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The EU Packaging & Packaging Waste Regulation developments in 2026 and plans for 2027

Luke Murphy, Vice President: Key Accounts

Agenda

- Introduction
- New developments in 2026
- Recycling logo proposals
- Commission guidance and FAQ: key points
- Declarations of conformity and data
- UK application?
- What's next in 2026/2027



The Packaging and Packaging Waste Regulation (PPWR) was published on 22 January 2025 and applied from 12 August 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

New developments in 2026

JRC technical labelling proposal

13 Jan 2026: JRC published a technical proposal for harmonized EU waste-sorting labels to inform PPWR implementing acts under Articles 12 and 13.

First PPWR delegated act

Commission Delegated Decision (EU) 2026/429: Pallet wrappings and straps exempted from the 100% reuse requirement in specific transport cases.

General 40% reuse target still applies.

Commission guidance notice

10 Jun 2026: Commission Notice C/2026/3084 interprets selected PPWR provisions, while confirming PPWR itself remains the legal source.

BPA implementation

25 Jun 2026 UK guidance: EU BPA restrictions apply to EU and NI markets, with first key compliance deadline of 20 July 2026.

PPWR FAQ second edition

3 Aug 2026: DG ENV published updated FAQs addressing practical issues raised by stakeholders since adoption of PPWR.

PPWR general application

12 Aug 2026: PPWR applies generally

- PFAS restrictions for food-contact packaging
- Other general provisions of the legislation apply

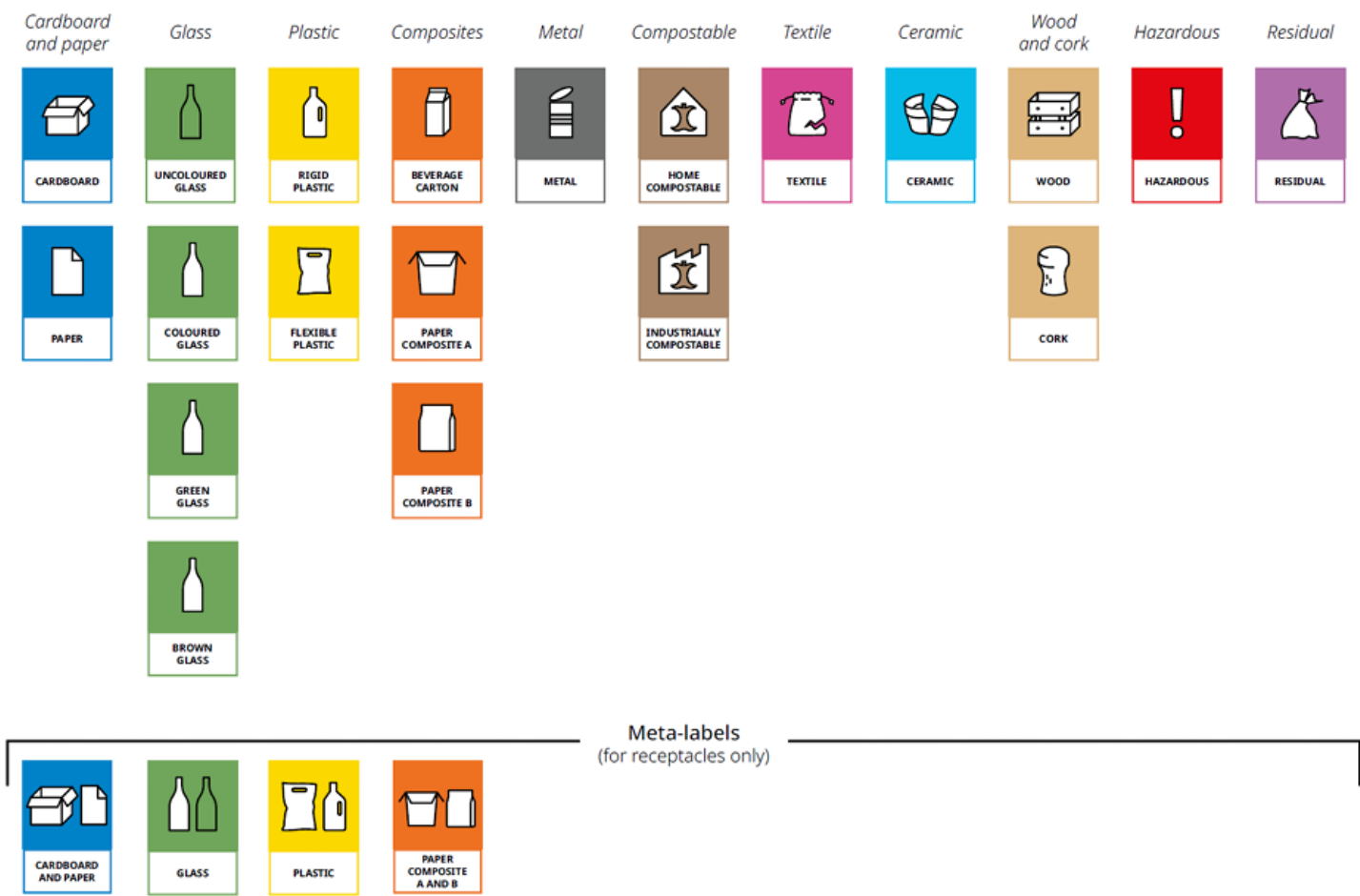
Recycling logos: reminder of Article 12 & 13

