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Packaging Waste: Navigating the EU Packaging & Packaging Waste Regulation

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Agenda

- Overview of last year's presentation
- Publication of PPWR January 2025
- Key impacts of PPWR for food and beverage industry: summary table
- Focus on mandatory recyclability
- Focus on minimum recycled content in plastic packaging
- Focus on Extended Producer Responsibility (“EPR”)
- Main impacts, compliance dates and mitigation
- PPWR timeline & transition dates 2026-2030



Overview of 2024 presentation “The New Packaging & Packaging Waste Regulation – key challenges”

- Waste hierarchy, generation of packaging waste by weight (paper/cardboard)
- Failed objectives of the Packaging Waste Directive (harmonisation, reduction in packaging volumes, community marking of packaging)
- Main provisions of draft PPWR
- Examples of packaging & non-packaging in scope
- Banned formats & exemptions: focus on single use-plastic following amendment
- Proposed transition dates 2026-2030



The Packaging and Packaging Waste Regulation (PPWR) was published on January 22, 2025 and will apply from August 12, 2026

Purpose:

To harmonise EU rules on packaging and packaging waste, reduce environmental and health impacts, and support the transition to a circular economy.

Scope:

Applies to all packaging placed on the EU market, regardless of material or sector, including food packaging.

Reference:

Regulation (EU) 2025/40

Key themes:

- Mandatory recyclability
- Minimum recycled content in plastic packaging
- PFAS & BPA restrictions
- Packaging minimisation
- Reusable packaging targets
- Compostable packaging rules
- Harmonised labelling
- Extended Producer Responsibility (EPR)
- Deposit and Return Systems (DRS)
- Penalties and market surveillance

PPWR key impact areas for food and beverage industry

#	Impact area	Description
1	Mandatory recyclability	All packaging must be recyclable (Grades A–C) by 2030; recyclable at scale by 2035. Packaging must be recyclable (Grades A–B) by 2038
2	Minimum recycled content in plastic packaging	Plastic packaging must contain recycled content (e.g., 30% for PET, 30% for SUP beverage bottles, 10% for other plastics by 2030)
3	PFAS & BPA restrictions	PFAS banned in food-contact packaging above set thresholds; BPA restrictions also in place (both 2026)
4	Packaging minimisation	Packaging must be reduced to the minimum necessary volume and weight by 2030. Empty space ratio requirements also apply by 2030 for grouped, transport, and e-commerce packaging
5	Harmonised labelling	Labels must indicate recyclability, material composition (2028) and reuse info (2029)
6	Extended Producer Responsibility (EPR)	Producers must register, report, and finance full packaging waste management (2025-2030) (register by 2026 – many member states already have live EPR schemes)
7	Penalties and market surveillance	Non-compliance may result in penalties, recalls, or market bans (2027)

Focus on mandatory recyclability



Focus on mandatory recyclability

- Deadline is 2030. All packaging placed on the market must be recyclable; this includes flexible and hard plastics, paper, glass, metal...
- There are a few exemptions from this aspect only (infant formula and follow-on formula, processed cereal-based food and baby food, food for special medical purposes). Compostable packaging is also exempt
- Packaging will be assessed against a recycling grade system and given a score: Grades A-C only will be classed as recyclable by 2030. This moves to two grades (A & B only are recyclable) by 2038
- There will be a reduction in EPR fees based on the recyclability grade of the packaging (i.e. grade A incurs lowest fees)
- These recycling grades are not fully defined yet in the PPWR (by the 'designed for recycling' and 'recycling at scale' criteria) and will be defined in 2028



Focus on mandatory recyclability: what could Grades A-C include?

Grade A (≥ 95% recyclable)

- Mono-material packs (PE, PP, PET)
- No disruptors: no metal, PVC, EVOH, inks/adhesives
- Fully compatible with current recycling systems
- High secondary yield, low contamination
- DfR certified (RecyClass or equivalent)

Grade B (≥ 80% recyclable)

- Mostly mono-material w/ minor barriers
- Few disruptors; sorting/recycling still viable
- Recyclable in most EU states, not all
- Needs some process tweaks (e.g. ink removal)
- Sortable, but may lower yield/quality

Grade C (≥ 70% recyclable)

- Multi-material w/ some recyclable parts
- Recyclability varies by region
- Disruptive elements (e.g. metallisation)
- Low recycle yield/quality
- May need advanced sorting or chemical recycling

References:

[RecyClass Design for Recycling Guidelines](#),
CEFLEX D4ACE Guidelines,
Grüner Punkt Minimum Standard 2025

Focus on minimum recycled content in plastic packaging



Focus on minimum recycled content in plastic packaging

EU: PPWR mandates the following minimum percentages of 'Post consumer Plastic Waste' content.

