



PPWR Compliance: Key EU Packaging Rules from 12 August 2026

From 12 August 2026, **PPWR compliance** becomes a critical requirement for businesses placing packaging on the EU market. The Packaging and Packaging Waste Regulation (PPWR) introduces new obligations affecting packaging design, material selection, technical documentation, regulatory compliance and end-of-life packaging management. For many businesses, compliance will become a prerequisite for continued access to EU markets.

PPWR's core aims are to reduce packaging waste, improve recyclability and accelerate the transition to a circular economy across Europe. Unlike previous legislation, the regulation applies directly across all EU Member States and introduces requirements that could prevent non-compliant packaging from being placed on the market. Companies manufacturing, importing, distributing or selling packaged goods into the EU should already be preparing for the changes.

For UK companies, Brexit does not put you outside its scope. PPWR applies to all businesses placing packaging on the EU market. For example, if you sell kitchenware online, the moment your parcel and its packaging land with an EU customer, you have placed packaging on the EU market, and the regulation applies. In addition, many of the provisions also apply to packaging placed on the Northern Ireland market.

From **12 August 2026**, elements of the new PPWR compliance framework begin to apply, and non-compliant packaging **could be blocked** from the EU market entirely.

What is the Packaging and Packaging Waste Regulation (PPWR)?

The Packaging and Packaging Waste Regulation (PPWR) entered into force on 11 February 2025. It replaces the old Packaging and Packaging Waste Directive (94/62/EC), which had been in place since 1994.

The key difference is in the legal form. The old Directive required each EU Member State to transpose the rules into national law, which led to inconsistency across markets. The PPWR is a Regulation, meaning it applies directly and uniformly across all 27 Member States. The harmonised approach has one set of rules, applied the same way, everywhere across the bloc.

PPWR Compliance: What Changes from 12 August 2026?

While most of the provisions will be phased in over several years and depend on the passing of additional legislation, here's what is required from 12 August 2026:

From 12 August 2026, every packaging type placed on the EU market must be accompanied by a valid Declaration of Conformity (DoC) and the supporting technical documentation.

Manufacturers, importers, distributors, and brand owners all have responsibilities in this process. It's vital to know where your business fits within the supply chain.

For businesses supplying products to EU markets, now is the time to review your packaging specifications, engage suppliers, establish documentation procedures, and prepare for the new requirements. Every unique packaging type placed on the EU market will need a signed DoC backed by technical documentation.

Manufacturers and importers must verify that packaging and all its components, such as void fill, liners, and labels comply with the PPWR, maintain technical files and Declarations of Conformity for 5-10 years, and ensure traceability through batch numbers, barcodes, or QR codes. This documentation enables market surveillance authorities to verify compliance efficiently and take action where necessary.

Future PPWR Compliance Deadlines and Requirements

PPWR is ambitious in its goals and sets out a timetable and targets through to 2040. Although there are additional details still to be confirmed the direction of travel and key requirements are clear:

Date	PPWR Milestone
11 Feb 2025	PPWR entered into force
12 Aug 2026	General application date, most provisions apply
By 1 Jan 2028	European Commission to adopt Design for Recycling (DfR) criteria and grading Methodology
From Jul 2029	Eco-modulated EPR fees linked to the new EU harmonised recyclability performance grades (A, B and C) become mandatory
By 2030	Target is to reduce packaging waste by 5% per capita (compared to 2018 levels) and ensure all packaging is recyclable by design
From 2030	Market access tightens, meaning only packaging graded A, B, or C can be placed on the EU market
By 12 Feb 2032	The Commission will review the 2030 targets with a view to increasing them or setting additional goals
From 2035	Packaging must also be 'recycled at scale' (collected, sorted, and recycled in meaningful volumes)
By 2038	Grade C phased out, only Grade A and B packaging permitted
By 2040	EU PPWR reaches its final milestone phase, enforcing a 15% reduction in per capita packaging waste compared to 2018 levels, peak recycled plastic targets, and maximum reuse quotas.

Which Businesses Must Comply with PPWR?

As is often the case in EPR systems, different actors have different parts to play and these are set out in the legislation. NB though your business may have multiple roles.

