

PPWR and the future of packaging sustainability

Empowering businesses to go beyond.

BEYONDLY



BEYOND TODAY
TOWARDS TOMORROW



What We Do

**We  develop better
solutions  for a
brighter tomorrow **

Our services



Compliance

Packaging Compliance

- Civil Sanctions
- PRN Procurement

WEEE Compliance

- Scoping Service

Batteries Compliance

International Compliance

Plastic Packaging Tax

PPWR

Energy Savings Opportunity Scheme (ESOS)

Streamlined Energy & Carbon Reporting (SECR)

Collections

- WEEE Collections



Consultancy

Sustainability

- Sustainability Strategy
- Carbon Management & Offsets
- B Corp

Resource Efficiency

- Sustainable Packaging
- Product Carbon Footprint (PCF)
- Zero Waste to Landfill



Data

Packaging

- Data Gathering
- Obligation Calculations
- Data Insights
- Nation Data

WEEE and Batteries

- Data Gathering
- Obligation Calculations
- Data Insights

Agenda

UK packaging landscape, focusing on EPR

EU packaging landscape, focusing on PPWR

Sustainability requirements

Labelling

Re-usable Packaging

Other obligations



Meet your presenters



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UK Packaging



Old regs (1997)

‘Producer Responsibility’

Paying for waste to be recycled
(PRN system)

Only covering ~20% cost of waste packaging

New regs (2024)

Extended Producer Responsibility (EPR)

Now including collection from households!
(PRN system + **EPR fees**)

Covering entire end of life of packaging



What's happened in 2025?

- 1 Jan 2025: pEPR comes fully operational
- PackUK (scheme administrator) announced shortly after!
- Issues and delays realised throughout Jan and Feb
- Draft fees and modulation framework in April
- & final amended RAM
- RAM 'flexibility' announced in June
- & confirmed base fees!
- First invoices in October
- Amended regulations in November
- First invoice payments and Y2 illustrative fees in December
- Carrier Bag reporting 'delay'

EPR timeline for 2026



2026	EPR Updates	Reporting Schedule	Fees	Circular Economy	Waste collections
Jan	01.01) Amended pEPR comes into force	01.01) Start gathering Organisation Waste, Nation of Sale, Carrier Bags (England) data		31.01) Circular Economy Strategy (Scotland) consultation closes	
Feb					
Mar			Amended 2025 NoL	Circular Economy Growth Plan (England) released as a white paper "Spring" 2026	31.03) Simpler Recycling (England) Y2 for Households
Apr		01.04) EPR deadline	2026 base fees due to be published		
May					
Jun					
Jul	RAM 2027 expected				
Aug	Potential update on mandatory labelling "Summer" 2026				
Sep					
Oct		01.08) EPR deadline	2026 NoL to be issued *		Scotland co-designing a new 'Code of Practice for Household Waste Recycling' to be released "End" 2026
Nov	Potential future regulatory amendments laid before parliament				
Dec			Illustrative 2027 base fees (separate rigid and flexible plastic)		



Evolution of RAM

UK recyclability assessment methodology (RAM)

Green

Widely recyclable

Amber

Recyclability challenges

Red

Not recyclable

Household, and “commonly ends up in public bins” packaging only

Modulation of the base fee

- **Green** packaging facing a **reduce** fee
- **Red** packaging facing an **increased** fee

‘Red’ Modulation timeline:

- 2025 (Y1) = no modulation
- 2026 = 20% increase
- 2027 = 60% increase
- 2028 = 100% increase
- 2029+ = further increases?

Modulation: Environmentally sustainable packaging

- Whether the packaging is reusable
- The extent to which the packaging is reused
- **The recyclability of the packaging**
- The environmental impact of manufacture, transportation and use
- The environmental impact when it becomes waste
- Material used is no more than reasonably necessary

RAM Roadmap Reviews

RAM 2027

- Take-back scheme guidance
- Language and definitions
- RAM v1.0 removals
- Fibre-based composite guidance

RAM 2028

- International alignment
- Simpler recycling alignment
- Flexible plastic guidance
- Rigid plastics guidance

Note

- 2025 & 2026 packaging data = RAM v1.1
- 2027 packaging data = RAM 2027, etc.



