

PPWR timeline

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

The PPWR applies directly in every EU member state. Its obligations are phased in over more than a decade — from substance limits and declarations of conformity in 2026 to re-use targets for transport packaging in 2030 and 2040. This overview shows which obligation applies to whom, from when, and what it means for users.

2025–26

Reusable packaging rules; PPWR applies

2027–29

Rotations, reporting, empty space, labels

2030

100% and 40% re-use targets, recyclability

2035–40

Grade C banned, aim of 70% re-use

This timeline reflects VARIBOX's interpretation of the PPWR as of September 2026. Dates and obligations may change. Not legal advice.

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Timeline of obligations

Each milestone lists the PPWR article, the obligation, the obligated party and what it means for users. Several dates are indicated as “at the earliest”, because they depend on delegated or implementing acts that still have to be adopted.

Our interpretation — subject to change. This timeline shows how VARIBOX reads the PPWR today. Dates and obligations may change. Not legal advice.

Re-use Obligation related to reusable packaging and re-use systems

11 Feb 2025 Reusable packaging requirements

Article	Obligation	Obligated party	Relevance for users
Art. 11 · Annex VI	Reusable packaging requirements: designed for many rotations, can be emptied/refilled without losing function, can be reconditioned, safe for workers Re-use	Manufacturer	Core requirement for IBCs to count as reusable

12 Aug 2026 PPWR applies — general date of application

Article	Obligation	Obligated party	Relevance for users
Art. 5	Substance limits: lead + cadmium + mercury + Cr(VI) ≤ 100 mg/kg; PFAS limits in food-contact packaging; minimise substances of concern	Manufacturer	PFAS limits apply to food-contact packaging only
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	Manufacturer	Buyers should request the declaration of conformity
Art. 16	Provide manufacturers with information needed to show conformity	Supplier of packaging or materials	Resin and component suppliers to the manufacturer
Art. 18	Verify conformity before placing on market; add own name and contact details	Importer	Packaging imported from outside the EU
Art. 19	Verify that packaging bears required marking and information before making it available	Distributor	Dealers and resellers
Art. 21	Manufacturer obligations transfer to anyone who markets packaging under their own name/ trademark or modifies it	Importer or distributor	Customer-branded or modified packaging
Art. 26 · 27 · Annex VI	Re-use system in place for reusable packaging: rules, tracking, reconditioning, incentives for re-use Re-use	Economic operators making reusable packaging available; users running their own closed loops	Closed loops between a processor and its customers count; incentives for re-use can be deposits
Art. 44	Registration in each Member State where packaging is first made available Onwards; national dates vary	Producer or PRO	Fillers shipping filled packaging to other Member States

Art. 47	Authorisation of PRO or individual EPR compliance	Producer or PRO	Mostly handled by PROs
Art. 45	EPR obligations incl. financial contributions	Producer	Fee paid on first making available

12 Feb 2027 Minimum rotations — delegated act

Article	Obligation	Obligated party	Relevance for users
Art. 11	Minimum number of rotations for reusable packaging Re-use Delegated act due	Manufacturer	Delegated act will define what reusable means in numbers

1 Apr 2027 Annual reporting

Article	Obligation	Obligated party	Relevance for users
Art. 44	Annual reporting of packaging volumes At the earliest	Producer or PRO	For the preceding calendar year

12 Feb 2028 Empty space — sales packaging

Article	Obligation	Obligated party	Relevance for users
Art. 24	Empty-space limitation: minimise empty space in sales packaging	Economic operator filling the packaging	The filler (the user), not the manufacturer

12 Aug 2028 Material-composition label

Article	Obligation	Obligated party	Relevance for users
Art. 12	Material-composition label At the earliest	Manufacturer	Not for transport packaging and deposit and return systems

12 Feb 2029 Reusable packaging label

Article	Obligation	Obligated party	Relevance for users
Art. 12	Label plus QR code/data carrier informing users that packaging is reusable Re-use At the earliest	Manufacturer	Transport packaging and deposit and return systems are exempt

1 Jan 2030 Re-use targets, empty space, design and recycled content

Article	Obligation	Obligated party	Relevance for users
Art. 24	Empty-space limitation: max 50% empty space in grouped packaging, transport and e-commerce packaging	Economic operator filling the packaging	The filler (the user), not the manufacturer
Art. 10 · Annex IV	Packaging minimisation by weight and volume	Manufacturer or importer	Separate from Art. 24: Art. 10 is about design, Art. 24 about filling

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 **Re-use**	Economic operators using the packaging	IBCs are explicitly listed; dangerous goods exempt
Art. 29	Reuse system with reuse of at least 40% (2030) and aim of 70% (2040) of transport packaging, or sales packaging used for transport, used within the EU **Re-use** **1 Jan 2030 / 1 Jan 2040**	Economic operators using the packaging	IBCs are explicitly listed; dangerous goods exempt
Art. 31	Reporting on achievement of reuse targets to the Competent Authority **Re-use** **First reporting year 2030**	Economic operators	Users need data like rotation and fleet records
Art. 6 · Annex II	Design for recycling; recycled at scale; grade C (≤ 70% recyclable) banned **1 Jan 2030 / 1 Jan 2035 / 1 Jan 2038**	Manufacturer	Packaging with dangerous goods exempt
Art. 7	Minimum recycled content in plastic packaging: 10% in food packaging and 35% in other packaging (2030); 25% in food packaging and 65% in other packaging (2040) **1 Jan 2030 / 1 Jan 2040**	Manufacturer or importer	Calculated per manufacturing plant per year; packaging with dangerous goods exempt

2035–2040 Later steps of the obligations above

Art. 6 · Annex II	**1 Jan 2035** — Recycled at scale	Manufacturer
Art. 6 · Annex II	**1 Jan 2038** — Grade C (≤ 70% recyclable) banned	Manufacturer
Art. 29	**1 Jan 2040** — Aim of 70% reuse of transport packaging used within the EU	Economic operators using the packaging
Art. 7	**1 Jan 2040** — Recycled content: 25% in food packaging and 65% in other packaging	Manufacturer or importer

Roles explained

Who is who under the PPWR. One company can have several roles at the same time.

Role	Explanation
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.

Disclaimer — our interpretation. This timeline reflects how VARIBOX reads Regulation (EU) 2025/40 (PPWR) as of September 2026. Dates, obligations and their scope may still change, in particular through delegated and implementing acts, Commission guidance and national implementation. This overview is for general information only and does not constitute legal advice. Always refer to the official text of the regulation and seek legal advice for your specific situation.

Reusable packaging and the PPWR

VARIBOX reusable IBCs are designed for a long service life and many rotations — supporting PPWR readiness for re-use of transport packaging. Questions? Contact us at info@varibox-ibc.com.