

### Overview of the deadlines for

## **EU regulation on packaging** and packaging waste (PPWR)

As part of the Green Deal and the Circular Economy Action Plan, the EU Packaging and Packaging Waste Regulation (PPWR) entered into force on February 11, 2025. It's general date of application in all member states of the European Union will be on August 12, 2026. The regulations aims to minimise the negative environmental impact of packaging and waste while promoting the transition to a circular economy. It sets new standards for the packaging industry and presents companies with challenges but also offers a wide range of opportunities for a more sustainable future.

BellandVision has summarized the most important deadlines for you.





#### **Disclaimer:**

#### Please note:

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The page markers provide you with an overview of which requirements you will face this year and in 2026.



### **TIMELINE:**

Article 5.1, 4 - Substances in packaging	Requirements for substances in packaging	Valid from August 12, 2026
Article 5.5 - Substances in packaging	Food-contact packaging shall not be placed on the market if it contains perfluorinated and polyfluorinated alkyl substances (PFAS) in a concentration equal to or above the specified limit values.	Valid from August 12, 2026
Article 6.2a - Recyclable packaging	The packaging must be designed for material recycling.	Applies from January 1, 2030 or 24 months from the date of entry into force of the delegated act, whichever is the latest.
Article 6.2b - Recyclable packaging	When it becomes waste, the packaging can be collected separately, sorted into specific waste streams without affecting the recyclability of other waste streams, and can be recycled at scale.	Applies from January 1, 2035 or 5 years from the date of entry into force of the implementing act, whichever is the latest.
Article 6.3 - Recyclable packaging	Packaging may only be placed on the market if it is recyclable within the recyclability performance grades A, B or C (Annex II, Table 3).	Applies from January 1, 2030 or 24 months from the date of entry into force of the delegated acts, whichever is the latest.
Article 6.3 - Recyclable packaging	Packaging may only be placed on the market if it can be recycled within the recyclability performance grades A or B (Annex II, Table 3).	Applies from January 1, 2038



manufacturing plant and year.

### **TIMELINE:**

Article 6.8 - Recyclable packaging	Modulation of financial contributions	Within 18 months from the date of entry into force of the delegated acts pursuant to paragraph 4. (The European Commission shall adopt the delegated act by January 1, 2028)
Article 6.10 - Recyclable packaging	Innovative packaging that does not comply with the requirements for recycling may be made available on the market up to 5 years from the end of the calendar year in which it was placed on the market.	Applies from January 1, 2030
Article 7.1 - Minimum recycled content in plastic packaging	Any plastic parts of packaging that are placed on the market shall contain a minimum percentage of recycled content recovered from post-consumer plastic waste, calculated as an average value per manufacturing plant and year per packaging type and format.	Applies from January 1, 2030, or 3 years from the date of entry into force of the implementing act, whichever is the latest.
Article 7.2 -	Any plastic parts of packaging placed on the market shall contain a minimum percentage of recycled content from post-consumer plastic waste (increase in the quotas	Applies from January 1, 2040

Article 7.11 in plastic packaging

Minimum recycled content

in plastic packaging

The calculation and verification of the percentage of recycled content of packaging un-Minimum recycled content der paragraph 1 shall comply with the rules laid down in the implementing act adopted pursuant to paragraph 8.

from Article 7.1), per packaging type and format, calculated as an average value per

Applies from January 1, 2029, or 24 months from the date of entry into force of the implementing act, whichever is the latest.

Applies from January 1, 2040



## **TIMELINE:**

Article 9.1- Compostable packaging	The packaging referred to in Article 3.1(f) (permeable tea, coffee or other beverage bags or soft after-use system single-serve units that contains tea, coffee or another beverages etc.) and sticky labels affixed to fruit and vegetables shall be compatible with the standard for composting in industrially controlled conditions in bio-waste treatment facilities and with the standards for home composting (where required by Member States).	By February 12, 2028
Article 9.3 - Compostable packaging	Packaging other than referred to in paragraphs 1 and 2, including packaging made of biodegradable plastic polymers and other biodegradable materials, shall be designed for recycling in accordance with Article 6 without affecting the recyclability of other waste streams.	By February 12, 2028
Article 10.1 - Packaging minimisation	Manufacturers or importers shall ensure that the packaging placed on the market is designed so that its weight and volume is reduced to the minimum necessary to ensure its functionality, considering the shape and material from which the packaging is made.	By January 1, 2030
Article 11.1 - Reusable packaging	Packaging placed on the market shall be considered to be reusable when fulfilling all the requirements of Article 11(1).	Valid from February 11, 2025
Article 12.1 - Labelling of packaging	Packaging placed on the market shall be marked with a harmonised label containing information on its material composition to facilitate consumer sorting. Except for e-commerce packaging, this obligation does not apply to transport packaging or to packaging that is subject to a deposit and return system.	Applies from August 12, 2028, or 24 months from the date of entry into force of the implementing act, whichever is the latest.



