



A briefing on the EU's newly launched PPWR

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Introduction

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Our Company - Valpak

The UK's first and largest Producer Responsibility Scheme



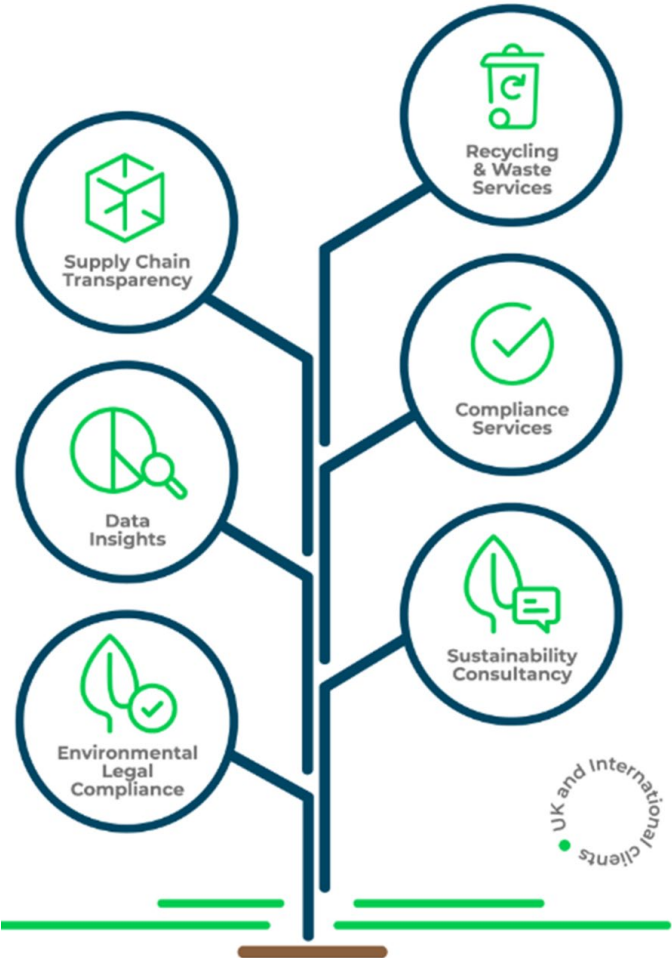
100% UK compliance record, over 25 years of experience, 200 employees



International knowledge worldwide, compliance network in over 190 countries



Standards of Excellence



Valpak's International Team

A specialised team of international experts



Part of Reconomy group,
collaborating with our sister
companies, RLG and
Noventiz



Account managers, data
consultants, researchers,
country experts and more



Team of over 40
members who submit
over 4,000 declarations
annually



Work with over 150
schemes to span over 270
countries and territories

Agenda

1. Legislative background
2. Roles & Responsibilities under the PPWR
3. Key Articles

Legislative Background



Legislative context

**Waste Framework Directive
2008/98/EC**

~~Packaging and Packaging waste
directive 94/62/EC~~

**Packaging and Packaging waste
Regulation 2025/40**

The Packaging and Packaging Waste Regulation came into force **11 February 2025**.

This becomes **applicable 12 August 2026**, repealing the Packaging and Packaging Waste Directive.

The PPWR is a **regulation**, legally binding Member States to adopt its requirements.

