

Road to the Implementation of the European Packaging and Packaging Waste Regulation (PPWR)

EU Regulation 2025/40

Infographic

March, 2025



Regulatory Itinerary

1

Adoption of the PPWR

December 16, 2024

2

Publication in the Official Journal of the EU

January 22, 2025

3

Entry into force

February 12, 2025

4

Direct Effect - Applicability

Effective August 12, 2026

(18 months after entry into force)

5

Progressive Application

Many of the obligations under the Regulation will apply at a later date, in many cases depending on the adoption of acts delegated by the European Commission.



FIRST BLOCK

Between certainties and uncertainties: adaptation, transition and development



Preparation and Anticipation

Preparation and anticipation are critical to ensure a smooth transition



Strategic Planning

Advance preparation is key to a successful transition to the new European packaging regulations.

- Know key deadlines and obligations
- Identify areas of impact



High-priority Actions

Review and adaptation of current processes:

- Review design and production processes
- Evaluate the packaging's placement on the market
- Logistical forecast to adapt to regulations
- Update administrative data management



Uncertainty Management

Aspects pending definition:

- Content of the new Royal Decree to be developed by the Ministry
- Delegated acts of the European Commission
- Interpretative notes of the MITECO and European Commission Guidelines

EU and National Regulations Coexistence



New Royal Decree on Packaging

Adaptation of national regulations to the European Regulation (PPWR):

- Amend or delete incompatible provisions
- Incorporate national measures permitted by the regulation
- Ensure consistency with the PPWR's deadlines and objectives

Expected deadline: Completion by August 2026, following a process that will include public consultations and inter-ministerial reviews.



Application of the Regulation

Before August 2026

- National regulations apply

Effective August 12, 2026

- The Regulation shall be directly applicable (direct effect) and shall prevail over any incompatible national rules (primacy).
- National regulations will apply during the transitional periods before the entry into force of each specific obligation.
- The new Royal Decree will complement the Regulation in aspects mandated or not regulated by European regulations.



System for Transitional Periods

Before the date of application of each deferred obligation:

- The application of national regulations is maintained

Two scenarios for obligations with deferred application dates:

- Those that require a delegated act or prior execution
 - In these cases, until the Commission's implementing act is adopted, the obligation cannot be enforced.
- Those that will apply on the date indicated without the need for a prior delegated act

Regional and Local Regulations

As with national regulations, the corresponding authorities will ensure the compatibility and alignment of regional and local regulations with the provisions of the Regulation, in line with the provisions of the new Royal Decree on Packaging.

Delegated and Implementing Acts: Pending Technical Elements



European Regulatory Framework

The European Commission will need to adopt more than 25 delegated and implementing acts to define key technical aspects of the PPWR, ensuring uniform criteria across the EU.



Examples of Areas to be Developed

- Recyclability criteria
- Harmonized labelling
- Compostability requirements
- DRS Systems



Implementation Challenges

The acts will determine the practical reality of regulatory compliance and provide legal certainty, although some uncertainty will persist until their final adoption.



Monitoring and Follow-up

Continuous monitoring of the development of these delegated and implementing acts is essential to ensure regulatory compliance.

Flexibility for the Member States

Examples of Areas of Flexibility Permitted

- 1 Waste reduction**
The possibility of setting more ambitious prevention targets, including the prohibition of certain formats
- 2 Promotion of reusable packaging**
Promoting specific standards to encourage reuse in key sectors.
- 3 Deposit-Refund Systems**
Potential implementation of a more ambitious model for single-use packaging.
- 4 The Banning of Formats**
The capacity, in limited cases, to extend the prohibitions on packaging formats and presentations.

General Principle

The PPWR establishes a harmonized framework, but allows Member States some flexibility to take additional, stricter measures.

Flexibility Condition

Additional measures should not create barriers to the single market or hinder the free movement of products within the EU.