Packaging sector overview

Operational considerations

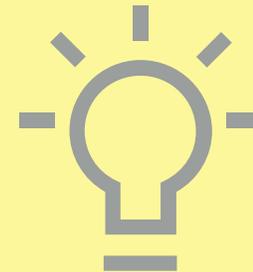
- Household waste collection reforms
- Digital waste tracking (DWT)

Packaging reporting

- Deposit return scheme (DRS)
- Packaging regulations (pEPR)
- Plastic packaging tax (PPT)

Emissions trading scheme (ETS) expansion

Affects pEPR fees as fossil derived materials e.g, plastic



UK pEPR: Key takeaways



- Dust settling on pEPR
- Other reforms happening
- Future developments will influence costs
- Data is still key!

EU Packaging

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Related regulations

- SUPD: Single-use Plastics Directive
- DPP: Digital Product Passports
- ESPR: Ecodesign Sustainable Products Regulation

Packaging reporting

- National pEPR reporting
- PPWR

Green claims

- Empowering Consumers Directive



What are the Packaging Waste Regulations (PPWR)?

The Aims

EU-wide packaging standards

Cut packaging waste

Circular economy alignment

Reduce packaging impacts on human health and the environment

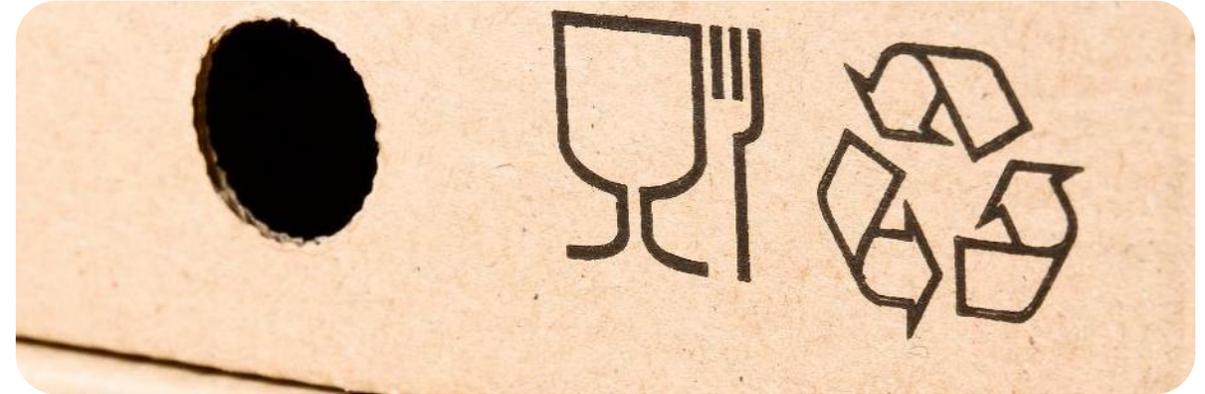
Mandated EPR across the EU





Who needs to comply?

- Manufacture packaging or packaged products
- Import packed goods into the EU
- Applies to suppliers and distributors who make packaged goods available for sale
- Includes e-commerce



Northern Ireland

PPWR is also in force in Northern Ireland

Excepting certain sections such as:

- re-use and re-fill obligations
- waste management, prevention, and reporting



What packaging is in scope of PPWR?

The regulation applies to all packaging placed on the market in the EU, regardless of the type of packaging:



