

## INFORMATION ON THE PACKAGING AND PACKAGING WASTE REGULATION (PPWR)

STATUS: JULY 10, 2025



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# 1. INTRODUCTION

## 1.1 1.1 BACKGROUND, OBJECTIVES & STATUS

“This Regulation establishes requirements for the entire life-cycle of packaging as regards **environmental sustainability and labelling**, to allow its placing on the market. It also establishes requirements **for extended producer responsibility, packaging waste prevention**, such as the **reduction of unnecessary packaging** and the **reuse or refill of packaging**, as well as the **collection and treatment**, including **recycling**, of packaging waste.” [Article 1 (1)]

### Additional objectives

- Efficient functioning of the internal market by harmonization in the field of packaging and packaging waste, in order to avoid obstacles to trade and distortion and restriction of competition
- At the same time, prevention or reduction of adverse effects of packaging and packaging waste on the environment and human health
- Transition to a circular economy and to achieving climate neutrality by 2050 at the latest

In addition to maintaining the **recycling targets** already defined for the years up to 2030 (e.g., recycling rate for plastic packaging of 50 % by 2025; 55 % by 2030), **reduction targets** for per capita packaging waste compared to 2018 will be defined at the member state level: by at least 5 % by 2030, by at least 10 % by 2035, and by at least 15 % by 2040.

### Current status

- Publication in the Official Journal of the EU on January 22, 2025 ✓
- Entry into force: February 11, 2025 ✓
- **Effective date: August 12, 2026**

### What's next?

More detailed definitions and specifications regarding the individual requirements will be published at a later date:

- 11 implementing acts
- three delegated acts
- 13 specific reports and/or evaluation/review requirements that may need to be fulfilled by legislative proposals (in addition to the general review clause)
- three standardization mandates
- three binding guidelines

[Link to the PPWR](#)

## 1.2 PPWR CONTENT OVERVIEW & KEY TOPICS

This guide summarizes the most important topics from the perspective of ARA customers:



For details on the individual provisions, we recommend referring to the original text of the PPWR.

The following guidelines do not cover, for example, requirements directly addressed to collection and recycling systems and to the member state.

Our guide has been compiled to the best of our knowledge and belief, but all information is provided without obligation and without guarantee (*see chapter 9 Disclaimer*).

## 1.3 AMENDMENTS TO DEFINITIONS (ARTICLE 3)

### 1.3.1 COFFEE PODS/CAPSULES BECOME PACKAGING

Art 3. (1): **‘packaging’** means an item ... including:

- Point (1f): a **permeable tea, coffee or other beverage bag**, or soft after-use system single-serve unit that contains tea, coffee or another beverage, and which is intended to be used and disposed of together with the product;
- Point (1g): a **non-permeable tea, coffee or other beverage system** single-serve unit intended for use in a machine and which is used and disposed of together with the product;

These will be **defined as packaging from August 12, 2026**, and will therefore have to be licensed in future. Details on tariff classification are not yet known.

In addition, these products, which will be defined as packaging in accordance with point (1f), must **be industrially compostable from February 12, 2028**, or, if the Member State so requires, home compostable (Article 9).

### 1.3.2 SALES, GROUPED AND TRANSPORT PACKAGING

The table below compares the terms sales packaging, secondary packaging, and transport packaging in the PPWR and the Austrian Packaging Ordinance 2014. The terms primary, secondary, and tertiary packaging are no longer used in the PPWR. The term grouped packaging has been expanded to include “to create a stock-keeping or distribution unit.”

The terms sales packaging, grouped packaging, and transport packaging are relevant because there are different regulations for each of these types of packaging: e.g., different obligations for reusable packaging (returnable), different definitions of manufacturer responsibility.

| PPWR (2025/40)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | AUSTRIAN PACKAGING ORDINANCE OF 2014                                                                                                                                                                                                                                                                                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Art 3. (1), point 5: <b>‘sales packaging’</b> means packaging conceived so as to constitute a sales unit consisting of products and packaging to the end user at the point of sale                                                                                                                                                                                                                                                                                                                    | <b>“Sales packaging or primary packaging”</b><br>Packaging that is offered to the end consumer as a sales unit.                                                                                                                                                                                                                |
| Art 3. (1), point 6: <b>‘grouped packaging’</b> means packaging conceived so as to constitute a grouping of a certain number of sales units at the point of sale, irrespective of whether that grouping of sales units is sold as such to the end user or whether it serves as a means to <b>facilitate the restocking of shelves</b> at the point of sale or to create a <b>stock-keeping or distribution unit</b> , and which can be removed from the product without affecting its characteristics | <b>“Grouped packaging or secondary packaging”</b> – unless covered by Z 4 or 6 – packaging that<br>a. contain one or more sales units which are sold together to the end consumer or are only used to stock sales shelves, and<br>b. can be removed without affecting the properties of the goods.                             |
| Art 3. (1), point 7: <b>‘transport packaging’</b> means packaging conceived so as to facilitate the handling and transport of one or more sales units or a grouping of sales units, in order to prevent damage to the product from handling and transport, but which excludes road, rail, ship and air containers                                                                                                                                                                                     | <b>“Transport packaging or tertiary packaging”</b><br>Packaging used to facilitate the handling and transport of several sales units or grouped packaging in order to prevent direct contact or damage during transport. Containers for road, rail, sea, and air transport are not included in the term “transport packaging.” |