Interpretative Notes from the Environment Ministry



The Ministry's Objective and Announcement

The Ministry for the Ecological Transition has announced the publication of Interpretative Notes to unify criteria and provide guidance on compliance with national regulations during the transition period.



Example: Interpretative Note on Marking and Labelling

Published in December 2024 by the MITECO

- Marking on multipack units
- Exceptions to labelling (e.g. small formats or on-site packaging)
- Stock dispatch until June 2025
- Flexibility in QR usage



Relevance

Interpretative notes facilitate compliance during the regulatory transition, clarifying obligations while moving towards full implementation of European regulations.



SECOND BLOCK

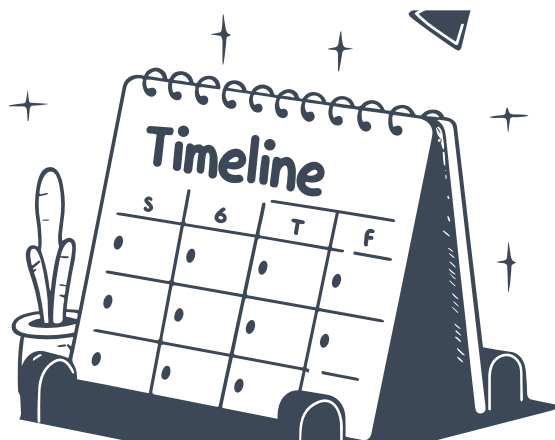
What we Know: Regulatory Obligations and Milestones

As of the Applicability Date of the Regulation



As of August 12, 2026

The Regulation becomes directly applicable



Date of Application

- As of August 12, 2026, 18 months after the regulation's entry into force, the direct application of the PPWR will begin.
- However, many of its most relevant obligations will not be enforceable immediately, but rather at later dates set down in the regulatory text itself.



Regulatory Coexistence

- National regulations will remain in force in all those aspects not directly governed by the Regulation.
- Likewise, it will continue to apply to those provisions subject to deferred application until the specific obligations established in the Regulation come into force.



Substance Restrictions

- The limitation of PFAS concentrations in food packaging
- Continuity in the reduction of substances of concern (lead, cadmium, mercury, hexavalent chromium)

PFAS in Food Contact Packaging

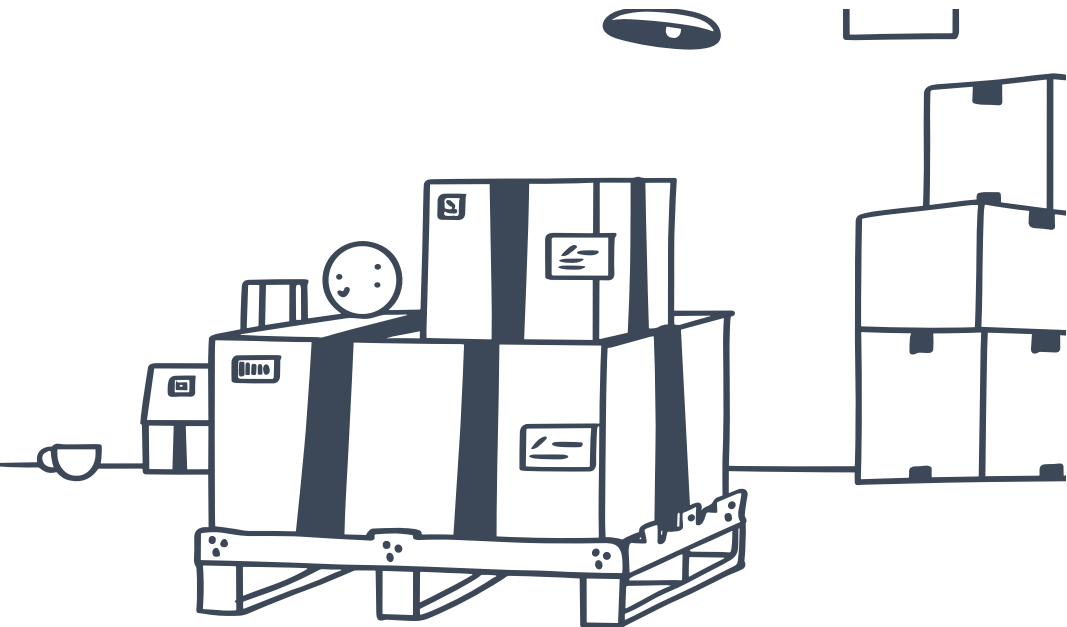
Packaging intended to come into contact with food may not be placed on the market if it contains PFAS in concentrations exceeding: 25 PPB for PFAS individually, 250 ppm for the sum of total PFAS after degradation, and 50 ppm for total PFAS, with specific limits for fluorine.