Sales



e-commerce



Transport



Grouped

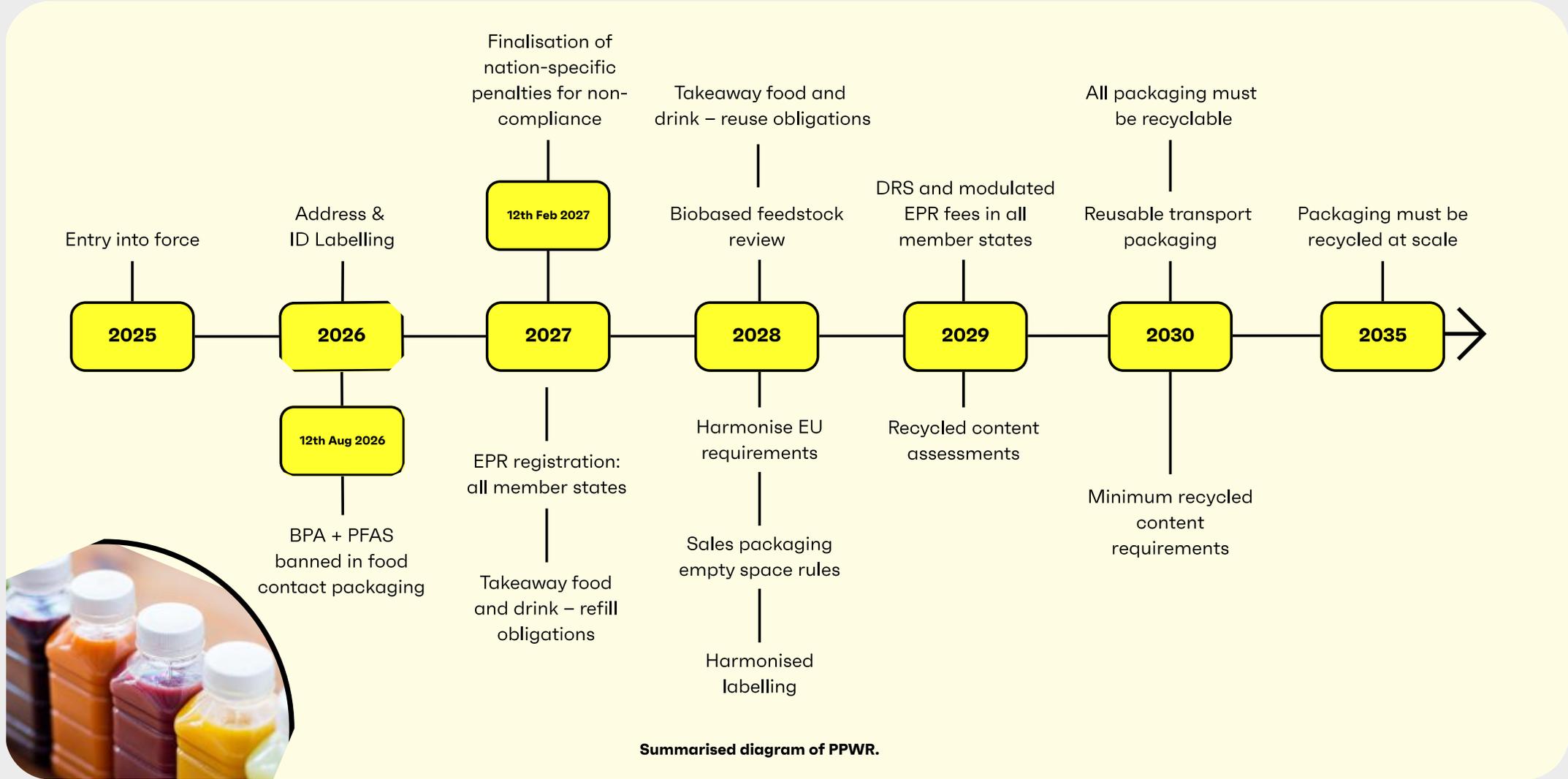


There are some specific exemptions:

- Packaging items like cups, food containers which are **sold empty to the final distributor**
- Contact sensitive products e.g., medicine, **food, infant formula**
- Dangerous goods and heavy machinery
- Some materials from 'other' category e.g., **cork, textile, rubber**

Please be aware these exemptions mostly apply to specific requirements and are not blanket applications!

