

Recyclable solutions for everyday packaging

PACK FOR THE FUTURE

Packaging Fair
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Chassé Theater
Claudius Prinsenlaan 8, Breda



PPWR : What needs to be done now?

Floriane de Kerchove

Public & Regulatory Affairs, Fost Plus

Paul Christiaens

Specialist (inter)national developments, Verpact

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Introduction PPWR

01

EU-legislation on packaging, now and upcoming

PPWD

EU-Directive

National legislation

Since 1994

PPWR

EU-Regulation

Direct effect

from 2026 onwards



PPWR, why?

Goals



Whole lifecycle of packaging



Level playing field / internal EU market



Climate neutrality by 2050



2025

2026

- First obligations on 12-08**
- Declaration of Conformity
 - Declaration changes

- 12/02: Bring your own in HORECA to go
- 12/02: Green dot forbidden
- 12/08: Register of producers established

2027

- First year for declaration in Register of producers
- 12/02: 10% reusable packaging in HORECA to go
- 12/02: Compostable (fruit & vegetable-stickers, coffee-theebag)
- 12/08: Empty space ratio
- 12/08: uniform EU-labelling of packaging

2028

- Requirements for calculation of percentage recycled content
- Collection targets beverage containers / DRS
- National collection targets
- 12/02: labelling obligations for reusable packaging

2029

- Full effect**
- All packaging recyclable: A, B, C, D (mandatory modulation)
 - Minimum recycled content (voluntary modulation)
 - New measures to reduce material use
 - Maximum empty space (50%)
 - Refill requirements (final distributor)
 - Reuse obligations (economic operators)
 - Restriction on use of certain packaging formats
 - Prevention of packaging waste targets (Member State)

2030

Roles

02



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Who's who? The roles

General representation, there are exceptions

- **Supplier:** company that supplies to manufacturer.
- **Manufacturer:** owner of a brand or the company which commissions the manufacture and packaging of a product.
- **Importer:** company within the Union that places packaging* or packaging of packaged products from third country on the market.
- **Distributor:** any company, other than Manufacturer or Distributor, that makes packaging* or packaging of packaged products available on the market.
- **End user:** consumer, or company that no longer makes the packaging* or packaging of packaged products available on the market.

*This refers to transport packaging, service packaging, primary production packaging



Who is the Producer?

Or the company which declares?

Manufacturer

For making available within the country, and for making available to end users in other EU countries (in that case the declaration must be filed in the end user's country).

Importer

For all imported packaging* or packaging of packaged products that remain in the country, as well as those delivered to end users in other EU countries (although in that case, the declaration must be filed in the end user's country).

Distributor

For all packaging or packaging of packaged products* sourced from another EU country and resold to another distributor or an end user.

End user

Never

For deliveries to businesses or individuals outside the EU: the PPWR does not apply in those cases, but rather the laws of the country of destination

*This refers to transport packaging, service packaging, primary production packaging



Conformity assessment

03

Conformity of packaging

Get your packaging passport in order

WHAT

Mandatory 'self-assessment' and declaration for each individual packaging, to comply with sustainability requirement.

Manufacturer – draw up and keep

Supplier – provide information and documentation

Importer – receive and keep

Distributor – due diligence

WHO

HOW

PPWR conditions (bijlage VII)

PPWR format for declaration (bijlage VIII)