Reuse (1) and Bulk Sale

As of August 2026, new measures for reuse and bulk sale will be implemented



As of August 2026



Reuse

Reuse Systems

Reusable packaging must be subject to approved systems with reconditioning processes and specific return points within closed systems.

Bulk Sale

Consumers should be provided with clear information on the applicable hygienic standards and the formats permitted with regards to containers for refilling. In addition, the packaging made available for this purpose must comply with the standards established in the PPWR.



Reuse

Digital Traceability

Digital or physical labels (QR codes, RFID) will be introduced to ensure the traceability and control of reusable packaging reuse cycles.



Additional EPR Costs



As of August 12, 2026

In addition to the costs specified in Article 8a (4) (a) of Directive 2008/98/EC, producers' financial contributions shall cover the following



Labelling of Bins

- The costs of labelling waste bins designed for the collection of packaging waste.
- Special relevance due to the incorporation of the new harmonized pictograms for packaging marking, which will require the re-labelling of bins.
- Within 18 months from the entry into force of the Regulation, the EC shall adopt implementing acts to establish a standard label and specifications for marking bins.



Characterization of Municipal Waste

Costs associated with studies of the composition of mixed municipal waste carried out in accordance with Implementing Regulation (EU) 2023/595 and the Packaging Regulation (Article 56, Paragraph 7, Letter a).

HORECA Take-away Packaging



Between 2027 and 2028



February 2027: Consumers' Own Containers

Final distributors must allow consumers to carry their own reusable containers for beverages and prepared meals. Hygiene and food safety standards must be guaranteed.

- Provide information with visible signs
- Price no higher than that of disposable packaging



February 2028: Reuse System

The final HORECA distributors will give consumers the option to take products away in reusable packaging within an established reuse system.

- The need to establish systems that will allow for the management of reusable packaging.

2027 (TBC)

National DRS

Provisional date of the national introduction of the Deposit and Return System (DRS) for certain single-use beverage packaging (Royal Decree 1055/2022)

Compostable Packaging and Data Harmonization



As of 2028

Starting in 2028, new data compostability and harmonization requirements will be implemented for producer registries



Compostable Formats

As of February 2028, the following must be compostable:

- Adhesive labels placed on fruits and vegetables.
- Permeable bags of tea, coffee or other beverages,

Possible Extension

Member States have the authority to require that other elements be compostable:

- Non-permeable single-dose units of tea, coffee or other beverages intended for use in machines
- Lightweight and ultra-lightweight plastic bags.

Continuous Assessment

The inclusion of new formats in the list of packaging that must be compostable will be evaluated.

Technical Specifications

The European Commission will establish, by means of delegated acts before February 2026, the harmonized technical specifications for compostable packaging, including criteria for domestic composting.

Data Harmonization for Registries

2028 will mark the start of the harmonization of data reporting requirements across all national packaging producer registries, improving interoperability and facilitating intra-Community trade



Harmonized Labelling



As of August 2028

42 months after the entry into force of the Regulation, or 24 months after the adoption of the relevant implementing acts, whichever is later.



