



# The Packaging and Packaging Waste Regulation (PPWR) and International EPR Obligations

13 May 2026

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# Our Company - Valpak

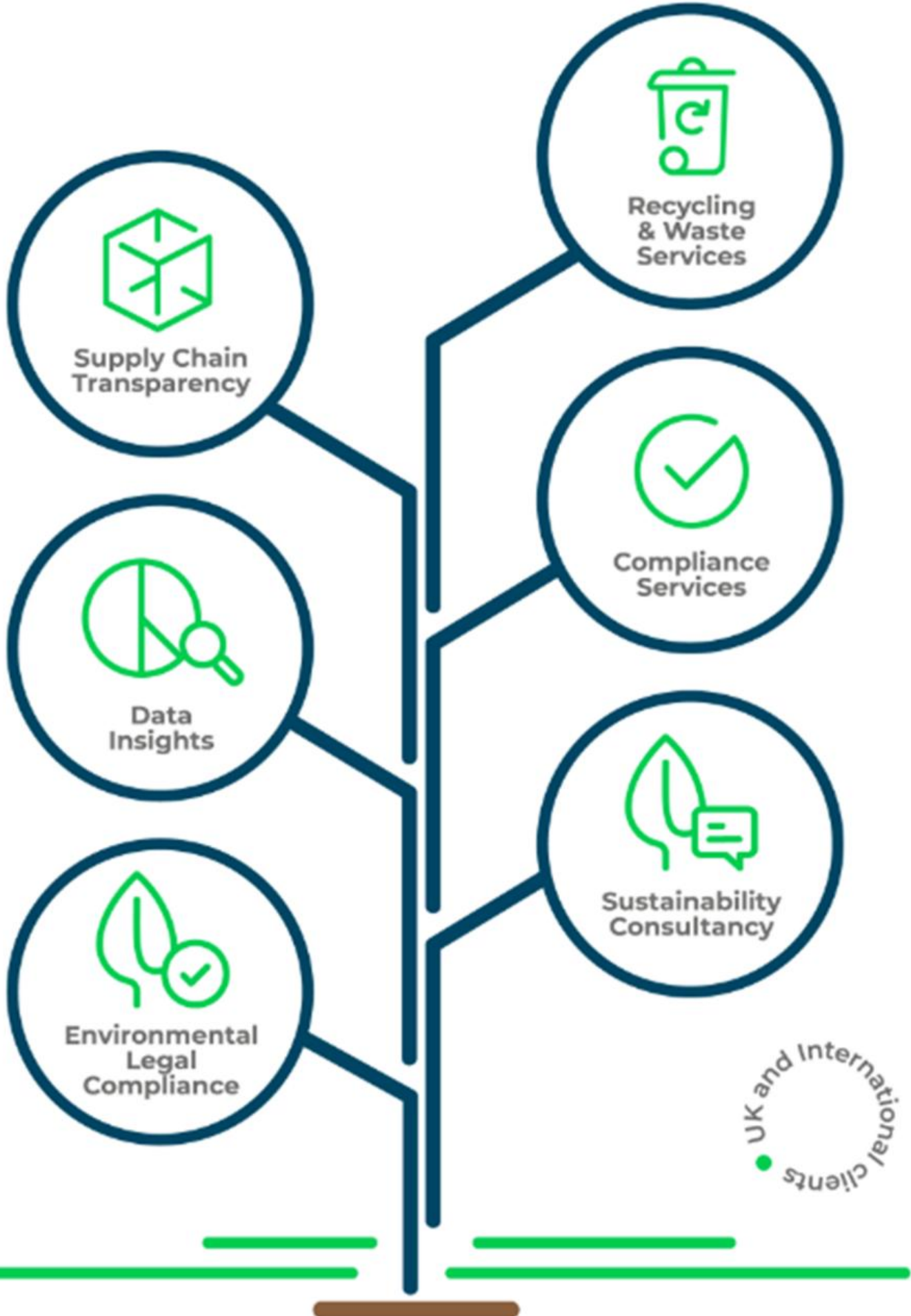
## The UK's first and largest Producer Responsibility Scheme



100% UK compliance record, over 25 years of experience, over 400 employees



International knowledge worldwide, compliance network in over 190 countries



### Standards of Excellence



# International Compliance at Valpak

## A specialised team of international experts



Part of Reconomy group, collaborating with our sister companies, RLG and Noventiz



Team of over 40 members who submit over 4,000 declarations annually



Account managers, data consultants, researchers, country experts and more



Work with over 150 schemes spanning over 270 countries and territories

# Agenda

1. International EPR Compliance
2. European EPR Principles
3. EPR Global Expansion
4. The PPWR
5. Legislative Background
6. EPR under the PPWR
7. Roles and Responsibilities Under the PPWR
8. Timeline
9. How Valpak can help
10. Questions

# **International EPR Compliance**



# European EPR Principles



# What is Extended Producer Responsibility?

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- Producers take responsibility for managing harmful waste
- Producer pays principle
  - Companies financially responsible for waste management
  - Encourages eco-friendly product design
- Aims to reduce waste going to landfill
- Promotes recycling and responsible disposal



# The Waste Framework Directive

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## Waste Framework Directive 2008/98/EC

Packaging  
Directive  
94/62/EC

Batteries  
Directive  
2006/66EC

WEEE & RoHS  
Directives  
2012/19/EU  
2011/65/EU

End-of-Life  
Vehicles Directive  
2000/53/EC

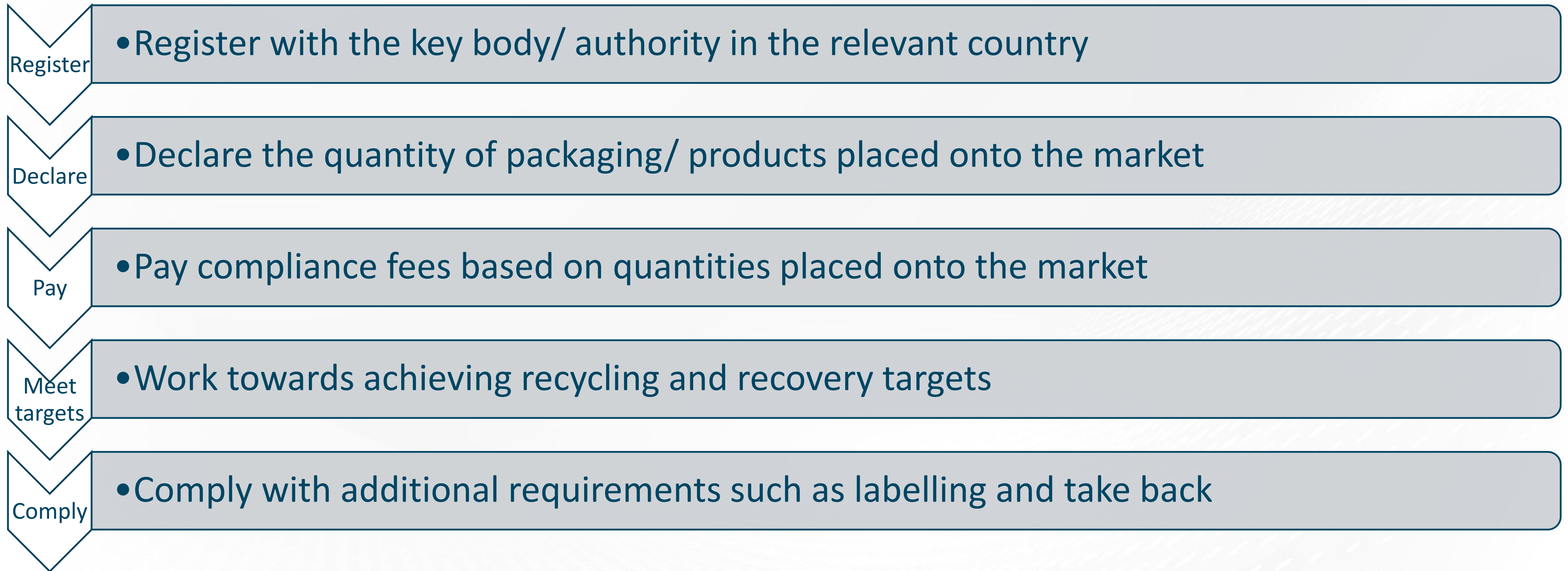
Landfill Directive  
1999/31/EC

- The origin of EU EPR regulations
- Each member state responsible for transposition into national law
- Countries worldwide use EU directives as a model for EPR

