



INTERGRAF GUIDANCE DOCUMENT ON THE PACKAGING AND PACKAGING WASTE REGULATION.

VERSION 1
(SEPTEMBER 2025)



Disclaimer: For the purpose of maintaining the readability of this guidance, certain details that are not considered essential to the general interest of the industry have been intentionally omitted. For the complete and authoritative provisions, reference should be made directly to the Regulation.

BACKGROUND.

The Packaging and Packaging Waste Regulation ([EU 2025/40](#)) was adopted on 19 December 2024. It repeals the Packaging and Packaging Waste Directive first introduced in 1994 and amended on several occasions. The move from a Directive to a Regulation aims at ensuring a greater harmonisation and enforceability of packaging rules across the EU.

The Regulation will be completed with several **secondary legislation**, which will regulate the more technical aspects of the text.

TIMETABLE.

Entry into force: **11 February 2025**

Entry into application: **12 August 2026**

SCOPE.

The scope covers **all packaging**, regardless of the material used. It applies to both B2C and B2B.

Packaging is defined in Article 3 and an **indicative list of items** in the scope of the definition is provided in Annex I.

APPLICATION.

The requirements of the legislation are applicable to **Member States** and **economic operators**, including manufacturers, suppliers as well as users of packaging.

For the sake of this Regulation, the **MANUFACTURER** is the operator “*who manufactures packaging or a packaged product*” or “*has packaging or a packaged product designed or manufactured under its own name or trademark*”.

The **SUPPLIER** is the operator “*who supplies packaging or packaging material to a manufacturer*”.

When importing packaging from a non-EU country, the **IMPORTER** will have obligations under the Regulation.

IMPACT ON THE PRINTING INDUSTRY.

Printers will have obligations under the new Regulation in the following cases:

- Printers supplying manufacturers are **SUPPLIERS** under the Regulation
- Printers manufacturing packaging or a packaged product, or having it designed or manufactured under their own name or trademark, are **MANUFACTURERS** under the Regulation
- Printers supplying manufacturers, who are **micro-companies**¹ selling packaging under their own brand – if based in the same EU Member State - may be considered **MANUFACTURERS** under the Regulation.
- Printers **using packaging material** for their products on the EU market, including transport packaging, are also subject to obligations.
- Non-EU printers will not have direct obligations. The EU customer as first placer on the EU market will be the **IMPORTER** and will have the same obligations as a **MANUFACTURER**.

DESIGN REQUIREMENTS.

Design requirements are applicable to manufacturers.

SUBSTANCES IN PACKAGING

ARTICLE 5

Manufacturing of packaging should minimise the presence of **substances of concern** and consider the adverse impact on the environment due to microplastics.

The sum of the concentrations of lead, cadmium, mercury and hexavalent chromium resulting from substances present in packaging or packaging components shall not exceed 100 mg/kg.

By 12 August 2026: food contact packaging shall not contain **PFAS** (per- and polyfluorinated alkyl substances) above the limit indicated in Article 5.

RECYCLABLE PACKAGING

ARTICLE 6

All packaging shall be **recyclable** according to the following:

From 1/01/2030: meet the **design for recycling criteria** (to be established in secondary legislation established by 1/01/2028)

From 1/01/2035: be **recyclable at scale** (to be defined in secondary legislation by 1/01/2030)

By 1/01/2030: be **recyclable within grades A, B or C**

By 1/01/2038: be **recyclable within grades A or B**

Recyclability performance grades:

A ≥ 95%

B ≥ 80%

C ≥ 70%

Derogations to the recyclability requirements apply to: immediate packaging of medicinal products; contact sensitive packaging of medical devices; outer packaging of medicinal products; packaging used to transport dangerous goods; and sales packaging made from lightweight wood, cork, textile, rubber, ceramic, porcelain or wax.

¹ A micro-company is an enterprise that employs fewer than 10 people and has an annual turnover or an annual balance sheet total of no more than €2 million.

RECYCLED CONTENT

ARTICLE 7

Any plastic part of packaging placed on the market shall contain the following **minimum percentage of recycled content**:

	By 1/01/2030	By 1/01/2040
Single-use plastic beverage bottles	30%	65%
Contact sensitive packaging (PET)	30%	50%
Contact sensitive packaging (other than PET)	10%	25%
Other plastic packaging	35%	65%

Derogations to the recyclability requirements apply to: immediate and outer packaging of medicinal products; contact sensitive packaging of medical devices; compostable plastic packaging, packaging used to transport dangerous goods; packaging of supplies and components for the manufacturing of medicinal products; and food contact plastic packaging if not compliant with the FCM Regulation.

