

**Regulation (EU)
2025/40 on Packaging
and Packaging Waste
(PPWR) applicable
since 12 August 2026**

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Executive Summary

Regulation (EU) 2025/40 on packaging and packaging waste (PPWR) has entered into application on 12 August 2026, replacing Directive 94/62/EC. As a regulation, in contrast to a directive, the PPWR is directly applicable across the EU, without requiring any transposition into the national law of each Member State. The scope of the PPWR covers the entire lifecycle of packaging placed on the EU market, from its design to its end-of-life. While the heavy metals limit and the recycling targets are carried over from the previous regime, the regulation turns formerly general requirements into precise, dated obligations on recyclability, minimisation, reuse, labelling, and mandatory recycled content, most of which apply from 2030. It also introduces limits on the content of PFAS in food-contact packaging, a conformity assessment, a declaration of conformity for manufacturers, a cap on empty space in packaging, bans on certain single-use formats, as well as refill and reuse obligations for the take-away sector.

A. The Regime before the PPWR

Until this summer, the packaging in the European Union was governed by Directive 94/62/EC, adopted in 1994 and amended several times, most recently in 2018.

The directive set a limit on heavy metals in packaging and laid down general “essential requirements”, under which packaging had to be kept to the minimum adequate weight and volume, and be designed to allow reuse or recovery. These requirements were binding for placing packaging on the market, but they were formulated in general, qualitative terms, and left considerable room for interpretation, with the technical details developed through harmonized standards rather than in the legislation itself. The Directive also set recycling targets for Member States and required them to establish extended producer responsibility (EPR) schemes for all packaging by the end of 2024. Extended producer responsibility aims at enforcing the “Polluter-Pays-Principle”, one of the most important principles of EU Environmental Law, enshrined in Article 191(2) TFEU. This principle provides that the entity causing environmental damages is responsible for remedying them, which includes financial compensation. Finally, the now repealed Directive encouraged waste prevention and reuse, however without making them mandatory. The marking of packaging materials was voluntary.

B. New Regime: Regulation (EU) 2025/40

Against this background, Regulation (EU) 2025/40 on packaging and packaging waste (PPWR) was adopted on 19 December 2024 and published in the Official Journal on 22 January 2025 with the aim of fostering circular economy as a foundational pillar of the [European Green Deal](#). The Regulation repeals Directive 94/62/EC and, as a regulation, applies directly and uniformly in all Member States. It covers all packaging, whatever the material, and addresses the full cycle from design to waste status. Member States shall not restrict the placing on the market of packaging that complies with the regulation’s sustainability and labelling requirements.

Some elements of the old regime covered by Directive 94/62/EC have been retained, such as the limit of 100mg/kg on the combined concentration of lead, cadmium, mercury and hexavalent chromium. The recycling targets for Member States are also unchanged: 65% of all packaging waste shall be recycled in each Member State by the end of 2025, and 70% by the end of 2030, together with material-specific targets. By the end of 2030, for example, Member States must recycle 85% of paper and cardboard packaging waste, 80% of ferrous metals, 75% of glass, 60% of aluminium, 55% of

plastic and 30% of wood. The principle of extended producer responsibility (EPR) also remains in place. Thus, producers that place packaging or packaged products on the market bear the financial, and, where applicable, organisational responsibility for managing this packaging once it becomes waste, in practice usually by paying fees to a collective scheme. These fees cover the costs of separately collecting, transporting and treating the waste.

Other elements are tightened significantly, not least recyclability. All packaging must become recyclable. However, this requirement does not apply immediately: packaging must be designed for recycling from 1 January 2030, or 24 months after the entry into force of the Commission's delegated acts on design for recycling, whatever is later, and must additionally be recycled at scale from 1 January 2035. Recyclability will be expressed in performance grades, based on a recyclability score assessed per packaging unit: grade A means a score of at least 95%, grade B at least 80%, and grade C at least 70%. Packaging scoring below 70% is considered technically non-recyclable. The detailed assessment criteria will be set by the Commission. Only packaging in grades, A, B, or C may be placed on the market from 2030, and only packaging in grades A or B from 2038. By 1 January 2030, packaging must be reduced to the minimum weight and volume necessary for its function. Features that only increase the perceived volume of the product, such as false bottoms and double walls, will be prohibited.

Member States must reduce packaging waste per capita by 5% by 2030, 10% by 2035, and 15% by 2040, in each case compared with the packaging waste generated per capita in 2018, as reported by each Member State to the Commission. From 2030, at least 40% of transport packaging must be reusable and the reusable share must be at least 10% for non-cardboard grouped packaging boxes and 10% for beverages made available by final distributors. Wine, spirits and highly perishable beverages are exempt from the beverage target.

