

Packaging and Packaging Waste Regulation (PPWR)

What is PPWR?

It is a new EU wide law setting uniform rules across all EU Member states to minimise packaging waste, increase recyclability and restrict harmful substances.

Will I be impacted?

PPWR applies TO **ALL ECONOMIC OPERATORS** placing packaging or packaged products on the EU market, regardless of where the company is established.

It covers **ALL PACKAGING/ PACKAGING WASTE**, regardless of the type of packaging or the material used & regardless of source (manufacturing, retail, household, etc).

NOTE: "Placing on the market" does NOT require a sale.

What happens if non-compliant?

As it currently stands, Economic Operators will receive a first warning if found being non-compliant. However, if non-compliance persists, Member states may take further action such as prohibiting, recalling or withdrawing non-compliant packaging.

When do compliance obligations begin?

Core PPWR compliance obligations came into effect on **AUGUST 12TH 2026**, these include:

- **Ban on PFAS in food-contact packaging**
- **Limits on substances of concern/ heavy metals** (e.g. lead, mercury, cadmium, etc)
- **Conformity Assessment:** technical documentation must be gathered on each type of packaging and a Conformity Assessment performed in accordance with the requirements laid out in the regulation.
- **Declaration of Conformity:** Importers must have a DoC and keep a record of the accompanying technical documentation for each type of packaging they use. Packaging cannot be placed on the EU market without a Conformity Assessment & DoC.
- **Extended Producer Responsibility Registration:** There is currently no overarching EU EPR authority. Instead, each EU Member State has their own system. Manufacturers must register with the relevant national EPR systems in each EU Member State in which they place packaging on the market.

Further obligations will be phased in over time such as clear labelling, minimum levels of recycled content, recyclability at scale & limits on empty space.

How can BDO help?

STAKEHOLDER ENGAGEMENT:
We collaborate with suppliers to clearly explain PPWR requirements and ensure all parties understand their obligations.

DOC CREATION AND RECORD MAINTENANCE:
We create Declarations of Conformity on your behalf and establish record keeping systems for technical information.

PRODUCT CONFORMITY ASSESSMENT:
We conduct conformity assessments on your behalf to determine if packaging/ packaged products are compliant.

TECHNICAL DOCUMENTATION:
We collaborate with suppliers to gather the technical data necessary to perform a conformity assessment.

OBLIGATION CLARIFICATION:
Based on your role in the supply chain, we will clearly outline what is required of your business under PPWR.

EPR REGISTRATION:
We liaise with national EPR bodies throughout the EU to submit membership applications and clarify member-state level requirements.

For PPWR support, contact us today →

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