The state of technological development of **bio-based plastic packaging** will be reviewed by the Commission by **12 February 2028**.

COMPOSTABLE PACKAGING

ARTICLE 9

By **12 February 2028**: by derogation from the recyclability requirement, permeable bags or soft after-use system single-serve units of tea, coffee or other beverage; and **sticky labels** attached to fruit and vegetables will have to be compostable in industrially controlled conditions (according to standards to be developed by 12 February 2026).

MINIMISATION

ARTICLE 10

By **1 January 2030**: the weight and volume of packaging shall be **reduced to the minimum necessary** for enring its functionality taking account of the shape and material.

Annex IV provides a **methodology for packaging minimisation assessment**, including performance criteria (product protection, manufacturing processes, logistics, functionality, ...).

Packaging not compliant with the performance criteria listed in Annex IV and packaging with characteristics that are only aimed to **increase the perceived volume** of the product (including double walls, false bottoms, unnecessary layers) shall not be placed on the market.

Derogations apply to protected designs and products belonging to geographical indications.

PRINT-SPECIFIC ASPECTS

- **Paints, inks, varnishes, lacquers, and adhesives** directly on a product are **not covered by the definition of packaging**. They are therefore excluded from the requirement on minimum recycled content in plastic packaging.
- **Labels hung directly on or attached to a product**, including sticky labels attached to fruits and vegetables, do **fall within the definition of packaging**, since the adhesive is a glue and not a label.
- Labels, varnishes, paints, inks, adhesives and lacquers, as well as parts that represent **no more than 5%** of its total mass, should **not be considered as composite packaging** and are therefore not subject to a recycling target.
- For the establishment of **design for recycling criteria** of packaging material, the following elements will be considered and may impact future printing procedures of packaging: labels; adhesives and inks and lacquers/printing/coding. These will be developed under secondary legislation.

LABELLING REQUIREMENTS.

Labelling requirements are applicable to manufacturers.

LABELLING OF PACKAGING

ARTICLE 12

By 12 August 2028: Packaging shall be labelled with its **material composition** to facilitate consumer sorting. Harmonised labels and specifications will be developed in secondary legislation.

Derogations apply to: transport packaging (not e-commerce) and packaging part of a deposit/return system for which national labels will be applicable.

Reusable packaging shall be labelled by 12 February 2029.

Labels or inscriptions that are likely to mislead consumers with respect to the sustainability requirements are prohibited.

ENVIRONMENTAL CLAIMS

ARTICLE 14

Environmental claims on packaging shall only refer to properties that **exceed the minimum requirements** of this Regulation and shall specify whether they relate to the packaging unit, part of it or to all packaging placed on the market by the producer.

PACKAGING RESTRICTIONS.

ARTICLE 25

From 1/01/2030: Packaging formats listed in Annex V will be banned from the EU market.

These include:

- Single-use plastic grouped packaging
- Single-use plastic packaging for unprocessed fresh fruit and vegetables (less than 1.5kg)
- Single-use plastic packaging for food and beverages consumed in HORECA premises
- Single-use plastic packaging for condiments, sauces, cream, sugar...
- Single-use accommodation sector packaging intended for cosmetics/hygiene
- Very lightweight plastic carrier bags

OBLIGATIONS OF MANUFACTURERS.

Manufacturers (or importers) shall only place on the market packaging that comply with the **design requirements** (articles 5 to 11), **labelling requirements** (articles 12 and 14) and **packaging restrictions** (article 25).

Moreover, before placing packaging on the market, manufacturers shall:

- carry out a **conformity assessment procedure** (detailed in Annex VII)
- draw up a **technical documentation** (detailed in Annex VII) – see below
- draw up an **EU declaration of conformity** (detailed in Article 39 and Annex VIII)

The EU declaration of conformity and technical documentation have to be kept for 5 years for single-use packaging and 10 years for reusable packaging.

Manufacturer shall also ensure that the packaging bears a related type, batch or serial **number** allowing its identification. The packaging should also include the name of the manufacturer (registered trade name or trademark) and postal address, either on the packaging or on a QR code. Where the size and nature of the packaging does not allow, the information is provided in an accompanying document.

OBLIGATIONS OF SUPPLIERS.

ARTICLE 29

Suppliers of packaging or packaging materials have an **information obligation** to the manufacturer. Suppliers shall provide all the information and documentation necessary for the manufacturer to demonstrate the conformity of the packaging, including the **technical documentation**. Information can be provided in paper or electronic format.

TECHNICAL DOCUMENTATION

[ANNEX VII]

The technical documentation specifies the applicable requirements and covers, as far as relevant for the assessment, the design, manufacture and operation of the packaging.

