legislation, so this is as much a process of figuring out what's workable for us as it is for you. Ahead of 12 August 2026, here's what we're actively working on:

- **Substance data**: We keep updating the required input from our material suppliers on substances of concern. We will document this for you to rely on for building your own Declaration of Conformity.
- **Staying current**: We'll keep the timeline and relevant articles updated as guidance develops, so you have the latest picture.
- **Technical documentation:** We keep updating relevant recyclability certifications and supporting document.

Roles and obligations

The PPWR works with a small number of defined roles within the packaging value chain. Which one applies to you — and to us — determines which obligations apply.

- **Producer — usually you, our customer**
  The producer is the party responsible for Extended Producer Responsibility (EPR): registration, reporting, and financing the collection and processing of packaging waste. This is typically the party that **first places the packaged product on the market** in the Member State where the packaging will eventually become waste. From 12 August 2026, producers must be able to demonstrate that the packaging and materials used comply with the applicable legislation.
- **Manufacturer — usually you, our customer**
  In most cases, you are also the manufacturer within the scope of the PPWR. The manufacturer is responsible for the packaging's conformity with the PPWR's requirements, and draws up the technical documentation and the EU Declaration of Conformity. For sales packaging, this is normally the party that fills the product and places it on the market under its own name or brand. The European Commission has confirmed that, for sales packaging, the manufacturer is normally the filler or brand owner — not the party that produced the packaging itself.
- **Supplier — our role**
  Within the PPWR, SP Packaging does not act as the producer, but as a supplier. We manufacture packaging, but we do not place this packaging on the market under our own name or brand. A supplier delivers packaging or packaging components to other parties in the packaging chain. As a supplier, we do have an **information obligation** (Article 16): we must supply you, the manufacturer, with the information you need to demonstrate that our packaging complies with the applicable legislation.

Timeline

11 February 2025 — Entry into force

- PPWR becomes law. If you already sell reusable packaging, it must meet the reusability requirements from this date, even though enforcement only starts in August 2026 (Article 11).

30 March 2026 — Commission guidance published

- Official guidance and FAQs clarifying "manufacturer," "producer," "importer," and other definitions and scope questions.

12 August 2026 — General application date

- Heavy metals in packaging are capped at 100 mg/kg for all our packaging (Article 5)
- Packaging should display the producer/manufacturer's name, brand and (email) contact details together with an identifier like a batch number.
- Packaging must not be bigger or heavier than necessary as a general principle, with the detailed criteria following in 2030 below (Article 10)
- If any of the packaging is marketed as reusable, these has to be an actual way to get it back. (Article 11).

- Declaration of Conformity + technical documentation required for every packaging type placed on the market.
- Manufacturer, supplier, importer, distributor obligations (Articles 15–19) all become enforceable.

31 December 2026

- The method for calculating and verifying recycled content is set (Article 7).

30 June 2027

- The method for calculating reuse rates is set (Article 29).

1 January 2028

- The detailed recyclability grading criteria, A to E, are expected (Article 6).

12 February 2028

- The method for calculating empty space in packaging is set (Article 24)
- Filled sales packaging must meet a minimisation requirement (Article 10).

12 August 2028 (expected)

- Harmonised EU label becomes mandatory: material composition and sorting instructions, for easy recycling by consumers (Article 12)

1 January 2029

- The recycled-content calculation method itself must already be used. For example, if a component contains recycled PET, that percentage needs to be evidenced this way a full year before the actual minimum percentages apply (Article 7).

12 February 2029

- If you supply reusable packaging, it must carry a label showing how and where it can be reused or returned (Article 12)

1 January 2030 — Second major milestone

- Only recyclability grades A, B or C may be placed on the market (below 70% recyclable = off the market) (Article 6).
- Minimum recycled-content percentages for plastic packaging apply (Article 7).
- Packaging may not be bigger than necessary: concrete maximum weight/volume limits apply, and features that make a product look bigger than it is(Article 10).
- Restricted formats under Annex V are banned outright (e.g. miniature hotel toiletries, very lightweight plastic bags) (Article 25).
- Maximum 50% empty space in transport, grouped and e-commerce packaging (Article 24).
- Reuse targets start to apply, with annual reporting to national authorities beginning this year. Reporting on this sits with the producer (Article 29).

1 January 2035

- Recyclability must be demonstrated "at scale" in practice, not just by design (Article 6).

1 January 2038

- Only grades A and B remain permitted; grade C packaging is phased out too (Article 6).

1 January 2040

- Recycled-content percentages step up further.
- EU-wide packaging waste must be 15% lower than 2018 levels.

Several of these dates depend on delegated or implementing acts that are still being finalised; if those are adopted later than planned, the related deadline shifts with them.

