

European Packaging Regulation - Packaging and Packaging Waste Regulation (PPWR)

May 2025

Summary

- **Packaging requirements have become considerably stricter** as a result of the **European Green Deal**. Consequently, the packaging industry is **now facing far-reaching changes**.
- With the aim of minimizing the **environmental impact of packaging** and **promoting the circular economy**, the **Packaging and Packaging Waste Regulation** (PPWR) came **into force on 11 February 2025**, replacing the EU Packaging Directive.
- The PPWR affects **all companies that manufacture packaging for the EU, distribute or use it in the EU**. According to industry estimates, around **80% of packaging in numerous sectors will have to be redesigned** in future.
- Affected companies must have **completed the implementation of first requirements** by the time they **come into force in August 2026**. Over the years, the **regulatory pressure will continue to increase** as additional requirements are introduced and existing ones are tightened by 2030.
- The PPWR stipulates that **only packaging** with a **valid EU declaration of conformity** may be placed on the market. This declaration requires a **comprehensive conformity assessment procedure**, which is accompanied by **additional obligations** for production, use, reuse, recycling and disposal of packaging **along the entire supply chain**.
- In addition to the **operational challenges** associated with the redesign of many packaging types, companies are threatened with **reputational damage and fines** if they violate the regulation.
- In order to be able to fulfil the requirements from August 2026 and also **long-term**, companies and in particular supply chain management & procurement departments must **start preparing today**.
- HÖVELER HOLZMANN supports you from the **resource-saving readiness check**, the creation of a **PPWR roadmap to implementation support to put all requirements pragmatically into corporate practice**.

The 5 key takeaways on PPWR¹ will give you a quick overview of the materiality and the consequences of non-compliance

1

The PPWR is already in force

The PPWR came into force on 11 February 2025, replacing the EU Packaging Directive. Companies now have an 18-month transitional period until it comes into force.

2

Almost all packaging is affected by the PPWR

According to industry estimates, around 80% of packaging in numerous sectors will have to be redesigned in the future.

3

First requirements to be implemented by 2026

Affected companies must have already implemented the first requirements by the start of validity in August 2026.

4

Requirements with a 2030 deadline must be started now

The realization of many long-term requirements is complex, and the availability of recycled materials is already short in supply. Companies must act immediately in order to remain competitive.

5

Non-compliance may result in penalties

In addition to operational challenges in relation with the redesign of many packaging-types, companies are threatened with reputational damage and fines in the event of non-compliance.

European Packaging Regulation - Packaging and Packaging Waste Regulation (PPWR)¹ has been in force since February 2025

Goals



- **Reduce environmental impact** of packaging in EU by ...
- ...**reducing resource consumption and packaging waste** as well as promoting **recycling** and **circular economy**

Affected are...



- ... **Producers** (EU & poss. non-EU)
 - ... **Distributors** (EU & poss. non-EU)
 - ... **Importers** (EU) &
 - ... **Consumers** (EU)
- of packaging or packaged products

Background & classification

- Part of **European Green Deal**; EU Circular Economy Action Plan → Growth strategy for resource-efficient, clean & competitive European economy
- **Replaces EU Packaging Directive & German Packaging Act**

PPWR centerpiece: conformity assessment procedure²



Challenges



- Ensure **quality** and availability of required materials
- Increasing **cost pressure** while safeguarding own competitiveness
- Need for **investment** (e.g. in recycling technologies for producers)
- Increased administrative burden due to parallel **EU regulations** (e.g. **EUDR**)

Sanctions/Harms³



- **Fines** in case of non-conformity (exact amount to be determined by EU)
- **Economic damages** for non-saleable goods
- **Reputational risk** from non-compliance

Timeline



From 2026, affected companies must have implemented the first requirements and taken them into account for their declaration of conformity