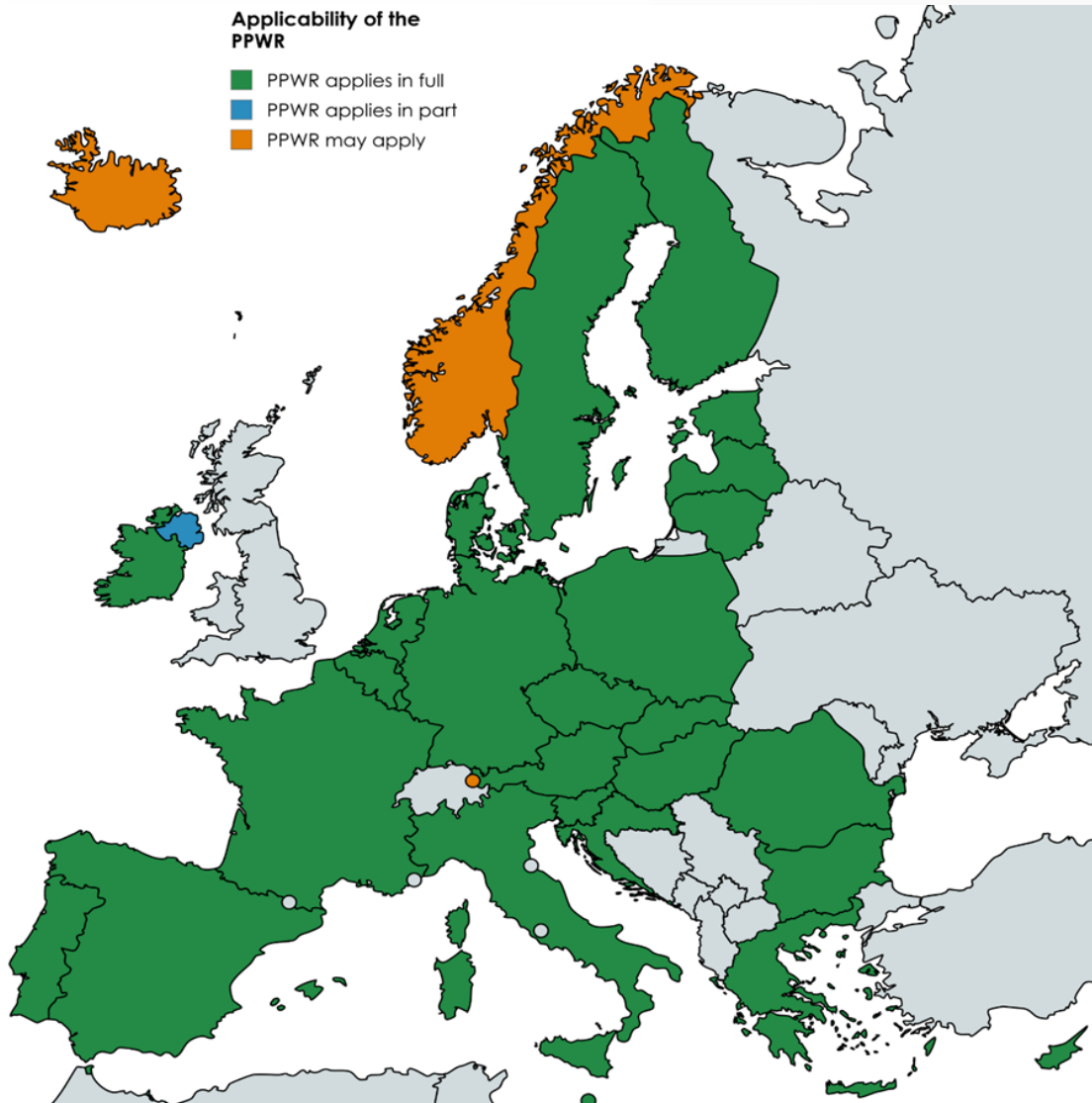
What is the Packaging and Packaging Waste Regulation?

The regulation applies to **all packaging and packaging waste** regardless of the packaging material.

- To facilitate the **harmonisation** of requirements across Member States.
- Reduce packaging waste.
- Increase consumer information.
- It also seeks to improve **extended producer responsibility** through increasing its efficacy and equity of application.



Applicability of the PPWR:



The PPWR applies in full in **all EU Member States**

Applies in part in **Northern Ireland**

Applies with expectation of alignment in EEA:

- **Norway**
- **Lichtenstein**
- **Iceland**

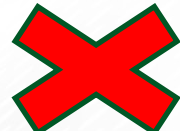
Switzerland is expected to align.