### 1.3.3 REGULATION REGARDING COMPOSITE PACKAGING

Article 3 (1), point 24: a unit of packaging **made of two or more different materials** which are part of the weight of the main packaging material and cannot be separated manually and therefore form a single integral unit, unless one of the materials constitutes an insignificant part of the packaging unit and in any event **no more than 5 % of the total mass** of the packaging unit and excluding labels, varnishes, paints, inks, adhesives and lacquers.

The amendment to the definition primarily concerns the procedure for reporting packaging weights by member states.

➔ Despite the change in the definition of composite packaging in accordance with PPWR, it is still up to the member state itself to decide **how to assign individual tariff categories**. Possible adjustments or retention of the previous “80/20 rule” for allocation to the composite packaging tariff category (*see also Annex 5, Packaging Ordinance 2014*) are therefore **still open**.

## 2. MANUFACTURER, IMPORTER, DISTRIBUTOR & AUTHORISED REPRESENTATIVE

### 2.1 TERMS AND ROLES

The PPWR defines different roles in the packaging value chain that are responsible for compliance with packaging requirements: manufacturers, importers, and distributors.

Depending on the constellation, each of these roles can also become a “producer” responsible for compliance with extended producer responsibility (*see Chapter 5*).

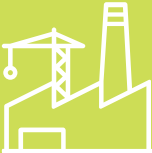
| TERMS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | EXAMPLES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>“Manufacturer”</b> Art. 3 (1), point 13:<br/>Any natural or legal person who <b>manufactures packaging or a packaged product</b> or has the packaging or packaged product designed or manufactured under its <b>own name or trademark</b>, regardless of whether other trademark are visible on the packaging or the packaged product.</p> <p><i>Exception:</i><br/><i>If that company falls under a micro-enterprise in accordance with Recommendation 2003/361/EC, the packaging supplier is considered to be the manufacturer, provided that it is located in the same member state<sup>1)</sup>.</i></p> | <p>According to the EU Commission, the user of the packaging or the trademark owner usually assumes the role of the manufacturer:</p> <ul style="list-style-type: none"> <li>- Company that distributes packaged goods under its own name or trademark.</li> </ul> <p><i>Producing company that fills packaging and distributes it under their own name or trademark.</i></p> <p><i>Retail company that distributes packaged goods under its own brand trademark.</i></p> <ul style="list-style-type: none"> <li>- Company that manufactures packaging and distributes it under its own name or trademark.</li> </ul> <p><i>Packaging manufacturer that distributes packaging under its own name/trademark and this packaging does not otherwise receive any brand name.</i></p> <ul style="list-style-type: none"> <li>- Upstream companies that supply packaging or packaging materials to a manufacturer are considered “suppliers.”</li> </ul> |
| <p><b>“Importer”</b> Art. 3 (1), point 17:<br/>Any natural or legal person established within the Union that places <b>packaging from a third country</b> on the market.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                       | <ul style="list-style-type: none"> <li>- Companies that import packaging or packaged products from non-EU countries.</li> </ul> <p><i>Retail company that imports packaged goods from South America and distributes them in Austria.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p><b>“Distributor”</b> Art. 3 (1), point 18:<br/>Any natural or legal person in the supply chain, other than the manufacturer or importer, that makes packaging available on the market.</p>                                                                                                                                                                                                                                                                                                                                                                                                                      | <ul style="list-style-type: none"> <li>- Company that distributes packaging or packaged products from the EU or national territory.</li> </ul> <p><i>Retail company (e.g. also wholesalers) that imports packaged goods from Germany and distributes them in Austria.</i></p> <p><i>Retail companies (e.g. also wholesalers) that distribute packaged goods from Austria within the country.</i></p> <p><i>Retail company (e.g. also wholesalers) that distributes packaged goods from Austria to Hungary.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                 |

**Please note: Importers and distributors can become manufacturers! (Article 21)**

Where an importer or distributor places packaging on the market under their own name or trademark or modifies packaging already placed on the market in a way that could affect compliance with the relevant requirements of this Regulation, they shall be considered a manufacturer.

<sup>1)</sup> Articles 15 and 21 instead cite as a criterion that the packaging supplier must be located in the Union as a criterion.