For the following packaging:

- Contact-sensitive PET as the major component (excl. single use plastic bottles): 30% by 2030, 50% by 2040
- Contact-sensitive non-PET (excl. single use plastic bottles): 10% by 2030, 25% by 2040
- Single use plastic beverage bottles: 30% by 2030, 65% by 2040
- Other plastic packaging: 35% by 2030, 65% by 2040

This will mean an increased demand (and cost) for recycled post consumer plastic waste (in the EU and globally) until economies of scale and infrastructure catch up.

There will likely be a reduction in EPR fees based on the recycled content of packaging.



Focus on minimum recycled content in plastic packaging: Challenges & derogations

The resulting packaging (e.g. a beverage bottle with 65% recycled content) **will itself have to be recyclable!**

Recycled plastic material will still have to meet food contact material provisions & be of acceptable technical quality (i.e. strength, barrier and colour/clarity)

Derogations include:

- Plastic packaging for food that is intended only for infants and young children, food for special medical purposes and packaging for drinks and food typically used for young children
- Compostable packaging
- Where the plastic part is <5% of the total weight of the whole packaging unit
- Where the quantity of recycled content represents a threat to health & non-compliance with Reg (EU) 1935/2004

Focus on Extended Producer Responsibility ("EPR"):



Focus on Extended Producer Responsibility (“EPR”): Overview

Extended Producer Responsibility (EPR) makes producers financially and operationally responsible for the entire lifecycle of their packaging, including its collection, sorting, recycling, and disposal.

A central mechanism to drive packaging sustainability and circularity.

Mandatory EPR: all EU pack producers must join authorised schemes (A. 45)
Builds on mature systems (France, Germany, NL)

Producers will pay modulated fees based on packaging credentials
Factors include:
recyclability & % recycled content

Producers must report annually: pack volumes, materials, recyclability & recycled content (Art. 56))

Producers & online sellers must appoint an authorised representative in each member state where packaging is placed on the market (Article 45(3))

Implementation timeline:

Early compliance: Many MS already have schemes under previous EPR framework (keep an eye on national rules)

12 Aug 2026: Registration deadline for authorised person in each member state

2026–2030: Rollout of more EPR obligations including modulated fees and recyclability/recycled content requirements

