

PPWR – OVERVIEW OF KEY OBLIGATIONS BY YEAR

Article	Name/ Area	2025	2026	2027	2028	2029	2030	2031	2032	2033	2035	2038	2040
Art. 5	Requirements for substances in packaging		The sum of concentrations of Pb, Cd, Hg, and Cr ^{VI} must not exceed 100 mg/kg (from 12.8.2026)				The Commission shall carry out an assessment of the need to amend the PFAS ban (by 12.8.2030)			The Commission shall evaluate the sufficiency of requirements for substances of concern in packaging materials (by 12.8.2033)			
			Minimising the presence of substances of concern (from 12.8.2026)										
			Ban on PFAS in packaging coming into contact with food (from 12.8.2026)										
			The Commission shall draw up a report on the presence of substances of concern in packaging (by 31.12.2026)										
Art. 6	Recyclable packaging		Evaluate recyclability in accordance with EN 13430:2004 (from 12 August 2026 until the relevant DA)		The Commission shall adopt DA – design for recycling criteria and performance classes of recyclability, methods for performing recyclability assessments (by 1.1.2028)	Eco-modulation of fees into PRO based on design for recycling – recyclability classes (18 months from IA – 7/2029)	Packaging must be recyclable in class A, B, or C (from 1.1.2030)	Eco-modulation of fees into PRO based on recycling at scale criteria (18 months from IA – 7/2031)			Recyclability – requirement for recycling at scale (from 1.1.2035 or 5 years from IA)	Packaging must be recyclable only in class A or B (from 1.1.2038)	
							The Commission shall adopt IA – methodology for assessing recycling at scale (by 1.1.2030)						

Legend:

Economic operator obligation

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Art. 7	Minimum recycled content in plastic packaging		The Commission shall adopt IA – methodology for the calculation and verification of recycled content		The Commission shall assess the need for exemptions from recycled content (by 1.1.2028)	Calculation and verification of % of recycled content in accordance with the IA (1.1.2029 or 24 months from the entry into force of the IA)	Minimum recycled content in plastic packaging: contact-sensitive PET 30%, other contact-sensitive plastic 10%, single-use bottles 30%, other plastic packaging 35% (by 1.1.2030 or within 3 years from the entry into force of the IA)		The Commission shall review progress toward meeting the recycled content targets by 2030 + legislative proposal for amendments (targets for 2040) (by 12.2.2032)				Increase of minimum recycled content in plastic packaging – stage 2: PET 50%, other plastics 25%, bottles 65%, others 65% (from 1.1.2040)
			The Commission shall adopt IA – methodology for verifying the equality of rules for recycled content from third countries (including an external audit) (by 31.12.2026)						The Commission shall assess the introduction of recycled content in packaging other than plastic – legislative proposal (by 12.2.2032)				
			The Commission shall adopt DA – sustainability criteria for plastic recycling technologies (by 31.12.2026)										
Art. 8	Bio-based feedstock in plastic packaging				The Commission shall review the state of technological development of bio-based plastics (with a possible addition of an obligation based on the review results, as well as the possible use of bio-based plastics instead of recycled content) (by 12.2.2028)								
Art. 9	Industrially compostable packaging		The Commission shall request standardisation organisations to update the harmonised standards (by 12.2.2026)		Mandatory industrially compostable packaging: tea/coffee bags, capsules, labels for fruit and vegetables (from 12.2.2028)								
					Other packaging (including packaging made of biodegradable plastics) must be designed for material recycling (from 12.2.2028)								