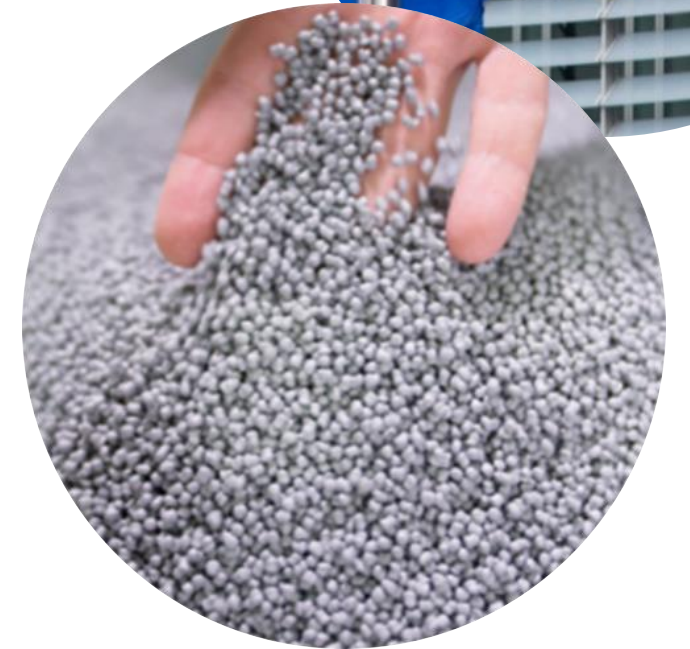
WHEN

12 August 2026

USE

For now: **access** to the EU-market.

For future reference: **documentation and evidence** that packaging complies with specific design requirements.



Important to realise

- Starting **August 12, 2026**, all packaging must have a declaration of conformity
 - ➔ If no declaration of conformity is provided, the packaging may be removed from the market following an inspection.
- Compliance applies **to each individual packaging** (in terms of composition).
- The same company is not the manufacturer for every **type of packaging**.
- Conformity consists of **two parts**:
 - Administration and analysis, and if the result is positive:
 - Declaration of conformity
- The declaration of conformity applies to the **entire EU-market**.



Conformity: WHAT is part of the conformity assessment?

Not all rules take effect on Augustus 12



Article 5: Limits to substances of concern

- ✓ Per Augustus 12 2026
- ✓ No additional rules



Article 6: Recyclability

- ✓ **Not required for DoC** per August 12
- ✓ **Status Quo till 2030**, EN 13430 can be used as extra guidance
- ✓ 2030 onwards extra requirements for Recyclability (Recycling Performance Grades) + fee modulation



Article 7: Use of post-consumer recycle in plastic parts of packaging

- ✓ 2030 onwards
- ✓ End of 2026 more clarity



Article 8: Possibly additional legislation, based on evaluations

- ✓ Per February 12, 2028



Article 9: Stickers on fruit & vegetable + coffee-theebags compostable

- ✓ Per February 12, 2028



Article 10: Packaging minimisation

- ✓ **Not required for DoC** per August 12
- ✓ **Existing requirements** and compliance standard remain in effect: EN 13428 can be used as guidance
- ✓ 2030 onwards, harmonised standards



Article 11: Minimum requirements for reusable packaging, a.o. minimum # rotations

- ✓ 2030 onwards
- ✓ Additional rules February 2026



Article 12: Regulation on the use of symbols on packaging

- ✓ Feb 12 2027: ban on 'isolated green dot'
- ✓ Aug 12 2028: uniform symbols: composition + disposal guide
- ✓ Aug 12 2028: national symbols DRS
- ✓ Aug 12 2029: uniform symbols + QR-code reusable packaging

Your conformity = your passport

Packaging information as the foundation



Document **technical specifications** regarding packaging: materials, weight, presence of constituents, content, protection, load capacity, etc. Analyze these for conformity.



Record everything in a **system**.

The information can serve as:



- **License to operate**: access to the market
- Evidence of compliance with **individual targets**
- Basis for **declaration** of packaging on the market



Make data **interoperable** throughout the supply chain, even when obligations rest with other economic operators: **a single set of data** (single source of truth).