# What do the regulations mean for businesses?

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Producers obligated by the regulations must:



# Key Difference Between Countries

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Who is  
obligated

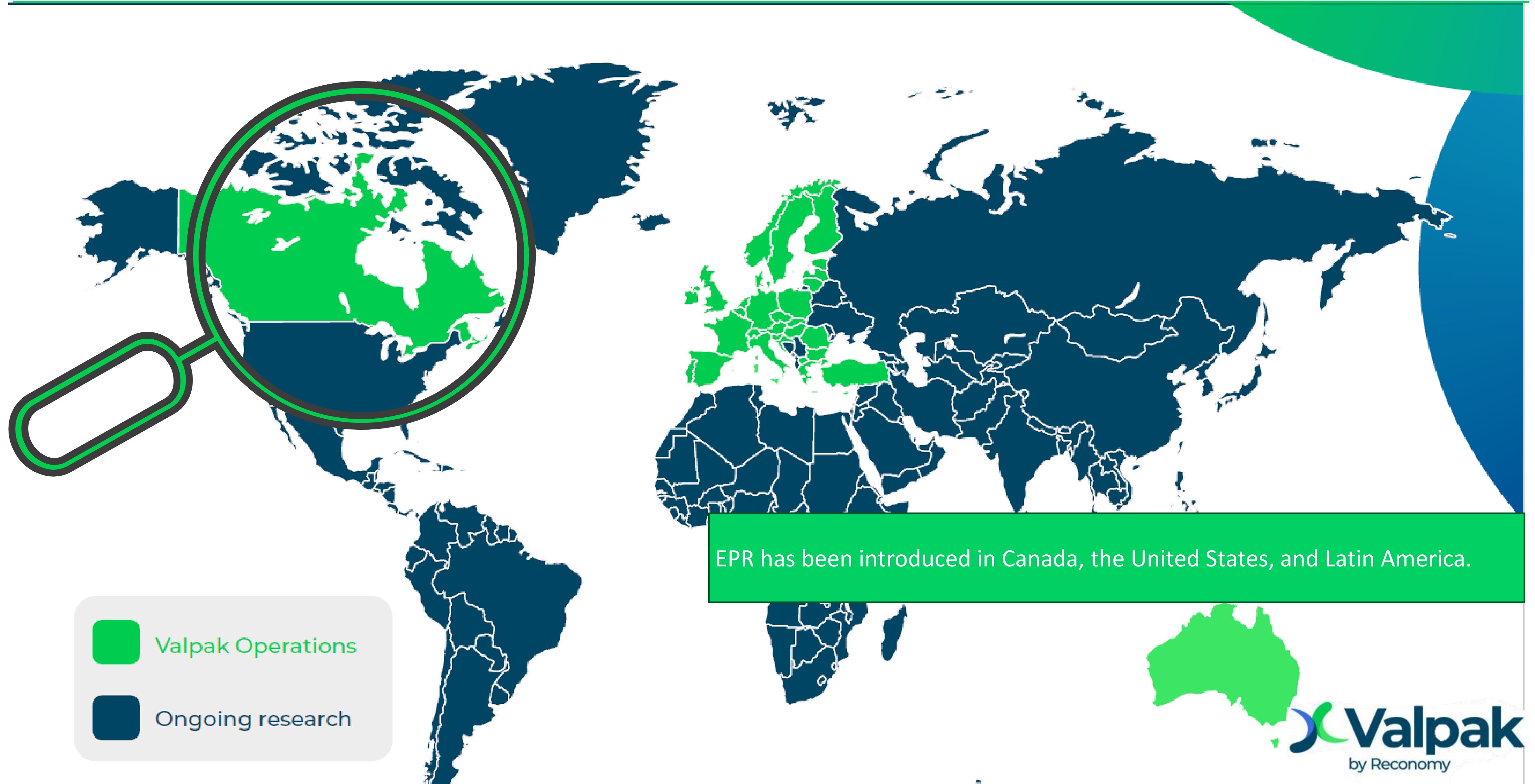
Data Required

Additional  
Requirements

# EPR Global Expansion



# North America EPR



EPR has been introduced in Canada, the United States, and Latin America.

- Valpak Operations
- Ongoing research

# EPR in the USA

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There are no Federal EPR laws in the USA, which means at a country-wide level.

Instead, laws are passed on a State level. Similar to the EU, this means that whilst the regulations have a similar goal; there are nuances as to how each State has implemented plans to achieve that goal.



**Electronics:** 25 States + District of Columbia



**Batteries:** 14 States + District of Columbia



**Packaging:** 7 States

# EPR in Canada

- Canada is a federal system of 13 Provinces and territories
- Each state has its own implementation of (EPR) Product stewardship
- Some provinces have not yet implemented EPR due to infrastructural issues or lack of need
- There is alignment across several Provinces on WEEE and Battery collection plans
- Packaging EPR is currently only obligating household or 'Curbside,' recycling however Quebec is moving to obligate B2B or (IC&I) packaging

	Packaging	WEEE	Batteries
Alberta	Active	Active	Active
British Columbia	Active	Active	Active
Manitoba	Active	Active	Active
New Brunswick	Active	Active	
Newfoundland & Labrador		Active	
Nova Scotia	Active	Active	Active
Northwest territory		Active	
Ontario	Active	Active	Active
Prince Edward Island		Active	Active
Quebec	Active	Active	Active
Saskatchewan	Active	Active	Active
Yukon	Active	Active	Active
Nunavut			







# **The Packaging and Packaging Waste Directive (PPWR)**

# Legislative Background



# Legislative context

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**Waste Framework Directive  
2008/98/EC**

~~Packaging and Packaging waste  
directive 94/62/EC~~

**Packaging and Packaging waste  
Regulation 2025/40**

The Packaging and Packaging Waste Regulation came into force 11 February 2025.

This becomes applicable 12 August 2026, repealing the Packaging and Packaging Waste Directive.

The PPWR is a regulation, legally binding Member States to adopt its requirements.

