

PPWR - New Obligations for Packaging

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Companies must pay particular attention to the new requirements regarding packaging and packaging waste from 12 August 2026, as Regulation (EU) 2025/40 (Packaging and Packaging Waste Regulation - PPWR) will come into force.

PPWR is directly applicable in all Member States and covers all companies that place packaged products on the market.

Substance of the rules

In principle, companies will need an EU Declaration of Conformity, a technical dossier, and compliance with extended producer responsibility obligations (including the corresponding registration and reporting requirements)¹ in order to place packaging on the market.

From 2030, non-recyclable packaging (Class D), single-use plastics and void spaces of more than 50 % will be banned.

Scope of application

PPWR applies to all packaging made available on the EU market from 12 August 2026 onwards – regardless of the material used, as well as to all packaging waste, regardless of whether this packaging is used or generated in industry, other manufacturing, retail or distribution companies, public administration, households or the service sector, and in conjunction with national waste and environmental legislation.

Addressees

The PPWR is primarily aimed at manufacturers. However, according to the definition of manufacturer in the PPWR, any entity, including importers, distributors and online retailers,² that places packaged products on the market is subject to the obligations set out therein.

Timeline

The PPWR entered into force on 11 February 2025, its key provisions will apply from 12 August 2026. It will be implemented gradually as follows:

➤ From 12 August 2026

Food-contact packaging with a PFAS content³ above certain limits may no longer be placed on the market from 12 August 2026.

¹ The registration under extended producer responsibility (EPR) in Romania comprises two essential steps: concluding a contract with an authorized organization and fulfilling the reporting obligations to the environmental authorities. Without this legal measure, companies may not place packaged products on the market

² Manufacturer, supplier, producer, authorised representative, importer, distributor, final distributor and fulfilment service provider

³ per- und polyfluorinated alkyl compounds

➤ **From 2027**

Providers of public catering services, such as restaurants, canteens or cafés, must offer their customers the option of having beverages and ready-made meals filled into containers they have brought themselves.

➤ **From 2028**

Void space in packaging must be reduced to a minimum, while the safety and usability of the product must be maintained (Art.24).

A new harmonized labeling (QR code) will indicate the material composition, including the proportion of recycled material and the content of biobased plastic.

Adhesive labels on compostable packaging must comply with the harmonized standard for compostability.

➤ **From 2030**

All packaging must either be recyclable or reusable in an economically viable manner. Packaging with a recycling rate of less than 70 % is no longer considered recyclable and may no longer be placed on the market.

The minimum recycled content is 10–30 % for contact-sensitive packaging, 30 % for single-use plastic beverage bottles and 35 % for other plastic packaging.

Reuse targets are being introduced for various transport packaging types.

➤ **2035**

Packaging must be recyclable on a large scale to promote a circular economy.

➤ **2038**

To be placed on the market, packaging must meet at least Class B (recycling rate of over 80 %).

➤ **2040**

Stricter requirements are being introduced for the minimum share of recycled material, which will range between 25 and 65 % depending on the type of packaging and its intended use. The reuse targets for various transport packaging within a reuse system will be set higher – 70 % reuse.

Conclusion

Given the generally known amount of packaging waste, we believe the PPWR is welcome.

As the final provisions of the PPWR will already enter into force in 2030, however, the compliance pressure on companies in Romania to adapt their packaging and waste structures in good time is increasing.

The development of PPWR-compliant and economically viable circular economy, packaging, as well as EPR and registration structures can take years, making early planning essential.

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