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Art. 10 + 24	Packaging minimisation			The Commission shall request standardisation organisations for a methodology to calculate packaging minimisation (by 12.2.2027)	The Commission shall adopt IA – methodology for calculating the empty space ratio (by 12.2.2028)		Packaging minimisation – necessary minimum (by 1.1.2030)		The Commission shall review the empty space ratio and exemptions and assess the setting of a ratio for consumer packaging (by 12.2.2032)				
					Consumer packaging: empty space reduced to a minimum (from 12.2.2028)		Grouped, transport packaging and e-commerce: maximum empty space ratio of 50% (from 1.1.2030 or 3 years from the entry into force of the IA)						
Art. 11 + 29, 31	Reusable packaging	Conditions under which packaging is considered reusable packaging – in force from 11.2.2025		The Commission shall adopt DA – minimum number of rotations for the most frequently used reus. pcg. (by 12.2.2027)	The Commission shall adopt DA – conditions and reporting requirements for agreements on grouping for consumer packaging, with regard to the quantity and type of packaging placed on the market and the location of distributors (by 1.1.2028)		Targets for reuse – stage 1 (from 1.1.2030)	Submission of a report on the attainment of reusable packaging targets for the first reported year 2030 and subsequently each year (within 6 months from the end of the year)					Targets for reuse – stage 2 (from 1.1.2040)
				The Commission shall publish guidance on product types – exemptions and targets for consumer packaging (by 12.2.2027)									
				The Commission shall adopt IA – methodology for calculating reuse targets (by 30.6.2027)									
Art. 28, 32, 33	Re-filling (HORECA + distributors)			HORECA end-distributors will allow customers to bring their own container for filling (by 12.2.2027)	HORECA: possibility of using reusable containers for beverages and ready-to-eat meals consumed outside the point of sale (by 12.2.2028)		Targets for reuse – stage 1 (from 1.1.2030)	Submission of a report on the attainment of reusable packaging targets for the first reported year 2030 and subsequently each year (within 6 months from the end of the year)					Targets for reuse – stage 2 (from 1.1.2040)
							End-distributors with an area > 400 m ² shall allocate 10% of sales area to re-fill stations (food and non-food products) (from 1.1.2030)						
							HORECA: end-distributors – effort to have 10% of products in reusable packaging format (from 2030)						

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Art. 12	Packaging labelling		The Commission shall adopt IA – harmonised packaging labelling (material composition, reusable packaging, recycled content) (by 12.8.2026)	Voluntary labelling of packaging included in EPR (QR code or other digital labelling) (from 12.2.2027)	Mandatory harmonised labelling on packaging – material composition (from 12.8.2028 or 24 months from entry into force of the IA)	Labelling of reusable packaging – only in systems with an operator (from 12.2.2029 or 30 months from the entry into force of the IA)	The Commission shall adopt IA – a methodology for identifying substances of concern (by 1.1.2030)		Labelling of substances of concern according to the IA (within 24 months from the entry into force of the IA)				
			The Commission shall adopt IA – methodology for determining material composition + methodology for digital labelling (by 12.8.2026)		Voluntary labelling of recycled content – must comply with the IA and the methodology (from 12.8.2028 or 24 months from entry into force of the IA)								
Art. 15	EU Declaration of Conformity and Packaging Identification		EU DoC demonstrating that the packaging complies with PPWR (by 12.8.2026)										
			Manufacturer identification details and a packaging identification element on the packaging (by 12.8.2026)										

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Art. 25, 34, 43	Reduction of the amount of packaging waste			The Commission shall publish guidance on the further specification of the ban on certain plastic packaging (Annex V) (by 12.2.2027)			Ban (Annex V): single-use plastic packaging for fresh fruit and vegetables, seasonings, sauces, etc. in HORECA (from 1.1.2030)		The Commission shall assess the environmental impact of packaging restrictions, availability of alternatives, suitability of new restrictions and maintaining exemptions + legislative proposal (by 12.2.2032)		MS shall reduce the amount of packaging waste per capita by 10% compared to 2018 (by 2035)		MS shall reduce the amount of packaging waste per capita by 15% compared to 2018 (by 2040)
				The Commission shall adopt IA – methodology for calculating packaging waste generation (12.2.2027)			MS shall reduce the amount of packaging waste per capita by 5% compared to 2018 (by 2030)		The Commission shall review the packaging waste reduction targets (by 12.2.2032)				
									The Commission shall draw up a report on bags made of materials other than plastic (by 12.2.2032)				
Art. 44, 56, 57	Register and records		The Commission shall adopt IA – format for registration in the register and reporting (types of packaging and material categories) (by 12.2.2026)	The Commission shall adopt IA – methodology for packaging databases, amount of generated packaging waste, calculation of annual consumption of lightweight plastic bags per capita, and correction factor (by 12.2.2027)	MS shall adopt measures for packaging databases (within 12 months from the entry into force of the IA)	Expected start date for the new reporting							

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Art. 63	Green public procurement						The Commission shall adopt IA – minimum requirements for public procurement (packaging and packaged products) (by 12.2.2030)	Public procurement according to the procedures specified in the IA (from 12 months after the entry into force of the IA)					
Art. 67	SUP Directive					Ban on placing on the market of food and beverage containers made of extruded polystyrene (XPS), shrink wrap for luggage at airports/railway stations, plastic chips as filling material, plastic rings as group packaging ("6pack") (from 12.2.2029)							
Art. 68	Update of national legislation			MS shall incorporate the rules (penalties) into national legislation and notify the Commission (by 12.2.2027)									

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