

Guide to the PPWR

January 2025



**ROUNDTABLE FOR REUSABLE
CONTAINERS TRAYS
AND PALLETS**
COMMITTED TO CIRCULAR PLASTICS



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Disclaimer:

The Packaging and Packaging Waste Regulation has been formally adopted by the European Parliament and the Council of the European Union. It was published on 22 January 2025 and will enter into force on 11 February 2025. This document is based on the final version of the PPWR, published in the official journal of the European Union [accessible [here](#)]

This document represents the RCTP Secretariat's understanding of the legislation and should not be relied upon as legally binding or for compliance with the Regulation (please refer to the full text of the Regulation).

Summary: What the PPWR means for you

What is the PPWR?

The PPWR is the EU regulation setting out the rules on packaging. Its goal is to reduce packaging waste.



From when will the PPWR apply?

The PPWR was published on 22 January 2025 and it will enter into force 20 days later, on 11 February 2025. The PPWR will apply from 18 months after its entry into force, in particular from 11 August 2026. Specific relevant provision of the PPWR will have other, later dates of application, which are further presented in this guide.

Key general provisions in the PPWR

- **Reuse** has been defined and mandated in a legally binding EU text that will directly apply in all EU member states from 11 August 2026 onwards.
- Packaging reduction targets will be in place for EU member states
- Mandatory design for recycling by 2030
- Most plastic packaging will have to contain a minimum percentage of recycled materials
- Wide limitations and bans on single-use packaging for foods, beverages and in the HORECA sector
- Bans on PFAS in food contact packaging.

Reuse Targets

- Reuse targets set for transport packaging for 2030 (40%) and 2040 (70%)
- All B2B transport packaging in one country and between sites is to be 100% reusable

Recycled Content

- By 2030 plastic packaging must contain a minimum percentage of recycled content
- There are 2030 and 2040 targets
- Different targets apply to PET and non-PET contact-sensitive packaging, and other types.

Others

- A maximum empty space ratio of 50% in grouped, transport, and e-commerce packaging
- Member states must meet packaging reduction targets of 5% by 2030, 10% by 2035, and 15% by 2040

Implementation Timeline

Overview of requirements and deadlines

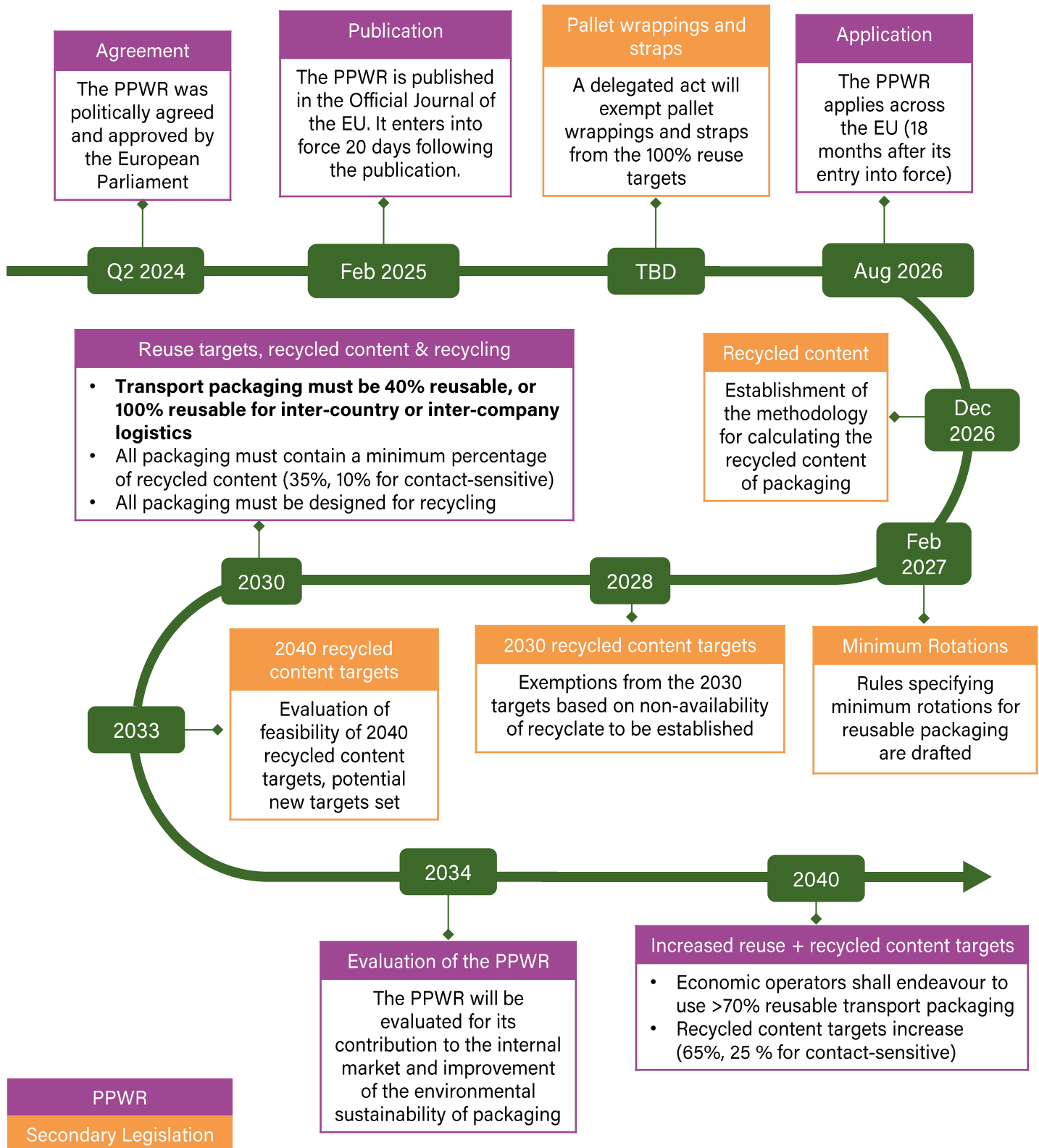
The Packaging and Packaging Waste Regulation is introducing numerous requirements for producers of packaging and sets out different targets that the producers will need to achieve. Following the applicability of the PPWR in 2026, the legislation puts forward several requirements on recycled content, recyclability criteria, utilisation of reusable packaging.