Recyclability

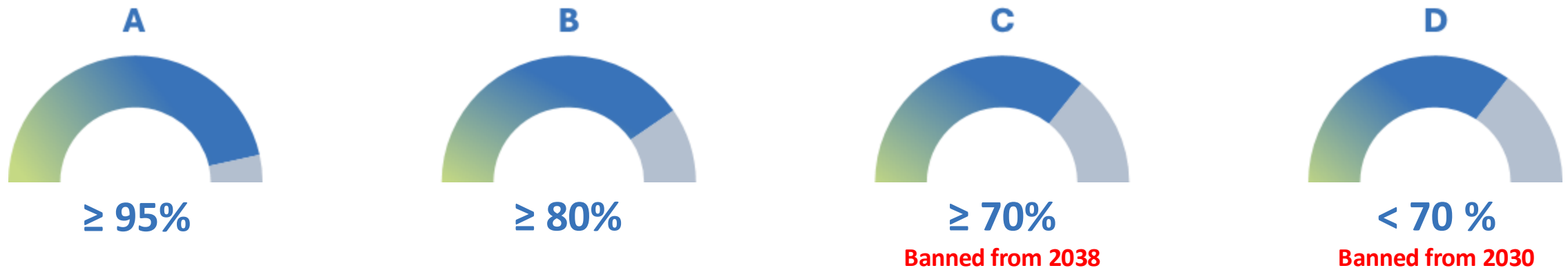
04



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Design for Recycling

Performance grade = recyclability performance for the entire packaging

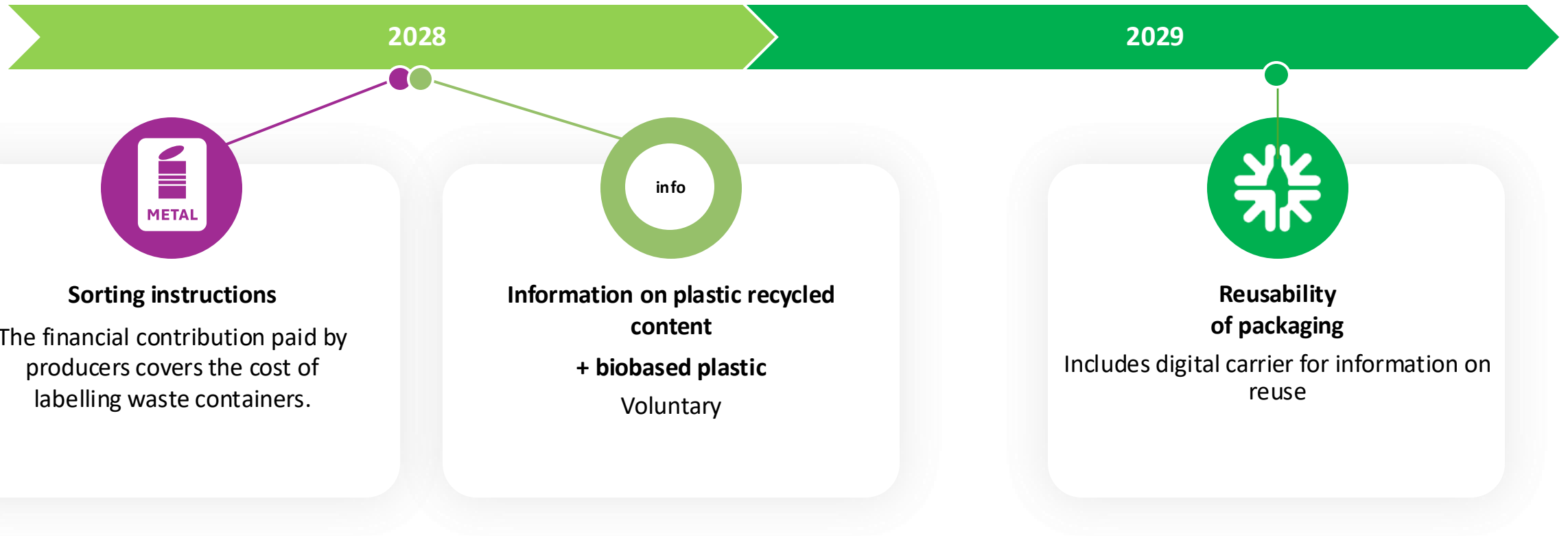


- **By January 2028:** The Commission proposes delegated acts to set D4R criteria and recyclability performance grades.
- **From 2030: financing contributions** based on performance grades A – C.
- **By 2035,** packaging must **be recycled at scale**; otherwise its recyclability performance grade can be downgraded (at scale = annual amount of recycled material of at least 55%).

