

# Packaging and Packaging Waste Regulation (PPWR) – Business Guidance

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## Topics

### [Packaging](#)



The EU Packaging and Packaging Waste Regulation (PPWR) introduces a comprehensive reform of how packaging must be designed, labelled, reused and recycled across the EU. It aims to reduce packaging waste, increase the use of recycled materials and promote circularity in packaging systems.

For UK food and drink manufacturers, the PPWR will be relevant to any business exporting to the EU or supplying the Northern Ireland market. Under the Windsor Framework, most PPWR provisions apply in Northern Ireland, creating a dual regulatory landscape for UK producers operating across different markets.

### **Members Notice: Specific PPWR Requirements Applicable from 12 August 2026**

From 12 August 2026, the EU Packaging and Packaging Waste Regulation (PPWR) (Regulation (EU) 2025/40) will begin to apply to all packaging placed on the EU market; many of the provisions will also apply to packaging placed on the N Ireland market. While most of the provisions will be phased in over several years corresponding with the development of secondary legislation, members attention is drawn to those detailed below which become applicable from 12 August 2026:

#### **1. Conformity Assessment Procedure (Article 39)**

Before packaging can be placed on the EU market, it is the responsibility of the manufacturer to:

- Assess the conformance of the packaging against Articles 5–12 following the procedure set out in Annex VII of PPWR. NB Initially only Article 5 falls within scope of the conformity assessment procedure (CAP); additional Articles will fall within scope as the corresponding provisions become applicable (e.g. Article 10 on packaging minimisation, is due to apply from January 2030). The EC has clarified that the manufacturer retains legal responsibility for compliance, including where elements of the CAP are carried out by third parties. NB the CAP, being based on Articles 5-12, only applies to packaging.
- Draw up an EU Declaration of Conformity confirming compliance as set out in Annex VIII.
- Retain this documentation and make it available to regulators on request:
  1. For at least 5 years (single-use packaging)
  2. For at least 10 years (reusable packaging)

#### **2. Heavy Metal Concentration Limits (Article 5)**

Packaging must not exceed a combined total concentration of 100 mg/kg of:

- Lead
- Cadmium

- Mercury
- Hexavalent chromium

### 3. PFAS Restrictions (Article 5)

Food-contact packaging must not exceed:

- 25ppb for any individual PFAS
- 250ppb for the sum of PFAS (targeted analysis)
- 50ppm total PFAS, including polymeric PFAS

The European Commission has confirmed that these limits apply to the packaging unit as a whole, including inks, coatings, adhesives and other components, and apply irrespective of whether PFAS are intentionally added or unintentionally present. Manufacturers must ensure compliance with the applicable PFAS thresholds set out in Article 5(5).

Packaging exceeding any of the PFAS limits must not be placed on the EU market from 12 August 2026. The restriction applies to packaging placed on the market from this date. In general, sales and grouped food-contact packaging are placed on the market when they are filled, whereas transport and service packaging are placed on the market empty.

The Regulation does not include explicit transitional provisions for packaging already filled or products with long shelf lives and this remains an area of ongoing discussion.

There is currently no harmonised EU methodology for PFAS testing in food-contact packaging. However, the Commission has indicated that work is ongoing, involving industry stakeholders, civil society, Member State competent authorities and the EU Reference Laboratory for Food Contact Materials, with the aim of developing a harmonised testing protocol. In the interim, manufacturers should seek appropriate assurance from suppliers and consider analytical testing where necessary, recognising that screening methods such as total fluorine analysis may help indicate the potential presence of PFAS but will not, on their own, identify specific PFAS substances or necessarily demonstrate compliance with each of the thresholds in Article 5(5)

#### What UK Producers need to do

UK producers placing packaging on the EU or N Ireland market from 12 August 2026 will need to ensure that they understand the above provisions and take appropriate steps to be able to demonstrate compliance. The EC has now published guidance on the interpretation of PPWR requirements, including the CAP. This guidance is intended to support implementation but does not amend the legal obligations set out in the Regulation. Further clarification may be provided over time as additional implementing and delegated acts are developed.