### **TIMELINE:**

Article 12.1 -
Labelling of packaging

For the packaging referred to in Article 9(1) and, where applicable, in Article 9(2), the labelling shall indicate that the material is compostable, that is not suitable for home composting and that compostable packaging is not to be discarded in nature.

Applies from August 12, 2028, or 24 months from the date of entry into force of the implementing act, whichever is the latest.

#### Article 12.1 -Labelling of packaging

Packaging subject to a deposit and return system as referred to in Article 50(1) shall be marked with a clear and unambiguous label.

Applies from August 12, 2028, or 24 months from the date of entry into force of the implementing act, whichever is the latest.

#### Article 12.1 -Labelling of packaging

Packaging placed on the market that contains substances of concern shall be marked by using standardised, open, digital-marking technologies.

Applies from August 12, 2028, or 24 months from the date of entry into force of the implementing act, whichever is the latest.

#### Article 12.2 -Labelling of packaging

Reusable packaging placed on the market shall bear a label informing the users that the packaging is reusable. Further information on reusability, including the availability of a local, national or EU-wide re-use system and information on collection points, shall be made available through a QR code or another type of standardised, open, digital data carrier.

Applies from February 12, 2029, or 30 months from the date of entry into force of the implementing act, whichever is the latest.

#### Article 12.4 -Labelling of packaging

Where packaging to which Article 7 applies is placed on the market and marked with a label containing information on the share of recycled content, that label and, where applicable, the QR code or other type of standardised, open, digital data carrier shall comply with the specifications laid down in the relevant implementing act adopted pursuant to Article 12(6) and shall be based on the methodology for calculating and verifying the percentage of recycled content established in accordance with Article 7(8).

Applies from August 12, 2028, or 24 months from the date of entry into force of the implementing act, whichever is the latest.



#### TIMELINE:

Article 12.7 -Labelling of packaging Packaging placed on the market containing substances of concern shall be labelled using standardised, open, digital-marking technologies. The marking shall include at least the name and concentration of the substance of concern contained in each material in a packaging unit.

Applies by January 1, 2030

Articles 15.1, 15.2 und 15.3 -Obligations of manufacturers

Before placing packaging on the market, manufacturers shall carry out the conformity assessment procedure referred to in Article 38 or have it carried out on their behalf and shall draw up the technical documentation referred to in Annex VII.

Manufacturers shall only place packaging on the market which fulfils the requirements

laid down in or in pursuant to Articles 5 to 12.

Valid from August 12, 2026

Manufacturers shall keep the technical documentation referred to in Annex VII and the EU declaration of conformity in the case of single-use packaging for five years from the date of placing the packaging on the market and in the case of reusable packaging for ten years from the date of placing the packaging on the market.

Article 16 -Information obligations of suppliers of packaging or packaging materials Suppliers shall provide the manufacturer with all the information and documentation necessary for the manufacturer to demonstrate the conformity of the packaging and packaging materials with this Regulation, including the technical documentation referred to in Annex VII and required under or pursuant to Articles 5 to 11, in one or more languages which can be easily understood by the manufacturer. This information and documentation shall be provided either on paper or in electronic form.

Valid from August 12, 2026

Where appropriate, the information and documentation required under the Union legal acts applicable to contact-sensitive packaging shall be part of the information and documentation to be provided to the manufacturer in accordance with Article 16(1).

