

PPWR: Packaging and Packaging Waste Regulation (Regulation (EU) 2025/40), explained

The Packaging and Packaging Waste Regulation sets recyclability, recycled content, re-use, labelling and producer responsibility rules for all packaging on the EU market, with duties for manufacturers, importers, distributors and online platforms. It applies from 12 August 2026, replacing Directive 94/62/EC, with labelling from 12 August 2028 and design targets from 1 January 2030.

Reviewed 24 September 2026 by Conphora compliance team · Next review 13 March 2027 · Not legal advice

Key facts

Reference	Regulation (EU) 2025/40	Act type	Regulation
In force	11 February 2025	Applies from	12 August 2026
Enforced by	Market surveillance authorities designated by each Member State under Regulation (EU) 2019/1020, to whose Annex I the regulation is added, enforce the packaging requirements, and a competent authority in each Member State runs the register of producers and the extended producer responsibility rules; in Denmark the designated competent authority is Miljøstyrelsen (the Danish Environmental Protection Agency) and producers register with Dansk Producentansvar.	CELEX	32025R0040

Key dates

19 December 2024	Regulation (EU) 2025/40 adopted by the European Parliament and the Council in Brussels	title and signature block after Art. 71
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22 January 2025	Publication in the Official Journal, OJ L 2025/40	OJ reference
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11 February 2025	Entry into force, the twentieth day after publication; packaging placed on the market from this date counts as reusable only if it meets the nine criteria of Article 11(1)	Art. 71 and Art. 11(1)
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12 February 2026	Deadline for the Commission to adopt the implementing act on the format for registration in and reporting to the national registers of producers, and to request harmonised standards on compostable packaging	Art. 44(14) and Art. 9(6)
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26 May 2026	Commission Delegated Decision (EU) 2026/429 enters into force: pallet wrappings and straps are exempted from the 100 % re-use requirements of Article 29(2) and (3)	Art. 1 and Art. 2
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10 June 2026	Commission Notice C/2026/3084, the guidance document for Regulation (EU) 2025/40, published	title and subject matter
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12 August 2026	The regulation applies; Directive 94/62/EC is repealed with transitional exceptions; food-contact packaging may no longer be placed on the market with PFAS at or above the Article 5(5) limits; deadline for the Commission's implementing acts on harmonised labels and the digital-marking methodology	Art. 71, Art. 70(1), Art. 5(5), Art. 12(6), Art. 12(7) and Art. 13(2)
31 December 2026	Deadline for the Commission's implementing act on calculating and verifying recycled content, the delegated act on sustainability criteria for plastic recycling technologies, the third-country equivalence methodology and the report on substances of concern in packaging	Art. 7(8), Art. 7(9), Art. 7(10) and Art. 5(2)
12 February 2027	Member States must have penalty rules in place and notified; HORECA final distributors must let consumers bring their own container for take-away drinks and food; deadline for the Commission's	Art. 68(1), Art. 68(3), Art. 32(1), Art. 11(2), Art. 25(6) and Art. 29(8)

delegated act on
minimum rotations
for reusable
packaging and its
guidelines on Annex
V and on the
beverage re-use
targets

1 January 2028	Deadline for the Commission's delegated acts on design-for-recycling criteria and recyclability performance grades and on pooling arrangements for beverage re-use targets	Art. 6(4) and Art. 29(12)
12 February 2028	Tea, coffee and beverage bags and sticky fruit labels must be compostable; other biodegradable packaging must be designed for material recycling; empty space in sales packaging must be reduced to the minimum; HORECA final distributors must offer take-away in reusable packaging; deadline for the Commission's empty-space methodology	Art. 9(1), Art. 9(3), Art. 24(4), Art. 33(1) and Art. 24(2)
12 August 2028	Harmonised material-composition label on packaging and harmonised labels on waste receptacles, or 24 or 30 months after the implementing acts if later;	Art. 12(1), Art. 12(4), Art. 13(1) and Art. 70(2)

recycled-content labels must follow the harmonised specification; Decision 97/129/EC repealed