#### Purpose of the Guidance

This guidance has been prepared to help UK manufacturers understand the implications of the PPWR and how it interacts with existing UK packaging legislation, including:

- [Extended Producer Responsibility \(EPR\)](#)
- Plastic Packaging Tax (PPT)
- [Consistent Collections](#)

It provides a comparison between PPWR and UK regulations, highlighting areas of alignment and difference across implementation timelines, obligations, and compliance requirements. The aim is to support members in assessing potential impacts on packaging, operations, and supply chains. This guidance includes dedicated sections on:

- [Substances of Concern](#)
- [Producer Obligations](#)
- [Recyclable Packaging](#)
- [Minimum Recycled Content in Plastic Packaging](#)
- [Compostable Packaging](#)
- [Excessive Packaging & Minimisation](#)
- [Reusable Packaging & Refill](#)
- [Labelling Requirements](#)
- [Restrictions on Certain Packaging Formats](#)
- [Prevention of Packaging Waste](#)
- [Separate Collections](#)
- [Recycling Targets](#)

#### Why PPWR Matters

Businesses placing food and drink products on the EU market must comply with the [Packaging and Packaging Waste Regulation \(PPWR\)](#), which sets requirements covering packaging design, recyclability, recycled content, labelling and reuse. The PPWR entered into force on 11 February 2025, and its general application date is 12 August 2026. However certain provisions will apply later.

Due to the Windsor Framework, most of these requirements also apply to packaging placed on the Northern Ireland market as outlined in the [Commission's explanatory memorandum accompanying Regulation \(EU\) 2025/40](#). This includes rules on substances of concern, recyclability, recycled content, compostability, packaging minimisation, labelling and restrictions on certain packaging formats.

Under PPWR, “placing on the market” refers to the first time packaging or a packaged product is made available on the EU market in the course of a commercial activity, which triggers the relevant regulatory requirements. The Commission guidance indicates that the

point at which this occurs will depend on the type of packaging: for sales and grouped packaging, this will typically be when the packaging is filled and supplied with a product, whereas for transport and service packaging, this may occur when the empty packaging is first supplied. Members should therefore consider the specific packaging format and supply chain when determining the point at which obligations apply.

By contrast, most of the system and infrastructure obligations laid down in PPWR do not apply in Northern Ireland. This includes reuse targets, refill infrastructure requirements and wider national waste collection and management system measures. As such Northern Ireland will remain in scope of the UK's packaging extended producer responsibility (pEPR) scheme.

This guidance outlines the core provisions of PPWR and compares these with equivalent requirements under UK packaging legislation, notably Extended Producer Responsibility (EPR), Essential Requirements Regulations and the Plastic Packaging Tax (PPT). However for many of the provisions within PPWR further detail will be elaborated within future secondary legislation, otherwise known as implementing and delegated acts.

### **Requirements for Substances of Concern (PPWR Article 5)**

From 12 August 2026, producers or importers placing packaging on the EU market must ensure that packaging complies with the following specific substance requirements set out in article 5 by completing and retaining a conformity assessment procedure with supporting technical documentation as evidence:

- Lead, cadmium, mercury, and hexavalent chromium: Under PPWR, the total concentration of these heavy metals in packaging must not exceed 100 ppm. In the UK, the same limit is established under the Packaging (Essential Requirements) Regulations 2015 (SI 2015 No. 1640).
- PFAS, Under PPWR, food contact packaging placed on the EU market must comply with specific concentration limits for per- and polyfluoroalkyl substances (PFAS). These limits apply irrespective of whether PFAS are intentionally added and, in practice, mean that food contact packaging exceeding the defined thresholds must not be placed on the EU market from 12 August 2026. In the UK, PFAS in packaging are regulated under REACH Regulation (EC) No. 1907/2006. At present, there are no confirmed plans to introduce equivalent packaging-specific concentration limits.

### **Producer Obligations (PPWR Article 5 to 11)**

Manufacturers may only place packaging on the EU market if it complies with the requirements outlined in Articles 5 to 11 of PPWR. Under PPWR, the manufacturer is responsible for demonstrating compliance, while producer obligations relating to waste management apply separately in each Member State. They must also retain technical documentation demonstrating this compliance - for five years after placing single-use packaging on the market, and for ten years in the case of reusable packaging.