PPWR timeline



PPWR: Sustainability Requirements



Packaging requirements & specifications

**Substances of concern
(SoC)**

Minimum recycled content

Recyclability

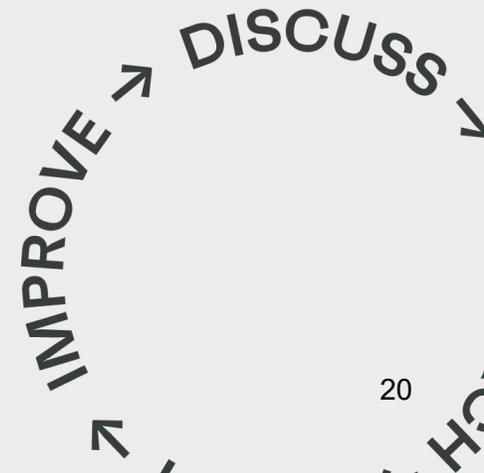
**Biobased feedstock in
plastic packaging**

Compostable packaging

**Restriction on use of
packaging formats**

Packaging minimisation

**Excessive packaging and
empty space**





Packaging requirements & specifications

Parameters for DfR criteria:

- Additives
- Labels & Sleeves
- Closures and small components
- Adhesives
- Colours
- Material composition
- Barriers / coatings
- Inks and lacquers
- Product residues
- Ease of dismantling

Recyclability

EU design for recycling

Grade A

Grade B

Grade C

Technically non-recyclable

Designed for Recycling (DfR) & recycled-at-scale (RaS)

All packaging will need to be recyclable by 2030

Other considerations:

- Separability of components
- Established collection and sorting processes
- Preservation of secondary materials
- Available recycling technologies
- Substances of Concern



Substances of concern (SoC)

12.08.26:

- Minimise the “presence and concentration” of SoC in packaging
- Concentration limits (100mg/kg) for lead (Pb), cadmium (Cd), mercury (Hg), hexavalent chromium (Cr(VI))
- PFAS limits for food-contact packaging
- Compliance must be demonstrated by technical documentation

PFAS limits for food contact:

- **25 ppb** for any individual non-polymeric PFAS
- **250 ppb** for the sum of non-polymeric PFAS measured as the sum of targeted PFAS analysis
- **50 ppm** for PFASs including polymeric PFAS

Future:

- Review of the recognised SoCs and whether regulation is achieving goal of reduction

Other:

- BPA ban in food contact materials from 20 July 2026 (inc. NI)

Under current UK pEPR regulations, PFAS only attracts a red rating but is expected to be consulted on in the future, potentially aligning with EU considerations.

Per- and polyfluoroalkyl substances (PFAS)

Typically included within packaging due to:

- Grease and oil resistance
- Water repellence
- Thermal stability
- Non-stick surface
- Chemical resistance

Commonly found in **cardboard and paper packaging** but also plastic linings e.g., fast food wrappers

PFAS can lead to **environmental and water contamination**, with environmental persistence. PFAs can also migration into consumables, so can **impact human health**.

Hinder the recyclability of products and further **limit the application of output recycle**. Increasing the need for closed loop solutions.





Packaging requirements & specifications

Minimum recycled content

- **01.01.29:** Assessment of packaging against recycled content methodology and potential fee modulation
- **01.01.30:** First recycled content requirements for plastic packaging



Targets

- 30% contact-sensitive PET ex. beverage bottles
- 10% contact sensitive other than PET ex. beverage bottles
- 30% single-use plastic beverage bottles
- 35% all other plastic packaging





Packaging requirements & specifications

Compostable packaging

- **12.02.28:** Certain packaging formats (e.g. tea/coffee bags & fruit/veg sticky labels) to be compatible with industrial composting standards
- Other biodegradable packaging shall be designed for recycling without affecting recyclability of other waste streams
- **12.02.26:** confirmed requirements of compostable packaging



Excessive packaging and empty space

- **12.02.28:** Sales packaging shall have minimum empty space to ensure packaging functionality
- **01.01.30:** Companies who fill grouped, transport, e-comm packaging shall ensure that maximum empty space ratio is 50% as per methodology



Packaging minimisation

- **01.01.30:** Importers, manufactures to ensure weight, volume of packaging is reduced to minimum necessary to function as packaging
- As per harmonised standards (due **12.02.27**)