## Role Overview

|                    | <br><b>SUPPLIER</b>                                               | <br><b>MANUFACTURER</b>                                                                                                                                                                                                                                                                                 | <br><b>IMPORTER</b>                           | <br><b>DISTRIBUTOR</b> |
|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|
| <b>WHO?</b>        | supplies packaging or packaging material to a manufacturer                                                                                         | designs or manufactures packaging or packaged products under its own name or trademark or has packaging or a packaged product designed or manufactured under its own name or trademark                                                                                                                                                                                                   | places packaging from a third country (outside the EU) on the EU market                                                         | Company in the supply chain that makes packaging available on the market                                  |
| <b>OBLIGATIONS</b> | Obligations pursuant to Article 16:<br><br>Provision of information and documentation all necessary to demonstrate the conformity of the packaging | Obligations pursuant to Article 15:<br><br>Primarily responsible for ensuring packaging compliance and drawing up declarations of conformity and technical documentation<br><br>Depending on the constellation, manufacturer, importers, or distributors may also become “producers” who are responsible for complying with “extended producer responsibility” ( <i>see Chapter 5</i> ). | Obligations pursuant to Article 18:<br><br>Have to ensure compliance of packaging and preparation of declarations of conformity | Obligations pursuant to Article 19:<br><br>Due diligence regarding compliance of packaging                |

## 2.2 OBLIGATIONS OF MANUFACTURERS (ARTICLE 15)

 **Status:** Clarification regarding the declaration of conformity (applicable standards) still pending!

Manufacturers are **primarily responsible for complying with the “sustainability requirements” set out in Articles 5 to 12** (e.g., ensuring that packaging is recyclable, meeting minimum recycled content requirements, labeling with separation instructions— *see also Chapter 3*) and may only place packaging on the market that meets these requirements. Proof is provided by so-called declarations of conformity.

Before placing packaging on the market, manufacturers shall:

- carry out or have carried out a **conformity assessment** procedure in accordance with Article 38,
- draw up the **technical documentation** in accordance with Annex VII.,
- draw up an **EU declaration of conformity** in accordance with Article 39, provided that it has been demonstrated that the packaging complies with the applicable requirements.

The documents **must be submitted** to the national authority upon request **within 10 days** in one or more languages which can be easily understood by that authority. The **retention period is 5 years** (single-use packaging) or 10 years (reusable packaging).

**Suppliers** of packaging or packaging materials have to provide the manufacturer with all information or documentation necessary to demonstrate the conformity of the packaging (Article 16).

Changes to packaging or **updates to the standards or specifications used for the assessment** must be taken into account – if necessary, a new conformity assessment has to be carried out.

If there is reason to believe that the packaging is non-compliant, the manufacturer has to take immediate corrective action (recall if necessary) and inform and cooperate with the authorities.

Furthermore, manufacturers ensure:

- **Identification of the packaging**, e.g. by type, batch, or serial numbers
- **Information about the manufacture** on the packaging or via QR code: name, registered trade name/trademark and postal address and, where available, electronic means of communication (e-mail)
- That information provided is clear, understandable and legible

## Declaration of conformity and technical documentation proving compliance with sustainability regulations

### Sample EU declaration of conformity in accordance with Annex VIII

| ANNEX VIII                                         |                                                                                                                                                                                                                                                                                             |
|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| EU declaration of conformity No <sup>(*)</sup> ... |                                                                                                                                                                                                                                                                                             |
| 1.                                                 | No ... (unique identification of the packaging):                                                                                                                                                                                                                                            |
| 2.                                                 | Name and address of the manufacturer and, where applicable, the manufacturer's authorised representative:                                                                                                                                                                                   |
| 3.                                                 | This declaration of conformity is issued under the sole responsibility of the manufacturer.                                                                                                                                                                                                 |
| 4.                                                 | Object of the declaration (identification of the packaging allowing traceability): description of the packaging:                                                                                                                                                                            |
| 5.                                                 | The object of the declaration referred to point 4 is in conformity with the relevant Union harmonisation legislation: ... (reference to the other Union acts applied).                                                                                                                      |
| 6.                                                 | References to the relevant harmonised standards or the common specifications used or references to the other technical specifications in relation to which conformity is declared:                                                                                                          |
| 7.                                                 | Where applicable, the notified body ... (name, address, number) ... performed ... (description of intervention) ... and issued the certificate(s): ... (details, including the date of the certificate(s), and, where appropriate, information on the duration and conditions of validity). |
| 8.                                                 | Additional information:                                                                                                                                                                                                                                                                     |
| Signed for and on behalf of:                       |                                                                                                                                                                                                                                                                                             |
| (place and date of issue):                         |                                                                                                                                                                                                                                                                                             |
| (name, function) (signature):                      |                                                                                                                                                                                                                                                                                             |

The declarations of conformity has to be available from the date of validity of the PPWR on August 12, 2026. However, various details regarding the sustainability criteria (definitions, standards, etc.) are not yet known or defined and will therefore only be added on the respective date. **The first sustainability requirement to be met is the “Requirements for substances in packaging” (Article 5, compliance with PFAS limits), which must be included in the declarations of conformity from August 12, 2026.**

The **applicable harmonized standards or common specifications** will be published in accordance with Articles 35-37.