In the UK, the Packaging (Essential Requirements) Regulations 2015, require that producers ensure all packaging placed on the market must be of a minimum volume and weight and must be the minimum amount to maintain the necessary levels of safety, hygiene and acceptance for the packed product and for the consumer. Packaging must also meet essential requirements for safety and functionality and be manufactured to permit its reuse or recovery as well as meet heavy metal limits. Producers must also keep documentation demonstrating compliance for up to four years.

### **Recyclable Packaging (PPWR Article 6)**

- From 1 January 2030, all packaging placed on the EU market must be recyclable, with limited exceptions (e.g. for certain medical or safety-critical uses).
- Recyclability will be categorised into three grades (A, B, or C), with detailed criteria to be set in implementing acts which must be adopted no later than 1 January 2028 (PPWR Art. 6.4). These grades will determine how EPR fees are modulated.
- From July 2029 (18 months after adoption of the delegated act required by January 2028, in line with PPWR Art. 6.8), EPR fees must be modulated based on the recyclability grade of packaging. At the same time as establishing the detailed design for recycling criteria the EC will adopt (via Implementing Acts) harmonised modulation criteria based on the recyclability performance grade whilst leaving MSs to set their own fee rates.
- Eco-modulation may also take into account additional factors such as the use of recycled content and the presence of hazardous substances.
- From 1 January 2035, packaging must not only be recyclable in theory but also recycled at scale. This means that sufficient collection, sorting, and recycling infrastructure must be in place across the EU for that type of packaging.
- From 1 January 2038, only packaging with a recyclability grade of A or B will be allowed on the EU market. Packaging graded as C will no longer be permitted.

Comparing both the EU and the UK EPR schemes, there are notable differences in their approaches to recyclability assessment and fee modulation. The PPWR will use a grading system to assess recyclability based on a “design for recycling” approach (2030) eventually only permitting grades A and B on the market (2038). The UK's EPR system assesses recyclability using the [Recyclability Assessment Methodology \(RAM\)](#) tool which assesses performance throughout the recycling process based on current infrastructure provision. Unlike the EU, the UK does not plan to ban any specific packaging formats based on recyclability. However, producers using harder-to-recycle packaging are expected to face significantly higher EPR fees.

Feature	EU PPWR	UK EPR
<b>Recyclability Requirement</b>	All packaging must be recyclable from 2030, with some exceptions	No legal requirement for packaging to be recyclable
<b>Assessment Method</b>	Recyclability grading system classifying into A, B & C grades	RAM developed by Defra classifying packaging into green, amber and red grades
<b>Fee Modulation Start</b>	EPR fee modulation must reflect recyclability grades from July 2029	Modulated fees to be introduced in 2026 based on recyclability as assessed by RAM
<b>Bans on Non/Low-Recyclable Packaging</b>	Yes plus packaging graded C will be banned from 2038	No, non-recyclable and more challenging to recycle packaging is allowed but subject to higher EPR fees
<b>Additional Modulation Criteria</b>	May include recycled content, presence of hazardous substances, and design complexity	Further criteria to be considered from 2028

Table 1. Comparison between PPWR & EPR on recyclability requirements

### Minimum Recycled Content in Plastic Packaging (PPWR, Article 7)

Subject to specific exemptions, any plastic component of packaging placed on the EU market must contain a minimum percentage of recycled content derived from post-consumer plastic waste. These minimum requirements are set by packaging type and format, with binding targets for 2030 and 2040 (see Table 2 below). Recycled content will be calculated as an average per manufacturing plant and calendar year.

The recycled content requirements do not apply in the following cases:

- Food-contact plastic packaging, where the inclusion of recycled content would pose a risk to human health and cause the packaging to breach Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food.
- Compostable plastic packaging.
- Contact-sensitive plastic packaging used for:
  - Infant formula and follow-on formula,
  - Processed cereal-based food,
  - Baby food,
  - Food for special medical purposes.
- Any plastic part that represents less than 5% of the total weight of the packaging unit.