Restriction on use of packaging formats

Annex V (01.01.30)

- Single-use plastic grouped (multipack) packaging
- Single-use plastic packaging for unprocessed fresh fruit and vegetables <1.5kg
- Single-use plastic packaging for food and beverages filled and consumed within HORECA
- Single-use plastic packaging for condiments, creamer, sugar, seasonings in HORECA
- Single-use accommodation sector packaging intended for an individual booking
- Very lightweight plastic carrier bags

Amendments to the SUPD (12.02.29)

- Food containers made of EPS or **XPS** used to contain food for immediate consumption without further preparation
- Beverage containers and cups for beverages, including caps, lids made of EPS or **XPS**
- **Shrink wrap used in airports, train stations for the protection of luggage during transport**
- **Chips of PS and other plastics that are used to protect goods during transport and handling**
- **Multi-pack plastic rings used as grouped packaging**

PPWR: Reusable packaging



Obligations from 01.01.30

- Transport packaging = 40% / 70% reuse target
- Internal use / intrastate = 100% reuse target
- Grouped packaging in the form of boxes = 10% / 25% reuse target
- Beverages in sales packaging = 10% / 40% reuse target



Pallet wrap and strapping
now exempt for internal use &
transport packaging in
member state!

Packaging requirements & specifications



Reuse obligation

- Identify if you have any re-use systems in play, which meets the general requirements!
- Ensure they work, maintain the condition of packaging.
- Reuse systems can be operated by third party.
- 30.06.27 – established minimum number of rotations for common packaging reusable packaging formats



PPWR: Labelling

Labelling: Manufacturers, importers & distributors



Company, Trademark™, Street Town City Postcode, website.com
Batch #019845 542900



**1. Packaging
identification**

**2. Company
identification**

Labelling: Harmonised labels – 12.08.28



Figure ES 1. Final label proposal (colour and text)