1 January 2029	Member States must separately collect at least 90 % of single-use plastic beverage bottles and metal beverage containers up to three litres through deposit and return systems; recycled-content calculation must follow the implementing act, or 24 months after it if later	Art. 50(1), Art. 50(2) and Art. 7(11)
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12 February 2029	Reusable packaging placed on the market must carry the reusability label and a QR code or other data carrier, or 30 months after the implementing act if later; the additions to Part B of the Annex to Directive (EU) 2019/904 in Article 67(5) apply	Art. 12(2) and Art. 71
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1 January 2030	Packaging must be designed for recycling in grade A, B or C and plastic parts must meet the 2030 minimum recycled content, each or 24 or 36 months after the Commission acts if later; packaging must be minimised in weight and volume; the Annex V format restrictions, the 50	Art. 6(2), Art. 6(3), Art. 7(1), Art. 10(1), Art. 25(1), Art. 24(1), Art. 29 and Art. 43(1)
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% empty-space
ratio and the 2030
re-use targets
apply; Member
States must cut
packaging waste
per capita by 5 %
against 2018

1 January 2035	Recyclability also requires that the packaging waste is collected separately, sorted and recycled at scale, or five years after the implementing acts if later; Member States must cut packaging waste per capita by 10 %	Art. 6(2) and Art. 43(1)
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1 January 2038	Only packaging recyclable in grade A or B may be placed on the market	Art. 6(3)
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1 January 2040	The 2040 minimum recycled content percentages apply; economic operators must endeavour to reach the 2040 re-use targets; Member States must cut packaging waste per capita by 15 %	Art. 7(2), Art. 29 and Art. 43(1)
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Obligations by role

Manufacturer (including brand owners of packaged products)

- Place on the market only packaging that conforms to the sustainability and labelling requirements of Articles 5 to 12. Art. 15(1) and Art. 4(1)
- Keep the sum of lead, cadmium, mercury and hexavalent chromium in packaging or its components at or below 100 mg/kg, and from 12 August 2026 do not place food-contact packaging on the market with PFAS at or above the Article 5(5) limits; show compliance in the technical documentation.
Art. 5(4), Art. 5(5) and Art. 5(6)
- Assess the recyclability of each packaging unit against the design-for-recycling criteria and express it in grade A, B or C; from 1 January 2030, or 24 months after the delegated acts if later, place no packaging on the market outside grades A to C, and from 1 January 2038 only grades A or B.
Art. 6(2), Art. 6(3) and Art. 6(9)
- From 1 January 2030, or three years after the implementing act if later, ensure every plastic part of packaging contains the minimum recycled content from post-consumer plastic waste (30 % for contact-sensitive PET, 10 % for other contact-sensitive plastics, 30 % for single-use plastic beverage bottles, 35 % for other plastic packaging), rising in 2040, and document it. Art. 7(1), Art. 7(2) and Art. 7(6)
- By 12 February 2028, make tea, coffee and beverage bags and sticky fruit labels compostable and design other biodegradable packaging for material recycling. Art. 9(1) and Art. 9(3)
- By 1 January 2030, design packaging so that its weight and volume are the minimum necessary for functionality, and do not place on the market packaging that fails the Annex IV performance criteria or that only increases perceived volume through double walls, false bottoms or unnecessary layers, unless a protected design, trademark or geographical indication applies. Art. 10(1), Art. 10(2) and Art. 10(4)
- Treat packaging as reusable only if it meets all nine Article 11(1) criteria, and for reusable packaging include in the technical documentation a description of the re-use system with the written confirmations of the system participants. Art. 11(1), Art. 11(3) and Art. 26(2)
- Carry out the Annex VII internal production control before placing packaging on the market, draw up the technical documentation and the EU declaration of conformity per packaging type, keep both for 5 years (single-use) or 10 years (reusable), and re-assess when design, materials or the referenced standards change. Art. 15(2), Art. 15(3), Art. 15(4), Art. 38, Art. 39 and Annex VII
- Carry out the Annex VII internal production control before placing packaging on the market, and re-assess conformity when the design, materials or the referenced standards change.
Art. 15(2), Art. 15(4), Art. 38, Art. 39 and Annex VII
- Draw up the Annex VII technical documentation per packaging type before placing it on the market.
Art. 15(2) and Annex VII
- Draw up the EU declaration of conformity per packaging type where the Annex VII procedure has demonstrated compliance. Art. 15(2) and Art. 39
- Keep the technical documentation and the EU declaration of conformity for 5 years after placing single-use packaging on the market, or 10 years for reusable packaging. Art. 15(3)
- Mark the packaging with a type, batch or serial number or other identifier, and with your name, registered trade name or trademark and a single postal address and, where available, electronic contact, on the packaging, in a QR code or other data carrier or in an accompanying document, without obscuring other mandatory labelling. Art. 15(5), Art. 15(6) and Art. 15(7)
- From 12 August 2028, or 24 months after the implementing acts if later, apply the harmonised material-composition label; label reusable packaging as reusable with a QR code or other data carrier from 12 February 2029; follow the harmonised specification for any recycled-content or biobased-content label;