Labelling

05

Harmonised Labelling

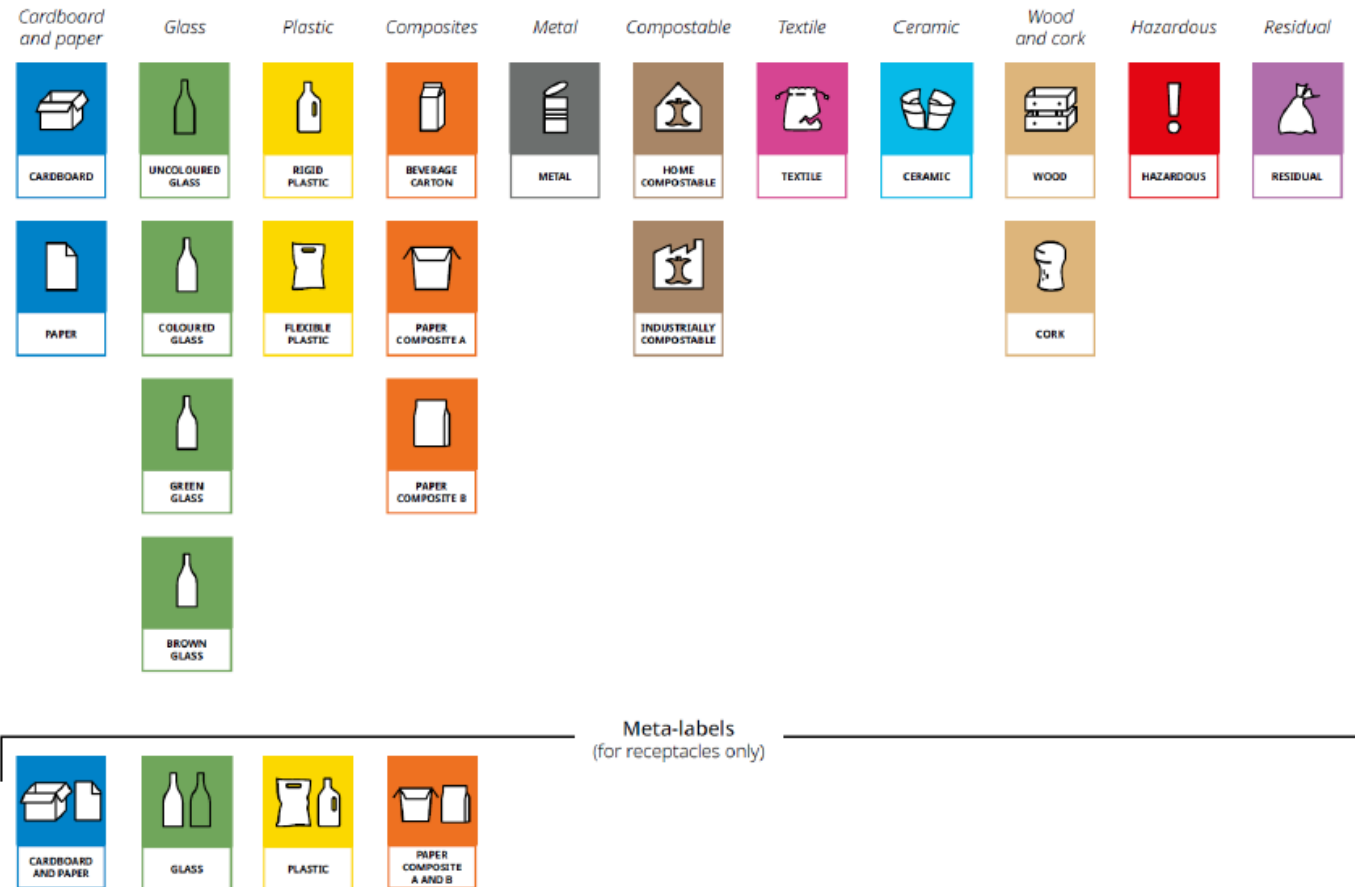


+ label (national/EU) for packaging with DRS system when implemented

Sorting labels

- **On packaging and waste receptacles**
 - to make sorting easier for consumers (i.e. not for transport packaging, except for e-commerce)
- **Current status: JRC technical proposal (Jan 2026):**
 - labels with/without text and in colour/B&W
 - 3 options for the receptacles
- **Next steps:**
 - Implementing act (< 08/2026?)
 - August 2028: labels on packaging and waste containers