# What is the Packaging and Packaging Waste Regulation?

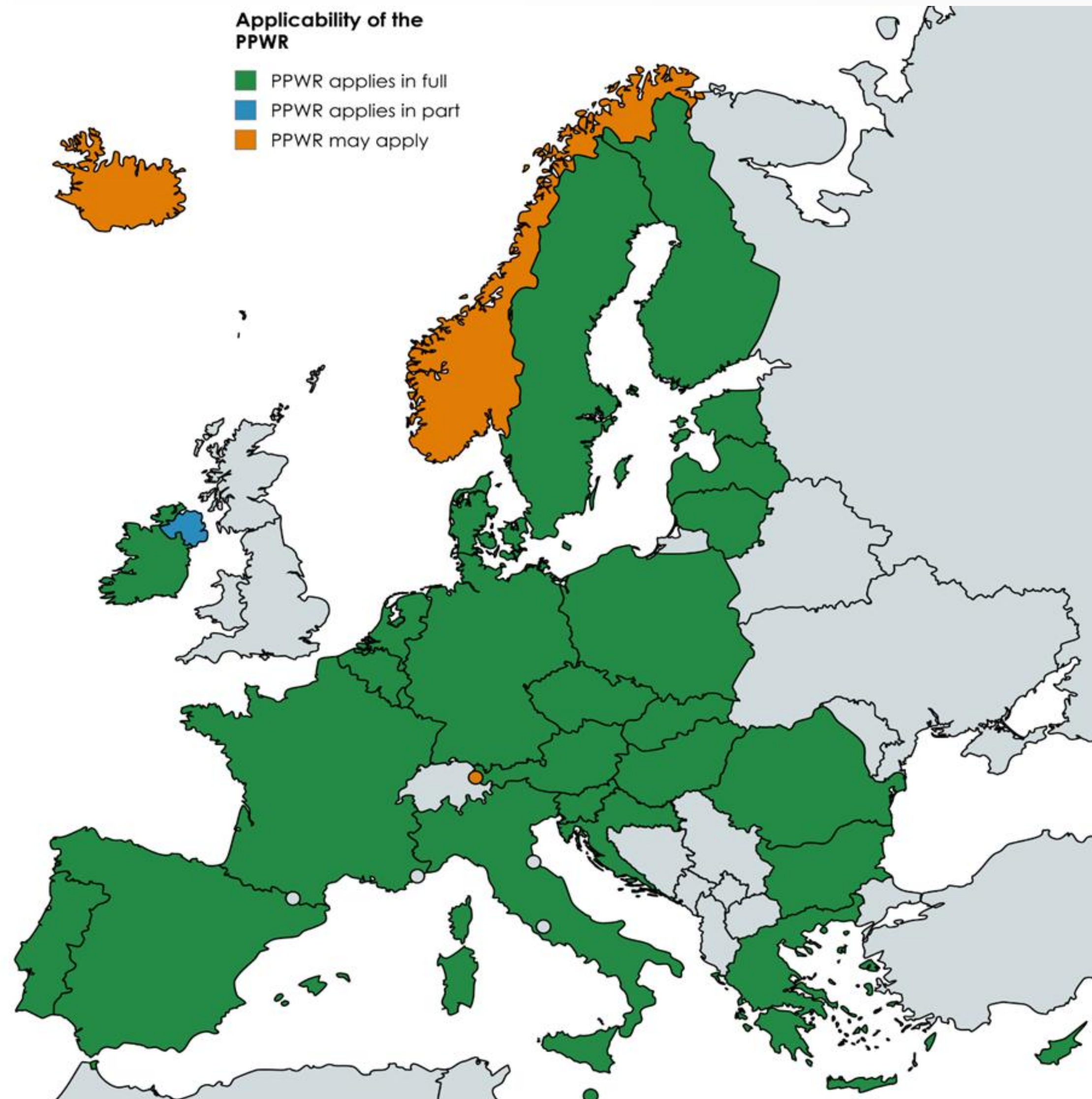
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The regulation applies to **all packaging and packaging waste** regardless of the packaging material.

- To facilitate the **harmonisation** of requirements across Member States.
- Reduce packaging waste.
- Increase consumer information.
- It also seeks to improve **extended producer responsibility** through increasing its efficacy and equity of application.



# Applicability of the PPWR:



The PPWR applies in full in all EU Member States

Applies in part in **Northern Ireland**

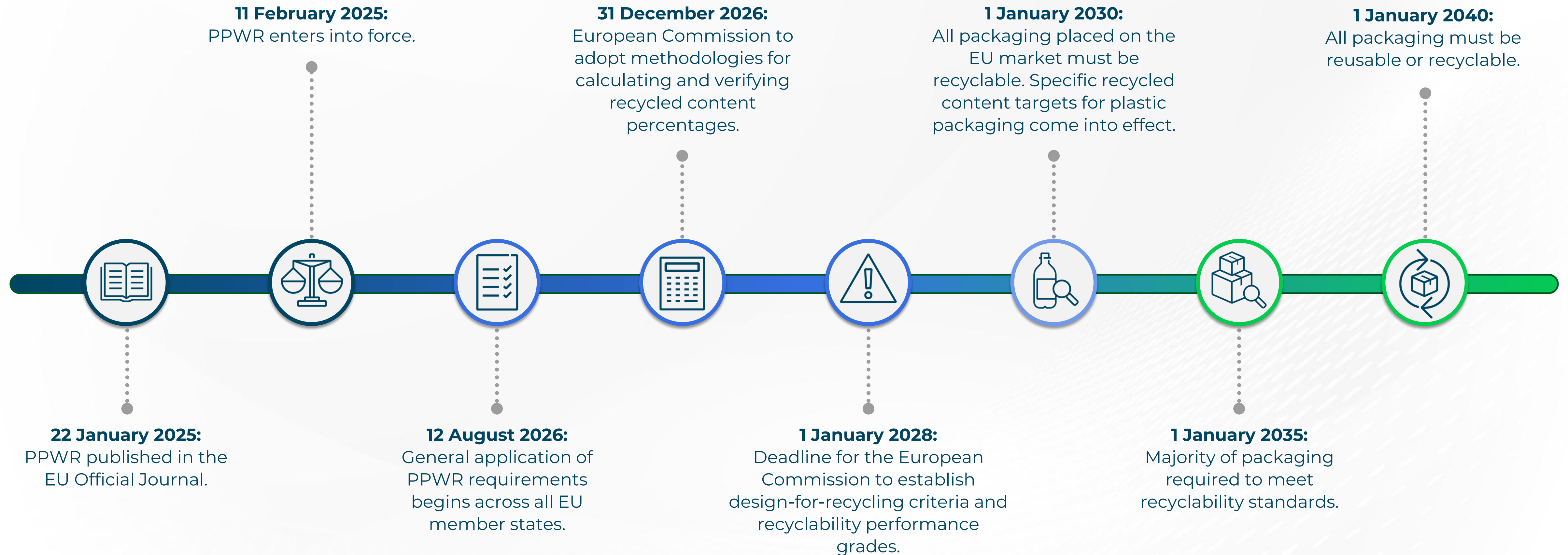
Applies with expectation of alignment in EEA:

- **Norway**
- **Lichtenstein**
- **Iceland**

**Switzerland** is expected to align.

# PPWR – Implementation Timeline

Below is a timeline highlighting key milestones and compliance deadlines:



*Companies that do not comply with the requirements of the PPWR cannot place their products and packaging on the EU and Northern Ireland market.*

# EPR under the PPWR



# Producer Definition

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- (15) 'producer' means any manufacturer, importer or distributor to whom, irrespective of the selling technique used, including by means of distance contracts, one of the following applies:
- (a) the manufacturer, importer or distributor is established in a Member State and makes available for the first time from within the territory of that Member State and on that same territory transport packaging, service packaging, or primary production packaging, whether as single-use packaging or as reusable packaging; or
  - (b) the manufacturer, importer or distributor is established in a Member State and makes available for the first time from within the territory of that Member State and on that same territory products packaged in packaging other than those referred to in point (a); or
  - (c) the manufacturer, importer or distributor is established in a Member State or in a third country and makes available for the first time on the territory of another Member State, directly to end users, transport packaging, service packaging or primary production packaging, whether as single-use packaging or as reusable packaging; or
  - (d) the manufacturer, importer or distributor is established in a Member State or in a third country and makes available for the first time on the territory of another Member State, directly to end users, products packaged in packaging other than those referred to in point (c); or
  - (e) the manufacturer, importer or distributor is established in a Member State and unpacks packaged products without being an end user, unless another person is the producer as defined in point (a), (b), (c) or (d);

# Expected changes to EPR in the EU:

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Removal of the packaging minimum threshold in all EU countries.

- Belgium, Ireland, Latvia, Lithuania, Netherlands, Slovakia

INCO terms will no longer be considered for producer obligations.

- Czech Republic, Estonia, Germany, Poland

This is the regulatory date from the PPWR. However, from an operational perspective this is likely to be different in each Member State.

# Expected changes to EPR in the EU:

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**Online platforms** must check compliance with EPR requirements and can choose to take on EPR responsibilities but are not obligated to do so.

**Authorised Representatives** must be appointed by ‘producers’ if they are established in the EU and are selling to another Member State where they have no physical presence.