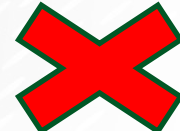
Extended Producer Responsibility under PPWR

Producers must comply with EPR requirements individually or collectively by registering with a compliance scheme. This applies to all packaging placed on the market.

EPR compliance fees collected cover:

- Collection and sorting
- Treatment
- Recycling
- Transport
- Labelling waste receptacles
- Carrying out compositional surveys

Thresholds 

B2B vs B2C 

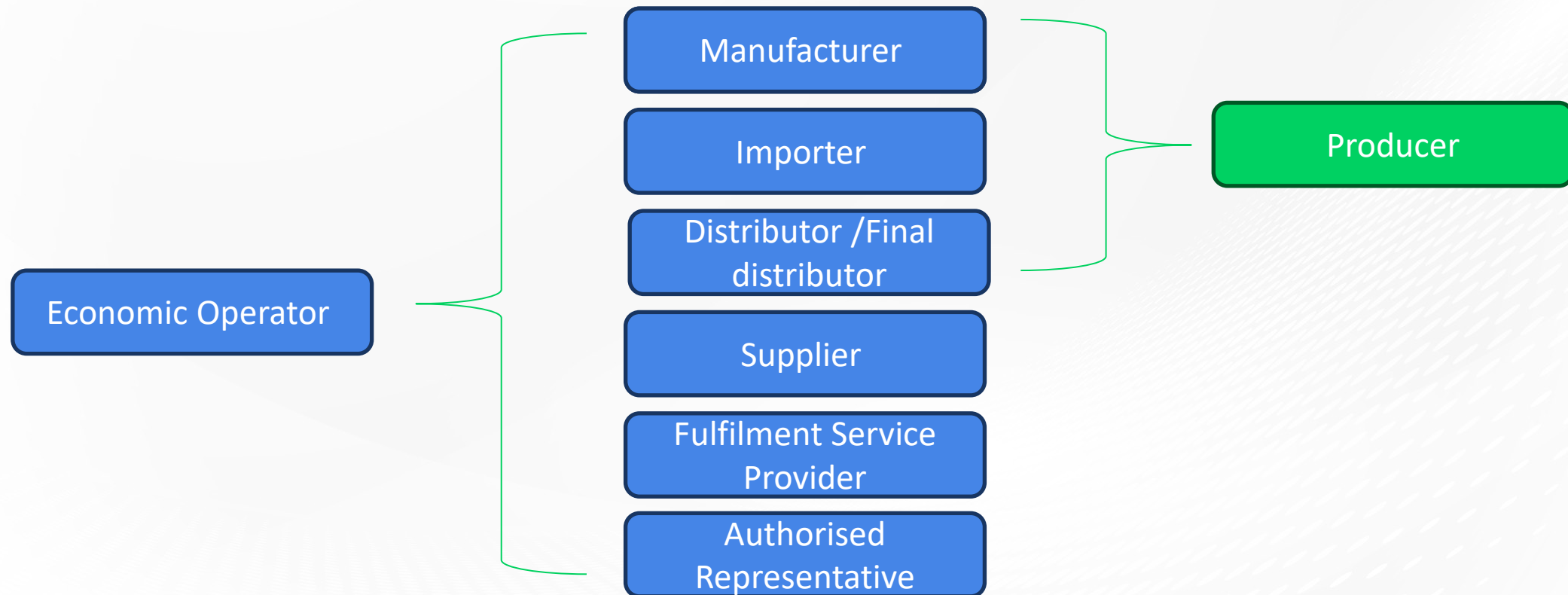
Expected changes:

- Shift in understanding of who the obligated producer is
 - Harmonisation of reporting & Eco-modulation
 - Removal of minimum reporting thresholds
- Introduction of AR requirement in all member states