The basis for preparing the EU Declaration of conformity document is the implementation of a **conformity assessment procedure** in accordance with Article 38 and the **technical documentation** to be prepared in accordance with Annex VII, including the following information:

- General description of the packaging and its intended use
- Conceptual designs, manufacturing drawings, and materials of components
- Descriptions and explanations of the drawings mentioned above and the schemes and operation of the packaging
- List of the standards and specifications applied
- Test reports

### Use of an authorised representative (Article 17)

A manufacturer may appoint an authorised representative in accordance with Art. 3 (1), point 19 to take on certain obligations. The mandate shall include at least the following tasks:

- Submission of the EU declaration of conformity and technical documentation to the national authority upon request within 10 days, retention period of documents for 5 years (single use packaging) or 10 years (reusable packaging).
- In the event of non-compliance of packaging: cooperation regarding corrective measures at the request of the competent national authorities.
- Termination of the mandate if the manufacturer violates obligations.

However, the authorised representative is not responsible for preparing the necessary documents!

## 2.3 OBLIGATIONS OF IMPORTERS (ARTICLE 18)

Importers shall only place packaging on the market which complies with the **“sustainability requirements” set out in Articles 5 to 12** (e.g., compliance with packaging recyclability, compliance with minimum recycled content requirements, labeling with separation instructions – *see also Chapter 3*).

Before placing packaging on the market, importers shall ensure:

- The **conformity procedure** referred to Article 38 has been carried out and the **technical documentation** referred to Annex VII has drawn up by the manufacturer.

- The packaging is **labeled correctly** in accordance with Art. 12.
- All required documents are attached.
- **Identification of the packaging**, e.g. by type, batch, or serial numbers took place.
- **Information about the manufacture and importer** on the packaging or via QR code: name, registered trade name/trade-mark and postal address and, where available, electronic means of communication (e-mail).
- That information provided is clear, understandable and legible .

If there is reason to believe that the packaging is non-compliant, it must not be placed on the market. If the packaging has already been placed on the market, the importer has to take immediate corrective action (recall, if necessary), inform the authorities and cooperate with them.

The documents must be **submitted** to the national authority **upon request within 10 days** in one or more languages which can be easily understood by that authority. The **retention period** is 5 years (singel-use packaging) or 10 years (reusable packaging).

## 2.4 OBLIGATIONS OF DISTRIBUTORS (ARTICLE 19)

Distributors have a **due diligence** regarding compliance of packaging they make available.

Before making packaging available on the market, distributors shall verify that:

- The **producer that is subject to the obligations** on extended producer responsibility for the packaging (see 5.1 Definition of producer) is **registered in the register of producers**.
- The packaging is **labelled correctly in accordance with Art. 12**.
- **Identification of the packaging**, e.g. by type, batch, or serial numbers took place.
- **Information about the manufacture and importer** on the packaging or via QR code: name, registered trade name/trade-mark and postal address and, where available, electronic means of communication (e-mail).

If there is reason to believe that the packaging is non-compliant, it must not be placed on the market. If the packaging has already been placed on the market, distributors has to take immediate corrective action (recall, if necessary) and inform the authorities, cooperate with them, and provide them with all available documentation.

**→ In order to rule out the risk of non-compliance, it is therefore recommended that distributors also actively check the existence of the declaration of conformity or request that it be presented to them.**

### 3. SUSTAINABILITY REQUIREMENTS FOR PACKAGING

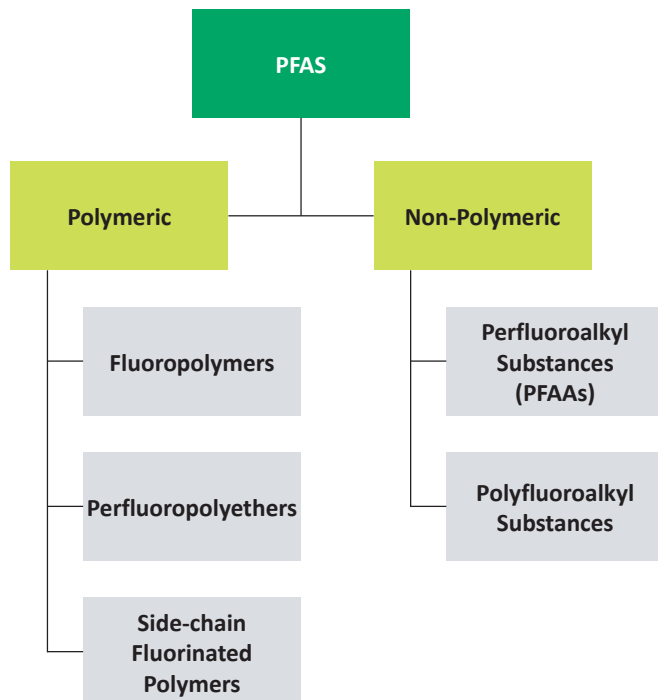
Manufacturer, importer, and distributor of packaging are responsible for complying with the **sustainability requirements of Articles 5 to 12**. Proof of compliance is provided by conformity procedures in accordance with Article 38 and by the technical documentation to be prepared in accordance with Annex VII.