- A12: Packaging must carry a pictogram-based, easily understandable harmonized label indicating material composition
- A12: Transport packaging (except for e-commerce) and Deposit Return Scheme (DRS) packaging are exempt
- A12: **Optional** QR codes may additionally be used to provide sorting info
- A12: If labels cannot be displayed visibly and legibly, the label or QR code must be attached to the grouped packaging. If this is not possible, recyclability information may be provided exclusively through a QR code
- A12: Recyclability information shall be available in one or more languages
- A12: Labelling information shall be available to end users prior to purchase, **including through online sales**
- A13: Packaging & waste bin labels must match
- A13: Recyclability labels must be displayed on all waste bins for collection of packaging waste. A packaging waste bin may carry more than one label



JRC design proposal

Figure 13. Pictograms and materials as used in the proposed EU harmonised waste sorting labelling scheme.



Achromatic and transparent versions also suggested where necessary



Commission guidance (June 2026): additional interpretation

Definition of 'placing on the market'

For food packaging, placing on market generally occurs when packaging is filled and sealed, whereas transport packaging is placed on market empty.

"All packaging placed on the market must be recyclable from 12 August 2026"

Existing PPWD recyclability standards apply until the new delegating acts take force in ~2030.

PPWR recyclability obligations apply from 12 August 2026, but final design-for-recycling criteria and recyclability grades are still awaiting Commission delegated acts

Harmonized recycling logos (Article 12)

Clarifies Member States cannot maintain parallel national sorting labels. Once EU labels apply, MS should repeal conflicting national systems as soon as possible (max. 24 months after logos are published).

Composite packaging with >5% plastic

Classed as single use packaging.

Subject to the HORECA bans in A25 & Annex V.

"composite packaging, including paper-based packaging containing 5 % or more plastic, is covered by the packaging bans..."

PFAS in food-contact packaging

Additional recommended enforcement guidance:

- Total fluorine
- Organic fluorine confirmation
- TOP analysis (total oxidizable precursors)

Limiting gold plating

The guidance repeatedly warns against:

- Early implementation
- National sustainability requirements
- Additional reuse obligations
- Other market barriers

Reminder of Annex V bans

Condiments etc. for catering

Single-use plastic packaging for condiments, preserves, sauces, coffee creamer, sugar, and seasoning in HORECA sector.

Excludes takeaway.

Other catering packaging

Single-use plastic packaging for foods and beverages filled and consumed within the premises.

Unprocessed fruit and veg packaging

Single-use plastic packaging for less than 1.5 kg pre- packed fresh fruit and vegetables.

Exemptions possible for various quality reasons and to avoid mixture with organic produce.

Grouped packaging

Single-use plastic packaging used at the point of sale to group goods sold in bottles, cans, tins, pots, tubs, and packets designed as convenience packaging (multi-packs).

Packaging to facilitate handling exempt.

Very lightweight plastic bags

Except for very lightweight plastic carrier bags required for hygiene reasons or provided as sales packaging for loose food when this helps to prevent food wastage.

New Guidance expected

Additional guidance on what is in/out of scope is expected by **February 2027**.

Commission FAQ (August 2026): additional interpretation

Definitions & roles – manufacturer etc.

More focus on who is manufacturer, importer and producer for different packaging scenarios.

This matters for EPR registration and documentation ownership (including DoC).