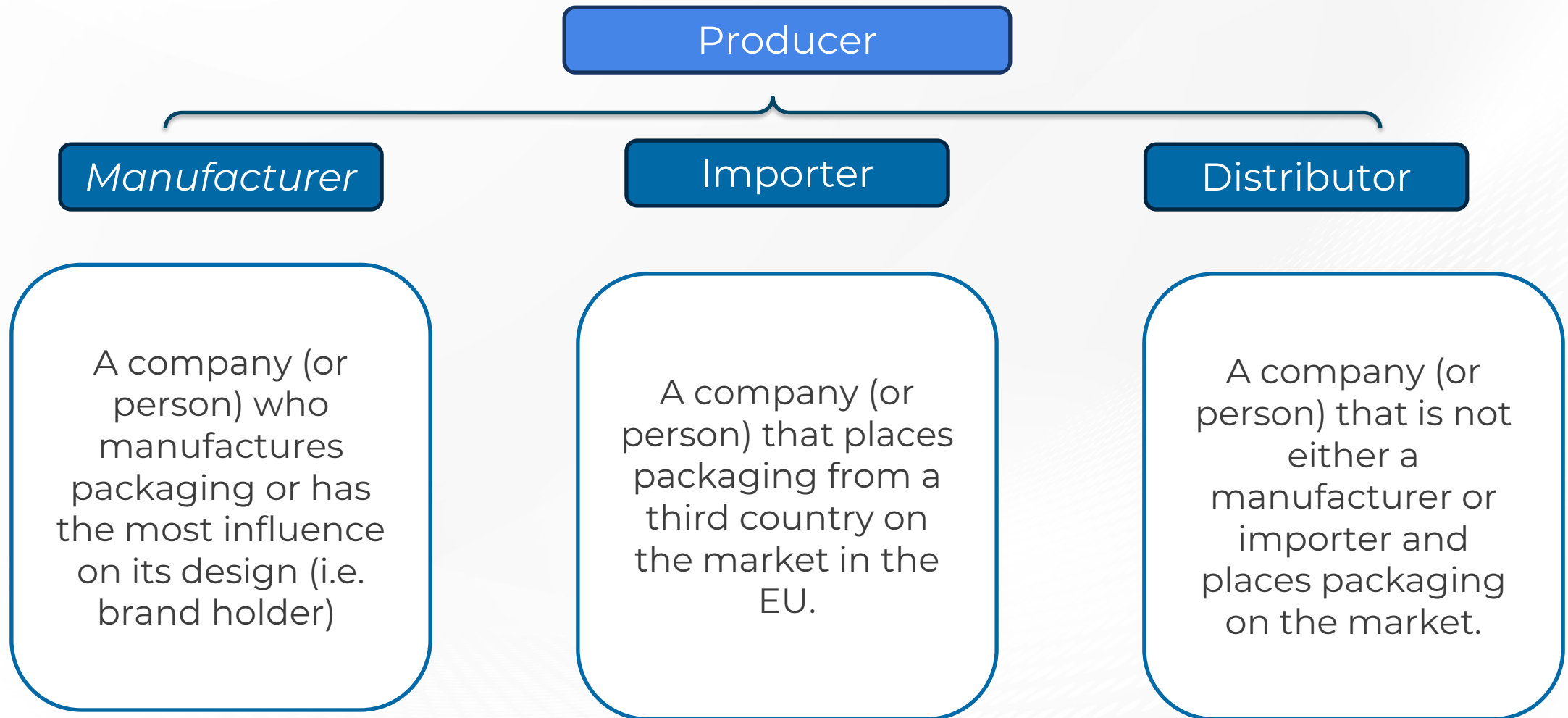
Roles & Responsibilities under the PPWR

Roles - Who does the PPWR affect?

(12) ‘economic operator’ means the manufacturer, the supplier, the importer, the distributor, the authorised representative, the final distributor and the fulfilment service provider;



Producer – Definition



Manufacturer – Definition

- (13) ‘manufacturer’ means any natural or legal person that manufactures packaging or a packaged product; however:
- (a) subject to point (b), where a natural or legal person has packaging or a packaged product designed or manufactured under its own name or trademark, regardless of whether any other trademark is visible on the packaging or on the packaged product, ‘manufacturer’ means that natural or legal person;
 - (b) where the natural or legal person that has the packaging or packaged product designed or manufactured under its own name or trademark falls within the definition of micro-enterprise set out in Recommendation 2003/361/EC as applicable on 11 February 2025, and the natural or legal person that supplies the packaging to the natural or legal person that has the packaging designed or manufactured under its own name or trademark is located in the same Member State, ‘manufacturer’ means the natural or legal person that supplies the packaging;

Exemption: a business or person will not be considered the manufacturer if they are a micro-enterprise (an entity with fewer than 10 employees and an annual turnover below €2 million).