Requirements		Start	Relevant for...								
Currently only defined for member states			Prefabricator / Packaging manufacturer	Chemistry	Aesthetics and health (exkl. medicine ¹)	E-Commerce	Logistics companys	Retailers (with own-brand products)	FMCG	Hotel and restaurant industry	Recycling & waste management
C	Recycling goals	2025	●	●	●	🕒	🕒	🕒	🕒	🕒	●
	Details on short-term requirements on next slide										
	Conformity assessment	2026	●	🕒	🕒	🕒	🕒	🕒	🕒	🕒	🕒
	Information-/notification-/reporting-obligations	2026	🕒	○	🕒	🕒	○	🕒	🕒	●	🕒
	Labelling obligations	2026	🕒	○	🕒	🕒	○	🕒	🕒	○	🕒
	Substance restrictions	2026	●	●	○	🕒	○	🕒	🕒	○	🕒
	Reuse/refill	2026	🕒	●	🕒	🕒	🕒	●	●	●	🕒
	Compostability	2027	🕒	○	○	○	○	🕒	🕒	○	🕒
	Extended producer responsibility (EPR)	2027	🕒	🕒	●	●	○	●	●	○	●
	Bio-based plastics	2028									
	Deposit and return scheme (DRS)	2029	○	○	○	🕒	🕒	●	●	🕒	🕒
	Recyclability	2030	●	🕒	●	●	🕒	●	🕒	🕒	🕒
	Minimum recycled content	2030	●	🕒	🕒	🕒	🕒	🕒	🕒	🕒	●
	Packaging minimization	2030	🕒	🕒	🕒	●	🕒	🕒	🕒	○	○
Formats/deceptive packaging	2030	🕒	🕒	🕒	●	●	🕒	🕒	●	○	
Reduce waste	2030	🕒	🕒	○	○	○	○	○	○	🕒	
Currently only defined for member states		C	Relevant for conformity assessment		Low impact	○	🕒	🕒	🕒	●	High impact
1 Medical devices covered by Regulation (EU) 2017/745 are largely exempt											

Currently only defined for member states



Relevant for conformity assessment

Low impact



High impact

1 Medical devices covered by Regulation (EU) 2017/745 are largely exempt

While EU implementing acts are still expected for some requirements, first partial requirements have been finalized for the start of application

Effective dates PPWR requirements

2026



Conformity assessment



**Information/notification/
reporting obligations**



Substance requirements



Labelling obligations



Reuse/refill

Content Requirements

Apply new **rules for conformity assessment** of packaging

Inform end users on **reuse/refill options**

- **Comply with limit value** 100mg/kg **lead, cadmium, mercury** & hexavalent chromium in packaging materials
- **Comply with PFAS² limits** for **food packaging**

- **Use identification feature** (e.g. serial number) + name/trademark with postal address and **contact details** of producer/importer on packaging
- **Use QR codes** on packaging

- Apply **definition of reusable packaging**
- **Ensure** existence of **reuse system**
- **Participate in reuse system** for users of reusable packaging (incl. ensuring compliance between system & packaging)
- **Create incentives to** collect packaging

Exceptions

Relevant for registration only: For manufacturers who place a **yearly maximum of 10 tons of packaging** in circulation in an EU member state for first time



Practical examples for e.g. substance restrictions see following slide

For sales and transport packaging:
Transport of dangerous goods, [...],
Packaging in flexible format for transport of food and animal feed

For drinks packaging:
Perishable drinks [...]

General:
Retailers with sales areas of no more than 100 square meters, islands with fewer than 2000 inhabitants, municipalities with fewer than 54 inhabitants [...]

A large proportion of companies will have to change around 80 % of their product packaging to meet the new requirements of the PPWR

Example of substance restrictions

PIZZA BOXES, PAPER CUPS ETC.



