EU PPWR COMPLIANCE WHITE PAPER

FROM ARTICLES TO EXECUTION CHECKLIST

(Importer & Brand Edition, 2025)

EU PPWR Compliance White Paper

From Articles to Execution Checklist
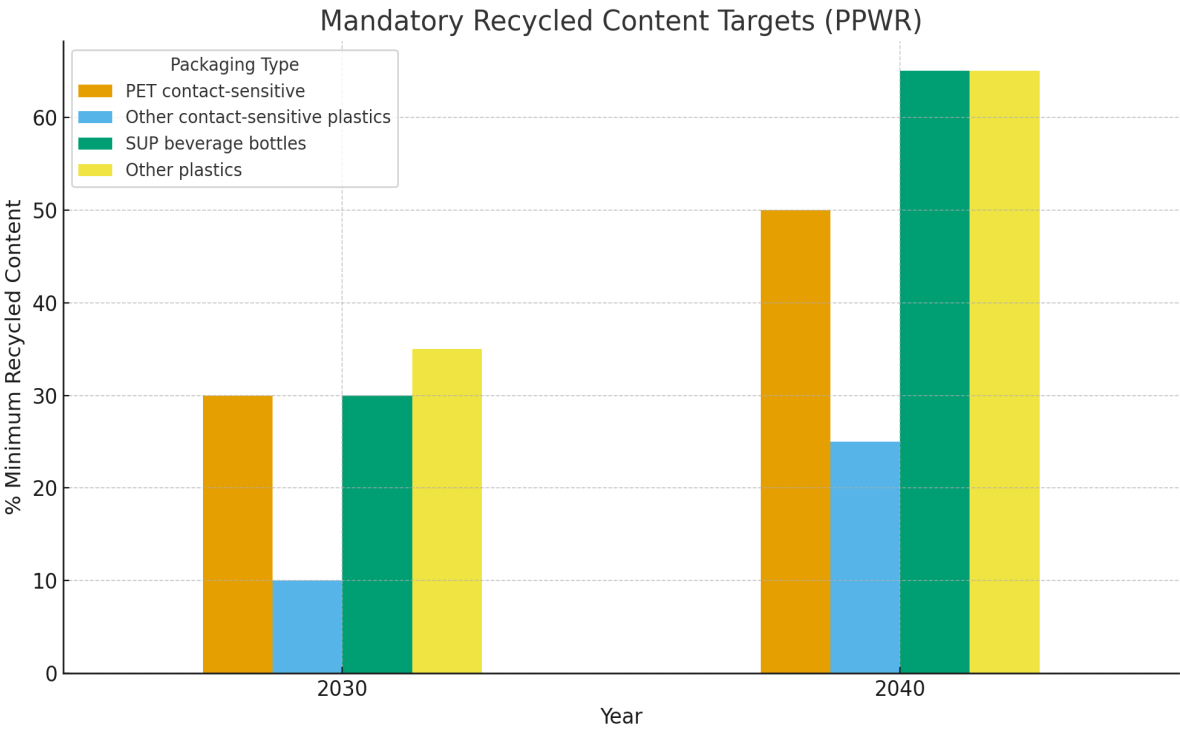
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Executive Summary

The EU Packaging & Packaging Waste Regulation (PPWR) sets binding requirements for recyclability, recycled content, compostability, harmonised labelling, and PFAS limits. Application starts in August 2026; recyclability grades apply from 2030; A/B grades only from 2038.

Year	Requirement
2026	PPWR applies across all Member States
2028	Harmonised labelling; Compostability for tea/coffee bags & fruit labels
2030	Recyclability grades A/B/C mandatory; Plastic recycled content thresholds apply
2038	Only grades A/B recyclable packaging permitted