- In summary, a manufacturer is “the business or person that manufactures or has packaging or a packaged product manufactured to their own specific design.”
- Manufacturers are responsible for ensuring the packaging introduced on the EU and Northern Ireland market is compliant with PPWR's requirements
- Manufacturers are the economic operator responsible for packaging compliance.

Manufacturer responsibilities

Manufacturers can only place packaging on the market if it compliant with the requirements in Articles 5-12:

- Requirements for Substances (article 5)
- Recyclability (Article 6)
- Minimum Recycled content (Article 7)
- *N/A Bio-based feedstock (Article 8)*
- Compostable packaging (Article 9)
- Packaging minimisation (Article 10)
- Reusable packaging (Article 11)
- Labelling of packaging (Article 12)

Manufacturers must **provide evidence to demonstrate** their packaging is compliant with the **Sustainability Requirements** by conducting the **conformity assessment procedure.**

Note: Each requirement becomes in applicable in different stages, meaning this evidencing has a staggered implementation

Manufacturers - Responsibilities



Manufacturers must complete the [Conformity Assessment Procedure](#) and draw up the [EU Declaration of Conformity](#) for **EACH** packaging unit

Manufacturers shall indicate their name, means of contact, and postal address by physical means or through a digital carrier (i.e. QR code) on the packaging unit, plus the unique identification number.

This requirement is applicable from the **12th August 2026**.

All packaging placed on the **EU and Northern Ireland** market must have completed the conformity assessment procedure and have an EU Declaration of Conformity.

Packaging Unit – key points

"A complete packaging item, including all its attached or separate parts, that together performs a packaging job, like containing, protecting, handling, delivering, storing, transporting, or presenting products. This includes independent units of grouped or transport packaging where they are discarded prior to the point of sale"

A packaging unit is not necessarily equivalent to a SKU. It should be understood as unique packaging format.

- The Conformity Assessment Procedure is carried out per packaging unit.
- One Declaration of Conformity is **required** per packaging unit.



Packaging Levels and Units

Sales Packaging



Grouped Packaging



Transport Packaging



Each Level = One Unit of Packaging

Packaging Levels – Sales & Grouped

	New Packaging Levels
<i>Primary packaging</i>	Sales Packaging - This packaging type is designed to create a complete sales unit (product plus packaging) that gets sold directly to the end user at the point of sale
<i>Secondary Packaging</i>	Grouped – designed to hold multiple individual products together as a group at the store, regardless of whether customers buy the whole group or whether it is used to help with restocking shelves or managing inventory



Multipack Vs Distribution unit



Packaging Levels - Transport

	New Packaging Levels
<i>Tertiary packaging</i>	Transport – designed to make it easier to handle and move ones or more individual sale items (or groups of sale items) while protecting them from damage during handling and transportation.



12 August -What became applicable?

PPWR becomes fully applicable across the EU



The PPWD is officially repealed and replaced by the PPWR

New Producer and Manufacturer definitions and obligations apply (all other definitions take effect, unless otherwise stated)