and never use labels or symbols likely to mislead consumers about sustainability or sorting.

Art. 12(1), Art. 12(2), Art. 12(4), Art. 12(5) and Art. 12(8)

- Make environmental claims about packaging properties regulated by the regulation only where the packaging exceeds the minimum requirements, state whether the claim concerns the unit, part of it or all your packaging, and evidence it in the technical documentation. Art. 14
- If you consider or have reason to believe that packaging you placed on the market since 11 February 2025 does not conform, immediately bring it into conformity, withdraw or recall it and inform the market surveillance authority of the Member State where you made it available; reusable packaging placed on the market before 11 February 2025 is exempt from this duty. Art. 15(8) and Art. 15(9)
- On a reasoned request, provide the information and technical documentation demonstrating conformity in a language the authority understands, electronically and on request on paper, within 10 days, and cooperate on corrective action; be able to identify your packaging suppliers and customers for 5 years (single-use) or 10 years (reusable). Art. 15(10) and Art. 22
- On a reasoned request, provide the information and technical documentation demonstrating conformity in a language the authority understands, electronically and on request on paper, within 10 days, and cooperate on corrective action. Art. 15(10)
- Be able to identify your packaging suppliers and customers for 5 years (single-use packaging) or 10 years (reusable packaging). Art. 22
- Obtain from your suppliers of packaging and packaging materials the information and documentation you need to demonstrate conformity, including the Annex VII technical documentation and, for contact-sensitive packaging, the food-contact and similar documentation; suppliers are obliged to provide it.

Art. 16

- From 1 January 2030, do not place on the market packaging in the formats and uses of Annex V, such as single-use plastic grouped packaging, single-use plastic packaging for under 1,5 kg of fresh fruit and vegetables, single-use HORECA packaging and portion packs, single-use hotel toiletries and very lightweight plastic carrier bags. Art. 25(1) and Annex V
- If you fill grouped, transport or e-commerce packaging, keep the empty space ratio at or below 50 % from 1 January 2030, or three years after the implementing act if later; if you fill sales packaging, reduce empty space to the minimum by 12 February 2028; filling materials count as empty space.

Art. 24(1), Art. 24(3) and Art. 24(4)

- From 1 January 2030, if you use transport packaging such as pallets, boxes, crates, drums or pallet wrappings, ensure at least 40 % is reusable within a re-use system, 100 % for transport between your own or linked sites and for deliveries to another operator in the same Member State, and 10 % of non-cardboard grouped boxes; pallet wrappings and straps are exempt from the 100 % requirements under Delegated Decision (EU) 2026/429. Art. 29(1), Art. 29(2), Art. 29(3), Art. 29(4) and Art. 29(5); Art. 1
- If you use reusable packaging, participate in a re-use system meeting Part A of Annex VI, recondition the packaging per Part B before offering it again, and return closed-loop packaging to the approved collection points. Art. 27

