

PPWR update

European Packaging Law

The PPWR is a European law that applies to all packaging placed on the European market. The term packaging is very broad under this law: this also includes polybags, hangtags, small boxes, envelopes, and shipping packaging, as well as clothes hangers.

What the PPWR law entails and when does it become mandatory?

This law regulates which packaging is permitted on the European market and how packaging waste must be managed. The law has already been introduced as of 2025, but the general requirements will come into effect from August this year for new packaging production. Existing packaging that has already been produced and is currently stored in a European warehouse can still be used. Packaging that is imported from outside the EU before August but only enters after August must meet the requirements of the PPWR law. For new production, there is a phased implementation of the requirements. The law will be fully applicable from January 2030.

Information requirements and logos on or labelling of packaging

With the PPWR, logos are also introduced for mandatory labelling of material composition, reusable packaging, harmful substances, and symbols for waste separation. Additionally, there are "voluntary" logos for recycled content and bio-based content. It also provides the opportunity to communicate about national deposit and return systems.

What do I need to comply with by August 12, 2026?

Brands are usually considered manufacturers because they place products on the market under their own name. What needs to be done as a manufacturer? A lot of things in the coming years; below you will find the two points you need to address first:

1. Conformity assessment from August 12, 2026

This is the process that proves compliance with the sustainability, labelling, and information requirements of the PPWR. From August 12, 2026, manufacturers must carry out a "conformity assessment procedure" before placing a product on the EU market and ensure that the packaging states the packaging number and their contact details. Part of this process is the technical documentation. Once it is proven that the packaging complies with the requirements, manufacturers can draw up an "EU Declaration of Conformity". You can find a template for this online or request it from us.

The conformity assessment must be performed for each packaging type. Different versions of the same article (for example, the exact same polybag from the same supplier in multiple sizes) may be grouped together.

The minimum requirements for the technical documentation can be requested from us or found online.

The technical documentation must remain up-to-date for 5 years from the moment the packaging is placed on the market, or 10 years if the packaging is reusable.

If requested, the documentation must be made available to market surveillance authorities and translated into multiple languages.

Packaging ID and contact information are mandatory: this can be a type, batch, or serial number, or any other element that enables identification. If the size or type of packaging does not allow for this, it can be communicated on a document accompanying the packaged product (such as the packing slip included with a shipment). Contact information means: name, postal address, and an email address or website URL. This information may also be included on a document with the shipment or provided via a digital data carrier (for example, a QR code).

2. Corrective measures and quality management system

From August 12, manufacturers must take corrective actions after placing a packaged product on the EU market and notify relevant authorities if a packaging is non-compliant. In addition, a procedure must be initiated at that time (e.g., via a quality management system) to ensure that new productions are compliant.

Timeline PPWR law

February 11th 2025 Start PPWR law.
August 12th 2026 * The law comes into effect for productions of new packaging (conformity assessment and corrective measures and quality management system + packaging ID + contact info). Existing packaging may still be used. * It is now being defined what the label specifications and requirements are, and how the material composition can be identified.
December 31st 2026 * Publication of the "Implementing Act" of the methodology for calculation and verification of recycled content.
February 12th 2027 * The minimum number of rotations of reusable packaging is being defined.
June 30th 2027 * It is being defined how the definition of reusable can be calculated.
January 1st 2028 * Publication of "design-for-recycling" criteria * Assessment of recyclability & levels is determined
February 12th 2028 * The empty space of packaging must be reduced to the minimum necessary for the functionality of the item.
August 12th 2028 * Packaging must have a label with information about the material composition. * Voluntary choice: use of logos or labelling with communication about recycled or bio-based content.
February 12th 2029 * Reusable packaging must have a label with information for users about reusability.
January 1st 2030 * All packaging must contain a minimum of 35% recycled material. * Packaging must be minimized in terms of weight and volume to what is practically necessary for functionality. * As of now, a maximum empty space ratio of 50% applies (grouped, transport, and for e-commerce packaging). * A minimum of 40% of shipping packaging within the EU must be reusable. * And 100% of the shipping packaging used within the home country must be reusable. * A minimum of 10% of packaging (in the form of boxes, excluding cardboard) used to create a grouped stock must be reusable.
January 1st 2035 * All packaging must be recycled at scale.
January 1st 2040 * All packaging must contain a minimum of 45% recycled material.



Do I have even more extra responsibilities as a "producer", EPR (Extended Producer Responsibilities)?

The "producer" can be the manufacturer, importer, or distributor. This depends on the packaging category and business context. If you are a producer, your obligations are as follows:

From February 12, 2026 - this is delayed, the European Commission is behind schedule
A format for registration and reporting has been published. This specifies aspects such as packaging volumes, types, and materials. Minimum thresholds are being removed, and there is simplified reporting for parties that place less than 10 tonnes of packaging on the market per year.

From August 12, 2027
A publicly accessible register of producers will be set up; registration numbers will be issued within 12 weeks from this date.

From January 1, 2028
Publication of a framework for modulating fees based on sustainability requirements, such as recyclability and recycled content.

Getting started with the PPWR law in practice

Complying with the PPWR law starts with having a clear overview of your packaging. Without this, it is difficult to prove that you meet the requirements.

A practical step-by-step plan:

Identify your packaging materials: what do you use as a brand throughout the entire process?

Do you have a clear understanding of your role and associated responsibilities? Are you, as a brand, indeed the manufacturer?

Review what is still missing for your technical documentation.

Contact suppliers to get the technical information complete and to be able to draw up "EU Declarations of Conformity".

Minimal requirements technical documentation

- a. A general description of the packaging and its intended use.
- b. A conceptual design, manufacturing drawings, and material of the components.
- c. Description and explanations necessary for the understanding of the provided drawings (mentioned in point b) and the operation of the packaging.
- d. A list of:
 - (i) the harmonized standards referred to in Article 36 that have been applied in full or in part;
 - (ii) the common specifications referred to in Article 37 that have been applied in full or in part;
 - (iii) other relevant technical specifications used for measurement or calculation purposes;
 - (iv) if harmonized standards or common specifications have been applied in part: an indication of the parts that have been applied;
 - (v) if harmonized standards or common specifications have not been applied: a description of the solutions adopted to meet the requirements referred to in point 1;
- e. A qualitative description of the manner in which the assessments referred to in Articles 6, 10, and 11 have been carried out.
- f. Test reports, if available

Notes:

- * Transition period: packaging that is already on the EU market may still be used for 3 years after the start of the new requirements.Example: August 12, 2026 the label specification will be published, August 12, 2028 it enters into force, until August 12, 2031 packaging may be sold or used)
- * Pallet wrapping and pallet strapping/bands fall outside the 100% reuse obligation, but do count towards the 40% EU reuse target.
- * Exceptions apply to micro-enterprises. A micro-enterprise is a company with fewer than 10 employees and less than 2 million in turnover.
- * It is prohibited to use misleading labels, texts, or markings that create confusion for end users.

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Dit document is tot stand gekomen met dank aan Modint. Voor meer informatie of vragen verwijzen we naar Modint, info@modint.nl

More information
Let's connect!