Status: 23.07.2025 5



## **TIMELINE:**

Article 19.2 - Obligations of distributors	<ul> <li>Before making packaging available on the market, distributors shall verify that</li> <li>the producer subject to the EPR obligations for the packaging is registered in the register of producers referred to in Article 44;</li> <li>the packaging is labelled in accordance with Article 12; and</li> <li>the manufacturer and the importer have complied with the requirements set out in Article 15(5) and (6) and Article 18(3), respectively.</li> </ul>	Valid from August 12, 2026
Articles 18.7, 21 & 22.2	Other information obligations and submission obligations of economic operators	Valid from August 12, 2026
Article 24.1 - Obligations related to excessive packaging	Economic operators who fill grouped packaging, transport packaging or e-commerce packaging shall ensure that the maximum empty space ratio is 50%.	Applies by January 1, 2030, or 3 years from entry into force of the implementing act, whichever is the latest
Article 24.4 - Obligations related to excessive packaging	Economic operators filling sales packaging shall ensure that the empty space is reduced to the minimum necessary for ensuring the packaging functionality including product protection.	Valid by February 12, 2028
Article 25.1 - Restrictions on the use of certain packaging formats	Economic operators shall not place packaging in the formats and for the uses listed in Annex V on the market.	Applies from January 2030

Status: 23.07.2025 6



### TIMELINE:

Article 26.1 -
Obligations in relation to
reusable packaging

Economic operators making reusable packaging available for the first time on the territory of a Member State shall ensure that a system is in place for the re-use of that packaging in that Member State, which includes an incentive to ensure the collection of that packaging and which meets the requirements laid down in Annex VI.

Valid from August 12, 2026

Article 27.1 -Obligation related to reuse systems

Economic operators making use of reusable packaging shall participate in one or more re-use systems and shall ensure that the re-use systems within which the reusable packaging can be re-used comply with the requirements laid down in Annex VI, Part A.

Valid from August 12, 2026

Article 27.2 -Obligations related to reuse systems

Economic operators using reusable packaging shall ensure that such packaging is reconditioned in accordance with Part B of Annex VI before offering it again for reuse to the final user.

Valid from August 12, 2026

Article 27.4 -Obligation related to reuse systems

Economic operators that make use of reusable packaging in closed loop systems in accordance with the requirements of Annex VI shall be required to return the packaging to one or more of the collection points identified by the system participants and approved by the system operator.

Valid from August 12, 2026

Article 28.1 -

Economic operators who offer the possibility to purchase products through refill shall Obligations related to refill inform end-users of the "rules of refill" referred to in Article 28(1).

Valid from August 12, 2026

Article 28 2 -Obligations related to refill

Economic operators who offer the possibility to purchase products through refill shall ensure that refill stations comply with the requirements laid down in Part C of Annex VI and any requirements laid down in other Union legal acts for the sale of products by refill.

Valid from August 12, 2026



#### TIMELINE:

Article 28.3 -Obligations related to refill

Economic operators who offer the possibility to purchase products through refill shall ensure that if packaging or containers are offered to end users at refill stations, that packaging and those containers are not provided free of charge, if they do not meet the requirements laid down in Annex VI or provided as part of a deposit and return system.

Valid from August 12, 2026

Article 28.5 -

Final distributors with a sales area of more than 400 m<sup>2</sup> shall endeayour to dedicate Obligations related to refill 10% of this sales area for refill stations - for both food and non-food products.

Valid from January 1, 2030

Article 29.1 -Re-use targets

Economic operators that use transport packaging or sales packaging used for the transport of products, including for products distributed via e-commerce, within the territory of the Union, in the form of pallets, foldable-plastic boxes, boxes, trays, plastic crates, intermediate bulk containers, pails, drums and canisters of any size or material, including flexible formats or pallet wrappings or straps for stabilisation and protection of products put on pallets during transport, shall ensure that at least 40% of such packaging used in total is reusable packaging within a re-use system.

Valid from January 1, 2030

Article 29.1 -Re-use targets Those economic operators shall endeavour to use at least 70% of the packaging referred to in the first subparagraph in a reusable format within a re-use system.

Valid from January 1, 2040



### **TIMELINE:**

Article 29.2 - Re-use targets	By way of derogation from paragraph 1 of this Article, economic operators that use transport packaging or sales packaging used for transporting products in the forms as listed in paragraph 1 of this Article within the territory of the Union, between different sites on which the operator performs its activity, or between any of the sites on which the operator performs its activity and the sites of other linked enterprises or partner enterprises, as defined in Article 3 of the Annex to Recommendation 2003/361/EC, as applicable on February 11, 2025, shall ensure that such packaging is reusable within a re-use system.	Valid from January 1, 2030
Article 29.3 - Re-use targets	By way of derogation from paragraph 1, economic operators that use transport packaging or sales packaging used for transporting products, including for products distributed via e-commerce, in the forms as listed in paragraph 1, to deliver products to another economic operator within the same Member State shall ensure that such packaging is reusable within a re-use system.	Valid from January 1, 2030
Article 29.5 - Re-use targets	Economic operators that use grouped packaging in the form of boxes, excluding card-board, outside of sales packaging to group a certain number of products to create a stock-keeping or distribution unit shall ensure that at least 10% of such packaging is reusable packaging within a re-use system.	Valid from January 1, 2030
Article 29.5 - Re-use targets	Economic operators shall endeavour to use at least 25% of the packaging referred to in the first subparagraph in a reusable format within a re-use system.	Valid from January 1, 2040