Packaging Type	Minimum Recycled Content by 2030	Minimum Recycled Content by 2040
<b>Contact-sensitive PET packaging (excluding single use beverage bottles)</b>	30%	50%
<b>Single-use plastic beverage bottles</b>	30%	65%
<b>Other contact-sensitive plastic packaging</b>	10%	25%
<b>Non-contact-sensitive plastic packaging</b>	35%	65%

Table 2. PPWR recycled content targets for 2030 and 2040

The Commission must adopt implementing acts by 31 December 2026 to establish a unified methodology for assessing, verifying, and certifying recycled content from post-consumer plastic waste, including material sourced or processed outside the EU.

From 1 January 2029, all affected plastic packaging must comply with the adopted methodology for calculating and reporting recycled content.

In contrast, the UK Plastic Packaging Tax (PPT) imposes a flat-rate tax on plastic packaging that contains less than 30% recycled content, regardless of type or use. Unlike PPWR, PPT does not set future targets, ban non-compliant packaging or make allowances

for the constraints imposed by food contact materials legislation. While both frameworks aim to increase recycled plastic use, the EU uses a regulatory compliance model, whereas the UK takes a fiscal approach to drive change.

Feature	EU PPWR	UK (PPT)
Start Date	Targets apply from 2030, with higher targets in 2040	30% recycled content target introduced on 1 April 2022
Type of Measure	Plastic packaging PoM must meet the mandatory minimum recycled content	Fiscal penalty for packaging with less than 30% recycled content
Recycled Content Thresholds	Varies by packaging type (e.g. 30% by 2030, 65% by 2040)	Flat rate of 30% recycled content for all plastic types
Verification Requirements	Mandatory reporting using a harmonised EU methodology	Manufacturers and importers to keep records demonstrating recycled content and tax paid

Table 3. PPWR & UK PPT similarities and difference towards recycled content

### Compostable Packaging (PPWR Article 9)

By February 2026, the European Commission must request the European standardisation organisations to update harmonised standards for compostable and home-compostable packaging. From 2030, specific packaging types, including tea bags, filter coffee pods, and PLU labels on fruit and vegetables, must comply with the standards for industrial composting and home composting standards.

Until mid-2026, Member States may add other packaging formats to the list of items that must be compostable, based on national conditions. However, unless compostability is explicitly required under PPWR or through a national derogation, packaging must be recyclable and must not hinder the recyclability of other waste streams even if made from biodegradable or compostable materials.

In contrast, the UK EPR scheme currently does not mandate compostability for any packaging type and treats compostable packaging as non-recyclable and therefore it will be subject to higher EPR fees. NB Under UK EPR legislation tea bags and coffee pods where the coffee is discarded with the capsule are not considered packaging

### Excessive Packaging & Minimisation (PPWR Article 10 & 24)

By 1<sup>st</sup> January 2030, packaging placed on the EU market must be designed in such a way that its weight and volume are limited to the minimum necessary to ensure its functionality, including protection, hygiene, safety, characteristics of reusable packaging and provision of information to consumers. Use of packaging features that are considered misleading, such as double walls, false bottoms or other design elements that artificially increase the perceived volume of a product will also be prohibited. By 12<sup>th</sup> February 2027, the Commission must request the European standardisation organisations to prepare harmonised standards and assessment methodologies for packaging minimisation to ensure consistent enforcement across Member States.

By 1 January 2030, or three years after implementing acts take effect (whichever is later), grouped, transport, and e-commerce packaging may contain no more than 50% empty space. By 12 February 2028, the Commission will define the calculation method for this, taking into account safety, product protection, or legal requirements. From 12 February 2028, sales packaging must also minimise empty space while maintaining functionality. Exceptions apply for products that settle during transport or require headspace as well as to sales packaging used directly as e-commerce packaging and to reusable packaging within reuse systems. By 12 February 2032, the Commission will review the 50% limit and exemptions; it will then consider setting specific ratios for certain products.

The UK, the Packaging (Essential Requirements) Regulations 2015, contain a similar general requirement that producers ensure all packaging placed on the market must be of a minimum volume and weight, must be the minimum amount to maintain the necessary levels of safety, hygiene but with the additional consideration of maintaining consumer acceptance for the packed product. EPR will also apply fees based on the weight of the packaging such that excessive packaging will attract higher compliance costs.