Figure 13. Pictograms and materials as used in the proposed EU harmonised waste sorting labelling scheme.



Source: Author's elaboration.

not translated – example of plastic stream collection

Option 3a



France

Denmark

Belgium



Plastic collection in a country commingling paper and plastic

Plastic collection in a Nordic Scheme implemented country

Plastic collection in a country using bags for door-to-door collection



not translated – example of plastic stream collection

Option 3b



France

Denmark

Belgium



Plastic collection in a country commingling paper and plastic

Plastic collection in a Nordic Scheme implemented country

Plastic collection in a country using bags for door-to-door collection



Deposit and Return System (DRS) labels

Reminder:

- DRS for single-use plastic beverage bottles and single-use metal beverage containers <3 L.
- Exemptions: Selective collection rate above 80% in 2026 and after submission of implementation plan by MS to achieve 90% by 1/1/2029.

Different situations in Member states > example:

- Belgium : no DRS at the moment (still in discussion).
- Netherlands: DRS implemented.

Labels

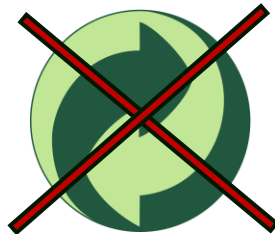
- PPWR: national labels + possible EU harmonised label (decision MS).

Digital marking technology

- **Digital marking for:**
 - Identification of packaging containing substances of concern (SoC).
 - Additional information (e.g. reuse, sorting instructions, recycled or bio-based plastic).
- **QR-code** or other type of standardised, open, digital data carrier.

No misleading or confusing labels

Examples



Green dot: < Feb 2027
(use of QR code allowed instead)



Others: < August 2028 (tbc)

> Guidelines European Commission where appropriate

Transition period

In general, packaging which was lawfully placed on the market before 12 August 2026, or otherwise before the date of application of a specific provision, may remain on the market without having to be brought into compliance, withdrawn or recalled.

Producer, register and reporting

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Producer

	PPWR	Belgium	Netherlands
New definition of producer	Makes available for the first time in the Member State >12/08/2026	Clarification from EC required	
No more minimum threshold		No > 300 kg starting from 12/8/2026	Threshold in 2026 still applicable
New packaging: tea and coffee bags, tea and coffee capsules	>12/8/2026	New specific fees > 12/8/2026	Existing fees 2026
Authorised Representative for EPR	To be appointed by a producer when not established in MS >12/8/2026	Idem > 12/8/2026 To be communicated to PROs by members. Registration in 'proto-register'	Idem >12/8/2026 To be communicated to PRO by producers

Register of producers

	PPWR	Belgium	Netherlands
Register of producers	MS : national register 12/8/2027 (or later depending on I.A.*)	'Proto-register': registration via Fost Plus and Valipac for members >12/08/2026	National register managed by Rijkswaterstaat (Department of Public Works and Water Management)
	Fee possible	175€/registration/year/ organisation (starting from 2027)	

* Implementing Act foreseen for 12/2/2026 (+18 months) but not adopted yet => new register for 1/1/2028?

Reporting

	PPWR	Belgium	Netherlands
Reporting	Format of reporting tbd in an I.A. (12/2/26* + 18 months)	2026: same format as today 2028*: new reporting format (based on I.A.) => 1st reporting year for producers : mid 2029 for 2028	

* Implementing Act foreseen for 12/2/2026 (+18 months) but not adopted yet => new register for 1/1/2028?

Thank you for your attention.
Time for questions!

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