- Member States can choose to mandate AR requirements for companies selling from third countries into the Member State.

These requirements have been introduced to crack down on smaller companies in third countries that sell via online marketplaces that slip through the cracks in EPR compliance.

# National Transposition will occur

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There is still scope for **National Transposition** for EPR; not all the introduced EPR requirements will be harmonised.

Current list of EU countries with draft law adopting PPWR:

<b>Belgium</b>	<b>Hungary</b>
<b>Bulgaria</b>	<b>Latvia</b>
<b>Czech Republic</b>	<b>Luxembourg</b>
<b>Denmark</b>	<b>Poland</b>
<b>Finland</b>	<b>Sweden</b>
<b>France</b>	<b>Lithuania</b>
<b>Germany</b>	

# Penalties

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1. By **12 February 2027**, Member States shall lay down the rules on penalties applicable to infringements of this Regulation and shall take all measures necessary to ensure that they are implemented.
2. The penalties provided for shall be **effective, proportionate, and dissuasive.**
3. Where the legal system of the Member State does not provide for administrative fines, the procedure is begun by a relevant authority and the fine is imposed by competent national courts.



# National Producer Registries: Context

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National Producer Registries are to be established 18 months after the Implementing Act published *12<sup>th</sup> February 2026 (delayed)*.

- The IA is to clarify the specific format for registration and reporting for EPR

**As the IA has been delayed, we expect that all Member States must establish a Producer Registry by the January 2028**

- This will depend when the IA is published

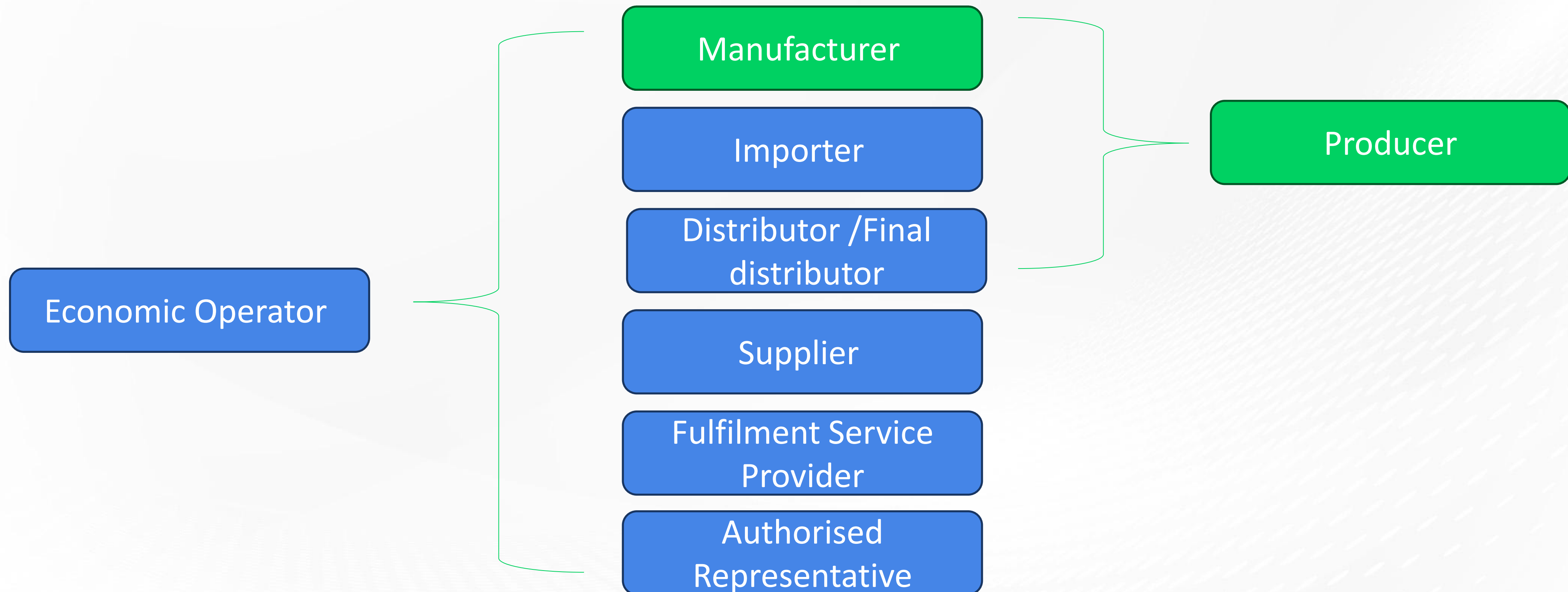
Member States that will need to establish a National Producer Registry:

- |  |   |
|--|---|
| <ul style="list-style-type: none"><li>• <b>Austria</b></li><li>• <b>Belgium</b></li><li>• <b>Cyprus</b></li><li>• <b>Czechia</b></li></ul> | <ul style="list-style-type: none"><li>• <b>Hungary</b></li><li>• <b>Ireland</b></li><li>• <b>Italy</b></li><li>• <b>Latvia</b></li><li>• <b>Netherlands (the)</b></li></ul> |
|--|---|

# **Roles & Responsibilities under the PPWR**

# Roles - Who does the PPWR affect?

(12) 'economic operator' means the manufacturer, the supplier, the importer, the distributor, the authorised representative, the final distributor and the fulfilment service provider;



# Producer - Objective

(12) ‘economic operator’ means the manufacturer, the supplier, the importer, the distributor, the authorised representative, the final distributor and the fulfilment service provider;

## Producer

(Role defined in Article 45)

Objective: Finance the packaging waste disposal infrastructure in the Member State where their packaging becomes waste. (known as **Extended Producer Responsibility**)

# Producer – Definition

- (15) 'producer' means any manufacturer, importer or distributor to whom, irrespective of the selling technique used, including by means of distance contracts, one of the following applies:
- (a) the manufacturer, importer or distributor is established in a Member State and makes available for the first time from within the territory of that Member State and on that same territory transport packaging, service packaging, or primary production packaging, whether as single-use packaging or as reusable packaging; or
  - (b) the manufacturer, importer or distributor is established in a Member State and makes available for the first time from within the territory of that Member State and on that same territory products packaged in packaging other than those referred to in point (a); or
  - (c) the manufacturer, importer or distributor is established in a Member State or in a third country and makes available for the first time on the territory of another Member State, directly to end users, transport packaging, service packaging or primary production packaging, whether as single-use packaging or as reusable packaging; or
  - (d) the manufacturer, importer or distributor is established in a Member State or in a third country and makes available for the first time on the territory of another Member State, directly to end users, products packaged in packaging other than those referred to in point (c); or
  - (e) the manufacturer, importer or distributor is established in a Member State and unpacks packaged products without being an end user, unless another person is the producer as defined in point (a), (b), (c) or (d);

# Producer – Definition

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Under the PPWR, a **'producer'** could be a:

<b>Manufacturer</b>	<b>Importer</b>	<b>Distributor</b>
A company (or person) who manufactures packaging or has the most influence on its design (i.e. brandholder)	A company (or person) that places packaging from a third country on the market in the EU.	A company (or person) that is not either a manufacturer or importer and places packaging on the market.

# Manufacturer - Objective

(12) ‘economic operator’ means the manufacturer, the supplier, the importer, the distributor, the authorised representative, the final distributor and the fulfilment service provider;

**Manufacturer**  
(Role defined in Article 15)

Objective: Ensure the packaging introduced on the EU market is compliant with PPWR's requirements.