### Reusable Packaging & Refill (PPWR Article 11 & 29)

PPWR sets out specific conditions under which packaging may be classified as reusable. To qualify, packaging must be designed and marketed to be reused multiple times without losing its intended function. By February 2027, the EC must establish the minimum number of rotations required for packaging to be considered reusable. PPWR sets binding reuse targets for certain packaging types, with phased obligations from 2030 to 2040 requiring producers to meet minimum percentages of reusable packaging.

Packaging Category	2030 Target	2040 Target
<b>Consumer (B2C) Packaging</b>		
- Sales packaging for alcoholic and non-alcoholic beverages	10%	40%
- Grouped packaging (boxes, excluding cardboard & excluding outside sales packaging)	10%	25%
<b>Industrial (B2B) Packaging</b>		
- Transport packaging (e.g., pallets, crates)	40%	70%
- Transport packaging within the same Member State or between affiliated companies	100%	100%

Table 4. PPWR Reuse/Refill targets for 2030 and 2040

Additionally, from 1 January 2030, final distributors with a sales area exceeding 400 m<sup>2</sup> are required to allocate at least 10% of their sales area to refill stations, covering both food and non-food products.

For now, the UK EPR system does not include binding reuse targets or minimum rotation requirements although Defra is expected to launch a call for evidence later in 2025 to explore ways to support and incentivise reusable packaging, focusing initially on glass. This step aims to gather stakeholder input to inform future policies that promote reuse and advance the UK's circular economy.

### Labelling Requirements (PPWR Article 12)

By August 2026, the European Commission must adopt an implementing act establishing a harmonised packaging label, including a standard pictogram and detailed labelling specifications. This system is intended to help consumers correctly sort packaging waste by linking packaging labels with corresponding waste collection bins.

In June 2025, the Commission's Joint Research Centre (JRC) conducted a targeted consultation on a proposed system of Waste Sorting Labels (WSL). Building on this consultation, the JRC published a technical proposal in January 2026 outlining a potential harmonised EU labelling system, including standardised pictograms and guidance on how packaging labels may correspond with waste collection bins across Member States. The proposal is intended to inform the Commission's implementing act, which remains due by August 2026.

In contrast, under the UK EPR Scheme, mandatory packaging labelling requirements have been temporarily removed pending a review of the scope for alignment with the EU PPWR framework, with the aim of reducing complexity for businesses operating across UK and EU markets. This is likely to feature as part of a consultation planned by the UK Government for later in 2026 on how best to avoid regulatory barriers within the UK's internal market arising from measures adopted under PPWR.

### Restrictions on certain Packaging Formats (PPWR Article 25)

From 1 January 2030, economic operators will be prohibited from placing the following packaging formats on the EU market:

- Single-use plastic grouped packaging (e.g., collation films or shrink wraps) used at the point of sale to bundle bottles, cans, tins, pots, tubs, or packets intended as convenience packaging to encourage or enable consumers to purchase multiple products. This restriction does not apply to grouped packaging necessary for handling or logistics.
- Single-use plastic packaging for pre-packed unprocessed fresh fruit and vegetables weighing less than 1.5 kg.
- Single-use plastic packaging, such as sachets, containing individual portions or servings of condiments, preserves, sauces, coffee creamer, sugar, and seasoning.

No such prohibitions have been legislated or are currently planned in the UK. However, under the current UK Plastics Pact there are voluntary targets for producers to eliminate problematic and unnecessary packaging which cover some of these items.

### Prevention of Packaging waste (PPWR Article 43)

PPWR sets binding targets for reducing per capita packaging waste compared to 2018 levels: 5% by 2030, 10% by 2035, and 15% by 2040. By 12<sup>th</sup> February 2027 correction factors will be established to account for tourism. Until 31<sup>st</sup> December 2025, Member States may request an alternative base year if justified by reporting changes rather than consumption trends. By 12<sup>th</sup> February 2032, the Commission will review progress and consider introducing material-specific targets, accompanied, if necessary, by new legislative proposals.

Member States are required to implement additional waste-prevention measures, such as extended producer responsibility schemes or require producers to implement waste-prevention plans, provided they are proportionate, non-discriminatory, and do not distort trade. They must also encourage the provision of tap water in reusable or refillable formats for free or a small service fee in hospitality settings.