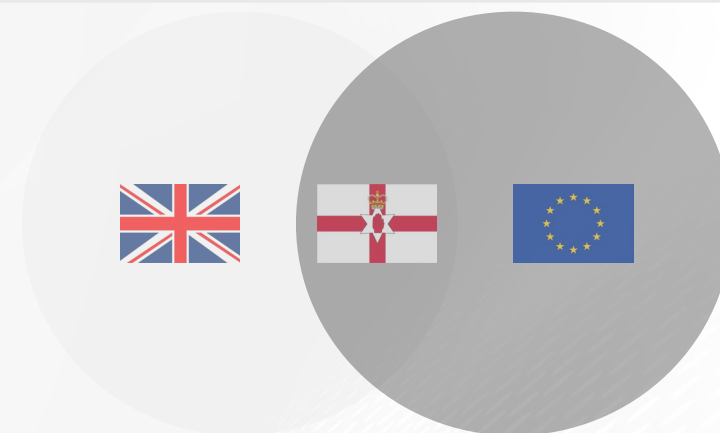


Responsibilities of a manufacturer apply (Conformity Assessment Procedure and Declaration of Conformity). Also applicable in NI

Article 5: Restrictions on PFAS in food-contact packaging and heavy metal for all packaging

Why is this important for UK businesses?

UK exporters must comply with PPWR requirements when selling any packaged goods to the EU, including Northern Ireland.



What PPWR requirements apply in Northern Ireland?

Notable articles applicable in NI	Not Applicable in NI
Art. 6 – Recyclability of Packaging	Art. 29-33 – Reuse & Refill Targets
Art. 12 – Labelling	Art. 45-50 – EPR & DRS Obligations
Art. 25 – Restrictions on Certain Packaging Formats	Art. 52 – Recycling Targets

Table is not exhaustive



Northern Ireland's EPR regime will remain firmly rooted within the UKs. However, many of the requirements that go beyond EPR, namely packaging recyclability, labelling, recycled content requirements, and more will still apply in the nation.

Exemptions for Alcohol and Beverages

Re-use Targets for Beverages in the HORECA Sector

Article 29(6), PPWR

From **1 January 2030**, final distributors making alcoholic and non-alcoholic beverages available to consumers in sales packaging **must ensure that at least 10%** of those beverages are provided in reusable packaging within an approved re-use system.

Scope of the Obligation

- **all beverages** (alcoholic and non-alcoholic) made available in sales packaging within a Member State.
- **final distributors** (e.g., bars, restaurants, cafés, hotels, catering establishments).

Re-use systems must comply with PPWR requirements for traceability, hygiene, and return logistics.

Exemptions for Alcohol and Beverages

Spirituous beverages (CN heading 2208)

The 10% re-use target **does not apply** to:

Alcohol-based **spirituos beverages** corresponding to **CN heading 2208**.

This exemption covers products such as:

- Whisky
- Vodka
- Rum
- Gin
- Liqueurs and other spirit-based beverages
- Aromatised wine(Regulation (EU) No 251/2014)
- products that are similar to wine products and aromatised wine products and that are obtained from fruit other than grapes and vegetables, and other fermented beverages falling within (CN Codes 2206)

Exemptions for Spirits

Packaging Minimisation

Article 10, PPWR

Exceptions

Certain packaging formats are exempt from the packaging minimisation requirements of Article 10, including;

Packaged products that benefit from a protected geographical indication or quality scheme under EU law (e.g., wine, spirits, craft products).

Exemptions for Wines

DRS

Article 50, PPWR

Exceptions

- categories of grapevine products, aromatised wine products as defined in Regulation (EU) No 251/2014;
- products that are similar to wine products and aromatised wine products and that are obtained from fruit other than grapes and from vegetables, and other fermented beverages falling within CN code 2206 00;
- alcohol-based spirituous beverages corresponding to CN heading 2208

Key Articles



Requirements for Substances (Article 5)

- From **12 August 2026**, packaging placed on the market shall be manufactured so that substances of concern are minimised.
- The sum of the concentrations of:
 - Lead
 - Cadmium
 - Mercury
 - Hexavalent chromium

Shall not exceed **100 mg/kg**.



This requirement will need to be included in the Conformity Assessment Procedure from 12th August 2026

Compliance - Conformity Assessment Procedure

Manufacturers can only place packaging on the market if it compliant with the requirements in Articles 5-12.

This is a mandatory requirement for each packaging unit.