# Manufacturer – Definition

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- (13) ‘manufacturer’ means any natural or legal person that manufactures packaging or a packaged product; however:
- (a) subject to point (b), where a natural or legal person has packaging or a packaged product designed or manufactured under its own name or trademark, regardless of whether any other trademark is visible on the packaging or on the packaged product, ‘manufacturer’ means that natural or legal person;
  - (b) where the natural or legal person that has the packaging or packaged product designed or manufactured under its own name or trademark falls within the definition of micro-enterprise set out in Recommendation 2003/361/EC as applicable on 11 February 2025, and the natural or legal person that supplies the packaging to the natural or legal person that has the packaging designed or manufactured under its own name or trademark is located in the same Member State, ‘manufacturer’ means the natural or legal person that supplies the packaging;

# Manufacturer – Definition

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A '**Manufacturer**' is the business or person that manufactures or has packaging or a packaged product manufactured to their own specific design.

This includes the business or person that **makes the packaging** or has **packaging or packaged products made** using its **own brand or name**. This is unless the business is considered a micro-enterprise.

Micro-enterprise: an entity with less than 10 employees and has an annual turnover below two million euros.

**Note: There can only be one manufacturer per packaging unit.**

# Manufacturers - Responsibilities

**Manufacturers** must complete the [conformity assessment procedure](#) and draw up the [EU Declaration of Conformity](#).

Manufacturers shall indicate their name, address and postal address by physical means or through a digital carrier (i.e. QR code) on the packaging unit.

This requirement is applicable from the **12th August 2026**.

All packaging placed on the **EU and Northern Ireland** market must have completed the conformity assessment procedure and have an EU Declaration of Conformity.

# Conformity Assessment Procedure:CC

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This is a mandatory requirement for each packaging unit.

1. Draw up technical documentation for the packaging unit.
  - Qualitative write up
  - Laboratory test results
  - Technical drawings
  
2. Draw up a [Declaration of Conformity](#) for each packaging unit manufactured.

# EU Declaration of Conformity



DoC forms part of the conformity assessment procedure must contain the following and must be continually updated:

1. A **Unique identifier** of the packaging ( e.g. No.X)
2. **Name** and **address** of the manufacturer (or AR where applicable)
3. **The Statement** “This declaration of conformity is issued under the sole responsibility of the manufacturer.”
4. Object of the **declaration/description** of the packaging (I.e. identification of the packaging)
5. **The statement** “The object of the declaration referred to point 4 is in conformity with the relevant Union harmonisation legislation” (currently only referencing the PPWR but may need reference national legislation)
6. References to the relevant **harmonised standards** or the **common specifications** used or references to the other technical specifications in relation to which conformity is declared:
7. *(If applicable)* the **notified body** ... (name, address, number) ... performed ... (description of intervention) ... and issued the certificate(s): ... (details, including the date of the certificate(s), and, where appropriate, information on the duration and conditions of validity.
8. *(Additional information)* Signed for and on behalf of: (place and date of issue): (name, function) (signature):

By drawing up the EU declaration of conformity, the manufacturer assumes responsibility for the compliance of the packaging.

# Conformity Assessment Articles

**Manufacturers** can only place packaging on the market if it is compliant with the requirements in Articles 5-12:

- Requirements for Substances (article 5)
- Recyclability (Article 6)
- Minimum Recycled content (Article 7)
- *N/A Bio-based feedstock (Article 8)*
- Compostable packaging (Article 9)
- Packaging minimisation (Article 10)
- Reusable packaging (Article 11)
- Labelling of packaging (Article 12)

For all applicable articles, technical documentation for the conformity assessment procedure and the EU declaration of conformity must be saved for **5 years** for single-use packaging and **10 years** for reusable packaging.

# In Summary:

## Producer

(Role defined in Article 45)

Objective: Finance the packaging waste disposal infrastructure in the member state where their packaging becomes waste. (known as **Extended Producer Responsibility**)

*This must be a company that has the closest connection to the Member State where the packaging becomes waste.*

## Manufacturer

(Role defined in Article 15)

Objective: Ensure the packaging introduced on the EU market is compliant with PPWR's requirements by completing the Conformity Assessment Procedure and the EU Declaration of Conformity.

*This must be the company that has the most influence on the design of the packaging.*

# Timeline



# 12 Feb 2025

Article 11: Reusable Packaging





# Article 11: Reusable Packaging

On 12 February 2027, IA on minimum number of rotations to be released.

## Reusable Packaging Requirement

- it has been designed with the objective to be re-used multiple times;
- it has been conceived and designed to accomplish as many rotations as possible under normally predictable conditions of use;
- it fulfils applicable requirements regarding consumer health, safety and hygiene;
- it can be emptied or unloaded without being damaged in a way that would prevent its further function and re-use;
- it is capable of being reconditioned
- it is capable of being emptied, unloaded, refilled or reloaded while maintaining the quality and safety of the packaged product and ensuring compliance with the applicable safety and hygiene requirements
- it allows for affixing of labels and the provision of information
- it can be emptied, unloaded, refilled or reloaded without risk to the health and safety of those responsible for doing so; AND
- it fulfils the requirements specific to recyclable packaging, so that it can be recycled when it becomes waste

# 12 Aug 2026

PPWR becomes fully applicable  
Article 38: Conformity Assessment  
Procedure

Article 39: Declaration of Conformity

Article 15: Manufacturer Obligation

Article 18: Importer Obligation

Article 5: Substances of Concern

Article 14: Environmental Claims



# What becomes applicable?

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## PPWR becomes fully applicable across the EU

The PPWD is officially repealed and replaced by the PPWR

New Producer and Manufacturer definitions and obligations apply (all other definitions take effect, unless otherwise stated)

Responsibilities of a manufacturer apply (Conformity Assessment Procedure and Declaration of Conformity)

Article 5: Restrictions on PFAs in food-contact packaging and heavy metal for all packaging

# New definitions now apply

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The definitions of a producer, manufacturer, importer, etc. become applicable.

## Expected changes to EPR in the EU:

- INCO to be implemented by 2025
  - Authorisation of producers if they are established in a Member State
  - Online platforms must check compliance with EPR requirements
- This is the regulatory date from the PPWR. However, from an operational perspective this is likely to be different in each Member State.

# Article 38 and 39: Conformity Assessment Procedure and DoC


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Manufacturers must complete the [Conformity Assessment Procedure](#) and draw up the [EU Declaration of Conformity](#).

This requirement is applicable from the [12th August 2026](#)

All packaging placed on the **EU and Northern Ireland** market must have completed the Conformity Assessment Procedure and have an EU Declaration of Conformity

# Article 15 and 18: Manufacturer and Importer Obligations

Manufacturer Indication Requirement	Importer Indications Requirement
<p>1. Manufacturers shall indicate their name, address and postal address by physical means or through a digital carrier (i.e. QR code) on the packaging unit.</p> <p>2. Manufacturers shall ensure that the packaging bears a type, batch or serial number or other element allowing its identification or, where the size or nature of the packaging does not so allow, that the required information is provided in a document accompanying the packaged product.</p>	<p>1. Importers shall indicate their name, address and postal address on their packaging. Where it is not possible to indicate that information on the packaging, it shall be provided via a digital carrier (i.e. QR code) or in a document accompanying the packaged product.</p> 

# Requirements for Substances (Article 5)

- From **12 August 2026**, packaging placed on the market shall be manufactured so that substances of concern are minimised.
- The sum of the concentrations of:
  - Lead
  - Cadmium
  - Mercury
  - Hexavalent chromium

Shall not exceed **100 mg/kg**.