No prevention targets are currently established under UK legislation.

### Separate Collections (PPWR Article 48 & 49)

PPWR requires Member States to set up systems for the return and separate collection of all packaging waste. These systems must support reuse and enable high-quality recycling. Packaging that meets design-for-recycling standards must be collected for recycling and cannot be sent to landfill or incineration, except for residues left after treatment when recycling is not technically or environmentally beneficial.

Member States must ensure nationwide collection and sorting systems that preserve the quality of recycled materials. In limited cases, mixed collection may be allowed if it achieves comparable results, but packaging collected in this way may still need to be sorted before disposal or energy recovery.

These systems must cover all packaging types and provide accessible facilities in public, commercial, and residential areas. They must be open to all operators and authorities, treat imported products fairly, and avoid distorting trade. Member States are also required to promote recycling that meets quality standards. From 1 January 2029, Member States must set mandatory collection targets aligned with PPWR recycling targets.

By contrast, the UK’s consistent collections policy is being taken forward separately in each of the four nations. The broad objective is for local authorities and businesses to collect paper and card, plastic, metal, glass (along with food and garden waste) nationwide by 31 March 2026, with plastic films and flexibles added by 31 March 2027.

In England, under a policy branded ‘Simpler Recycling’, packaging materials may be co collected except for paper and card (unless a separate assessment is made to demonstrate that this is either not technically or economically practicable or has no significant environmental benefit). Unlike the PPWR, the policy does not ban landfill or incineration of recyclable packaging. In addition, as of October 2024, [waste facilities in England must follow new rules for sampling, measuring, and reporting the types and amounts of waste they handle](#). These requirements aim to improve the quality of recyclable materials and ensure better data for recycling systems. Facilities must notify the Environment Agency, carry out regular sampling, and submit their waste data in the specified format.

Feature	PPWR (EU)	Consistent Collections (England)
Scope	All packaging types, nationwide.	Paper, card, rigid plastics, metals, glass, & flexible plastic films/flexibles (31 March 2027 in England).
Collection	Separate collection required mixed collection may be allowed if it achieves comparable results	Separate collections required. Co-mingling of plastic, metal and glass allowed in England if quality is maintained.
Sortation	Collected packaging must be sorted before disposal or recovery.	Sortation at collection in England. No requirements for sortation post collection for co-mingled waste but MRFs must monitor quality of inputs and outputs under materials facilities regulations
Landfill & Incineration	Landfill & incineration of recyclable packaging prohibited (residues permitted).	No ban on landfill/incineration

Table 5. Comparison of Separate Collections within PPWR vs. Consistent Collections

### Recycling Targets (PPWR Article 52)

PPWR sets binding recycling targets for packaging waste. By 31<sup>st</sup> December 2025, Member States must take measures to achieve the below recycling rates in table 6.

Packaging Material	PPWR Minimum Recycling Targets by Weight		UK Recycling Targets By Weight	
	By 31 <sup>st</sup> December 2025	By 31 <sup>st</sup> December 2030	By 31 <sup>st</sup> January 2026	By 31 <sup>st</sup> January 2031
Overall	65%	70%	-	-
Plastics	50%	55%	55%	65%
Wood	25%	30%	45%	50%
Ferrous Metals (Steel for UK)	70%	80%	80%	85%
Aluminium	50%	60%	61%	67%
Glass	70%	75%	74%	85%
Paper & Cardboard	75%	85%	75%	85%

Table 6. Comparison between PPWR Packaging Waste Prevention Targets 2025/2030 with UK EPR targets

Member States may postpone the material-specific targets by up to five years, provided that:

- Any derogation from the target may not exceed 15% when applied to a single target or divided between two targets.
- Recycling rates for any material must not fall below 30% after 31 December 2025.

- Recycling rates for glass, paper, and cardboard must not fall below 60% after 31 December 2025, or 70% after 31 December 2030.
- The derogation must be supported by an implementation plan submitted to the Commission no later than two years before the relevant deadline.

By 12 February 2032, the Commission will review the 2030 targets with a view to increasing them or setting additional goals.

**Also see:**

- [Packaging business guidance](#)
- [Packaging updates](#)