1. Draw up technical documentation for the packaging unit.

- Qualitative write up
- Laboratory test results
- Technical drawings

2. Draw up a [Declaration of Conformity](#) for each packaging unit manufactured.

EU Declaration of Conformity

DoC forms part of the conformity assessment procedure must contain the following and must be continually updated:

1. A **Unique identifier** of the packaging (e.g. No.X)
2. **Name** and **address** of the manufacturer (or AR where applicable)
3. **The Statement** “This declaration of conformity is issued under the sole responsibility of the manufacturer.”
4. Object of the **declaration/description** of the packaging (i.e. identification of the packaging)
5. **The statement** “The object of the declaration referred to point 4 is in conformity with the relevant Union harmonisation legislation” (currently only referencing the PPWR but may need reference national legislation)
6. References to the relevant **harmonised standards** or the **common specifications** used or references to the other technical specifications in relation to which conformity is declared:
7. *(If applicable)* the **notified body** ... (name, address, number) ... performed ... (description of intervention) ... and issued the certificate(s): ... (details, including the date of the certificate(s), and, where appropriate, information on the duration and conditions of validity.
8. *(Additional information)* Signed for and on behalf of: (place and date of issue): (name, function) (signature):

By drawing up the EU declaration of conformity, the manufacturer assumes responsibility for the compliance of the packaging.

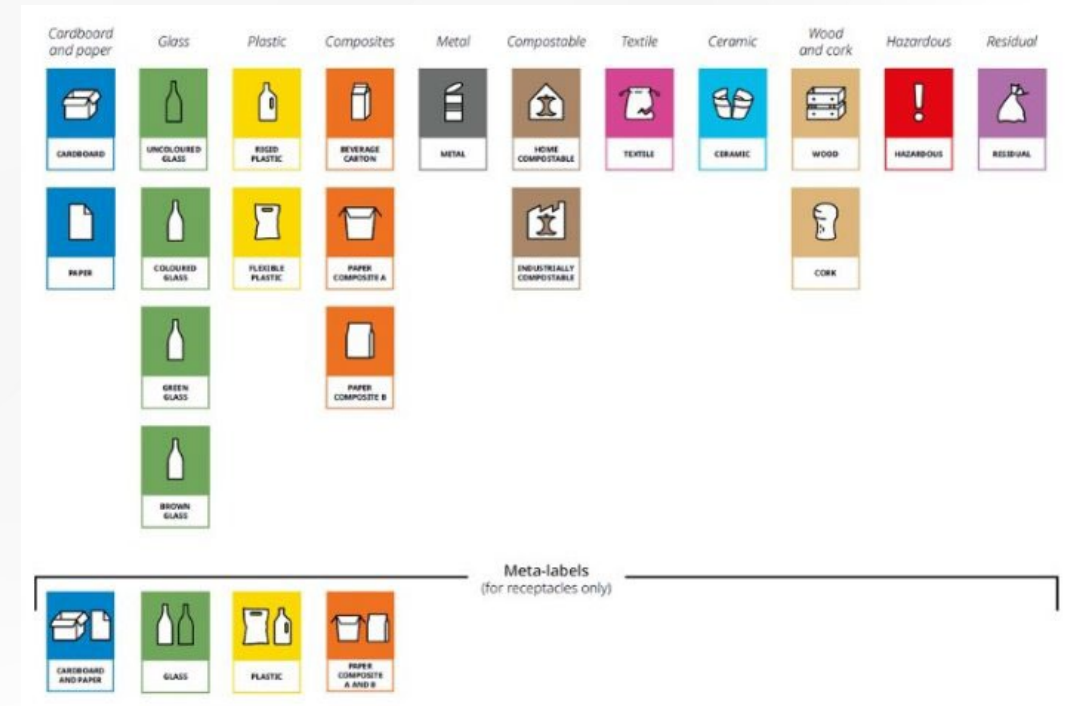
Technical Documentation:

- This requires a **risk assessment** of non-conformity & with no harmonised standards or common specifications, there can be no presumption of conformity.
- **Test reports** are the clearest way to guarantee auditable compliance documentation for Article 5 (2026)
- A risk-based approach can be taken where packaging that is identified as low risk may not require test reports but all evidence must be defensible and auditable within the technical documentation.