This requirement will need to be included in the Conformity Assessment Procedure from 12<sup>th</sup> August 2026

# PFAs (Article 5)

- “Forever Chemicals”
- The ban is currently **only for food-contact** packaging
- **Intentional or unintentional** PFAS
- From **12 August 2026**, the following categories of PFAs will be prohibited on the EU market:

Category	PFAS Limitation
Any PFAs measured with targeted PFAs analysis	25 ppb
The sum of PFAs measured as the sum of targeted PFAs analysis	250 ppb
All PFAs (polymeric PFAs included)	50 ppm

This requirement will need to be included in the Conformity Assessment Procedure from 12<sup>th</sup> August 2026

# Article 14: Environmental Claims

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Environmental claims must fulfil the following:

- (a) The claims are made only in relation to packaging properties **exceeding** the applicable minimum requirements set out in this Regulation
- (b) The claims **specify** whether they relate to the packaging unit, part of the packaging unit or all packaging placed on the market by the economic operator

If an environmental claim is made, it must be evidenced through technical documentation

This requirement will need to be included in the Conformity Assessment Procedure from 12<sup>th</sup> August 2028

# 12 Feb 2027

Article 12: Labelling (in part)  
Article 32: Refill Obligations for  
HORECA



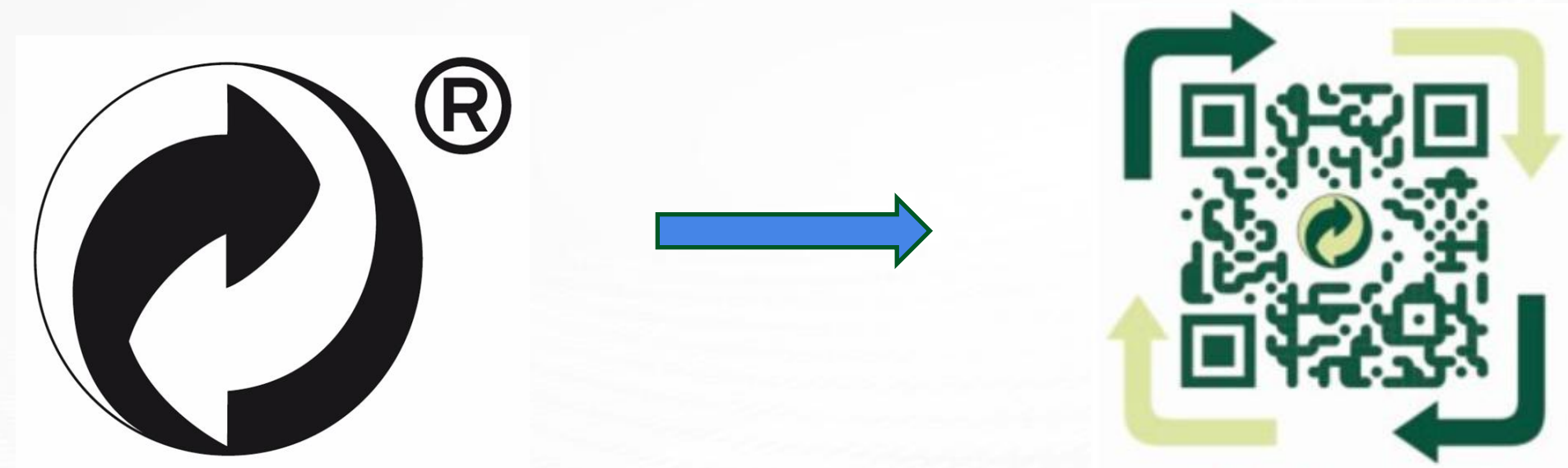
# Article 12: Labelling

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The Green Dot symbol and other symbols that denote a producer fulfils its extended producer responsibility obligations may only be displayed as a QR code or via other standardised digital means.

**Green dot:** The Green Dot® is a financing symbol for producer responsibility (EPR). The dot indicates that a **financial contribution** has been paid to a nationally authorised take-back system.

This has become digital to avoid consumers mistaking the symbol as a symbol for recycling.



# Article 32: Refill Obligations for HORECA

From **12 February 2027**, final distributors that conduct their business activity in the HORECA sector and that make available on the territory of a Member State must:

- For hot or cold beverages and ready-prepared food in take-away packaging **final distributors must provide a system for consumers to bring their own container**
- This must be done **at no higher cost** and under no less favourable conditions
- Consumers must be informed through clearly visible and legible information boards or signs, about the possibility of obtaining the products in a refillable container provided by the consumer



# 12 Feb 2028

Article 9: Compostable Packaging  
Article 33: Reuse Obligations for  
HORECA



# Article 9: Compostable Packaging



By **12 February 2028**, all permeable tea, coffee or other beverage bags, and sticky labels, must be compatible with the standard for composting in **industrially controlled** conditions and, where required by Member States, in at-home conditions as well.

Industrial Composting	At-Home Composting
Packaging that biodegrades in industrially controlled conditions or that can undergo biological decomposition under industrial conditions, including anaerobic digestion, but not in a home composting environment, combined, if necessary, with physical treatment	Packaging that can biodegrade in non-controlled conditions that are not processing facilities and is intended for use by individuals with the packaging for their own use

**On 12 February 2026**, the implementing act on technical specifications of composting standards will be released.

This requirement will need to be included in the Conformity Assessment Procedure from 12<sup>th</sup> February 2028

# Article 33: Reuse Obligations for HORECA

From **12 February 2028**, final distributors that conduct their business activity in the HORECA sector and that make available on the territory of a Member State must:

- For hot or cold beverages and ready-prepared food in take-away packaging **final distributors must provide reusable packaging options for their consumers**
- This must be done **at no higher cost** and under no less favourable conditions
- Consumers must be informed through clearly visible and legible information boards or signs, about the possibility of obtaining the products in reusable containers