Sustainability evidence

Compliance increasingly depends on technical files, supplier declarations, substance data, recyclability evidence and documentary traceability.

Using up existing stock

Packaging already produced before 12 August 2026 does not need to be destroyed, remanufactured or relabelled.

Packaging already placed on the market before that date can remain available even if not compliant with later PPWR requirements.

Inks and adhesives

Entire packaging systems (including inks, varnishes, coatings, glues and adhesives) are in scope of the PPWR.

PFAS in food-contact packaging

PFAS limits apply irrespective of intentional use, i.e. accidental contamination is covered too.

PFAS limits also apply to inks, varnishes, coatings, glues and adhesives.

Enforcement after 12 August 2026

Enforcement should not disrupt consumer access to goods.

Authorities should generally identify non-compliance, request corrective action and allow remediation before taking stronger measures such as withdrawal, recall or prohibition.

Declarations of conformity

- **Q: Who is responsible for the Declaration of Conformity (DoC)?**
- A: Responsibility sits with the “manufacturer” under PPWR Article 3. This is usually the entity placing packaging on the EU market under its own name or trademark, not necessarily the physical packaging producer
- The Commission Q&A says “Where multiple parties are involved, the manufacturer is the entity that determines packaging design specifications and characteristics, even where another party physically manufactures or fills the product”
- **Q: Does this DoC need updating?**
- A: Yes. The DoC will evolve as the PPWR does – it exists to demonstrate compliance with the existing legal obligations, which will increase as the PPWR provisions come into place
- **Q: What other supporting evidence do I need?**
- A: Behind the DoC is technical data for the packaging to show it is valid, includes a “Bill of Material” and other data



Example technical data: soft drink bottle

Component	Material	Weight
Bottle	PET	22 g
Cap	HDPE	2 g
Label	PP	1 g
Adhesive	Acrylic	0.1 g
Ink	Various	0.05 g

Other info needed (non exhaustive)

- Recycled PET content (%) (already needed for plastic bottles – not for other packaging yet)
- Food contact compliance evidence/certification
- PFAS declaration for compliance with Article 5
- Relevant test reports
- Recyclability assessment results will also be needed in the future (not yet)



PPWR in UK?

- **Q: Does/will the PPWR apply in the UK?**
- A: The PPWR is outside the Sanitary and Phytosanitary (SPS) agreement between the UK and EU, as it is not directly food safety related
- However, as Food Contact Material requirements are included in both the SPS & Article 5 of the PPWR, the FCM parts of the PPWR may be included in the future (currently being negotiated)
- We understand the UK is also waiting for the EU provisions on recycling logos to be published, which may also be incorporated into UK labels in the future (subject to consultation)



What's next in 2026-27 (1)

Q4 2026

- Art. 7(8) implementing act due by 31 Dec 2026: recycled-content calculation, verification and documentation rules
- Art. 12 harmonised labelling implementing acts remain outstanding/delayed

12 February 2027

- A68: Penalties for non-compliance must be published and implemented by MS
- A11: Amendment on minimum number for the rotations for reusable packaging
- A12: QR code or similar for EPR compliance may be used
- A25: Commission guidance on Annex V (single-use plastic bans)
- A29: Commission guidelines on products in/out of scope for reuse targets for alcoholic and non-alcoholic beverages



What's next in 2026-27 (2)

12 February 2027

- A56: Commission implementing acts for calculation / verification of various provisions
- Deposit return systems
- Packaging waste reporting (for EPR)

30 June 2027

- A29: Implementing act (establishing methodology calculation of the re-use targets)
- These will all be key to establish how compliance is measured and reported



Questions?

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For further information visit us at: leatherheadfood.com

Email: help@leatherheadfood.com

Follow us on LinkedIn: [@leatherheadfoodresearch](https://www.linkedin.com/company/@leatherheadfoodresearch)

Cambridge

Harston Mill
Harston
Cambridge
CB22 7GG
UK

London

First Floor
17 Waterloo Place
London
SW1Y 4AR
UK

Epsom

Great Burgh
Yew Tree Bottom Road
Epsom
Surrey
KT18 5XT
UK

Knaresborough

Concordia House
St. James Business Park
Grimbald Crag Court
Knaresborough
North Yorkshire
HG5 8QB
UK

Washington

1150 18th Street NW
Suite 475
Washington
DC 20036
USA

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