Requirement	Deadline
Commission sets out framework for register of producers for EPR schemes	February 2026
Member States implement national register of producers for EPR schemes	August 2027
Reusable packaging placed on the market must bear a reuse label	February 2029
40% of transport packaging must be reusable	2030
100% of for inter-company or inter-member state transport packaging must be reusable	2030
All packaging must contain a minimum percentage of recycled content (35%, 10% for contact-sensitive)	2030
All packaging must be designed for recycling (with grades A and B)	2030-2038
70% of transport packaging must be reusable	2040
All packaging must contain a minimum percentage of recycled content (65%, 25% for contact-sensitive)	2040

Disclaimer: reliance on secondary legislation

The PPWR's targets are subject to numerous delegated and implementing acts that the European Commission is developing over the coming years. The following pages will include an overview of such, and the expected timeline.

Implementation Timeline



Reuse Targets

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Scope

Reuse targets will apply to transport packaging or sales packaging used for transporting products in the EU. This includes via e-commerce.

Loophole
Reuse targets do not apply to cardboard boxes

Packaging types:

- pallets
- foldable-plastic boxes
- boxes
- trays
- plastic crates
- intermediate bulk containers
- pails
- drums and canisters of all sizes and materials, including flexible formats
- pallet wrappings or straps for stabilisation and protection of products put on pallets during transport*

**will be exempted from the 100% reuse target in a delegated act*

Targets

Transport packaging or sales packaging used for transport

used within one member state or to deliver goods between sites of the same operator in different member states

by 2030

40% must be reusable packaging

by 2040

70% should be reusable packaging

must be **100% reusable** by 2030

Definition of reuse:

're-use' means any operation by which reusable packaging is used again **multiple times** for the same purpose for which it was conceived;

Interesting for bottle-crate manufacturers

Reuse targets for sales packaging for alcoholic and non-alcoholic beverages:

- 10% by 2030
- 40% by 2040 (non-binding)



National deviations

- Individual member states **can** set **higher** reuse targets than those set out in the PPWR
- A member state that recycles >55% of its plastic packaging **and** prevents 3% waste by 2028 (compared to 2018 levels) **can** also **exempt** its economic operators from the reuse targets
 - Recycling statistics can be found on [Eurostat](#) (most recent available data is from 2021)

Recycled Content Targets

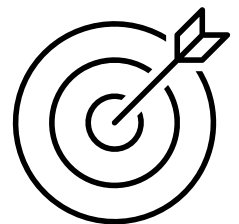
Overview

Recycled content targets have been set for plastic packaging. These targets lay out the minimum percentage of post-consumer plastic that must be included in packaging.

any plastic part of packaging

by **2030**
must contain **35%** recycled content

by **2040**
must contain **65%** recycled content



non-PET contact-sensitive packaging

by **2030**
must contain **10%** recycled content

by **2040**
must contain **25%** recycled content

calculation method

per packaging type and format

calculated as an average per manufacturing plant, per year

Example packaging type and format (PPWR Annexe II):

- Type: HDPE and PP – rigid
- Format: Crates and pallets, corrugated board plastic

Definition of post-consumer plastic waste:

Covers plastic waste generated from plastic products that have been supplied for distribution, or use and placed on the market

Therefore, we believe that own re-grind is covered in the definition.

Still to come: Secondary Legislation

The PPWR still needs to be fleshed out in certain areas. The tool used for expanding primary legislation (i.e. the PPWR) in more technical areas is **secondary legislation**.

This is drafted by the European Commission. Secondary legislation will be key in determining many important areas. The devil is in the detail.



Key decisions via secondary legislation

- Number of rotations for reuse
- Recycled content targets
- Recyclability of packaging
- Reuse target exemptions and assessment of 2040 targets

Content of secondary legislation	Deadline
Exemption for pallet wrappings and straps	ASAP, likely end 2025
Development a harmonised reuse label	August 2026
Methodology for calculating recycled content in packaging	December 2026
Rules specifying minimum rotations	February 2027
Exemptions from the 2030 recycled content targets based on non-availability of recyclate	2028
Design for recycling criteria and recyclability performance grades	2028
Methodology for recycled-at-scale assessment	2030
Evaluation of feasibility of 2040 recycled content targets	2033

