

# 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 PPWR<sup>1</sup> 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)<sup>1</sup> 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 procedure<sup>2</sup>



## 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/Harms<sup>3</sup>



- **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...								
			Prefabricator / Packaging manufacturer	Chemistry	Aesthetics and health (exkl. medicine <sup>1</sup> )	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

# 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 PFAS<sup>2</sup> 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

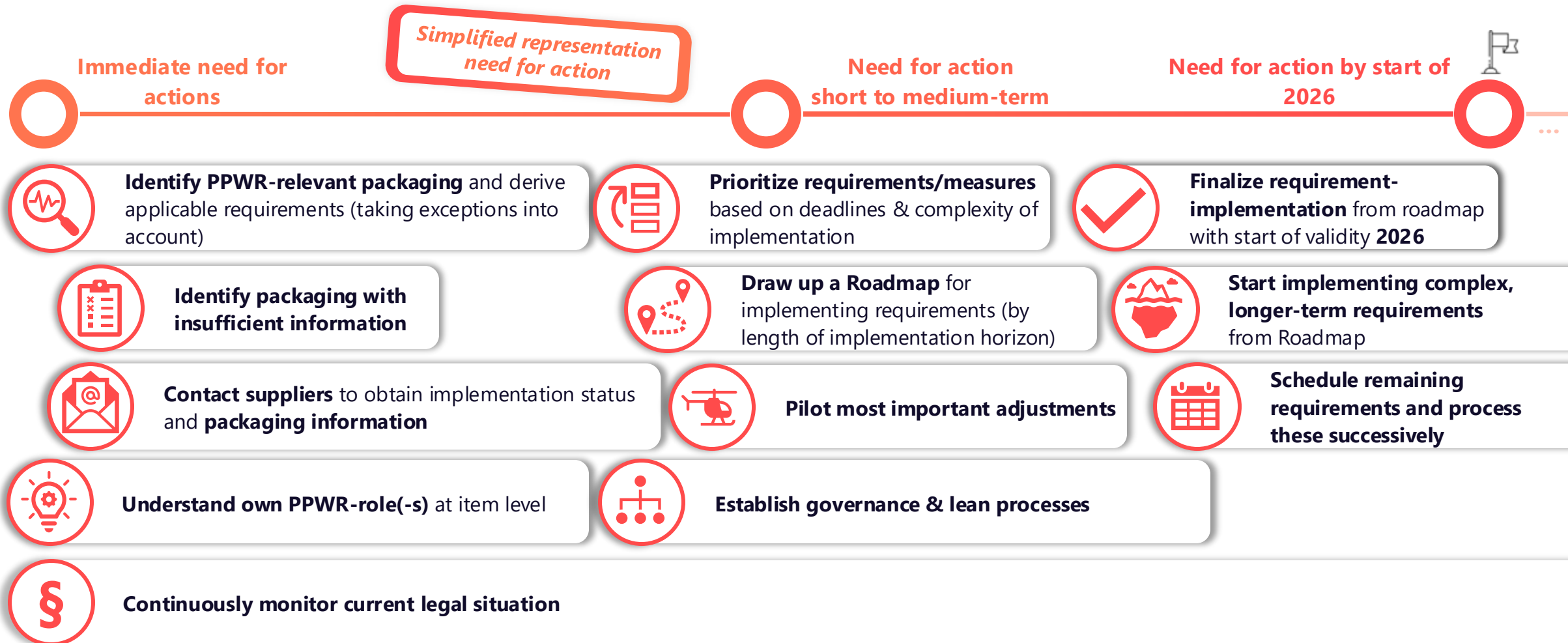


#### Extract of compliance challenges

- **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

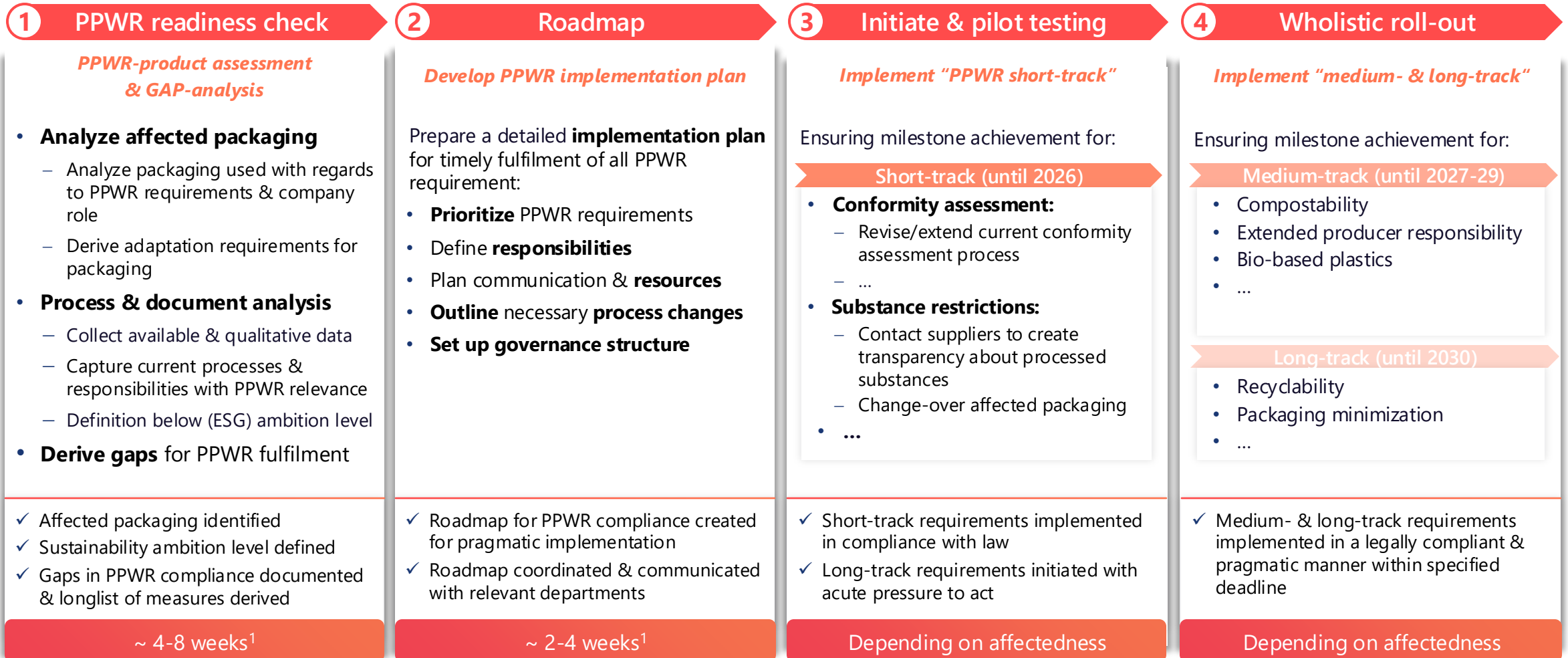


# Companies must act now in order to fully comply with the requirements from August 2026 and avoid fines





# 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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SCAN ME



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**

