

Factsheet:

Packaging and Packaging Waste Regulation (PPWR)

The goal with PPWR is to harmonize the rules on packaging across Member States in the EU to keep them in line with the Green Deal.

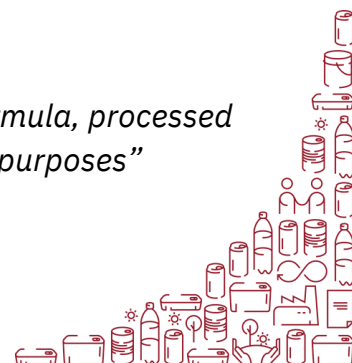
As part of the European Green Deal and the new Circular Economy Action Plan, the European Parliament and the Council adopted the **PPWR (EU) 2025/40** in December 2024. The regulation becomes applicable on the 12th of August 2026. The PPWR is directly applicable into national law. The objective is to ensure that all packaging are reusable or recyclable in an economically viable way by 2030.

The regulation also covers imported packaging and take precedence over regulations on Extended Producer Responsibility.

Highlights from the Regulation include:

- All packaging in the EU should by 1st of January 2030 be recyclable in an economically viable manner
 - The recyclability will be evaluated on an ABC scale
 - By January 2030 all packaging must receive a C score at minimum
 - By January 2038 all packaging must receive a B score at minimum
 - By January 2028 comes the grading methodology
 - From January 2035 all packaging must be recycled at scale
 - Based on methodology coming by January 2030
 - Main exceptions from regulation:
 - *“Contact sensitive packaging for infant formula and follow-on formula, processed cereal-based food and baby food, and food for special medical purposes”*
 - *Packaging used to transport dangerous goods (ADR)*

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Highlights from the Regulation include:

- Mandatory labelling on packaging
- Further regulation on Substances of Concern
- Heavy metal concentration by August 2026
- Food contact PFAS concentrations by August 2026
- Establishing the technical documentation and declaration of conformity lies with the manufacturer and must be accessible to National Authorities for 10 years
- Minimization rules:
 - The **empty space ratio** of single-use packaging cannot, by January 2030, exceed 50%
 - By February 2027, CEN standards will be developed laying down the methodology for the calculation and measurement of compliance with the minimisation requirements.
- Extended Producer Responsibility (EPR) will receive extra rules and deadlines

PPWR's effect on metal packaging

In general, we only expect the mandatory labeling and technical documentation to affect the design of the can, and so far, we have not seen any other effects on the design of metal packaging.

Recyclability grades:

The ABC performance grades will be evaluated using a Design for Recycling (DfR) score.

The grade is calculated for each component in the packaging, and no single component can hinder the recyclability of the main packaging.

By January 2028 the grading methodology will be published, and we expect metal packaging to fall within grade A.

DfR score	Recyclability grade
≥95%	A
≥80%	B
≥70%	C

Extended Producer Responsibility:

The gradings will lie the foundation for the eco-modulation of EPR fees.

By february 2027 packaging included in a EPR scheme may be identified in the Member State where it applies via a **QR code**. Moreover, each Member State must have a system to register for EPR schemes.





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Mandatory labels

From August 2028 packaging placed on the market must have a label containing information about its material composition based on acts implemented by 12th of August 2026. This label will be based on pictograms. As an example, the pictograms from Denmark are used for a decorated metal can and a metal can with a paper label.

Example on how the symbols for labelling could look in the case of metal cans

<p>Decorated metal can</p> 	<p>Metal can w. paper label</p> 
<p>Should only include the metal symbol. It covers both the material composition and how it should be sorted.</p>	<p>Can sorted as metal Label sorted as paper</p> <p>Should include both a metal and a paper symbol to cover the two types of materials, and a small text explaining which part of the packaging must be sorted where.</p>

The label must be visible and firmly integrated in the packaging, while ensuring end users can access the information before the purchase of sale. If the label cannot be placed on the packaging due to the nature or size of the packaging it must be placed on the grouped packaging. The data must be made available in the languages determined by the Member States where the packaging is made available on the market. The labeling requirements and formats will be based on acts to come by 12th of August 2026.

You are **ONLY** allowed to brand environmental claims on the packaging properties if they exceed the minimum requirements, using the same calculation methods, outlined in the PPWR and you must specify for which specific part of the packaging it refers to. For environmental claims outside the purview of PPWR we refer to the Green Claims directive.



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Substances of concern

From 12th of August 2026 the sum of heavy metals including lead, cadmium, mercury and hexavalent chromium present in packaging or packaging components cannot exceed 100mg/kg.

Food contact:

PPWR outlines restrictions on PFAS content in packaging which comes into contact with food. From 12th of August 2026 PFAS concentrations must be below certain thresholds. At Envases we will have eliminated all use of PFAS by 2026.

By January 2030 packaging containing substances of Concern must be marked by standard technologies still to be announced.

Recycling content plastic

By January 2030 and 2040, any plastic part of packaging will have to contain a minimum percentage of recycled content recovered from post-consumer plastic waste.

The targets are set per packaging type and format and will be calculated as an average per manufacturing plant and year. The methodology for the calculation and verification of the targets will be adopted through an implementing act by December 2026 and the economic operators will have to comply with it by January 2029.

Exemptions to Recycled content targets include:

- Packaging used to transport dangerous goods
- Any plastic part representing less than 5% of the total weight of the whole packaging unit.
- Contact sensitive packaging for infant formula and follow-on formula, processed cereal-based food and baby food, and food for special medical purposes

Waste prevention and management

Each Member State must reduce packaging waste in stages toward 2040. Based on 2018 data.

- 5% by 2030
- 10% by 2035
- 15% by 2040

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