Importer

- Place on the market only packaging that conforms to Articles 5 to 12, and before doing so verify that the manufacturer carried out the Annex VII conformity assessment and drew up the technical documentation, that the packaging is labelled per Article 12, is accompanied by the required documents and bears the manufacturer's identification and contact details; do not place non-conforming packaging on the market until it conforms. Art. 18(1) and Art. 18(2)
- Indicate your name, registered trade name or trademark and a postal address and, where available, electronic contact on the packaging, via the Article 12 data carrier or in an accompanying document, clearly and without obscuring other mandatory information. Art. 18(3) and Art. 18(4)
- Ensure storage and transport conditions under your responsibility do not jeopardise compliance, whether the packaging is empty or filled. Art. 18(5)
- If you consider or have reason to believe that packaging you placed on the market does not conform, immediately bring it into conformity, withdraw or recall it and inform the market surveillance authorities of the Member States where you made it available. Art. 18(6)
- Keep a copy of the EU declaration of conformity and be able to produce the technical documentation for 5 years (single-use) or 10 years (reusable) after placing the packaging on the market; provide it on reasoned request within 10 days in a language the authority understands and cooperate on corrective action. Art. 18(7), Art. 18(8) and Art. 18(9)
- Keep a copy of the EU declaration of conformity and be able to produce the technical documentation for 5 years (single-use) or 10 years (reusable) after placing the packaging on the market. Art. 18(7)
- On reasoned request, provide the conformity information and documentation within 10 days in a language the authority understands, and cooperate on corrective action. Art. 18(8) and Art. 18(9)
- Together with the manufacturer, ensure by 1 January 2030 that packaging is minimised in weight and volume and that plastic parts meet the recycled-content percentages, and document both in the technical documentation. Art. 7(6) and Art. 10(1)
- If you place packaging on the market under your own name or trademark, or modify it in a way that could affect compliance, you carry the manufacturer's obligations under Article 15. Art. 21
- On request, identify who supplied you with packaging or packaged products and whom you supplied, for 5 years (single-use) or 10 years (reusable). Art. 22

Distributor (including final distributors and retailers)

- Act with due care and, before making packaging available, verify that the producer responsible for it is registered in the register of producers, that the packaging is labelled per Article 12 and that the manufacturer and importer have applied their identification and contact details; hold back non-conforming packaging until it conforms. Art. 19(1), Art. 19(2) and Art. 19(3)
- Keep storage and transport conditions from jeopardising conformity, and use the producer's registration information only to verify compliance, never for commercial purposes. Art. 19(3) and Art. 19(4)
- If packaging you made available does not conform, make sure corrective measures are taken to bring it into conformity, withdraw or recall it, and immediately inform the market surveillance authorities of the Member States concerned. Art. 19(5)
- On reasoned request, provide the information and documentation you hold that demonstrates conformity, and cooperate with the authority; be able to identify your suppliers and customers for 5 or 10 years. Art. 19(6) and Art. 22
- On reasoned request, provide the information and documentation you hold that demonstrates conformity, and cooperate with the authority. Art. 19(6)
- Be able to identify your packaging suppliers and customers for 5 years (single-use packaging) or 10 years (reusable packaging). Art. 22
- If you sell under your own name or trademark or modify packaging in a way that could affect compliance, you take on the manufacturer's obligations. Art. 21
- As a final distributor of alcoholic and non-alcoholic beverages, make at least 10 % of those products available in reusable packaging within a re-use system from 1 January 2030, take back reusable packaging of the same type free of charge and redeem deposits; shops with a sales area of 100 m² or less are exempt, and wine, spirits and highly perishable drinks are excluded.
Art. 29(6), Art. 29(7), Art. 29(9) and Art. 29(10)
- In the HORECA sector, by 12 February 2027 let consumers bring their own container for take-away drinks and ready-prepared food at no higher price, and by 12 February 2028 offer take-away in reusable packaging within a re-use system, informing customers with visible signs; micro-enterprises are exempt from the re-use offer. Art. 32 and Art. 33
- In the HORECA sector, from 12 February 2027 let consumers bring their own container for take-away drinks and ready-prepared food at no higher price, informing customers with visible signs. Art. 32
- In the HORECA sector, from 12 February 2028 offer take-away drinks and ready-prepared food in reusable packaging within a re-use system, informing customers with visible signs; micro-enterprises are exempt. Art. 33
- If you offer products through refill, display and update the rules for refill (container types, hygiene, the end user's responsibility), ensure refill stations meet Part C of Annex VI, and do not hand out free containers that fail Annex VI unless they are in a deposit system. Art. 28

