



PPWR timeline

Key obligations and dates under the EU Packaging and Packaging Waste Regulation (EU) 2025/40

Key requirements for reusable packaging, who they affect and what they mean in practice for Sæplast users. Includes importer duties, reuse reporting, recycled-content targets and recycling milestones through 2040.

2025-26

Reusable-packaging requirements, conformity, reuse systems and EPR.

2027-29

Rotations, annual reporting, empty space and labelling.

2030-38

Reuse targets, minimisation, recycled content and recycling grades.

2040

Higher recycled content and the aim of 70% reuse.

Built for repeated use. Durable containers, repair options and end-of-life recycling are central to the Sæplast approach.

Timeline of obligations

Reusable packaging and general application. Bold labels identify who each requirement affects.

11 Feb 2025 Reusable-packaging requirements

Art. 11 Annex VI	Reusable packaging requirements: designed for many rotations, can be emptied/refilled without losing function, can be reconditioned, safe for workers In practice: Core requirement for tubs, pallets and IBCs to count as reusable	Manufacturer
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12 Aug 2026 General application

Art. 5	Substance limits: lead + cadmium + mercury + Cr(VI) ≤ 100 mg/kg; PFAS limits in food-contact packaging; minimise substances of concern In practice: PFAS limits apply to food-contact packaging only	Manufacturer
Art. 15	Conformity assessment (Annex VII); technical documentation; EU declaration of conformity; identification marking (type/batch/serial); marking or QR code with name and contact details; documentation kept 10 years for reusable In practice: Buyers should request the declaration of conformity	Manufacturer
Art. 16	Provide manufacturers with information needed to show conformity In practice: Resin and component suppliers to the manufacturer	Supplier of packaging or materials
Art. 18	Verify conformity before placing on market; add own name and contact details In practice: Packaging imported from outside the EU	Importer
Art. 19	Verify that packaging bears required marking and information before making it available In practice: Dealers and resellers	Distributor
Art. 21	Manufacturer obligations transfer to anyone who markets packaging under their own name/trademark or modifies it In practice: Customer-branded or modified packaging	Importer or distributor
Art. 26 Art. 27 Annex VI	Re-use system in place for reusable packaging: rules, tracking, reconditioning, incentives for re-use In practice: Closed loops between a processor and its customers count; incentives for re-use can be deposits	Economic operators making reusable packaging available; users running their own closed loops
Art. 44	Registration in each Member State where packaging is first made available In practice: Fillers shipping filled packaging to other Member States	Producer or PRO
Art. 47	Authorisation of PRO or individual EPR compliance In practice: Mostly handled by PROs	Producer or PRO
Art. 45	EPR obligations incl. financial contributions In practice: Fee paid on first making available	Producer

Reporting and labelling

Registration applies from 12 August 2026 onwards; national dates vary. Later milestones are shown below.

●	12 Feb 2027	Delegated act due	
	Art. 11	Minimum number of rotations for reusable packaging In practice: Delegated act will define what reusable means in numbers	Manufacturer
●	1 Apr 2027	Annual reporting, at the earliest	
	Art. 44	Annual reporting of packaging volumes In practice: For the preceding calendar year	Producer or PRO
●	12 Feb 2028	Sales packaging	
	Art. 24	Empty-space limitation: minimise empty space in sales packaging In practice: The filler (the user), not the manufacturer	Economic operator filling the packaging
●	12 Aug 2028	Material label, at the earliest	
	Art. 12	Material-composition label In practice: Not for transport packaging and deposit and return systems	Manufacturer
●	12 Feb 2029	Reusable label, at the earliest	
	Art. 12	Label plus QR code/data carrier informing users that packaging is reusable In practice: Check whether transport packaging is exempt	Manufacturer

What users should prepare

Request the declaration of conformity. Identify who fills packaging and who first makes it available in each market. Keep records of volumes, rotations and reusable fleets to support reporting.

Reuse and circularity

Milestones from 2030 onwards, including recycling and recycled-content requirements.

1 Jan 2030 Design, filling and reuse

Art. 24	Empty-space limitation: max 50% empty space in grouped packaging, transport and e-commerce packaging In practice: The filler (the user), not the manufacturer	Economic operator filling the packaging
Art. 10 Annex IV	Packaging minimisation by weight and volume In practice: Separate from Art. 24: Art. 10 is about design, Art. 24 about filling	Manufacturer or importer
Art. 29	Reuse system with 100% reuse of transport packaging, or sales packaging used for transport, used (a) between sites of the same company or partner/linked enterprises, and (b) for deliveries to another operator in the same Member State In practice: Pallets, crates, boxes, IBCs are explicitly listed; dangerous goods exempt	Economic operators using the packaging
Art. 29	Reuse system with reuse of at least 40% of transport packaging, or sales packaging used for transport, used within the EU. In practice: Pallets, crates, boxes, IBCs are explicitly listed; dangerous goods exempt	Economic operators using the packaging
Art. 31	Reporting on achievement of reuse targets to the Competent Authority. First reporting year: 2030. In practice: Users need data like rotation and fleet records	Economic operators
Art. 6 Annex II	Design-for-recycling requirements from 1 January 2030; recycled at scale from 1 January 2035; grade C banned from 1 January 2038. In practice: Packaging for dangerous goods exempt	Manufacturer
Art. 7	Minimum recycled content in plastic packaging: 10% in food packaging and 35% in other packaging from 2030. In practice: Calculated per manufacturing plant per year; packaging for dangerous goods exempt	Manufacturer or importer

1 Jan 2040 Higher targets

Art. 29	Aim of 70% reuse of transport packaging, or sales packaging used for transport, used within the EU. In practice: Pallets, crates, boxes, IBCs are explicitly listed; dangerous goods exempt	Economic operators using the packaging
Art. 7	Minimum recycled content in plastic packaging: 25% in food packaging and 65% in other packaging from 2040. In practice: Calculated per manufacturing plant per year; packaging for dangerous goods exempt	Manufacturer or importer

Who does what?

Roles and responsibilities used throughout this timeline.

Supplier Any natural or legal person that supplies packaging or packaging material to a manufacturer.

Manufacturer Any natural or legal person that manufactures packaging or a packaged product, or has it designed or manufactured, and markets it under its own name or trademark.

Importer Any natural or legal person established in the EU that places packaging or packaged products from a third country on the EU market.

Distributor Any natural or legal person in the supply chain, other than the manufacturer or importer, that makes packaging, including packaged products, available on the market.

Producer The Manufacturer, Importer or Distributor that first makes available in the EU: transport packaging, service packaging or primary production packaging, whether single-use or reusable, or products packaged in other types of packaging.

PRO A Producer Responsibility Organisation that financially organises the fulfilment of Extended Producer Responsibility obligations on behalf of several producers.

Economic operator The manufacturer, supplier, importer, distributor, authorised representative, final distributor and fulfilment service provider.

Dates and scope may depend on further legislation and exemptions. This overview provides general information, not legal advice.

Official text: Regulation (EU) 2025/40