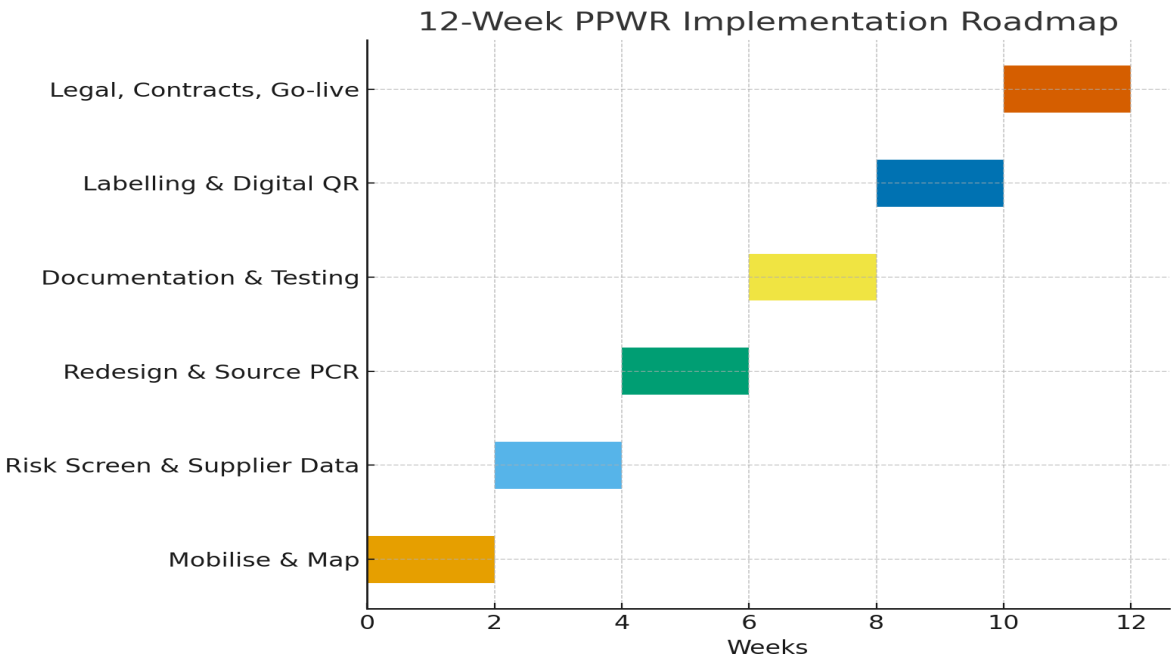# Design-for-Recycling & Plastic Recycled Content

Packaging must achieve recyclability grades A/B/C by 2030. Delegated acts will define criteria. By 2040, only grades A/B will remain permissible. Plastic packaging faces recycled content targets that increase significantly between 2030 and 2040.

Mandatory Recycled Content Targets (PPWR)

Category	2030 Target	2040 Target
PET contact-sensitive	30%	50%
Other contact-sensitive plastics	10%	25%
SUP beverage bottles	30%	65%
Other plastics	35%	65%

12-Week Implementation Plan

A stepwise plan ensures readiness within 12 weeks. Each block covers 2 weeks, spanning mobilisation, risk screening, design changes, documentation, labelling, and final audits.

12-Week PPWR Implementation Roadmap

Week	Action	Owner / KPI
1-2	Mobilise project & map SKUs	Regulatory Manager
3-4	Risk screen & supplier data	Procurement / QA
5-6	Redesign & source PCR	Packaging R&D
7-8	Documentation & testing	Quality / Compliance
9-10	Labelling & digital prep	Marketing / IT
11-12	Legal review & go-live	Legal / Ops

ERP/PLM Field Template

ERP/PLM systems must capture detailed compliance fields for every SKU to align with PPWR requirements. Below is a recommended schema structure:

Field	Example
SKU ID	BG12345
Category	Bagasse Bowl
Primary Material	Bagasse Pulp
Barrier	PLA Coating
Recyclability Grade Target	B
Recycled Content %	30%
Compostability Certification	EN 13432
Label Language Set	27 EU languages
QR Linkage	Yes

Market Context

In 2022, EU citizens generated 186.5 kg of packaging waste per capita, totalling 83.4 Mt. Paper/cardboard represented 41%, plastics 19%, glass 20%, metals 5%. Plastic packaging recycling lags at 41%, highlighting the urgency of compliance. PFAS restrictions (50 ppm threshold) further shape packaging innovation.

Material	Share of Total Packaging Waste (2022)
Paper/Cardboard	41%
Plastics	19%
Glass	20%
Metals	5%
Others	15%

References

1. European Commission – Regulation (EU) 2025/40, Official Journal of the EU
2. European Council Press Release – PPWR adoption 2025
3. Eurostat – Packaging Waste Statistics 2022
4. CEN – EN 13432 Compostability Standard
5. Ellen MacArthur Foundation – Global Commitment Report
6. OECD – Extended Producer Responsibility Review
7. European Environmental Bureau – PFAS in Food Packaging
8. RecyClass – Design-for-Recycling Guidelines
9. European Parliament – Circular Economy Reports
10. EU FAQs on Single-Use Plastics and PPWR transition