Authorised representative

- Act under a written mandate that at least allows you to keep the EU declaration of conformity and technical documentation at the disposal of the authorities for 5 years (single-use) or 10 years (reusable), cooperate on non-compliance measures, provide conformity information on reasoned request in a language the authority understands, make documents available within 10 days, and terminate the mandate if the manufacturer breaches the regulation. Art. 17(2)
- Do not take over the manufacturer's duty to place only compliant packaging on the market or to draw up the technical documentation; those cannot form part of the mandate. Art. 17(2), last subparagraph
- Where appointed as authorised representative for the extended producer responsibility in a Member State, fulfil the producer's registration and reporting obligations under Chapter VIII there.

Art. 3(1), point (20), Art. 44(3) and Art. 45(3)

Fulfilment service provider

- Ensure that warehousing, handling, packing, addressing and dispatching conditions for the packaging you handle, empty or filled, do not jeopardise its compliance with Articles 5 to 12. Art. 20
- When contracting with a producer offering packaged products to consumers in the Union, obtain its producer register number and self-certification of extended producer responsibility compliance, make best efforts to verify them against the public register, request corrections, and suspend the service if the producer does not remedy inaccurate information. Art. 45(7), Art. 45(8) and Art. 45(9)
- On request, identify the economic operators that supplied you with packaging or packaged products and those you supplied, for 5 years (single-use) or 10 years (reusable). Art. 22

Producer (extended producer responsibility)

- Register in the national register of producers of every Member State where you first make packaging or packaged products available, or unpack packaged products without being an end user, before doing so; a producer responsibility organisation or an authorised representative for extended producer responsibility may register on your behalf. Art. 44(2), Art. 44(3) and Art. 44(4)
- Report by 1 June each year the packaging quantities of the preceding calendar year per Annex IX, Part B (a simplified report below 10 tonnes a year), notify changes without undue delay, and expect Member States to require audits or quarterly reporting. Art. 44(7), Art. 44(8), Art. 44(9) and Art. 44(12)
- Report by 1 June each year the packaging quantities of the preceding calendar year per Annex IX, Part B, or a simplified report below 10 tonnes a year; Member States may require audits or quarterly reporting. Art. 44(7), Art. 44(8) and Art. 44(12)
- Notify the register of any change to your registration information without undue delay. Art. 44(9)
- Carry extended producer responsibility under Articles 8 and 8a of Directive 2008/98/EC for the packaging you first make available or unpack, including the costs of labelling waste receptacles and of compositional surveys, with fees modulated by recyclability grade and, optionally, recycled content. Art. 45(1), Art. 45(2), Art. 6(8) and Art. 7(7)
- If you sell directly to end users in a Member State other than the one where you are established, appoint by written mandate an authorised representative for the extended producer responsibility in that Member State. Art. 45(3)
- Give online platforms and fulfilment service providers your register number in the consumer's Member State and a self-certification that you only offer packaging meeting the extended producer responsibility requirements there; you are responsible for the accuracy of that information. Art. 45(4), Art. 45(7) and Art. 45(8)
- Where you use the option to mark packaging with an extended producer responsibility symbol from 12 February 2027, do so only through a QR code or other standardised digital marking that does not mislead about recyclability or reusability. Art. 12(9)

Provider of an online platform

- Before allowing a producer to offer packaging or packaged products to consumers in the Union, obtain its producer register number in the consumer's Member State and its self-certification of extended producer responsibility compliance, and make best efforts to assess that the information is complete and reliable. Art. 45(4) and Art. 45(6)
- Where a producer sells through your marketplace, you may take over its extended producer responsibility cost obligations on the basis of a written mandate. Art. 45(4), second subparagraph