| TOPICS                                        | ARTICLE | CONTENTS                                                                                                                 |
|-----------------------------------------------|---------|--------------------------------------------------------------------------------------------------------------------------|
| Requirements for substances in packaging      | 5       | e.g. PFAS limits                                                                                                         |
| Recyclable packaging                          | 6       | D4R (2030), Recycling at Scale (2035), eco-modulation starting from mid-2029<br>[assessment by manufacturers Art. 6 (3)] |
| Minimum recycled content in plastic packaging | 7       | Minimum recycled content 2030, 2040                                                                                      |
| Biobased feedstock in plastic packaging       | 8       | Possibly targets and sustainability requirements (still undetermined)                                                    |
| Compostable packaging                         | 9       | Stickers on fruit/vegetables, pads for coffee, tea; further requirements possible                                        |
| Packaging minimisation                        | 10      | Minimum weight and volume, compliance with Annex IV                                                                      |
| Reusable packaging                            | 11      | Requirements for reusable packaging, compliance with Annex VI Part B                                                     |
| Labelling of packaging                        | 12      | Requirements for labeling, e.g., for separate collection, re-use                                                         |

#### 3.1 REQUIREMENTS FOR SUBSTANCES IN PACKAGING (ARTICLE 5)

From **August 12, 2026**, food-contact packaging shall not be placed on the market if it contains **perfluorinated and polyfluorinated alkyl substances (PFAS)** in a concentration equal to or above the following **limit values**:

- **25 ppb** for any PFAS (non-polymeric PFAS)
- **250 ppb** for the sum of PFAS (non-polymeric PFAS)
- **50 ppm** for PFASs (non-polymeric and polymeric PFAS), if total fluorine exceeds 50 mg/kg
  - Proof of the amount of fluorine content measured from PFAS or non-PFAS
- Additional **limits** for **lead, cadmium, mercury, and hexavalent chromium**



Overview of PFAS; compare doi: [10.1002/ieam.258](https://doi.org/10.1002/ieam.258)

Manufacturers have to ensure compliance with the specified limit values when the packaging is first placed on the market. According to the interpretation of the EU Commission, no transition periods are provided for stockpiles.

### 3.2 RECYCLABLE PACKAGING (ARTICLE 6)

 **Status:** Details regarding this requirement (assessment of recyclability) still pending!

From 2030 onwards, packaging shall be **designed to be recyclable** in accordance with “Design for Recycling” criteria that are yet to be published. This means designing packaging in such a way that it can be recycled using established collection, sorting, and recycling processes proven in an operational environment.

The **criteria are to be defined** for 22 different packaging categories (Annex II, Table 1 PPWR) using defined parameters such as material composition, barriers/coatings, or sleeves (Annex 1, Table 4 PPWR) by **January 1, 2028**, at the latest by delegated acts at EU level.

The result is a classification into performance levels of recyclability: Categories A (recyclability  $\geq 95\%$ ), B (recyclability  $\geq 80\%$ ) and C (recyclability  $\geq 70\%$ ) are considered recyclable. From 2038 onwards, only categories A and B will be permitted.

#### Assessment of packaging components

**Separate components** of a packaging unit shall be assessed separately or individually to determine their recyclability. Separate components are components that needs to be disassembled completely and permanently from the main body of the packaging unit and that is typically discarded prior to and separately from the main body of the packaging unit. This also includes packaging components that can be separated from each other simply through mechanical stress during transport or sorting.

**Integrated components** of a packaging unit shall be evaluated together with the packaging unit to determine recyclability. Integrated components are components that do not need to be separated from the main body of the packaging unit and are typically discarded at the same time as the main body of the packaging unit. Integrated components that can become separated from each other as a result of mechanical stress during transport or sorting are assessed separately.

#### Examples:

- Separate components: tear-off strips, bottle caps, grouped packaging (e.g., folding boxes, wrapping film)
- Integrated components: labels, sealing film, lids, closures
- Integrated components that can be assessed separately: slip-on or snap-on lids that come off during transport or sorting of packaging waste

➔ Optionally, the actual separation behavior of consumers could be considered – details on how this would be determined are still outstanding.

From 2035, a new factor will be added to the assessment of a packaging's recyclability, namely the assessment of “**recycled at scale**” (RaS). This means that, in addition to being designed for recyclability, packaging shall also meet certain recycling thresholds in the waste stream. For this purpose, 13 different fraction groups or packaging categories are defined (Annex II, Table 2), which must achieve a recycling rate of at least 55 % at EU level (30 % for wood). **The basis for this assessment** will be **established by 1 January 2030** at the latest by implementing acts at EU level.