Lifecycle Impact Map

Beyond roles, the PPWR has concrete consequences at every stage of a packaging's life. For us, for you as our customer, and for our material suppliers. The table below gives the overview:

Stage	Your role	From SP Packaging	Material suppliers
1. Design	You confirm sales markets and sign off on the recyclability/minimisation trade-offs we propose	We build recyclability, minimisation and future labelling space into every concept from day one	Share material data early enough to inform design choices
2. Material choice	You approve any material changes needed for compliance and weigh the cost impact	We select materials that meet substance limits, recycled-content targets and the target recyclability grade	Supply materials with documented composition, substances and recycled content
3. Production	You may audit or request compliance sign-off before accepting delivery	We produce to the approved, compliant spec and keep batch records and test certificates	Deliver consistent batches; flag any substitution immediately
4. Transport	You specify transport/e-commerce packaging expectations for the final delivery leg	We design shipping/transport packaging within the empty-space and reuse rules	Less central here — we manage our own inbound transport requirements directly
5. EU import / use / export	You register as "producer" for EPR in every EU country where the product is sold	We act as importer for goods we bring in from outside the EU — not reduced by our size	We do import materials ourselves, we handle that directly
6. Use	You control consumer-facing claims and label variants across markets	We apply the harmonised label once mandatory and keep any sustainability claims accurate	Flag any component that could affect sortability or end-user confusion
7. End of lifecycle	As "producer", you register, report and pay EPR fees, modulated by recyclability and recycled content	We supply the recyclability/recycled-content data behind your EPR fee level	No direct EPR duty for raw materials.

Step-by-step detail

1. Design

The point where packaging structure, materials strategy and compliance approach are decided.

Your role

- You confirm which EU countries the finished product will be sold in; this determines which national EPR scheme(s) apply later.
- You sign off on the recyclability/minimisation trade-offs we propose, especially where a "premium" design instinct conflicts with the ban on false bottoms and double walls.
- You confirm brand/trademark placement — this decides, by default, who counts as "manufacturer" for that SKU.

SP Packaging

- We build Design-for-Recycling into every concept: mono-material structures where possible, avoiding coatings, adhesives or laminate combinations that would push a design into a low recyclability grade.
- We apply the minimisation principle at concept stage: no false bottoms, double walls, or oversized formats designed to make a product look bigger than it is.
- We reserve artwork space for the future harmonised EU label, so packaging doesn't need a late redesign purely for labelling.
- We determine, per client and SKU, who is legally "manufacturer" — this decides who ultimately signs the Declaration of Conformity.

Material suppliers

- Share material data sheets (composition, known substances, recyclability characteristics) early enough to actually influence the design.
- Flag any material with restricted substances or poor recyclability before it gets designed in.

2. Material choice

Choosing the substrates, resins, inks, adhesives and components that make up the finished packaging.

Your role

- You weigh sustainability marketing goals (recycled content, recyclable) against what the chosen material can actually support and substantiate, to avoid greenwashing.
- You approve material changes we propose for compliance to the PPWR, and see *the point where packaging structure, materials strategy and compliance approach are decided.* Cost implications of higher recycled-content or mono-material requirements.

SP Packaging

- We rule out materials, inks or adhesives that would push combined heavy metals above the 100 mg/kg limit.
- Where plastic components touch the product directly in contact-sensitive applications like cosmetics packaging, we treat them accordingly for recycled-content purposes (lower thresholds apply).
- We track the recycled-content percentage of any plastic resin used, since this feeds directly into the 2030/2040 targets.
- We steer clear of materials that would only work in packaging formats being banned from 2030.

Material suppliers

- Provide test certificates confirming substances of concern are within limits.
- State the recycled-content percentage of any plastic resin or component supplied, with evidence.
- Disclose known recyclability constraints.

3. Production

Manufacturing the packaging to the approved design and material specification.

Your role

- You may request compliance certificates or conduct audits.

SP Packaging

- We produce strictly to the approved, compliant specification..
- We run batch-level quality control against the declared substance and material composition.
- We keep batch and traceability records for the technical documentation required from 12 August 2026..
- We apply the same substance and material standards across all production sites.

Material suppliers

- Deliver batches consistent with the composition and compliance data already provided.
- Notify us immediately of any material or process change that could affect substance levels or recyclability.

4. Transport

How the packaging itself moves.

Your role

- You specify transport/e-commerce packaging expectations, especially where you manage the final delivery leg to end consumers directly.

SP Packaging

- We design shipping and transport packaging within the empty-space rules: maximum 50% empty space in transport, grouped and e-commerce packaging from 1 January 2030, with a general “no unnecessary empty space” principle already applying from 12 August 2026.
- Where reusable transport equipment is used for movements within the EU, we plan for the requirement that such formats sit within a reuse system from 1 January 2030.

Material suppliers

- Less relevant at this stage.

5. Import into EU / use in EU / export as part of a packaged end product

The point where packaging or components physically cross into the EU, are used within the EU market, or leave the EU again as part of a finished, packaged product.