2030: Full EPR compliance expected

Main impact areas, compliance dates and mitigation

PPWR timeline 2026-2030

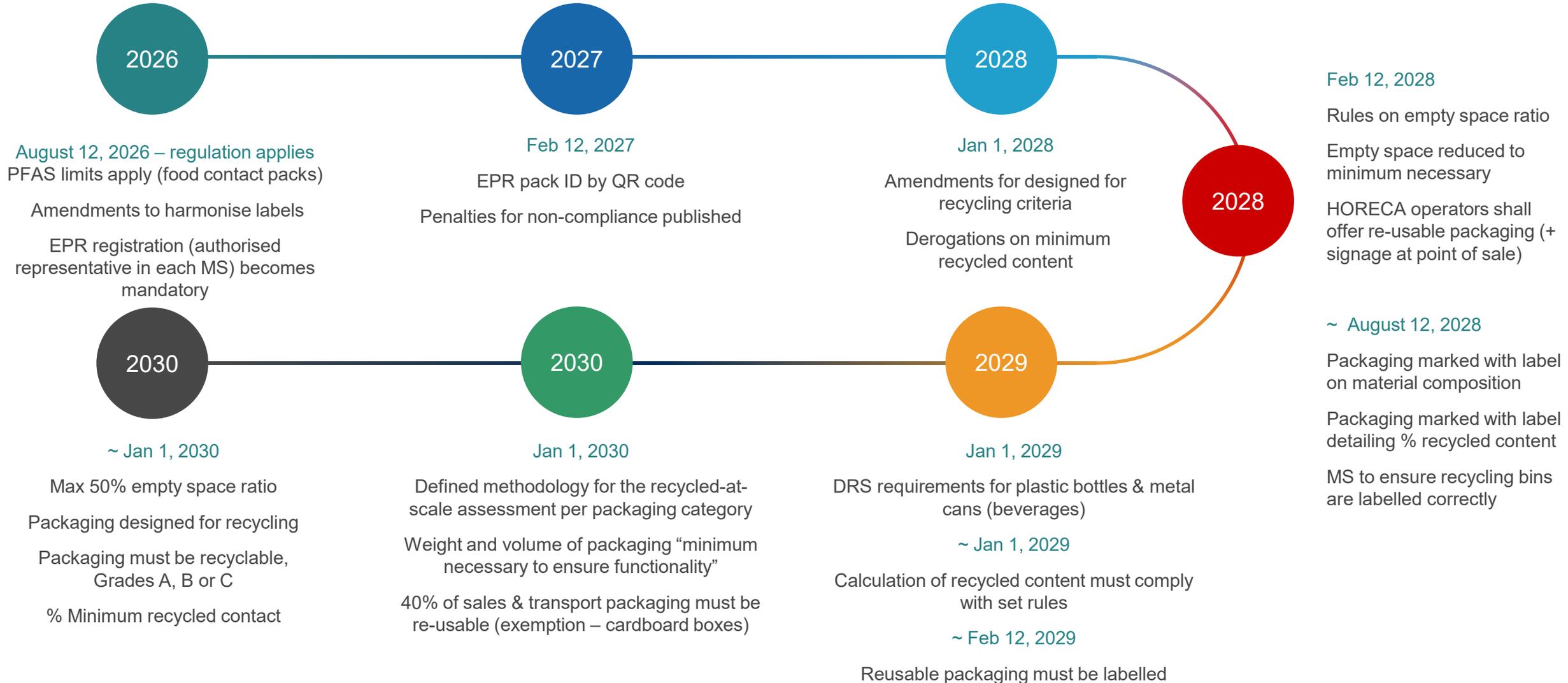


Main impact areas , compliance dates and mitigation

#	IMPACT AREA	DESCRIPTION	COMPLIANCE DATE	MITIGATION
1	Mandatory recyclability	All packaging must be recyclable	Jan 1, 2030 (Grades A–C) Jan 1, 2035 (Recyclable at scale) Jan 1, 2038 (Grades A–B)	Work with existing guidance, engage with suppliers early, redesign packaging to meet recyclability criteria once new rules published
2	Minimum recycled content in plastic packaging	Plastic packaging must contain minimum recycled content (e.g., 30% for PET, 30% for SUP beverage bottles, 10% for other plastics by 2030)	Jan 1, 2030; Higher targets by 2040	Audit current plastic use; switch to compliant materials; explore closed-loop systems & secure long-term supply of recycled material
3	PFAS & BPA restrictions	PFAS banned in food-contact packaging above set thresholds; BPA restrictions also in place	Aug 12, 2026 (PFAS); July 20, 2026 (BPA)	Reformulate materials; request declarations from suppliers; update specifications
4	Packaging minimisation	Packaging must be reduced to the minimum necessary volume and weight	Jan 1, 2030	Packaging audits for new & refreshed products; eliminate unnecessary layers; justify design
5	Harmonised labelling	Labels must indicate recyclability, material composition, and reuse info	Aug 12, 2028 + Feb 29, 2029 (reuse)	Update artwork; integrate QR codes; train marketing and packaging teams
6	Extended Producer Responsibility (EPR)	Producers must register, report, and finance full packaging waste management	Ongoing 2025-2030; register in MS by Aug 12 2026	Register in each member state; work with Producer Responsibility Organisations (PROs)
7	Penalties and market surveillance	Non-compliance may result in penalties, recalls, or market bans	Penalties in place 2027	Implement internal compliance checks; maintain technical documentation

PPWR timeline & transition dates * 2026-2030

* Not everything – for all transitional dates please see Regulation (EU) 2025/40



Questions?

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