

PACKR8 RESOURCE GUIDE

PPWR overview and timeline.

What the EU Packaging and Packaging Waste Regulation actually asks of you, who is in scope, and the deadlines that decide where your data programme has to be by 2030.

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01 / What PPWR is, in one paragraph.

PPWR is short for the EU Packaging and Packaging Waste Regulation, formally Regulation (EU) 2025/40. It replaces the old Packaging and Packaging Waste Directive (94/62/EC) and turns 27 different national interpretations into a single rulebook that applies the same way in every member state. The political point is harmonisation. The operational point is data. PPWR cannot be filed against a slide deck. It needs records that an auditor can pull apart and put back together.

02 / Who is in scope.

Anyone placing packaging or packaged goods on the EU market. That sounds broad because it is. Producers, importers, distributors, retailers, and online marketplaces are all named explicitly. Packaging manufacturers and converters are pulled in through the documentation chain.

Scope covers every packaging format you ship: the consumer-facing primary pack, the grouped secondary pack on shelf, and the transport packaging that gets it from a factory in Poland to a supermarket in Antwerp. Material is not a filter. Plastic, paper, metal, glass, wood, composites, bioplastics. All in. Reusable packaging is in but follows its own track under Articles 26 and 27.

Most underestimated bit. Online marketplaces have explicit obligations of their own. If you sell into the EU through a marketplace and you are not based in the EU, the marketplace becomes the responsible economic operator for PPWR purposes. That changes who the regulator goes after when something is wrong.

03 / The five things PPWR actually asks for.

Most teams find PPWR easier to think about as five buckets rather than one giant regulation. Each bucket has its own technical standards, deadlines, and pain points.

Recycled content (Article 7)

Plastic packaging has to contain a minimum percentage of post-consumer recycled (PCR) plastic, calculated per packaging unit and per material. Targets sit at 2030 with a higher checkpoint at 2040. The arithmetic is the easy bit. The hard bit is the evidence chain back to the recycler. Industrial trim does not count, no matter how much of it your converter pumps in.

Recyclability (Article 6, Annex II)

Every packaging unit gets a recyclability grade, A, B, or C. C grade is banned from 2030. Grading runs against the technical criteria in Annex II, which are aligned with EN 13430:2004 and the Design for Recycling implementing acts that are still being adopted as of 2026. If your packaging is multi-material or uses dark pigments that NIR sorters cannot read, this is where the conversation

gets uncomfortable.

Restricted substances (Article 5)

Heavy metals at the older limits. PFAS in food contact, with a phase-out underway. A handful of other substances on a list that is explicitly described as not final. Some restrictions kick in from 2026 and others land later in the decade. Treat the list as moving.

Reuse, refill, and reduction (Articles 25 to 29, Annex V)

Reuse and refill targets apply to specific sectors: beverages, transport packaging, takeaway food. On top of that there are overall packaging reduction targets at member state level (5 percent by 2030, 10 percent by 2035, 15 percent by 2040 against a 2018 baseline) and outright bans on the formats listed in Annex V.

Declarations of Conformity and EPR (Articles 11, 35 to 45)

Each packaging unit on the market needs a Declaration of Conformity in the Annex VIII format, backed by technical documentation kept for five years. Extended Producer Responsibility schemes stay national: Afvalfonds in NL, LUCID and Zentrale Stelle in DE, Fost Plus in BE, Citeo in FR, Ecoembes in ES, BDO in PL. What changes is that the data definitions and eco-modulation criteria they apply are now harmonised under PPWR. Same numbers, different filing portals.

04 / Timeline through 2030.

The headline obligations bite from 2030, but several earlier dates force preparation now. Treat the table below as planning anchors. The exact wording lives in EUR-Lex; check it before writing any internal policy.

YEAR	MILESTONE
2025	Regulation enters into force. Member states designate competent authorities.
2026	First substance restrictions apply. EPR scheme harmonisation begins in earnest.
2027	Implementing acts on Design for Recycling and the Annex II grading methodology adopted.
2028	Reusable packaging baselines set. Mandatory labelling rules apply.
2029	Reuse and refill targets begin to apply per sector.
2030	Recycled content targets, recyclability grade C ban, Annex VIII Declarations mandatory across the EU.