Penalties

Member States must lay down effective, proportionate and dissuasive penalties for infringements by 12 February 2027 and notify them to the Commission; for failures to meet the waste-reduction duties of Articles 24 to 29 (excessive packaging, format restrictions, re-use systems and re-use targets) the penalties must include administrative fines or an equivalent court-imposed fine. Market surveillance authorities may require corrective measures within a set period, prohibit the making available of packaging, withdraw or recall it, and act on formal non-compliance such as a missing or incorrect EU declaration of conformity, incomplete technical documentation, missing identification or a QR code without the required information; where non-compliance with the recyclability, recycled-content, empty-space, format, re-use, refill or take-away rules persists, the national penalties apply. The regulation adds itself to Annex I of Regulation (EU) 2019/1020, so the market surveillance powers of that regulation apply. In Denmark, Miljøstyrelsen is the designated competent authority and producers register with Dansk Producentansvar.

Art. 68, Art. 58(1), Art. 58(5), Art. 62 and Art. 66

Checklist

- 1. List every packaging item you make, fill, import or sell, decide whether it is packaging under Article 3(1) and Annex I, and sort it by type (sales, grouped, transport, e-commerce, service) and by single-use or reusable.
- 2. Decide your role per item: manufacturer (including own-brand packaged products), importer, distributor, final distributor, fulfilment service provider and, for extended producer responsibility, producer (Articles 3(1), 15 to 21).
- 3. Check substances now: the 100 mg/kg heavy-metal sum and, for food-contact packaging, the PFAS limits that apply from 12 August 2026 (Article 5).
- 4. Register as a producer in every Member State where you first make packaged products available and set up the annual report by 1 June (Articles 44 and 45).
- 5. Set up the Annex VII technical documentation and the Article 39 EU declaration of conformity per packaging type, with the 5- or 10-year retention (Article 15).
- 6. Add the manufacturer's and importer's identification and contact details and a type, batch or serial number to each packaging or its data carrier (Articles 15(5), 15(6) and 18(3)).
- 7. Plan for the harmonised material label from 12 August 2028 and the reusable label from 12 February 2029, and remove any sustainability claim or symbol that could mislead (Articles 12 and 14).
- 8. Assess recyclability grades, plastic recycled content, minimisation and the Annex V format bans against the 1 January 2030 deadlines, and start redesign where needed (Articles 6, 7, 10 and 25).
- 9. If you fill transport, grouped or e-commerce packaging, measure the empty-space ratio and plan the 40 % and 100 % re-use shares for 2030 (Articles 24 and 29).
- 10. If you run HORECA or beverage retail, prepare the bring-your-own-container system for 12 February 2027 and the reusable take-away offer for 12 February 2028 (Articles 32 and 33).

Sources

1. Regulation (EU) 2025/40 on packaging and packaging waste, OJ L 2025/40 of 22 January 2025 (EUR-Lex) — <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32025R0040>
2. Document information, dates, corrigenda and relationships for CELEX 32025R0040 (EUR-Lex) — <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32025R0040>
3. Commission Delegated Decision (EU) 2026/429 exempting pallet wrappings and straps from the 100 % re-use requirements (EUR-Lex) — <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32026D0429>
4. Commission Notice C/2026/3084, guidance document for Regulation (EU) 2025/40 on packaging and packaging waste (EUR-Lex) — <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52026XC03084>
5. Regulation (EU) 2019/1020 on market surveillance and compliance of products (EUR-Lex) — <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32019R1020>
6. Packaging waste (European Commission, DG Environment) — https://environment.ec.europa.eu/topics/waste-and-recycling/packaging-waste_en
7. Packaging and Packaging Waste Regulation, implementation and national competent authorities (European Commission, Green Forum) — https://green-forum.ec.europa.eu/packaging-and-packaging-waste-regulation-implementation_en
8. Packaging and Packaging Waste Regulation, frequently asked questions of 3 August 2026 (European Commission) — https://environment.ec.europa.eu/publications/faq-packaging-and-packaging-waste-regulation-ppwr_en
9. Producentansvar for emballage, typiske spørgsmål og svar (Miljøstyrelsen) — <https://mst.dk/erhverv/groen-produktion-og-affald/affald-og-genanvendelse/producentansvar/emballage/typiske-spoergsmaal-og-svar>

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