Extract of compliance challenges

- **Limit values for PFAS chemicals** in packaging
- Frequently used in pizza boxes, paper cups, straws etc. to improve resistance: water, grease and dirt repellent

Example of recyclability

YOGHURT PLASTIC CUP



Extract of compliance challenges

- In future, **packaging weight must be 70% recyclable**
- Design often contradicts PPWR recycling specifications
 - Several types of plastic: polypropylene (PP) & polyethylene terephthalate (PET)
 - Full-surface adhesive label

Example formats

COSMETICS AND TOILETRIES



Extract of compliance challenges

- **Ban on disposable packaging for cosmetics, hygiene and toiletries** in accommodation sector
- Minimum limits: **liquid up to 50 ml** & solid up to 100 g

Example of deceptive packaging

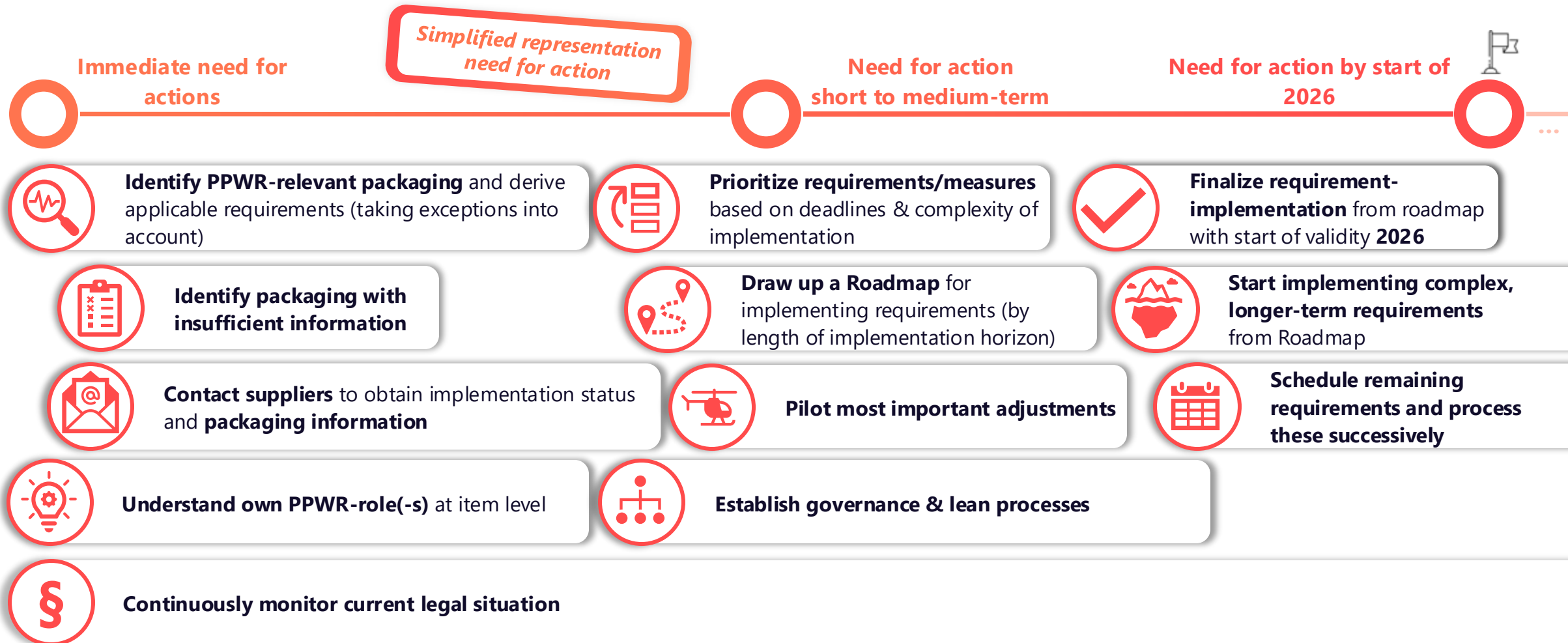
E-COMMERCE PACKAGING



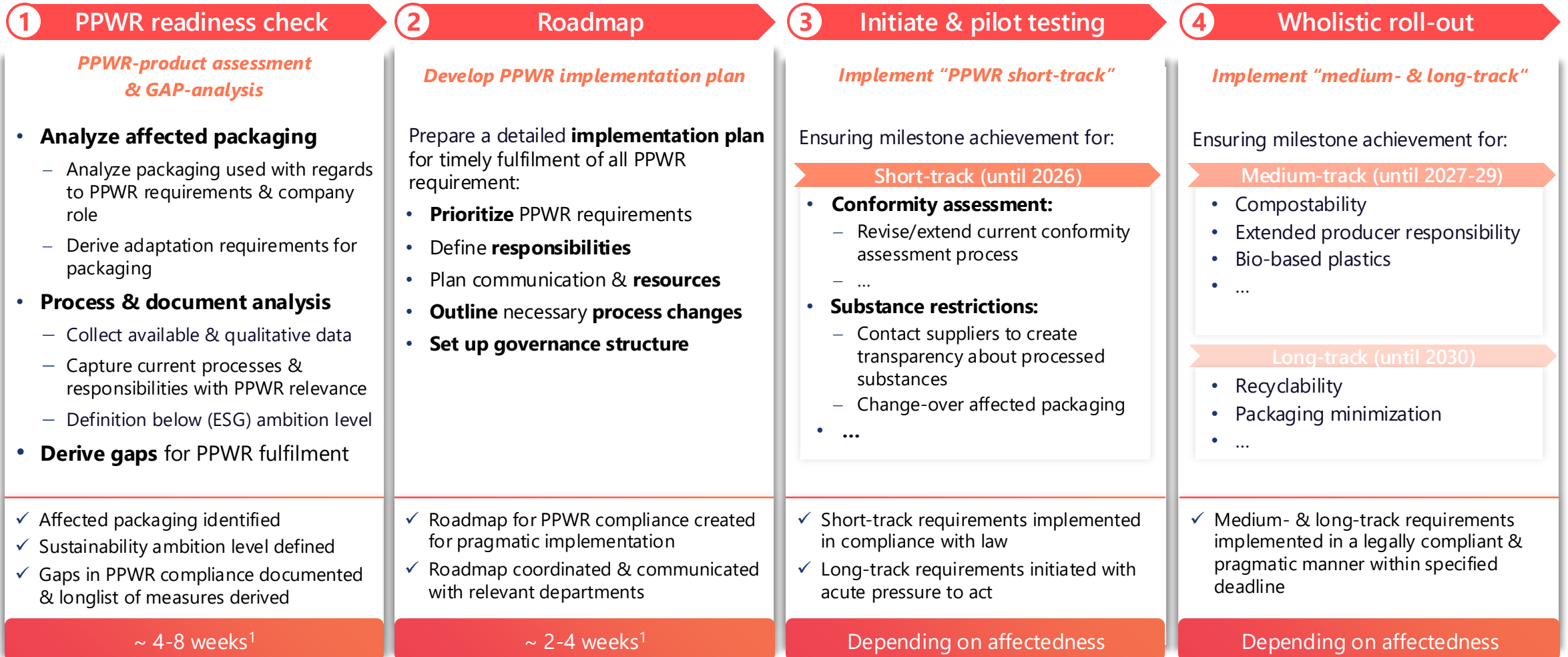
Extract of compliance challenges

- **Proportion of empty space** in packaging for e-commerce, among others, may **not exceed 50%** (filling materials count as empty space)
- Requirement **to reuse at least 10 %** of all e-commerce packaging

Companies must act now in order to fully comply with the requirements from August 2026 and avoid fines



We are happy to support with a modular, customized approach so that relevant aspects of the law are implemented pragmatically and with minimum effort



We look forward to the exchange!

Our sustainability experts for PPWR



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We look forward to introducing ourselves in person to discuss suitable ESG approaches and develop solutions together.
Further information on our sustainability practice at HHC / valantic can be found [HERE](#).



Publications & Webinars

Publication in trade journals such as Logistik Heute, Beschaffung aktuell etc. as well as sustainability studies with leading universities etc.



Regular **webinar series** on **current sustainability topics**



References

Numerous **references** - from SMEs to DAX companies - in a wide range of industries with successful **projects on social & ecological sustainability issues**