Your role

- You register as "producer" for Extended Producer Responsibility (ERP) purposes in every EU Member State where the packaged product is actually sold. This is a national registration in each country, not a single EU-wide one.
- If you (or your own distributor) import the finished packaged product into the EU directly, that party (not SP Packaging) carries the importer obligations for that flow.

SP Packaging

- We act as importer for any packaging or components we bring into the EU from outside it, verifying compliance and holding supporting documentation on request.

Material suppliers

- Less relevant at this stage.

6. Use

The packaging as encountered by the end consumer.

Your role

- You control consumer-facing marketing claims about the packaging's sustainability, and manage label variants across the different markets the product is sold in.

SP Packaging

- We apply the harmonised EU label once mandatory, expected from around August 2028.
- We ensure any sustainability-related information printed on packaging is accurate and can be substantiated with the data collected earlier in the chain.

Material suppliers

- Flag any supplied component that is visible to, or interacts with, the end consumer's sorting behaviour (for example, a cap or closure in a different material to the main body).

7. End of lifecycle

What happens once the packaging becomes waste.

Your role

- As "producer" for most SKUs, you register, report annual volumes and material breakdowns, and pay the EPR contribution in each Member State of sale. Fees are modulated by recyclability grade and recycled content.

SP Packaging

- We supply the recyclability grade and recycled-content data that ultimately determines your EPR fee level
- Where SP Packaging is itself deemed manufacturer for a given SKU (see Roles and obligations), it holds the compliance file that a producer's EPR organisation may request.

Material suppliers

- No direct EPR obligation for raw materials supplied into someone else's packaging, but recyclable, well-documented materials are an increasing commercial advantage.

Relevant articles

For the SKUs where you are manufacturer, these are the articles that matter most in practice. The timeline links here wherever an article is mentioned.

Article 5 — Substances of concern

Limits hazardous substances in packaging. Heavy metals (lead, cadmium, mercury, hexavalent chromium combined) must stay under 100 mg/kg — this applies to all our packaging from 12 August 2026.

Article 6 — Design for recyclability

From 1 January 2030, only the three best recyclability grades — A, B or C — may be placed on the market (below 70% recyclable is no longer allowed); from 2038, only A and B remain. In practice: mono-material designs score best, and it's worth designing new packaging with this scale in mind now, well ahead of 2030.

Article 7 — Recycled content

Minimum recycled-content percentages for plastic packaging apply from 1 January 2030. The calculation method itself must already be used from 1 January 2029. For example, if a component contains recycled PET, that percentage needs to be evidenced using the official method from that date, a year before the actual minimum applies.

Article 8 — Biobased plastic packaging

A review clause, not a hard requirement: the Commission is assessing biobased plastics and may propose new rules later. Worth keeping an eye on rather than acting on yet.

Article 10 — Minimisation

Packaging may not contain more material, or take up more space, than its function requires. From 1 January 2030, concrete maximum weight and volume limits apply per packaging type, and features that make a product look bigger than it is (such as double walls or false bottoms) are explicitly prohibited.

Article 11 — Reusable and refillable packaging

Defines what actually counts as reusable packaging (durability, safe refill or return). If you already sell reusable packaging, it has to comply in substance from 11 February 2025, even though enforcement only starts in August 2026.

Article 12 — Labelling

The harmonised EU label (material, sorting instructions) is expected mandatory from 12 August 2028, so consumers can recycle correctly. Reusable packaging carries its own reusability label, expected from 12 February 2029.

Articles 15–19 — Economic operator obligations

All effective 12 August 2026: manufacturer duties (Art. 15), supplier information duty (Art. 16), authorised representative mechanism for non-EU manufacturers (Art. 17), importer duties (Art. 18), and distributor duties (Art. 19). This is explained in roles and obligations.

Article 24 — Empty space

The specific 50% cap for transport, grouped and e-commerce packaging applies from 1 January 2030.

Article 25 — Restricted formats (Annex V)

Certain single-use formats are banned outright from 1 January 2030. Like the miniature cosmetics and toiletries packaging supplied to the hotel sector.

Article 29 — Reuse targets

Phased targets from 1 January 2030 (rising further by 2040): roughly 10% for grouped packaging, 10% for beverage packaging. In practice, this is a reporting obligation for you as the producer.

Articles 44–45 — Extended Producer Responsibility

This is what determines your EPR fee: registration, annual reporting and financing collection/recycling in every country you sell in, with fees modulated by how recyclable your packaging is and how much recycled content it contains. In short: better packaging design lowers your EPR costs. Fee modulation by recyclability grade and recycled content only becomes meaningful once the 2030 grading and content rules are actually in force.

Questions about your role under the PPWR, or about a specific packaging line? Get in touch with us and we will help you work it out.

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