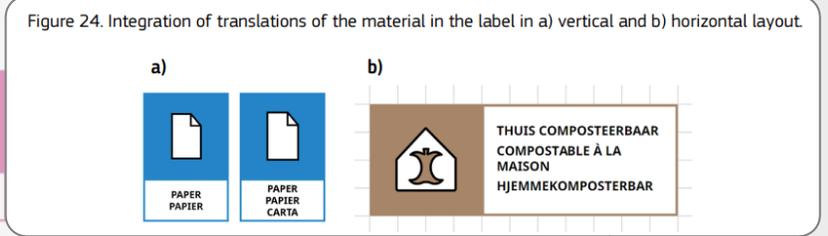
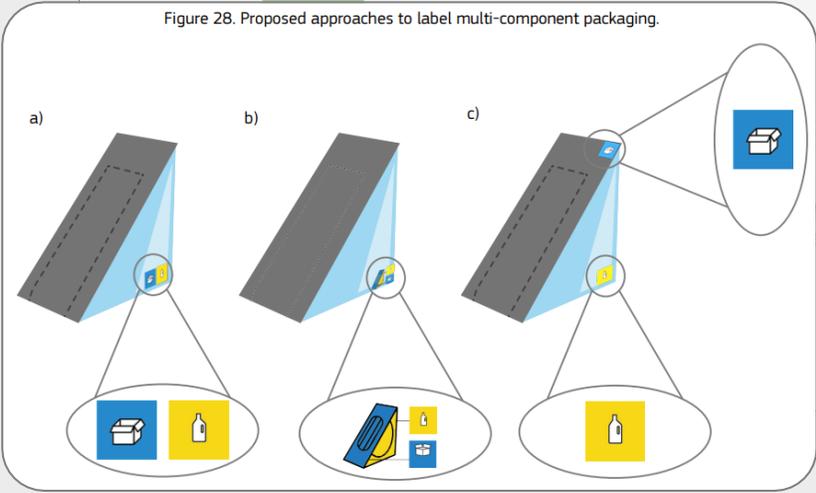
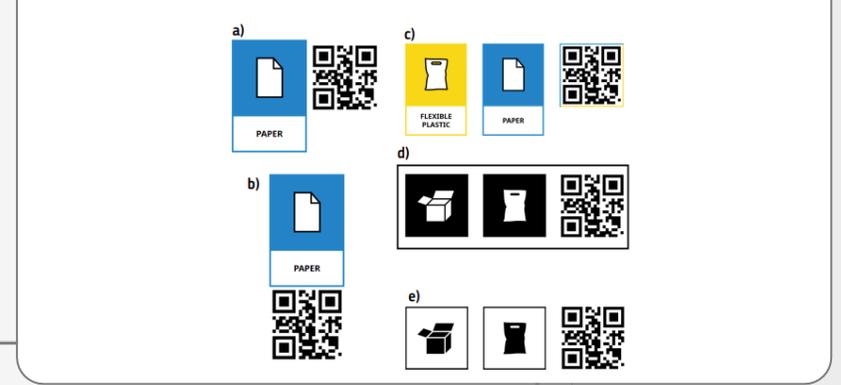
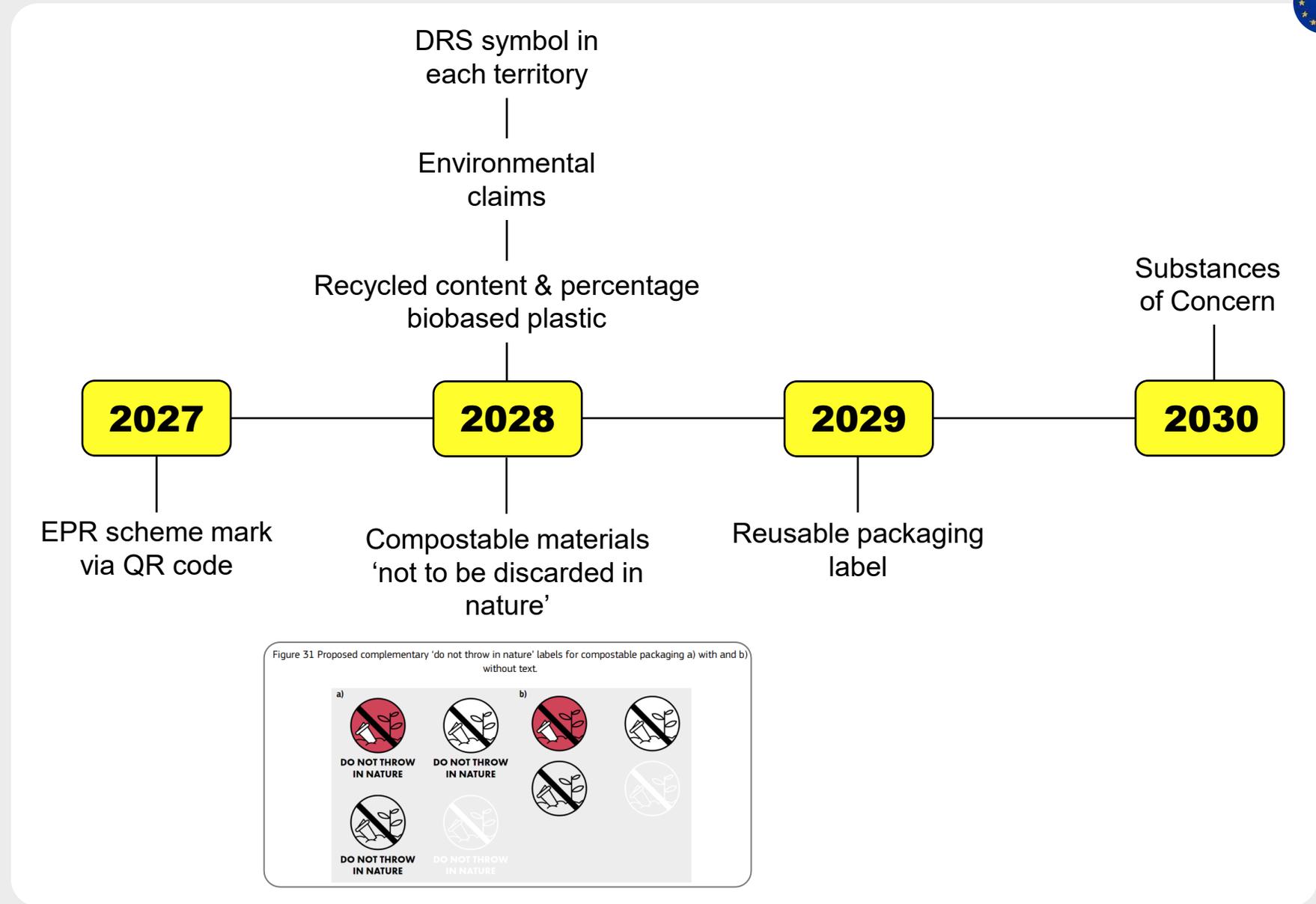