# 12 Aug 2028

Article 12: Labelling



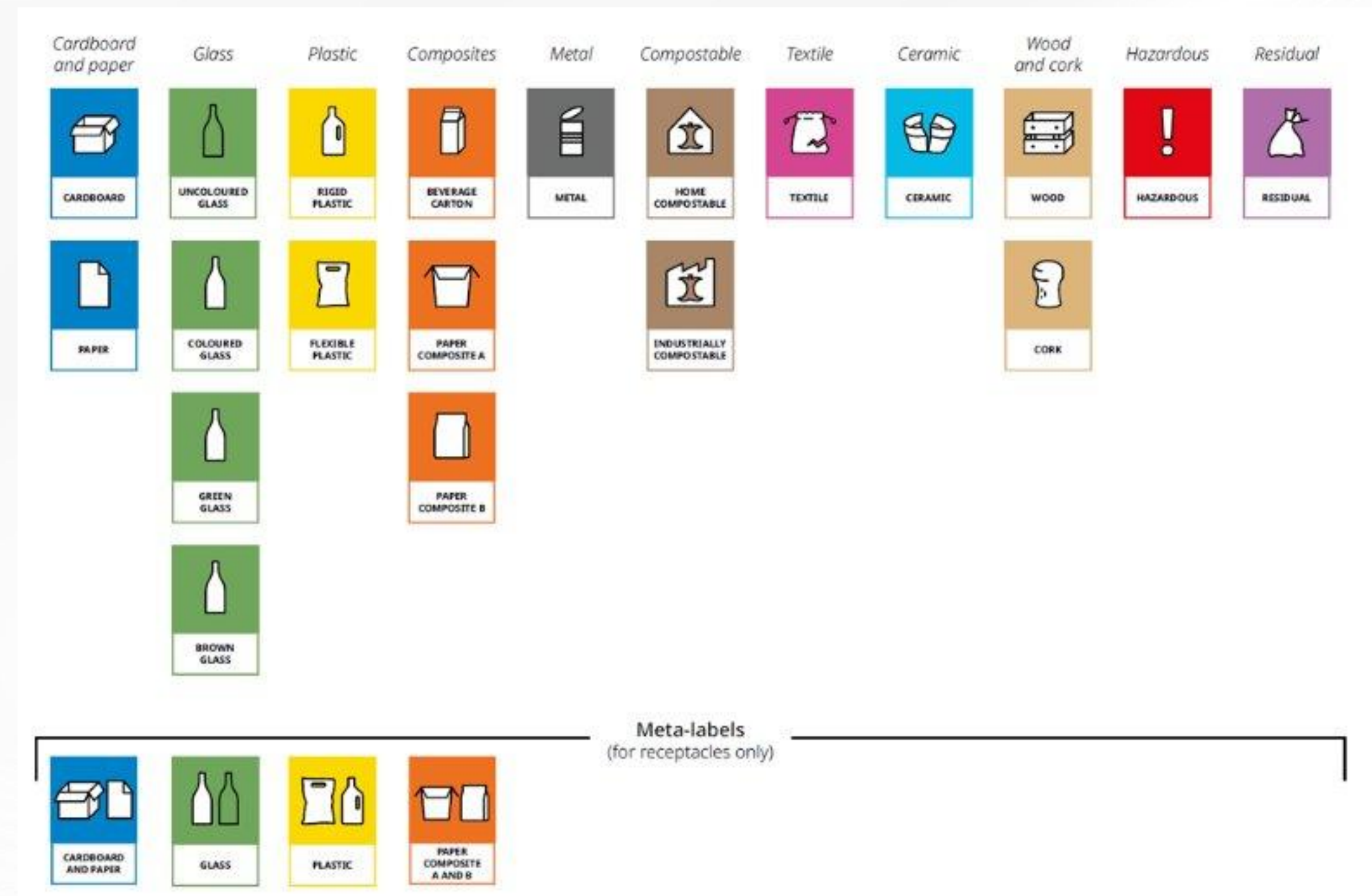
# Article 12: EU Waste Sorting Label

In order to facilitate consumer sorting, the PPWR introduces the mandatory harmonised **EU Waste Sorting Label**.

From **12 August 2028** all packaging placed on the market shall be marked with the harmonised label.

The label must:

- contain information on the packaging **material composition**.



This requirement will need to be included in the Conformity Assessment Procedure from 12<sup>th</sup> August 2028

# Article 12: EU Waste Sorting Label

Packaging Type	EU Harmonised Waste Sorting Label
Sales	✓
Service	✓
Takeaway	✓
Grouped	✓
Transport	✗
E-commerce	✓
Primary Production	✗
DRS	✗



# Mandatory Marking Requirements:

1. From **12 August 2028**, labels must identify if the material is **compostable**.
2. **Reusable packaging** placed on the market from **12 February 2029** shall bear a label informing users that the packaging is reusable.
3. From **12 August 2028**, packaging that is subject to **deposit and return systems** shall be marked.

Physical  
label

By **1 January 2030**, the Commission shall also adopt implementing acts to establish the methodology for identifying substances of concern by means of standardised, open, **digital**-marking technologies.

# Non-Mandatory Marking Requirements: Physical

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1. **Recycled content** placed on the market from **12 August 2028**, must be marked with the harmonised label and should indicate the share of recycled content.
2. **Biobased plastic content** information from **12 August 2026**.

Note: recycled content and biobased plastic content labels are voluntary.

# Non-Mandatory Marking Requirements: Digital

## Label

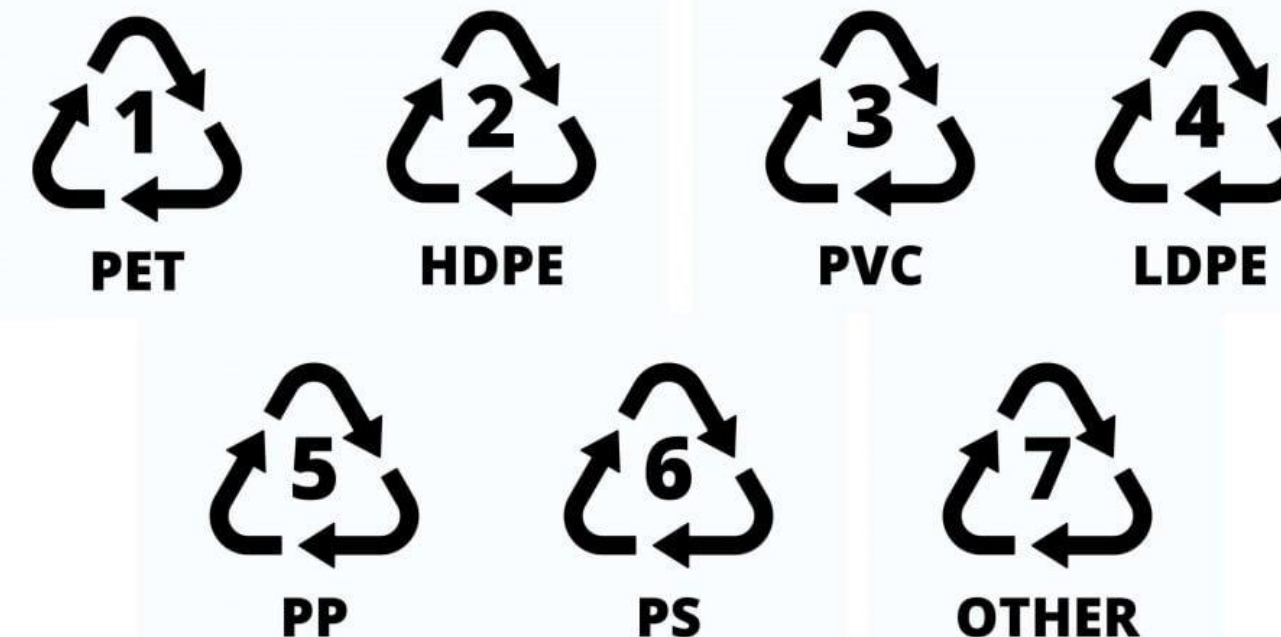
From 12 February 2027, the Green Dot symbol and other symbols that denote a producer fulfils its extended producer responsibility obligations may only be displayed as a QR code or via other standardised digital means.



## Material Identification

Alphanumeric Labelling shall not be prohibited from the 12 August 2028.

This will be displayed as a QR code or via other standardised digital means\*



# 1 Jan 2029

Article 50: Deposit and Return  
System



# Article 50: Deposit and Return Systems

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From **1 January 2029**, Member States must ensure the separate collection of at least 90 % per year by weight of the following packaging formats:

- single-use plastic beverage bottles with a capacity of up to three litres
- single-use metal beverage containers with a capacity of up to three litres

## Key minimum requirements:

- Data can be collected from DRS system
- Equal access and fair conditions of all economic operators
- The system operator is a non-profit and independent legal entity
- The end user is able to return the deposit bearing packaging without the need to purchase any goods
- Fees are transparent

# 1 Jan 2030

Article 6: Recyclability Standards

Article 7: Minimum Recycled  
Content

Article 10: Packaging Minimisation

Article 24: Excessive Packaging

Article 25: Packaging Restrictions

Article 29: Re-Use Targets

Article 31: Reporting Re-Use Targets



# Article 6: Recyclability Standards



From **1 January 2030**, recyclability performance is based on *design for recycling criteria*.

- Packaging recyclability shall be expressed in the Recyclability Performance Grades; **A**, **B** or **C**.

**ALL packaging placed on the market shall be recyclable under **two** conditions:**

1. It is designed for material **recycling**, which enables the use of resulting secondary raw materials that are of sufficient quality when compared to the original material that they can be used to substitute primary raw material
2. When it becomes waste, it can be collected separately, sorted into specific waste streams without affecting the recyclability of other waste streams and **recycled at scale** from 2035

# Recyclability Performance Grades



Recyclability Performance Grade	2030 Design for Recycling	2035 Design for Recycling and Recycled at Scale	2038 Design for Recycling and Recycled at Scale
A	≥95%	≥95%	≥95%
B	≥80%	≥80%	≥80%
C	≥70%	≥70%	N/A
<b>D-E (BANNED FROM EU MARKET)</b>	<b>NON-RECYCLABLE</b>	<b>NON-RECYCLABLE</b>	<b>NON-RECYCLABLE</b>

# Article 6: Recyclability Standards

On **1 January 2028**, specifics on how these grades will be determined and further information on the standards will be released by the European Commission.

Some factors considered include:

- Efficiency of sorting and recycling processes
- Separability of any packaging component
- Material composition
- Adhesives
- Residues

Key Note: Recyclability grades will be given on a 'packaging unit' basis, but each 'Separate component' will need to be individually assessed.

