

Essential Guide to the EU **New Packaging Regulation PPWR**

On 22 January 2025, the Official Journal of the European Union published the Packaging and Packaging Waste Regulation ((EU) 2025/40, hereinafter referred to as PPWR), which fully replaces the Packaging and Packaging Waste Directive (94/62/EC, PPWD) that had been in effect for nearly 30 years. Fully applicable from 12 August 2026, the PPWR introduces new requirements concerning PFAS, heavy metals, Declaration of Conformity (DoC), operators and labelling, EPR registration, and reusable packaging systems, aiming to enhance the sustainability and traceability of packaging.



Heavy Metals and PFAS Requirements

✓ Heavy Metal Limits

The total content of lead (Pb), cadmium (Cd), mercury (Hg), and hexavalent chromium (Cr(VI)) shall not exceed 100 mg/kg.

✓ PFAS Restrictions

Per- and polyfluoroalkyl substances (PFAS) are prohibited in food contact packaging if they exceed the following specific limits: 25 ppb for any individual non-polymeric PFAS, 250 ppb for the sum of non-polymeric PFAS; 50 ppm for total fluorine (F) content (including polymeric PFAS). Packaging with a total fluorine content or organic fluorine content below 50 mg/kg (0.005%) is considered compliant with the PFAS requirements (refer to Guidelines C(2026) 2151 and the Q&A document (FAQ)).

EU Declaration of Conformity (DoC)

- ✓ Starting from 12 August 2026, each type of packaging placed on the EU market must be accompanied by a formal EU Declaration of Conformity (DoC).
- ✓ The manufacturer is responsible for drafting and issuing the DoC. Importers must ensure compliance by obtaining and verifying these documents for each batch of goods.
- ✓ The DoC must be supported by technical documentation, including design specifications, test results, and recyclability assessments. This documentation must be kept for 5 years (for single-use packaging) and 10 years (for reusable packaging).

Manufacturer and Importer Labelling

- ✓ To ensure traceability and accountability, the PPWR requires clear identification of the relevant economic operators.
- ✓ Packaging must bear the name, registered trade name or trademark, postal address, and electronic contact address of the manufacturer and, where applicable, the importer.

EPR Registration in Each Member State

- ✓ Under Extended Producer Responsibility (EPR), producers must register in each Member State where the packaging is first made available. If the producer does not have an establishment in the Member State where the products are sold, an Authorised Representative (AR) may be required to fulfil their EPR obligations.

Requirements for Reusable Systems

- ✓ Starting from 12 August 2026, any operator placing reusable packaging on the market must ensure that an active system is in place for collection, reprocessing, and redistribution. This includes providing clear instructions to consumers, designated collection points, and established logistics to ensure that packaging genuinely returns to the cycle.

For more details, please refer to the original regulation text, as well as Guidelines C(2026) 2151 and the Q&A document (FAQ).

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