Figure 30. Suggestions to use QR codes providing further sorting relevant information for packaging next to the physical label (a, b) or labels (c, d, e).



Other labelling requirements



PPWR: Other obligations

General Obligations



Suppliers



Manufacturers



Importers



Distributors



Information on the prevention and management of packaging waste

It will be worth discussing this with your PRO in advance of PPWR coming into force



Conformity Assessments

- Substances of concern (SoC)
- Recyclability
- Recycled content
- Plastic: Biobased feedstock
- Compostable packaging
- Packaging Minimisation
- Reusable packaging
- Labelling

- Environmental claims
- Excessive packaging





What we know/don't know so far

- National Register of Producers enforcement
- Nation, scheme, and producer reporting infrastructure changes
- Simplified reporting for <10 tonnes
- Registration verification checks
- Further acts will follow which will provide detailed templates and instructions. We are likely to see these develop throughout 2026.

What this means for producers

- If you're selling in the EU now, take our compliance assessment and we can assess you against current rules in each member state.
- Expect format and details of EU producer register 12.02.26 - producer registrate will be due in member states by August 2027.
- Lack of registration becomes a real commercial continuity risk
- Small producer – track your tonnage by Member State

Key takeaways

Thinking outside the (cardboard) box

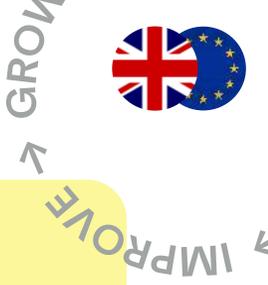
What does packaging need to do?



80% of a product's environmental impact is pre-determined in the design phase.

- **Life cycle thinking** – considering the packaging material and format's impact across the whole packaging life cycle.
- **Reduction** – removing components, decoration, considering alternative formats which achieve the same packaging function.
- **Lightweighting** – maximising the efficiency of packaging materials.
- **Improve recyclability** – consider collection systems, material separations, and end markets.
- **Material considerations** – where appropriate sometimes material changes can offer environmental benefits. This should be done with caution and horizon scanning is key.
- **Re-use or refill** – considering “packaging ownership”, convenience for the customer, reverse logistics to facilitate re-use systems.

Key takeaways



UK EPR

- April 2026: base fees due to be published
- July 2026: RAM 2027 expected
- Summer 2026: Potential update on mandatory labelling

EU PPWR

- February 2026: producer register reporting format and data granularity categories – still waiting!
- August 2026: implementing act is due on harmonised EU packaging labelling design and rules
- August 2026: SoC restrictions e.g., PFAS

Future considerations

- Future proof your packaging data systems
- Prepare labelling transition plans
- Scope the impact of packaging material choices on EPR fees including plastic recycled content level
- Build auditability



Understand and navigate your responsibilities under PPWR

Beyondly's team of compliance, packaging and data experts are on hand to help you prepare for PPWR.

PPWR Readiness Assessment:

Tailored to your business activities and packaging, allowing you to feel confident about PPWR's impact on your business.

What does this service entail?

- Clear summary of impacts on your business.
- Practical focus areas for your business.
- Tailored timeline
- Ongoing updates for 2026

Want to learn more, please contact our solutions team:
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