General Requirements

- European harmonized label with information on material composition
- Pictogram-based, with color or B/W option, and easy to understand, also for people with disabilities
- Applicable to all packaging placed on the market (except transport packaging)



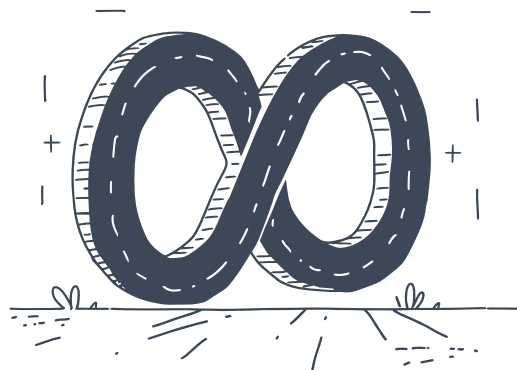
Digital and Optional Information

- Option to include a QR code or other digital medium providing additional harmonization information about the life cycle of the packaging or separation instructions
- Information available before purchase on online sales platforms
- Option to include a QR indicating membership in an EPR SYSTEM



Specific Labelling

- For packaging subject to a DRS system (with digital information on return points)
- For compostable packaging indicating domestic or industrial composting



Reusable Packaging

- Clear indication of reusability (harmonised EU labelling, act in 2029)
- Digital medium with information on the reuse system
- It should facilitate the tracking of containers and the calculation of rotations.

Technical Specifications

The European Commission will adopt delegated acts before August 2027 to define the technical specifications of labelling and harmonized pictograms on packaging. These acts will indicate:

- Standardized formats, pictograms and sizes to ensure consistency across the EU.
- A methodology for evaluating the composition and recyclability of packaging

Recyclability



As of 2030

Recyclability



Mandatory Recyclability

- Starting in 2030, only packaging with a minimum recyclability quality of 70% (Grades A, B and C) may be placed on the market.
- Packaging with lower levels of recyclability will be prohibited, with some exceptions.
- Technical criteria:** defined by delegated act before January 2028

Categories by Recyclability Quality



Grade A

Starting at 95% Recyclability



Grade B

Starting at 80% Recyclability



Grade C

Starting at 70% Recyclability

Eco-modulation: EPR financial contributions will be modulated in accordance with recyclability performance ratings.

Relevant Exceptions to Recyclability Requirements

Innovative Packaging

Innovative packaging that does not meet the requirements may be marketed for a maximum period of five years

Dangerous Goods

Packaging used to transport dangerous goods.

Materiality

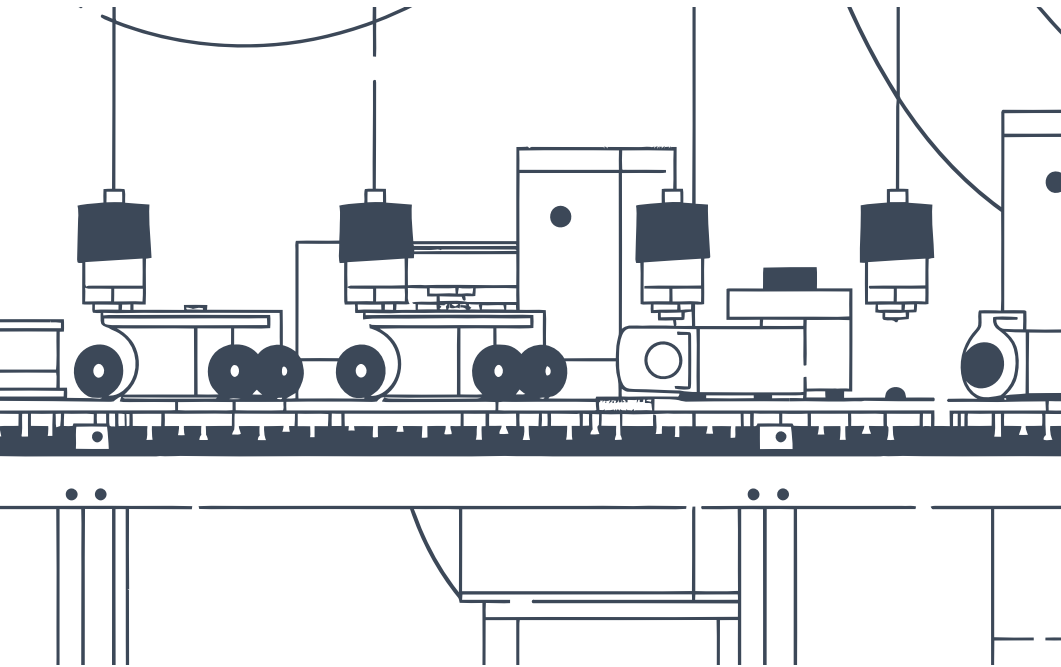
Primary packaging made of light wood, cork, fabric, rubber, ceramic, porcelain or wax.