### TIMELINE:

Article 29.6 -Re-use targets Final distributors that make alcoholic and non-alcoholic beverages in sales packaging available on the territory of a Member State to consumers shall ensure that at least 10% of those products are made available in reusable packaging within a re-use system.

Valid from January 1, 2030

Article 29.6 -Re-use targets Economic operators shall endeavour to make at least 40% of the products referred to in the first subparagraph available in reusable packaging within a re-use system.

Valid from January 1, 2040

Article 29.9 -Re-use targets The final distributors as referred to in paragraph 6 shall take back, free of charge, all reusable packaging of the same type, form and size as the packaging made available on the market by them, within this specific re-use system at the point of sale, ensuring the recovery and return of such packaging throughout the entire distribution chain. Final distributors shall ensure that end users are able to return the packaging at the location where the actual handover of such packaging takes place or in close proximity thereto. The final distributor shall fully redeem associated deposits or notify the return of the packaging according to the governance rules of the specific re-use system in order that any associated deposit be redeemed, as the case may be.

Valid from August 12, 2026

Articles 30.1, 30.2, 30.4 – Rules on the calculation of the achievement of the re-use targets

Regulations for economic operators on the calculation of the achievement of re-use targets

Valid from January 1, 2030, or 18 months from the date of entry into force of the implementing act, whichever is later.



#### TIMELINE:

Article 31.2 -Reporting to the competent authorities on re-use targets

Regulations for economic operators on reporting on re-use targets to the competent authorities

Within 6 months after the end of the reporting year. The first reporting year is 2030.

Article 32.1a/b, 2 – Refill obligation for the takeaway sector Final distributors that conduct their business activity in the HORECA (hotels, restaurants, catering) sector and that make available hot or cold beverages in take-away packaging on the territory of a Member State shall provide a system for consumers to bring their own container to be filled;

Final distributors that conduct their business activity in the HORECA (hotels, restaurants, catering) sector and that make available ready-prepared food in take-away packaging on the territory of a Member State shall provide a system for consumers to bring their own container to be filled.

Where consumers bring their own container to be filled, final distributors as referred to in paragraph 1 shall offer them the products at no higher cost and under no less favourable conditions than when selling the sales unit consisting of the same product and single-use packaging.

Final distributors shall inform consumers at the point of sale, through clearly visible and legible information boards or signs, about the possibility of obtaining the products in a refillable container provided by the consumer.

By February 12, 2027



### TIMELINE:

Article 33.1,2,3 – Re-use offer obligation for the take-away sector Final distributors that conduct their business activity in the HORECA (hotels, restaurants, catering) and that make available hot or cold beverages or ready-prepared food in take-away packaging on the territory of a Member State shall offer consumers the option of obtaining the products in re-usable packaging within a re-use system.

Final distributors shall inform consumers at the point of sale, through clearly visible and legible information boards or signs, about the possibility of obtaining the products in reusable packaging.

Final distributors shall offer the products filled in the reusable packaging at no higher cost and under less favourable conditions than a sales unit consisting of the same product and single use packaging.

By February 12, 2028

Article 33.5 -Re-use offer obligation for the take-away sector

Final distributors shall endeavour to offer 10% of products for sale in a reusable packaging format.

Valid from 2030

Article 44.2 -Register of producers Producers (or producer responsibility organisation entrusted by them) shall be obliged to register in the register of producers by submitting an application for registration to the competent authority of each Member State, in which they make packaging or packaged products available for the first time or where they unpack packaged products without being the end users.

Applies at the earliest by December 1, 2026, August 12, 2026 or at the latest by August 12, 2027, depending on the entry into force of the implementing act pursuant to Article 44(14) / before the packaging is placed on the market.



