

PACKR8 RESOURCE GUIDE

PPWR reuse and refill targets, sector by sector.

Articles 25 to 29 in plain terms: who has obligations, the 2029 onset, and how reuse interacts with EPR fees.

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01 / Why reuse is its own track.

Reuse and refill sit in their own articles (25 to 29) because they require something different from the rest of PPWR. Recycled content and recyclability are about how the pack is built. Reuse is about how the pack moves through use cycles. The producer has obligations for both the pack design and the system the pack circulates in.

PPWR sets percentage targets per sector and per packaging type, applied progressively from 2029. Producers above the relevant volume threshold must show that a percentage of their packaging is reusable, in active reuse, and supported by a qualifying system.

02 / Sectors with obligations.

Three sectors carry the bulk of the targets: beverages, transport packaging, and takeaway food. Grouped packaging in B2B also has reduction obligations that effectively force a reuse approach for many supply chains.

- Beverages (excluding wine, spirits, milk, and a few minor categories).
- Transport packaging used between economic operators (pallets, totes, crates, transport films).
- Takeaway food and beverages served in the HoReCa channel.
- Grouped packaging where it adds material without commensurate function (the 'unnecessary packaging' clause).

03 / Beverages: the headline target.

PPWR sets reuse / refill targets for beverage packaging applying from 2029, scaling up through 2034 and 2040. Member states retain some flexibility on exemptions: countries with high recycling rates and deposit-return systems can defer the targets if they meet alternative criteria. Most member states will not.

The target is calculated on the share of beverage packaging placed on the market that is part of a qualifying reuse system. Single-use packaging counts against the denominator; reusable bottles in active circulation count in the numerator. Reusables that are placed in a system but never returned do not count after the second cycle.

Practical implication: producers cannot solve the target by selling refillable bottles alongside single-use ones. The reusables have to actually circulate.

04 / Transport packaging in the supply chain.

Transport packaging targets cover what moves between economic operators: pallets, plastic totes, transport films, IBCs, FIBC. Targets ramp from 2029 with a 30 percent floor that escalates over the

decade.

Most transport packaging is already reusable in B2B supply chains. The challenge is documentation. Pallets are pooled, totes are exchanged, and the records of who owns what are often informal. PPWR pushes producers to formalise these arrangements with system participation evidence and reuse cycle counts.

Single-use transport packaging (one-trip pallets, single-use shrink film) faces the steepest pressure. Substituting these formats with pooled equivalents is the dominant compliance path.

05 / Takeaway food and HoReCa.

Takeaway food and beverages served in HoReCa (hotels, restaurants, catering) carry their own targets. From 2029, a percentage of beverages served on-premises must be in reusable cups; from 2030, takeaway food must be available in reusable formats on customer request; bans on specific single-use formats apply from 2026.

The single-use bans landing in 2026 hit faster than the percentage targets. Single-use sachets in hotels for shampoo and condiments, single-use pre-packaged portions in HoReCa for sugar and condiments, lightweight plastic carrier bags below 15 micron: all gone, with a few exemptions for hygiene and medical use.

Where producers underestimate. The reuse system is a co-obligation. The producer does not just supply reusable packaging; they participate in (or operate) the system that returns, washes, inspects, and re-deploys it. Without the system in place, the reusables count as single-use for compliance purposes.

06 / Reuse and EPR fees.

Reusable packaging is generally exempt from EPR fees on a per-cycle basis. The producer pays the fee on the first placement; subsequent uses do not generate new fees. The total fee burden over the pack's life is therefore much lower than a single-use equivalent.

The interaction with eco-modulation is positive. Reusable packaging tends to score well on recyclability and recycled content, and the per-tonne EPR fee is then divided across the use cycles. Producers running the maths over a five-year window typically find reuse pencils out, even at higher upfront unit cost.

07 / Frequently asked questions.

When do reuse targets start applying?

From 2029 for most sectors, with the percentage scaling up through 2034 and 2040. The 2026 dates apply to format-specific bans, not to the percentage targets.

Are wine and spirits in scope?

Wine, spirits, milk, and a handful of minor beverage categories are excluded from the beverage reuse targets. The exclusion list is in the Annex.

Do I need to operate the reuse system myself?

You can operate it yourself or participate in a system run by a third party. Either way, the system must be qualifying, with documented return rates, washing standards, and circulation tracking.

How does reuse affect my EPR fees?

Reusable packaging typically pays EPR fees once, on first placement. Subsequent reuse cycles do not generate new fees, and reusables tend to score well on eco-modulation, lowering the per-tonne rate.

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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