#### Eco-modulation

“**Eco-modulation**” means that the recyclability of packaging (and, where applicable, the respective use of recycled materials in packaging) should also be considered as a financial incentive when licensing packaging. Implementation is to take place 1.5 years after the respective definitions of recyclability have been established, resulting in an initial deadline of **mid-2029**.

**Exceptions** (For details, see Article 6, paragraph 11):

- Packaging for pharmaceutical and medical devices (various detailed provisions)
- Contact-sensitive packaging for infant formula and follow-on formula, processed cereal-based food and baby food, and food for special medical purposes
- Packaging used for the transport of dangerous goods
- Sales packaging made from lightweight wood, cork, textile, rubber, ceramic, porcelain or wax
- 5-year transition period for “innovative packaging” (use of new materials to significantly improve the functionality of packaging)

Please note: **Reusable packaging** shall be recyclable as well!

## Overview of requirements for the recyclability of packaging

### RECYCLABLE PACKAGING (ART. 6)



All packaging placed on the market shall be recyclable

**D4R: Design for Recycling from 2030 (recyclable design)**  
or 2 years after delegated acts  
→ Delegated acts until 01.01.2028

**Recyclable from**  
Grade A ≥ 95%  
Grade B ≥ 80%  
Grade C ≥ 70%



**non recyclable:** < 70%, **from 2038:** < 80%

**“Recycled at scale” from 2035**  
or 5 years after the implementing act  
→ Implementing acts until 01.01.2030

**an annual quantity of recycled material under each packaging category listed (annex II, table 2):**  
min. **30 % for wood** and **55 % for all other materials**  
(Minimum quotas can be revised by the EU Commission until 2035)

**Exceptions:**

- sales packaging made from **lightweight wood, cork, textile, rubber, ceramic, porcelain or wax**
- partly packaging for **medical products, baby food**, transport of **dangerous goods, innovative packaging** (transition period)
- review of exemptions until 2035

**“Eco modulation”:** Implementation 1.5 years after the respective legal acts (D4R and „recycled at scale“)

**Assessment of packaging:**  
**separate components (e.g. separation required for opening):** individual **components are assessed separately**  
**integrated components:** combined assessment, unless the integrated components separate due to **mechanical stress during transport or sorting**

### 3.3 MINIMUM RECYCLED CONTENT IN PLASTIC PACKAGING (ARTICLE 7)

 **Status:** Details regarding this requirement (assessment of recycled content) still pending!

To promote recycling of packaging, primary raw materials are to be increasingly replaced by recycled materials. To achieve this, **binding targets for the proportion of recycled content in plastic packaging will be set from 2030 onwards.**

| MINIMUM PERCENTAGE OF POST-CONSUMER RECYCLATE                                                    | FROM 2030          | FROM 2040 <sup>2)</sup> |
|--------------------------------------------------------------------------------------------------|--------------------|-------------------------|
| PET-packaging<br>with contact-sensitive content (except beverage bottles, see below)             | 30 %               | 50 %                    |
| Non-PET-plastic packaging<br>with contact-sensitive content (except beverage bottles, see below) | 10 % <sup>1)</sup> | 25 %                    |
| Single-use plastic beverage bottles                                                              | 30 %               | 65 %                    |
| All plastic packaging not listed above                                                           | 35 % <sup>1)</sup> | 65 %                    |

#### Contact-sensitive packaging

Article 3, paragraph 1, point 49 specifies which packaging falls under the term “contact-sensitive packaging.”

The following applications can be cited as examples:

- Materials and items intended to come into contact with food
- Animal feed, additives for animal nutrition
- Medical devices, in vitro diagnostics, medicated feed, veterinary drugs, human drugs
- Dietary supplements
- Cosmetic products (intended to be placed in contact with the external parts of the human body with a view exclusively or mainly to cleaning them, perfuming them, changing their appearance, protecting them, keeping them in good condition, or correcting body odors)
- Absorbent hygiene products and reusable menstrual cups
- Packaging for the transport of dangerous goods

The minimum recycled content shall be demonstrated for each type and format of packaging in accordance with Table 1 of Annex II, calculated as an average per manufacturing plant and year, in accordance with the **implementing acts to be adopted by December 31, 2026.**

<sup>1)</sup> Review of necessary adjustments by the EU by January 1, 2028

<sup>2)</sup> Review of necessary adjustments by the EU by August 12, 2032

Recyclates must be obtained from **post-consumer plastic waste** – from waste that is plastic that has been generated from plastic products that have been placed on the market or supplied for distribution, consumption or use in a third country in the course of a commercial activity, whether for payment or free of charge (no production waste).

Recyclates from third countries have to be collected and recycled in accordance with EU regulations and standards.