If you are deemed the 'Manufacturer'

You hold the highest level of legal liability under the EU's PPWR. You are considered the manufacturer if you physically make the packaging, or if you have the packaging designed and sell it under your own name or trademark.

Your Obligation: You must design the packaging to meet the recyclability and chemical standards, perform the conformity assessment, create the full technical file and draft the Declaration of Conformity (DoC).

If you are deemed the 'Importer'

You are the importer if you are established within the EU and place packaging from a non-EU country (like the UK) onto the EU market.

Your Obligation: You cannot just assume the packaging is compliant. You are legally required to verify that the non-EU manufacturer has carried out the conformity assessment, drawn up the technical documentation, and signed the DoC. If they haven't, you cannot legally place the product on the market.

How PPWR Applies to Northern Ireland

Due to the Windsor Framework, most of the PPWR requirements also apply to packaging placed on the Northern Ireland market as outlined in the Commission's explanatory memorandum accompanying Regulation (EU) 2025/40.

This includes rules on substances of concern, recyclability, recycled content, compostability, packaging minimisation, labelling and restrictions on certain packaging formats.

However, most of the system and infrastructure obligations laid down in PPWR do not apply in Northern Ireland. This includes reuse targets, refill infrastructure requirements and wider national waste collection and management system measures, these will remain in scope of the UK's packaging extended producer responsibility (pEPR) scheme.

PPWR vs UK Packaging EPR: What's the Difference?

UK businesses already dealing with the UK's packaging EPR (pEPR) scheme may wonder how the two systems relate.

They are separate pieces of legislation and must be treated as such in terms of compliance.

However, both are Extended Producer Responsibility measures with similar objectives of driving a circular economy through more efficient use of resources and higher rates of recycling. A key distinction though is that PPWR includes market access restrictions. Non-compliant packaging can be blocked from the EU market entirely and these restrictions have some of the most immediate deadlines.

PPWR and UK EPR Recyclability Requirements Compared

Both include assessments of recyclability:

- Under UK pEPR, packaging is assessed using the Recyclability Assessment Methodology (RAM) and poor recyclability attracts higher fees. RAM ratings (Red, Amber, Green) are used to modulate fees.
- The PPWR also requires assessments and uses EU-wide recyclability grades (A, B, C) to determine both fees and (progressively) whether packaging can be sold in the EU at all.

PPWR Labelling Requirements vs UK EPR Rules

Both include labelling requirements:

- UK pEPR labelling requirements are currently under review.
- The PPWR introduces harmonised EU labelling rules that will apply across all Member States.

PPWR and pEPR - the bottom line:

- If you sell into the EU, as well as domestically in the UK, you need to comply with both, as they run in parallel.
- A note on legal obligations for UK producers: The precise requirements for UK-based manufacturers and importers, including whether an Authorised Representative is needed in each EU Member State of sale, may vary depending on your supply chain structure and the Member States involved. We recommend seeking specialist legal and compliance advice to confirm your specific obligations.

PPWR Compliance Checklist for UK Exporters

The August 2026 start date has some immediate requirements.

Here is some advice from our experts at ERP UK on where to start:

- Map all packaging you place on the EU market and identify who is the "supplier", "manufacturer or "importer" and "distributor" for PPWR purposes. This determines who holds which compliance obligation.
- Be aware that from August 12, 2026, all food-contact packaging for PFAS has been banned.
- Set up EPR registrations in each EU Member State where you sell. Whether you need an Authorised Representative in individual Member States will depend on your specific situation. Take specialist advice.
- Prepare compliant labelling and an EU Declaration of Conformity for all packaging placed on the EU market.

After that you need to be looking ahead to the next requirements and deadlines such as:

- Check the recyclability grade of your packaging against the PPWR framework. Where packaging falls below the minimum threshold, redesign is not optional.
- Verify recycled content in plastic packaging against the 2030 targets. If your supply chain cannot currently meet those thresholds, start conversations with suppliers now.
- Review reuse and refill obligations for relevant packaging categories as further guidance is published.

Packaging waste regulation in Europe is moving fast. Businesses that act early will be better placed than those waiting for final delegated acts before making decisions.