Packaging labelling moves from a voluntary system to a mandatory harmonized label, based on pictograms, indicating the material composition of packaging to help consumers sort it. Minimum recycled content, previously limited to plastic beverage bottles, is extended to all plastic packaging. The minimum share of recycled plastic, calculated as a yearly average per manufacturing plant, is set out in the table below. The 2030 date will be postponed if the Commission adopts the calculation methodology late.

Type of Plastic Packaging	From 2030	From 2040
Contact-sensitive packaging (for example for food) made mainly of PET, other than beverage bottles	30%	50%
Contact-sensitive packaging made of other plastics, other than beverage bottles	10%	25%
Single-use plastic beverage bottles	30%	65%
All other plastic packaging	35%	65%

Producer responsibility is reinforced. The regulation introduces harmonized national registers of producers. Producers selling directly to end users in other Member States must appoint a local authorized representative. Online platforms must verify the compliance of producers using their services.

In addition, the Regulation introduces significant obligations regarding the content of PFAS, regarding PFAS in all food-contact packaging. PFAS (per- and polyfluoroalkyl substances) are a group of thousands of synthetic chemicals used in a broad range of applications, with food-contact materials and packaging among the most relevant sectors. They are often called "forever chemicals" because they are very persistent: they either do not break down in the environment themselves or degrade into other PFAS that do not break down. Many PFAS are classified as carcinogenic, mutagenic, toxic for reproduction or toxic to specific organs, and their presence in food-contact materials inevitably leads to human exposure. The regulation therefore treats this exposure as an unacceptable risk to human

health.

Since 12 August 2026, food-contact packaging may not be placed on the market if it contains PFAS at or above any of three limit values: 25 parts per billion (ppb) for any individual PFAS; 250 ppb for the sum of PFAS, in both cases measured by targeted analysis and excluding polymeric PFAS; and 50 parts per million (ppm) for PFAS overall, including polymeric PFAS. In this context, one ppb is one microgram per kilogram of material, and one ppm is one milligram per kilogram. Where total fluorine content exceeds 50mg/kg, the supplier of the material must, on request, provide proof of how much of that fluorine is attributable to PFAS, so that the manufacturer or importer can complete its technical documentation. The Commission must evaluate by 12 August 2030 whether this restriction needs to be amended or repealed, to avoid overlaps with PFAS restrictions in other EU legislation.

The new rules require tea and coffee bags as well as fruit and vegetable stickers to be compostable by 12 February 2028. Environmental claims about packaging are permitted only where the packaging exceeds the regulation's minimum requirements. Manufacturers are then required to carry out a conformity assessment, keep technical documentation, and issue an EU declaration of conformity for their products packaging.

The regulation also targets excessive and avoidable packaging. A maximum empty space ratio of 50% will apply to grouped, transport and e-commerce packaging. In practice, no more than half the volume of a shipping box may be empty or taken up by filling materials such as air cushions, bubble wrap or paper cuttings. From 1 January 2030, certain single use formats will be banned. These include plastic shrink wrap used to group bottles or cans at the point of sale, plastic packaging for less than 1.5kg of pre-packaged fresh fruit and vegetables, single-use plastic plates, cups and trays for food and drink consumed on the premises of restaurants and cafés, single-portion plastic sachets for condiments, as well as sauces and sugar in the same sector.

Finally, in the take-away sector, operators must accept customers' own containers by 12 February 2027 and offer a reusable packaging option by 12 February 2028. Member States must provide penalties, including mandatory administrative fines, for breaches of the rules on excessive packaging, format bans and reuse.

C. Conclusion

- The PPWR has applied directly in all Member States since 12 August 2026, replacing Directive 94/62/EC.
- The limits on PFAS in food-contact packaging have also applied since that date.
- Most other obligations follow in stages.
- Minimum recycled content will apply to all plastic packaging, in principle from 2030, at between 10% and 35% depending on the type of packaging, rising to between 25% and 65% from 2040.
- Recyclability and minimisation requirements and binding reuse targets also apply from 2030.
- Member States must in turn reduce packaging waste per capita by 5% by 2030, 10% by 2035 and 15% by 2040, compared with 2018 levels.
- Businesses placing packaged products on the EU market should identify their role under the Regulation and begin adapting their packaging well ahead of the 2030 deadlines.



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