**Exceptions** (For details, *see Article 7, paragraphs 4 and 5*):

- Packaging for pharmaceutical and medical devices (various detailed provisions)
- Contact-sensitive plastic packaging for food that is intended only for infants and young children, food for special medical purposes and packaging for drinks and food typically used for young children
- Packaging used for the transport of dangerous goods
- Compostable plastic packaging
- Plastic packaging that comes into contact with food, if the recycled content poses a health risk and conflicts with conformity requirements
- For any packaging parts representing less than < 5 % of the total weight of the whole packaging unit (e.g., coatings)

### 3.4 BIOBASED FEEDSTOCK IN PLASTIC PACKAGING (ARTICLE 8)

 **Status: Details regarding this requirement still pending!**

By February 12, 2028, the Commission shall review whether certain sustainability requirements, targets for increased use or a possibility for crediting as minimum recycled content in plastic packaging (*see Article 7*) should be defined for bio-based raw materials in plastic packaging.

If additional requirements are defined here, these also need to be considered in the context of compliance with sustainability requirements.

### 3.5 COMPOSTABLE PACKAGING (ARTICLE 9)

 **Status: Details regarding this requirement (applicable standards) still pending!**

From **February 12, 2028**, the following packaging shall be industrially compostable or home compostable (the latter if required by the member state):

- **Permeable tea, coffee or other beverage bag**, or soft after-use system single-serve unit that contains tea, coffee or another beverage, and which is intended to be used and disposed of together with the product [packaging according to article 3 (1) (1f)]
- **Sticky labels affixed to fruit and vegetables**



**Member States may also require that following packaging is compostable** if it is permitted to be collected with biowaste:

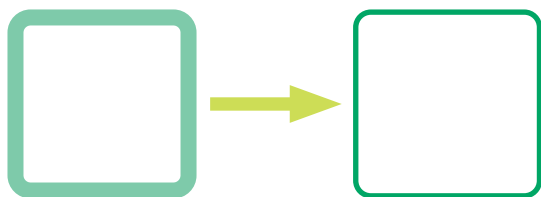
- Capsules for coffee or tea [packaging referred to in Article 3(1), point (1)(g)] composed of material other than metal, very lightweight plastic carrier bags and lightweight plastic carrier bags
- Other packaging for which the Member State already required that they be compostable (not relevant for Austria)

**All other compostable packaging**, including packaging made from biodegradable plastic polymers and other biodegradable materials, **shall be designed to be recyclable from February 12, 2028**, without affecting the recyclability of other waste streams.

The **relevant standards** concerning compostable packaging are to be developed by the European standardization organizations **by February 12, 2026**.

### 3.6 PACKAGING MINIMISATION (ARTICLE 10)

 **Status:** Details regarding this requirement (applicable standards) still pending!



- From January 1, 2030, packaging has to be designed so that its **weight and volume** is **reduced to the minimum** necessary, taking account the shape and material of the packaging.
- The relevant criteria and methods are set out **in Annex IV of the PPWR**. Special protected formats and brands are excluded.
- **By February 12, 2027, harmonized standards** are developed that specify the **method for calculating and measuring packaging minimisation**.
- The standards should specify **maximum adequate weight and volume limits**, as well as **wall thickness** and **maximum empty space** for the most common packaging types and formats.

### 3.7 REUSABLE PACKAGING (ARTICLE 11)

 **Status:** Details regarding this requirement (minimum number for the rotations) still pending!

The PPWR sets targets and requirements for the provision of reusable packaging – e.g., re-use targets (Article 29) and an obligation to offer re-use for the take-away sector (Article 33).

In order for packaging to be considered reusable, **certain requirements** must be met. These include:

- Packaging must be reusable and reconditionable multiple times – the **minimum number of the rotations will be specified** for the most common packaging formats **by February 12, 2027**.
- Maintaining the quality and safety of the packaged product and **complying with applicable safety and hygiene regulations**, including food safety regulations during emptying and refilling.
- Possibility of affixing labels and providing information about the product and packaging.
- Compliance with the **recyclability** of packaging in accordance with Article 6 (*see Chapter 3.2*).

In order to be considered as “reusable packaging,” Article 26 further stipulates that a corresponding **system for re-use** must be in place that meets the requirements of **Annex VI** (existing re-use systems are partially exempt from requirements). The manufacturer must obtain written confirmation from the system participants as proof of such a re-use system.

### 3.8 LABELLING OF PACKAGING AND WASTE RECEPTACLES (ARTICLES 12 AND 13)

 **Status:** Details regarding this requirement (pictograms) still pending!

To facilitate the separate collection of packaging, it should be marked with material-specific pictograms. At the same time, waste containers will also be marked with the relevant pictograms, making it even easier for consumers to separate their waste and dispose of packaging in the appropriate waste containers.

EU-wide standardisation of pictograms is intended to eliminate different country-specific sorting labels on packaging and simplify matters for manufacturers.



