



Packaging and Packaging Waste Regulation (EU) 2025/40

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State of play

- Commission's proposal: 30/11/2022
- European Parliament's position for negotiations: 22/11/2023
- Council's position for negotiations (the General Approach): 18/12/2023
- Technical (many...) and two political trilogues: between January – March 2024
- Provisionally agreed text on 24/04/2024
- Lawyer linguists' correction procedure (June – November 2024)
- **Final adoption: 19 December 2024**
- **Publication: 22 January 2025: [Regulation \(EU\) 2025/40 of the EP and the Council](#)**
- **Entry into force: 11 February 2025**
- **Application: 18 months after the entry into force (12 August 2026)**; but application of several provisions only by 2030 or linked to the adoption of secondary legislation (whichever is the latest)

Key measures



- **Full harmonisation of sustainability requirements** (hazardous substances, recyclability, recycled content in plastic packaging, compostability, minimisation, reusability)
- **Packaging waste prevention targets on MS** of 5% (2030), 10% (2035), 15% (2040) measured against waste generation from 2018
- **Mandatory deposit and return systems** for beverage cans and plastic bottles (obligation on MS) along with minimum requirements



- Harmonised **packaging labels for sorting** of packaging waste (except for DRS packaging)
- All packaging must be **recyclable by 2030**; by 2035, if also “effectively” recyclable
- **Minimum recycled content for plastic** packaging (with limited exemptions)
- **Prohibited substances** in packaging by 2030, (4 heavy metals and PFAS; a report to identify others)
- **Prohibited single use packaging formats (Annex V and amendment of Single Use Plastics Directive EU/2019/904)**



- **Reuse targets** for transport packaging, e-commerce packaging and beverages sold in retail sector
- **Empty space ratio** of 50% for grouped, transport and e-commerce packaging
- **Take-away sector** to offer customers the possibility of bringing their own containers (by 2027), ensure re-use offer by 2028 and shall endeavour offering 10% of their products in reusable packaging by **2030**
- More harmonisation of **extended producer responsibility** for packaging

Key measures

Regulation to be complemented by many delegated and implementing acts [14], guidelines [4], standardization requests [3] and studies and reports [13].



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Structure of reuse



Reuse targets

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Reuse/refill system

Economic operators that use reusable packaging must participate in an existing reuse system or a new reuse system compliant with Annex VI – part of technical documentation

Economic operators ensure that reusable packaging is reconditioned pursuant to Annex VI

Information to consumer requirements for refill systems, compliance of refill systems with Annex VI



Reusable packaging

Sustainability requirements

Reusable packaging complying with a series of conditions, such as minimum number of rotations



Enabling measures

MS to encourage the use of re-use and refill systems incl. through:

- DRS systems for reusable packaging
- economic incentives (e.g. on retailers)
- additional reuse targets

MS to ensure that EPR and DRS systems use a minimum % of their budget for reduction and prevention measures

Reuse targets

User

Transport packaging or “sales packaging used for transporting products”
in the form of pallets, foldable plastic boxes, boxes, trays, plastic crates,
intermediate bulk containers, pails, drums and canisters, flexible formats or
pallet wrappings or straps

40% within the EU from 2030

70% within the EU from 2040 (aspirational)

100% within the same company and for B2B within the same MS in 2030

Reuse targets' exemptions

Member States may exempt operators if the MS is reaching recycling rates 5% above the targets for 2025 and 2030, and packaging waste reduction target of 3% in 2028 compared to 2018

Micro-enterprise or economic operator with < 1000 kg of packaging per year.

Member States may exempt final distributors with a sales area < 100 m² & on islands < 2000 inhabitants (beverages)

Certain beverage packaging (highly perishable, grapevine products, aromatised wine, alcoholic spirituous beverages)

Possibility to adopt delegated acts to exempt additional economic operators or packaging formats due to economic constraints, hygiene and food safety issues and environmental issues

Reuse – Article 29(1)

- From 1 January 2030, economic operators that use transport packaging, or sales packaging used for transporting products, including for products distributed via e-commerce, **within the territory of the Union**, in the form of pallets, foldable-plastic boxes, boxes, trays, plastic crates, intermediate bulk containers, pails, drums and canisters of any size or material, including flexible formats or pallet wrappings or straps for stabilisation and protection of products put on pallets during transport, shall ensure that at least 40 % of such packaging in total is reusable packaging within a re-use system.

COM Legal Service to advise

- Goal: a practical interpretation that sets equal rules for all intra/extra EU economic operators

Expert Group on Waste - Implementation

- Expand Expert Group on Waste (EGW) to integrate all stakeholders
 - => notably to obtain their constructive input for the implementing legislation on the PPWR.
- EGW will consist of both representatives from Member States and the industry
- The Commission ready to ensure proportionate and smooth transition

Thank you!

For further questions, please reach out to: loannis.antonopoulos@ec.europa.eu