Methodological Note

The minimum content of recycled plastic in packaging shall be calculated as an annual average per manufacturing plant and shall apply to the part of packaging consisting of plastic placed on the market

Recyclability as of 2035

Recycled to Scale and New Recyclability Standards



2035 Large-Scale Recycling

- As of January 2035, all packaging must be recyclable "on a large scale"
- Mandatory implementation of industrial recycling at EU level
 - Methodology and development to be established through implementing acts



2038 Recyclability Standards

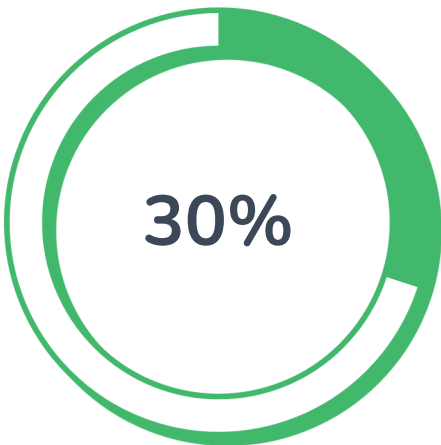
- New minimum recyclability standards as of January 2038:
- Grade A: $\geq 95\%$ recyclability
 - Grade B: $\geq 80\%$ recyclability
- Packaging that less than 80% recyclable will be banned from the market**

Recycled Plastic Content

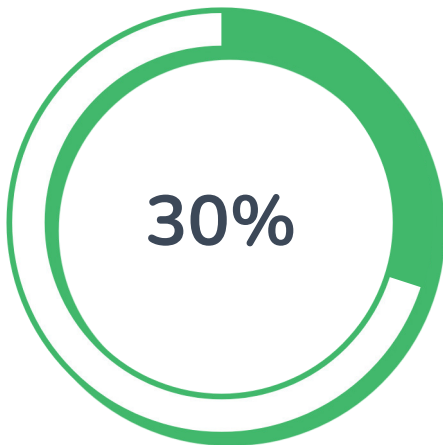
Targets for the minimum percentage of recycled content recovered from post-consumer plastic waste