### **TIMELINE:**

Article 44.7 -Register of producers The Producer (or their authorised representative for the extended producer responsibility or the producer responsibility organisation) shall submit the information referred to in Annex IX, Part B, point 1 for each full preceding calendar year to the competent authority responsible for the register.

Submitting the information no earlier than by June 1, 2027, for the full preceding calendar year 2026, and then annually by June 1, or at the latest by June 1, 2028, for the full preceding calendar year 2027, and then annually by June 1, depending on the entry into force of the implementing act pursuant to Article 44(14).

Article 44.8 -Register of producers Where a producer has made available for the first time on the territory of the Member State a quantity of packaging, including packaging of packaged products, of less than 10 tonnes during one calendar year, or where a producer as defined in Article 3(1), point (15)(e), unpacks a quantity of packaging of less than 10 tonnes during one calendar year, the producer or, where applicable, the producer's authorised representative for the extended producer responsibility or the producer responsibility organisation, as stipulated by national law in accordance with paragraphs 2 and 3 of this Article, shall submit the information set out in point 2 of Part B of Annex IX to the competent authority responsible for the register, by 1 June for each full preceding calendar year.

Submitting the information no earlier than by June 1, 2027, for the full preceding calendar year 2026, and then annually by June 1, or at the latest by June 1, 2028, for the full preceding calendar year 2027, and then annually by June 1, depending on the entry into force of the implementing act pursuant to Article 44(14).

Article 44.10 -Register of producers Producers, in the case of individual fulfilment of extended producer responsibility obligations, the producers responsibility organisation entrusted with carrying out those obligations, in the case of collective fulfilment of extended producer responsibility obligations, or the re-use system operators, in the case where re-use systems are fulfilling the extended producer responsibility obligations, shall submit the information set out in point 3 of Part B of Annex IX to the competent authority for each preceding calendar year on an annual basis.

Where national law public authorities are responsible for the organisation of the management of packaging waste, Member States may provide that those authorities shall submit the information set out in point 3 of Part B of Annex IX.

Submitting the information no earlier than by December 1, 2026, for the preceding calendar year 2025 and then on an annual basis, or at the latest by August 12, 2027, for the preceding calendar year 2026 and then on an annual basis, depending on the entry into force of the implementing act pursuant to Article 44(14).

Status: 23.07.2025 13



### TIMELINE:

Article 45.1 -Extended producer responsibility Under the schemes established in accordance with Articles 8 and 8a of Directive 2008/98/EC and with this section, producers shall have extended producer responsibility for packaging, including packaging of packaged products, which they make available for the first time on the territory of a Member State or which they unpack without being the end users.

Valid from August 12, 2026

Article 45.3 -Extended producer responsibility A producer referred to in Article 3(1), point (15)(c) and (d), shall appoint, by written mandate, an authorised representative for the extended producer responsibility in each Member State in which the producer makes packaging or packaged products available for the first time, other than the Member State where the producer is established. Member States may provide that producer established in third countries shall appoint, by written mandate, an authorised representative for the extended producer responsibility when making packaging or packaged products available on the market in their territory for the first time.

Valid from August 12, 2026

Articles 45.4 & 45.6 -Extended producer responsibility Providers of Online platforms that allow consumers to conclude distance contracts with producers shall obtain information on the registration and self-certification of compliance with extended producer responsibility requirements from producers that offer packaging or packaged products to consumers located in the Union. Providers of Online platforms shall make best effort to assess whether the information received is complete and reliable.

Valid from August 12, 2026

Article 46 -Producer responsibility organisation

Obligations for producer responsibility organisations

Valid from August 12, 2026



### TIMELINE:

Article 47.1 – Authorisation on fulfilment of extended producer responsibility In the case of individual fulfilment of extended producer responsibility, the producer, or in the case of collective fulfilment of extended producer responsibility obligations, the producer responsibility organisation entrusted with carrying out those obligations, shall apply for an authorisation on fulfilment of extended producer responsibility from the competent authority.

Valid from August 12, 2026

Article 55.1 -Information on prevention and management of packaging waste Producers, producer responsibility organisations or public authorities appointed by Member States shall make available to end users, in particular consumers, the information referred to in this Article regarding the prevention and management of packaging waste in relation to packaging supplied by producers on the territory of a Member State.

From August 12, 2026

55.1(d): Information on the meaning of labels and symbols in accordance with Article 12 from August 12, 2028, or from the date of application of the relevant provision of Article 12, whichever is the latest



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