It shall contain at least the following elements: (a) a general description of the packaging and its intended use; (b) conceptual design, manufacturing drawings and materials of components; (c) descriptions and explanations necessary for the understanding of the drawings provided under point (b) and the schemes and operation of the packaging; (d) a list of the harmonised standards; the common specifications; other relevant technical specifications used for measurement or calculation purposes; (e) a qualitative description of how the assessments provided for in Articles 6, 10 and 11 have been carried out; and (f) test reports.



Note that **when the manufacturer is a micro-company¹** and sells packaging under its own brand, the supplier of that packaging may be considered the manufacturer if based in the same EU Member State.

¹ A micro-company is an enterprise that employs fewer than 10 people and has an annual turnover or an annual balance sheet total of no more than €2 million.

OBLIGATIONS OF COMPANIES AS USERS OF PACKAGING.

EXCESSIVE PACKAGING

ARTICLE 24

By 1/01/2030: a **maximum of 50% empty space ratio** (including space filled with paper cuttings, air cushions, bubble wraps, sponge fillers, foam fillers, wood wool, polystyrene or Styrofoam chips) will be allowed in **grouped packaging, transport packaging** and **e-commerce packaging**.

A methodology for the calculation of the empty space ratio calculation will be established in secondary legislation.

PACKAGING REUSE

ARTICLE 29

From 1/01/2030: Economic operators shall ensure that **at least 40%** of the following packaging they use is **reusable**:

transport or sales packaging used to transport goods, including e-commerce, in the form of pallets, foldable plastic boxes, boxes, trays, plastic crates, intermediate bulk containers, pails, drums and canisters, including flexible formats or pallet wrappings or straps.

From 1/01/2040: It should be increased to at least **70%**.

From 1/01/2030: **100%** of the transport or sales packaging **between different sites of the same company**, as well as **B2B transport or sales packaging within the same Member State** shall be reusable.

⚠ Derogations apply to: **cardboard boxes** as well as transport packaging of dangerous goods; transport packaging for large-scale machinery; flexible format that is in direct contact with food.

For economic operators using **grouped packaging** in the form of boxes outside of sales packaging to group a number of products shall ensure that at least **10%** is reusable. Cardboard boxes are excluded from this requirement, and further derogations apply.

Exemption: micro-companies are exempted if they make not more than 1000 kg per calendar year of packaging available in a Member State.

OBLIGATIONS OF MEMBER STATES.

EPR SCHEMES

ARTICLE 44 & 45

The Regulation mandates Member States to implement an **Extended Producer Responsibility (EPR)** with a **modulation of the EPR fees** according to the **packaging recyclability performance grades** and, if they wish, also to the recycled content.

The currently applicable Packaging and Packaging Waste Directive from 2018 already mandated Member States to put in place EPR schemes for all packaging by 31 December 2024.

Secondary legislation will provide the details on the implementation of EPR schemes at national level **by 12 February 2026**.

Member States will establish a **register** to monitor compliance of manufacturers and importers with EPR requirements. They will have to register in the EPR register of each Member State where they market their packaging or packaged products.

NATIONAL TARGETS

ARTICLE 43, 49 & 52

The Regulation mandates Member States to achieve the following waste prevention and recycling targets.

Packaging waste prevention targets:

≥5% **by 2030**

≥10% **by 2035**

≥15% **by 2040**

Packaging collection targets:

By 1 January 2029: Member States will adopt mandatory collection objectives.

Packaging recycling targets:

	By 31/12/2025	By 31/12/2030
all packaging waste	≥ 65%	70 %
plastic	≥ 50%	≥ 55%
wood	≥ 25%	≥ 30%
ferrous metals	≥ 70%	≥ 80%
aluminium	≥ 50%	≥ 60%
glass	≥ 70%	≥ 75%
paper and cardboard	≥ 75%	≥ 85%

NON-COMPLIANCE.

ARTICLE 62 & 68

Economic operators are considered **non-compliant** when:

- the EU declaration of conformity has not been drawn up or drawn up correctly
- the QR code or data carrier do not provide access to the required information;
- the technical documentation is not available, is not complete or contains errors;
- the registered name or trademark is absent, false or incomplete; or other administrative requirement is not fulfilled
- the requirements on restrictions on uses of certain packaging formats or on excessive packaging are not complied with
- the requirements in relation to re-use or refill are not fulfilled
- the requirements on recyclable packaging and on minimum recycled content are not fulfilled.

Penalties are set up by the Member States. They shall be effective, proportionate and dissuasive. The failure to comply with the excessive packaging, the restrictions on use and reuse requirements shall include administrative fees.