By 2030

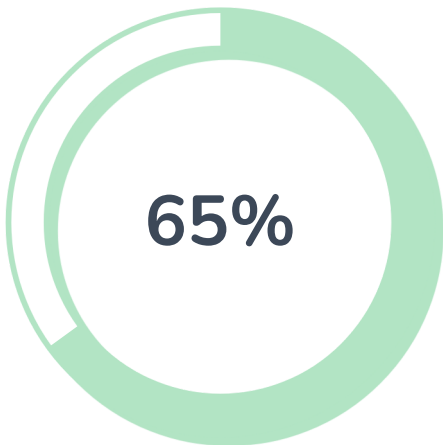
By 2040



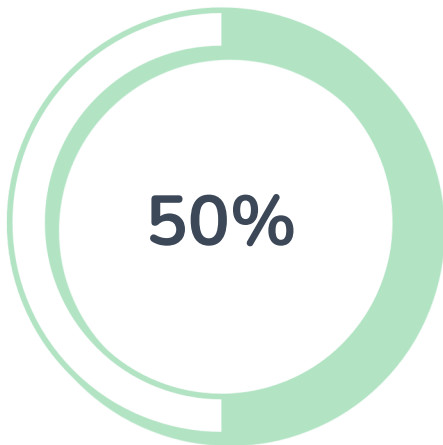
Single-use plastic beverage bottles



Plastic packaging suitable for contact, made mostly of PET



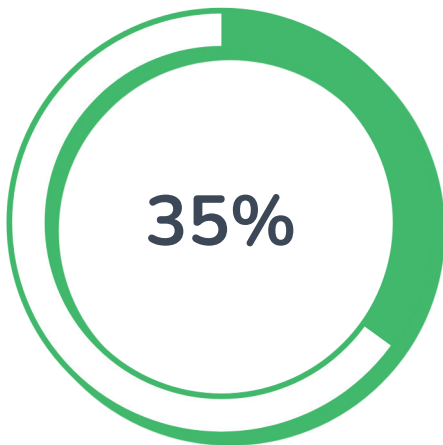
Single-use plastic beverage bottles



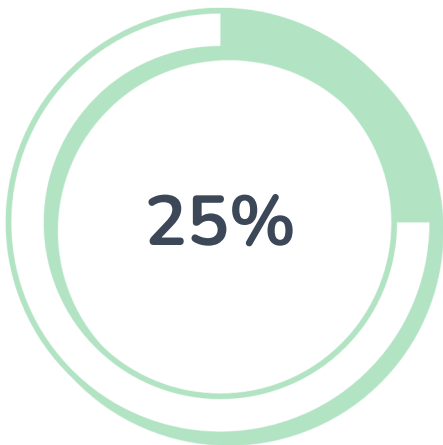
Plastic packaging suitable for contact, made mostly of PET



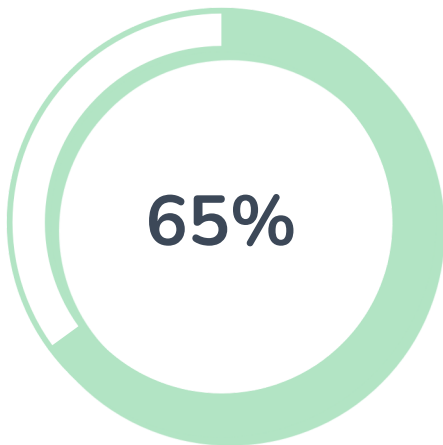
Plastic packaging for non-PET food consumption



Plastic packaging other than the above



Plastic packaging for non-PET food consumption



Plastic packaging other than the above

Format Prohibition and Waste Prevention Targets

Format Prohibition



January 2030

As of January 2030, the PPWR (Article 25 and Annex V) prohibits formats considered unnecessary or harmful to the environment.



Plastic Groupings at Points of Sale

The prohibition of single-use plastic collective packaging at points of sale to group products. Exceptions are maintained for handling, such as shrink-wrapped films



Fruit and Vegetable Packaging

The elimination of plastic packaging for fresh products under 1.5 kg, maintaining exceptions for technical reasons, such as the prevention of water loss or contamination



Single-dose packaging in HORECA

The prohibition of single-dose plastic packaging served in HORECA for condiments, preserves, sauces, milk for coffee, sugar and dressings, except when there is a justified technical or hygienic need



Hygiene Products at Hotels

The elimination of single-use cosmetic and hygiene products for in hotels and accommodations, allowed only at the client's explicit request



Ultra-lightweight Plastic Bags

Unless they are needed for hygiene reasons, or as primary packaging for bulk food when this helps to avert food waste.



SUP in HORECA

Plastic packaging for food and beverages filled and consumed at HORECA facilities.