This requirement will need to be included in the Conformity Assessment Procedure from 1<sup>st</sup> January 2030



# Article 7: Minimum Recycled Content Standards



By **1 January 2030**, plastic on the EU market must contain the minimum percentage of recycled content below:

Packaging Type:	2030	2040
Contact Sensitive Packaging (PET Based)	30%	50%
Contact Sensitive Packaging (other than PET)	10%	25%
Disposable Plastic Beverage Bottles	30%	65%
Other Plastic Packaging	35%	65%

**31 December 2026:** Methodologies and calculations and verifications to be released

This requirement will need to be included in the Conformity Assessment Procedure from 1<sup>st</sup> January 2030

# Article 10: Packaging Minimisation

1. By **1 January 2030**, the manufacturer or importer shall ensure that the packaging placed on the market is designed with minimum packaging

## The following will be prohibited:

- Characteristics that increase the perceived volume of a product
- Doubles walls
- False bottoms
- Unnecessary layers

This requirement will need to be included in the Conformity Assessment Procedure from 1<sup>st</sup> January 2030

Before **12 February 2027**, an implementing act on technical specifications and harmonised standards to be released.

# Article 24: Excessive Packaging

By **1 January 2030**, economic operators who fill:


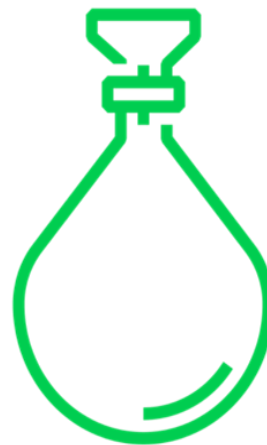

- grouped packaging
- transport packaging
- e-commerce packaging

Space filled by filling materials, such as paper cuttings, aircushions, bubble wraps, sponge fillers, foam fillers, wood wool, polystyrene or Styrofoam chips, shall be considered as empty space

Must ensure that the maximum empty space ratio, expressed as a percentage, is **50%**




# Article 25: Packaging Restrictions

From **1 January 2030**, economic operators shall not place on the market:

Packaging format	Illustrative example	
Single-use plastic grouped packaging	Collation films, shrink wrap	
Single-use plastic packaging for unprocessed fresh fruit and vegetables	Nets, bags, trays, containers	
Single-use plastic packaging	Trays, disposable plates and cups, bags, boxes	

# Packaging Restrictions Continued

From **1 January 2030**, economic operators shall not place on the market:

Packaging format	Illustrative example
Single-use plastic packaging for condiments, preserves, sauces, coffee creamer, sugar, and seasoning in HORECA sector	Sachets, tubs, trays, boxes 
Single-use accommodation sector packaging intended for an individual booking	Shampoo bottles, hand and body lotion bottles, sachets around bar soap 
Very lightweight plastic carrier bags	Very thin bags provided for bulk groceries 

# Article 29: Re-Use Targets

1. From **1 January 2030**, economic operators that use **transport packaging, or sales packaging used for transporting products** shall ensure that at least **40%** of such packaging in total is reusable packaging within a re-use system
2. This figure is to jump to **70%** in **2040**



**Reminder:** Re-usable packaging must be made with the purpose of being re-used and must be able to be re-used without damage

# Article 31: Reporting Re-Use Targets

1. **Economic operators** shall submit a report containing data concerning the achievement of the re-use targets set out in Article 29 for each calendar year to the competent authority
2. The report referred to above shall be submitted within 6 months from the end of the reporting year for which the data are collected
3. **The first reporting year shall concern the calendar year 2030.**

**12 February 2027:** Establishment of a European observatory on re-use to monitor and implement re-use measures from the PPWR

# 1 Jan 2035

Article 6: Recyclability continued



# Article 6: Recyclability Standards

This requirement will need to be included in the Conformity Assessment Procedure from 1<sup>st</sup> January 2035

Recyclability Performance Grade	2030 Design for Recycling	2035 Design for Recycling and Recycled at Scale	2038 Design for Recycling and Recycled at Scale
A	≥95%	≥95%	≥95%
B	≥80%	≥80%	≥80%
C	≥70%	≥70%	N/A
<b>D-E (BANNED FROM EU MARKET)</b>	<b>NON-RECYCLABLE</b>	<b>NON-RECYCLABLE</b>	<b>NON-RECYCLABLE</b>

# 1 Jan 2040

Article 6: Minimum Recycled Content  
Continued



# Article 7: Minimum Recycled Content

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Packaging Type:	2030	2040
Contact Sensitive Packaging (PET Based)	30%	50%
Contact Sensitive Packaging (other than PET)	10%	25%
Disposable Plastic Beverage Bottles	30%	65%
Other Plastic Packaging	35%	65%

This requirement will need to be included in the Conformity Assessment Procedure from 1<sup>st</sup> January 2030

**How can  
Valpak help?**



# PPWR Support and Expertise

Valpak's **PPWR Advisory Service** helps businesses prepare for and comply with every aspect of the new regulation. Our service is designed to inform, advise, and activate compliance across all EU markets.



# Bespoke Impact Assessment

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Drawing on the completed onboarding questionnaire, our team of PPWR experts will generate a detailed **Bespoke Impact Assessment**, highlighting the specifics requirements and obligations of your business under the incoming regulations. This will include:

- Qualitative analysis to explain PPWR's impact on your company
- All relevant sections of the PPWR based on your business activities
- Breaks down the roles and responsibility of your company under PPWR
- Structured by each article: summary of provisions, strategic considerations, impact rating, conformity assessment procedure.
- Rolling updates delivered as new articles come into force



# PPWR Document of Conformity generation

Utilised by obligated manufacturers for outsourced data collection, handling and Document of Conformity generation, trusting in Valpak's regulatory expertise and vast experience in packaging data management and insight

**Step 1** – Scoping & onboarding



**Step 2** – Supplier data collection



**Step 3** – Component-level data organisation

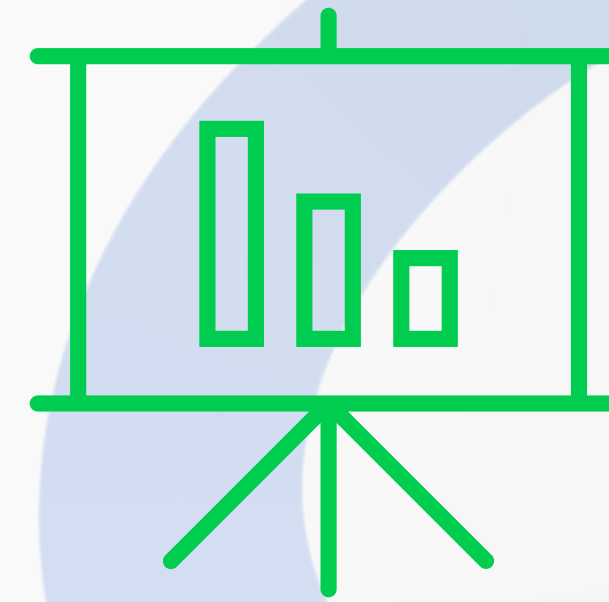


**Step 4** – Document of Conformity



# Beyond compliance: strategic insight

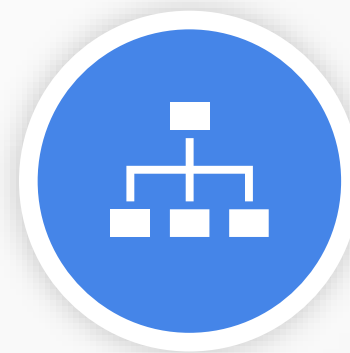
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Identify  
high-risk/  
non-compliant  
products



Map against  
PPWR  
articles



Root cause  
analysis



Clear  
actions for  
compliance



Prioritisation  
by revenue  
or volume

**Transforms compliance** into a proactive, risk-managed strategy





**Q&A**

**Thank you for your time.**