The **EC** has published a recommended testing approach in their latest guidance document; however this is not a formal methodology. Further formal guidance is expected Q3/4 2026.

Labelling Update

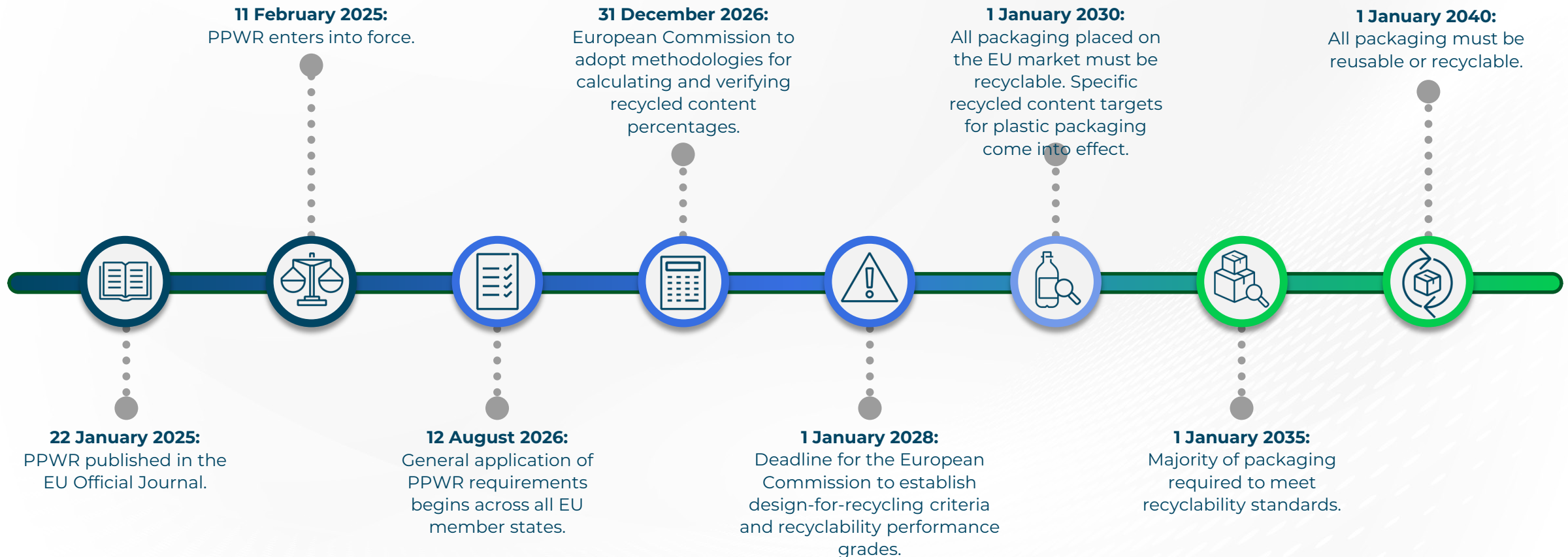
- The release for the specifications of the **EU Waste Sorting Label** has now been pushed back by the European Commission to **Q4 2026**.
- **Reusable packaging, DRS recycled and biobased content** is also expected to be released in Q4 2026.
- Two years after the implementing act on labelling is published, all packaging placed on the EU and NI markets must comply with the new labelling requirements. Packaging placed on these markets without the harmonised labels, before the 2028 deadline, will be subject to a sell-through period of up to three years.



Mock up labels from the JRC

PPWR – Implementation Timeline

Below is a timeline highlighting key milestones and compliance deadlines:



Companies that do not comply with the requirements of the PPWR cannot place their products and packaging on the EU and Northern Ireland market.

Thank you for your time

Any questions?

Please contact to see how Valpak
can assist you with PPWR
requirements

ppwr@valpak.co.uk