Waste Prevention Targets

The progressive reduction of packaging waste

Each Member State will reduce packaging waste generated per capita, compared to packaging waste generated in 2018,



2030
5% reduction compared to 2018

2035
10% reduction compared to 2018

2040
15% reduction compared to 2018

Empty Space



By 2030

Or three years after the entry into force of the Implementing Act

New regulation to optimize the use of space in packaging and reduce overpackaging

Efficient Design

Obligation to minimize the empty space in packaging, and its weight and volume to the minimum necessary, guaranteeing its functionality and avoiding overpackaging through efficient designs.

Relevant Exceptions

- Packaging that prior to February 2026 was registered as:
 - Protected Designs
 - Product packaging with PDO certification
 - Packaging whose shape is a registered trademark



Specific Limits

The empty space in collective packaging, transport packaging, or for products purchased by electronic commerce may not exceed 50% of its total internal volume.

Relevant Exceptions

- Sales packaging used as e-commerce packaging and Reusable Packaging.

Calculation Method

Before February 2028, the Commission will adopt a delegated act defining the harmonized method for calculating the empty space ratio.



Reusable Packaging (2)



As of 2030



Beverage Packaging

As of January 1, 2030, 10% of alcoholic and non-alcoholic beverages must be marketed in reusable packaging.

The calculation will be based on units or total volume. The details will be addressed in delegated acts.

Exceptions: highly perishable beverages, dairy and wine products



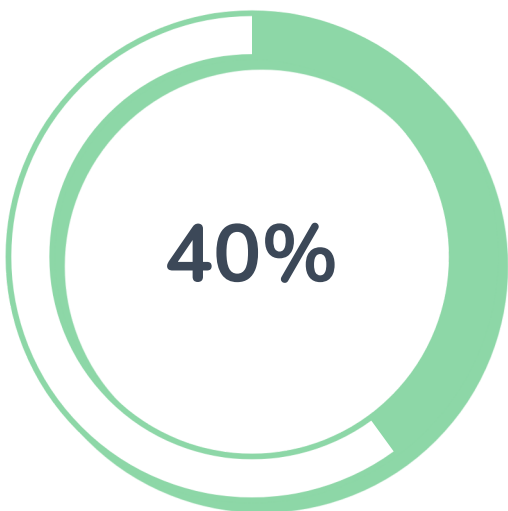
For 2030
Reuse Target
for Beverage Packaging

Transport Packaging

Mandatory reuse targets for 2030



Collective Packaging in the Form of Boxes
Except cardboard boxes



Transport Packaging within the EU and Online Sales
Except cardboard boxes



Shipping to own or related companies within the EU
Except cardboard boxes



Shipping within the territory of the Member State
Except cardboard boxes

Relevant Exceptions

- 1

Hazardous Goods
Packaging used to transport hazardous goods.
- 2

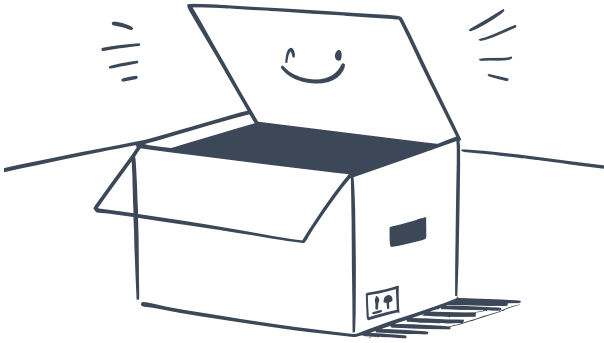
Large-Scale Machinery
Packaging used to transport large-scale machinery, equipment or products whose packaging is custom designed
- 3

Flexible Food Formats
Transport packaging in a flexible format in direct contact with food or feed
- 4

Microenterprises
Economic operators who place less than 1,000 kg of packaging on the market annually in the territory of a Member State and are micro-enterprises.

