

# Unwrapping PPWR

Interinstitutional agreement



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SHAPING A SUSTAINABLE  
FUTURE FOR PACKAGING

# Internal market & Labelling

(Articles 4 & 12)

## Article 4

- Member States to allow the placing on the market of packaging complying with the sustainability, labelling and information requirements set out in Articles 5 to 12.
- Member States allowed to maintain or introduce additional national sustainability or information requirements as long as those do not conflict with the Regulation's provisions.
- Member States should not impede the placing on the market of packaging that complies with the Regulation for reasons of non-compliance with their national requirements.

## Article 12

- Packaging to be marked with harmonised labels providing information on its material composition to facilitate consumer sorting. Packaging subject to DRS and transport packaging are exempted.
- If a packaging provides information on the share of recycled or bio-based content, the label shall be based on a harmonised methodology and specifications.
- National DRS and EPR symbols still allowed. However, EPR markings can only be mandated via digital means.

# Recyclability

## (Article 6)

### Recyclability by design

- From 1 January 2030, all packaging to be recyclable, in line with the design for recycling criteria to be established in delegated acts by 1 January 2028.
- Packaging recyclability will be expressed in performance grades A (higher or equal to 95%), B (higher or equal to 80%) or C (higher or equal to 70%). EPR fees will be modulated based on packaging recyclability.
- Packaging no longer allowed on the EU market if, by 1 January 2030, it is not recyclable within grades A, B or C.

### Recyclability at scale

- From 1 January 2035, packaging to be recycled at scale, in line with conditions to be detailed in implementing acts by 1 January 2030.
- Packaging no longer allowed on the EU market by 1 January 2038 unless it is recyclable within grades A or B.
- Packaging to be considered recycled at scale when, at EU level, the annual quantity of recycled material under each packaging category is equal or greater than 30% for wood and 55% for all other materials. Such thresholds can be reviewed by the Commission by 2035.



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# Recyclability

(Examples of derogations)

## Innovative packaging

- Innovative packaging is defined in Article 3.46 of the Regulation.
- From 1 January 2030, innovative packaging may be placed on the EU market for a period of max. 5 years even if not compliant with the requirements of Article 6.
- When this derogation is used, the economic operator shall notify the competent authorities, provide all technical details proving the innovative nature of the packaging and an indicative timeline to reach recyclability 'at scale'.

## Other derogations

- Derogations are foreseen for contact sensitive packaging of (in vitro) medical devices, contact sensitive packaging for infant formula, baby food, and food for special medical purposes, as well as outer and immediate packaging of medicinal products.
- Packaging used for the transport of dangerous goods and sales packaging made of specific materials (cork, wax etc.) are also exempted.
- Commission mandated to review, by 1 January 2035, all derogations and, where necessary, present a legislative proposal.

# Recycled content

(Article 7)

## Targets

- Recycled content targets set on any plastic part of packaging, per packaging type and format, calculated as an average per manufacturing plant and year.
- Targets to be achieved by 2030 and by 2040. A new 2040 25% target added for contact sensitive packaging made from plastic materials other than PET.
- A mirror clause defines which post-consumer plastic waste can be used to meet the targets. By 31 December 2026, the Commission will adopt a calculation methodology, as well as sustainability criteria for plastic recycling technologies.

## Derogations

- Recycled content targets do not apply to plastic parts representing less than 5% of the tot. weight of the packaging unit, as well as when potentially resulting in incompliance with food contact material legislation.
- Specific derogations are also foreseen, for example for different contact sensitive applications, for compostable plastic packaging, as well as packaging used for the transport of dangerous goods.
- Commission to present a report by 7 years from the EoF of PPWR reviewing 2030 RC targets and assessing the feasibility of achieving 2040 targets.

# Minimisation & prevention

(Articles 10, 24 & 43)

## Minimisation

- Minimisation and empty space requirements to apply by 1 January 2030.
- Packaging weight and volume to be reduced to the minimum necessary, in line with a methodology to be established.
- Derogations, for instance when design is protected by geographical indications of origin or Community designs.
- Max. empty space ratio of 50% for grouped packaging, transport packaging or e-commerce packaging.

## Prevention

- Member States minimum packaging waste prevention targets set for 2030 (5%), 2035 (10%) and 2040 (15%).
- Possibility for Member States to go beyond PPWR waste prevention measures and the set targets.
- Member States shall endeavour to reduce the amount of plastic packaging waste generation.
- ± By 2032, Commission to review the packaging waste prevention targets and assess the need to include targets for certain packaging materials, via legislative proposal.

# Packaging restrictions

(Article 25, Annex V)

## Key measures

- Packaging restrictions to apply from 1 January 2030.
- Member States allowed to maintain restrictions adopted before 1 January 2025, if applicable to packaging formats and purposes listed in Annex V but made from other materials.
- ± By 2032, Commission to assess the appropriateness of new restrictions presenting, where necessary, a legislative proposal.
- Additional packaging bans are set in Article 67, which amends the Single-use Plastics Directive.

## Annex V

- Most packaging bans apply to single-use plastic packaging formats, at the exception of restrictions for single-use accommodation sector packaging.
- Annex V foresees a few targeted exemptions and, in the case of single-use packaging for fresh fruit and vegetables, allows Member States to adopt derogations.
- ± By 2027, Commission to publish guidelines explaining in more detail Annex V, in consultation with the Member States and the European Food Safety Agency.

# Reuse

(Article 29)

## Targets

- Reuse targets are established for different sectors and packaging formats, including transport and beverages packaging.
- Reference to “at least”, making the targets minimum ones, and 2040 targets made aspirational (shall endeavour to).
- Final distributors in beverage sector are subject to a ‘take-back’ obligation under specific conditions. Member States may also allow them to form pools to meet the reuse targets for their sector
- Specific derogations are set, for instance, for transport packaging used for dangerous goods, highly perishable beverages or wines.

## Additional measures

- Horizontal derogation are foreseen, provided MS are on track with packaging waste prevention targets and economic operators have in place waste prevention and recycling plans.
- Commission empowered to adopt, via delegated acts, additional exemptions under specific conditions.
- By 30 June 2027, Commission to establish detailed calculation rules and methodology regarding the reuse targets.
- By 1 January 2034, EC to review the implementation of the 2030 targets and evaluate the feasibility of the targets set for 2040.



# Refill & reuse offer

(Article 32 & 33)

## Refill obligations

- ± By 2027, refill obligation for final distributors using take-away packaging for cold or hot beverages or ready-prepared food in the HORECA sector:
- The requirement includes the obligation to:
  - Offer the goods filled in consumers' containers at no higher costs or less favourable conditions than the single-use packaging alternative;
  - Inform the end consumers at the point of sale about the availability of a refillable option.

## Reuse offer

- ± By 2028, final distributors using take-away packaging for cold or hot beverages or ready-prepared food in the HORECA sector to provide a reusable option.
- The requirement includes the obligation to:
  - Offer the goods in reusable format at no higher costs or less favourable conditions than the single-use packaging alternative;
  - Inform the end consumers at the point of sale about the availability of a reusable option.
- From 2030, economic operators shall endeavour to offer 10% of products in reusable format and Member States can set higher targets.