2035 to 2040 Higher recycled content checkpoints and broader reduction targets.

05 / PPWR versus the old Packaging Directive.

The shift from directive to regulation is the single biggest structural change. Under the old directive, every member state could implement requirements in its own way. That is how the EU ended up with parallel EPR schemes, different recyclability definitions, and country-specific recycled content rules. PPWR collapses that variation. You still file with national EPR organisations, but the definitions, calculations, and evidence formats have to be the same in every country.

The other meaningful change is enforceability. A directive gets transposed into national law and is enforced by national authorities. A regulation applies directly. Cross-border non-compliance becomes a lot harder to argue around, and the European Commission gets stronger investigation powers.

Practical implication. If you have been running country-by-country compliance teams against country-by-country spreadsheets, PPWR will force a unified data foundation. The teams that adapt earliest spend less on duplicated work for the rest of the decade. The ones that wait will have a bad 2029.

06 / What this means for your data foundation.

From a data perspective PPWR comes down to a single sentence. Every claim about a packaging unit has to be defensible, traceable, and current.

Defensible. The auditor wants to see the calculation behind a recycled content percentage, the supplier certificate behind a material claim, the methodology behind a recyclability grade. Numbers without paper trails do not survive.

Traceable. Every piece of evidence needs to link to the packaging record it supports. A folder full of PDFs in SharePoint is not enough. The link between this Declaration, this SKU, this supplier certificate has to be machine-readable.

Current. Five-year retention is the floor. When the packaging changes, the version history stays. The question auditors increasingly ask is, show me what this pack looked like in March 2027 and what evidence supported the claim then. If you cannot answer that question, you have a problem.

This is where most teams come unstuck. Spreadsheet-based PPWR readiness passes a single point-in-time check and falls over the moment audits or version queries arrive. That is the reason a system of record (rather than yet another dashboard) is the practical answer.

07 / Frequently asked questions.

When does PPWR come into force?

PPWR entered into force in 2025 and applies progressively. The headline obligations on recycled content, recyclability grading, and Declarations of Conformity apply from 2030. Substance restrictions, reuse and refill targets, and EPR harmonisation phase in between 2026 and 2029.

Who is in scope?

Any economic operator placing packaging or packaged goods on the EU market: producers, importers, distributors, retailers, and online marketplaces. Scope covers all packaging formats and all materials.

What is a PPWR Declaration of Conformity?

A formal declaration in the Annex VIII format stating that a packaging unit complies with PPWR sustainability requirements. Backed by technical documentation kept for five years. The Declaration covers recyclability, recycled content, substance compliance, and labelling.

How does PPWR interact with national EPR schemes?

EPR schemes such as Afvalfonds (NL), LUCID (DE), Fost Plus (BE), Citeo (FR), Ecoembes (ES), and BDO (PL) remain national. PPWR harmonises the data definitions and eco-modulation criteria they must use, so producers still file per country but the underlying calculations converge.

Where can I read the regulation directly?

The consolidated text is on EUR-Lex under the reference Regulation (EU) 2025/40. The European Commission also publishes implementing acts and delegated acts as they are adopted. Bookmark both.

08 / About PackR8.

PackR8 is the packaging compliance platform for European producers preparing for PPWR and EPR. One source of truth for packaging data, with PPWR Declarations of Conformity, EPR filings, and audit evidence generated automatically from your records.

We started PackR8 because the same data problem was breaking the same teams every year. Smart sustainability leads with real strategies, stalled by packaging data that lived in eleven tabs of a spreadsheet maintained by someone in another country.

PackR8 fixes that. One packaging record per SKU. Full version history. Evidence pinned to every claim. Role-aware views for sustainability, packaging, and compliance teams. From that foundation, Declarations of Conformity, EPR filings, and audit responses become outputs rather than annual fire drills.

Talk to us.

The person you book a demo with is one of the team that built the platform. No SDR. No discovery calls. No funnel. Just a thirty-minute conversation about your packaging programme, and an emailed quote afterwards if it makes sense to keep going.

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