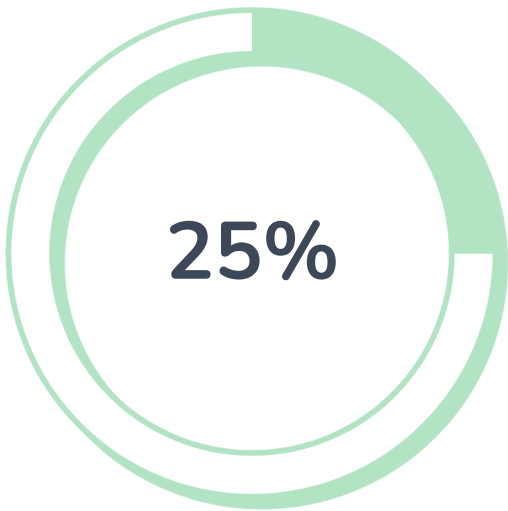
Cardboard boxes

Reuse targets do not apply to cardboard boxes

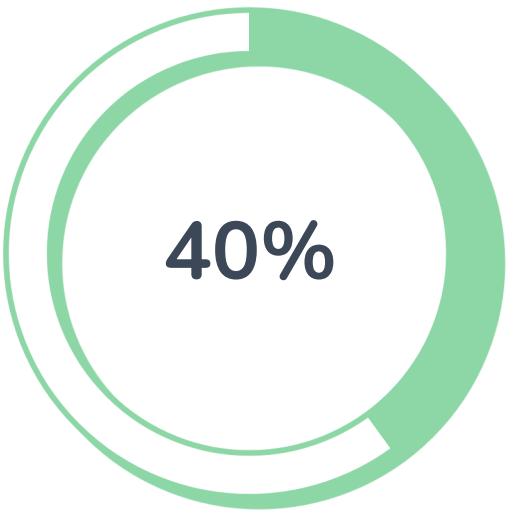


Aspirational Reuse Targets for 2040

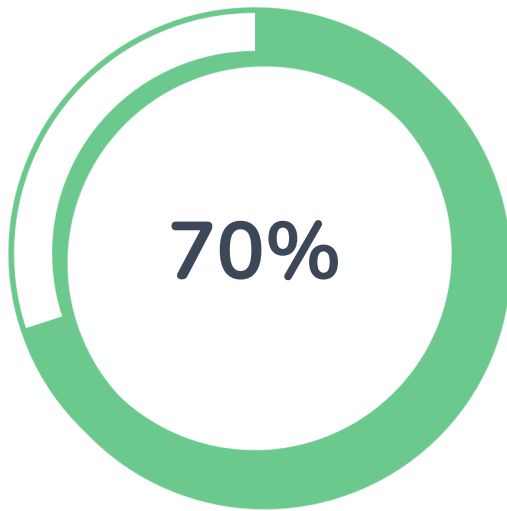
Member States will be able to set more ambitious targets



Collective Packaging in the Form of Boxes
Except cardboard boxes



Beverage Packaging



Beverage Packaging

Reuse and Distributors

- 1

Packaging Collection
Distributors will collect, free of charge, the reusable packaging of the same type they put on the market
They will refund the associated deposits
- 2

Exemptions
Distributors will be exempt from meeting beverage targets if they have a surface area of less than 100m2
- 3

Groupings
Distributors may form pools not exceeding 40% of the market share and composed of a maximum of 5 distributors.



Ecoembes Stands with You

Ecoembes offers a complete set of tools and resources to support you in the transition, helping you comply with regulations in a timely manner



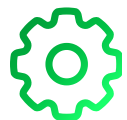
Technical Guidance

Personalized support to adapt to new regulatory requirements



Continuous Training

Specialized webinars and new training sessions to familiarize yourselves with the regulatory changes in The Circular Campus



Digital Tools

CD pack to help you assess sustainability and calculate the recyclability of your packaging



Update-to-date Information

With our Newsletter with the latest European and international news on regulations and the Circular Economy



ecoembes