- **Harmonized labels** will be published **by August 12, 2026**.
- The **labeling of packaging will be mandatory from August 12, 2028** (or 24 months after the implementing act comes into force):
  - o **Exceptions** apply to **transport packaging** (unless used for e-commerce); **if space is limited**, labels may be affixed to the grouped packaging; if this is not possible, QR codes<sup>1)</sup> only may be used.
  - o **Additional option of QR codes** with information about the destination of individual packaging components.
  - o The **recycled content** or the **proportion of bio-based plastics** can be specified **optionally**, but these must still comply with the labeling requirements to be published.
  - o From February 12, 2027, labels for extended producer responsibility systems (e.g., Green Dot) may only be displayed in a QR code.
  - o Substances of concern must also be declared – details will be specified by January 1, 2030.
  - o A **transitional period** of up to three years for packaging manufactured in or imported into the EU before the respective deadlines will be given.
  - o **Other exceptions:** Packaging for pharmaceutical and medical products, provided there is no space available or the labeling could jeopardize safe use.
- There are **separate guidelines for reusable packaging!**

**Waste receptacles must be marked** with the harmonized labels **by August 12, 2028** (or 30 months after the implementing acts). Depending on the national collection system, the waste receptacles may also bear several pictograms.

#### **Environmental claims (article 14)**

Environmental claims regarding packaging properties may only be made if they exceed the minimum requirements specified by law. Furthermore, the part of the packaging to which these claims refer must be specified.

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<sup>1)</sup> Or other type of standardised, open, digital data carrier.

## 4. ADDITIONAL REQUIREMENTS

### 4.1 OBLIGATION RELATED TO EXCESSIVE PACKAGING (ARTICLE 24)

 **Status:** Details regarding this requirement (details on calculation) still pending!

By limiting the “empty space ratio” of packaging, excessive packaging and the use of packaging materials should be avoided:

- Requirement for a **maximum empty space ratio of 50 % for grouped, transport, and e-commerce** packaging from January 1, 2030 or three years after the implementing act, which shall be enacted by February 12, 2028.

**Exceptions:**

- o If sales packaging is used directly as packaging for e-commerce.
- o For reusable packaging within a re-use system.
- For **sales packaging**, the **empty space shall be reduced to a minimum by February 12, 2028**, without a specific target (yet).

#### Terms: Empty space and empty space ratio

##### - Grouped packaging, transport packaging, or packaging for e-commerce

o Empty space:

The difference between the total volume of grouped packaging, transport packaging or e-commerce packaging and the volume of sales packaging contained therein

o Empty space ratio:

The ratio of the empty space and the total volume of the grouped packaging, transport packaging or e-commerce packaging

##### - Sales packaging

o Empty space:

Difference between the total internal volume of the sales packaging and the volume of the packaged product.

For products that are subject to settlement during transportation or where headspace is required to protect the food product, or other products that present these characteristics compliance with this paragraph shall be assessed as the pack-fill level at the time of filling; air between or within packed foodstuff or protective gases shall not be considered as empty space.

##### - In general

Space filled by filling materials, such as paper cuttings, air cushions, bubble wraps, sponge fillers, foam fillers, wood wool, polystyrene or Styrofoam chips, shall be considered as empty space.

### 4.2 RESTRICTIONS ON USE OF CERTAIN PACKAGING FORMATS (ARTICLE 25 AND THE EXPANDED SINGLE-USE-PLASTICS DIRECTIVE)

 **Status:** Details regarding this requirement (guidelines) still pending!

The PPWR establishes new market restrictions for certain packaging formats:

- **Restrictions from 2030** (see Annex V):

o **Single-use plastic packaging:**

- **Grouped packaging used at the point of sale**, e.g. collation films, shrink wrap

Exceptions: Grouped packaging that is necessary to facilitate handling

- **Packaging for less than 1,5 kg pre-packed fresh fruit and vegetables**, e.g. nets, bags, trays, containers

Exceptions: If there is a demonstrated need to avoid water loss, or turgidity loss, microbiological hazards or physical shocks, oxidation, or if there is no other possibility to avoid commingling of organic fruits and vegetables with non-organic fruits and vegetables

- **Packaging for foods and beverages filled and consumed within the premises in the HORECA sector**, e.g. trays, disposable plates and cups, bags, boxes

Exceptions: Establishments in the HORECA sector that do not have access to drinking water

- **Packaging in the HORECA sector, containing individual portions or servings**, e.g. used for condiments, preserves, sauces, coffee creamer, sugar and seasoning, e.g. sachets, tubs, trays, boxes

Exceptions: take-away sector & in hospitals, clinics and nursing homes

- o **Single-use packaging for cosmetics, hygiene and toiletry products for the use in the accommodation sector for an individual booking**, e.g. shampoo bottles, hand and body lotion bottles, sachets around bar soap

- o **Very lightweight plastic carrier bags**, except for very lightweight plastic carrier bags required for hygiene reasons or provided as sales packaging for loose food when this helps to prevent food wastage

- o **Guidelines** with more detailed examples will be published **by February 12, 2027**.

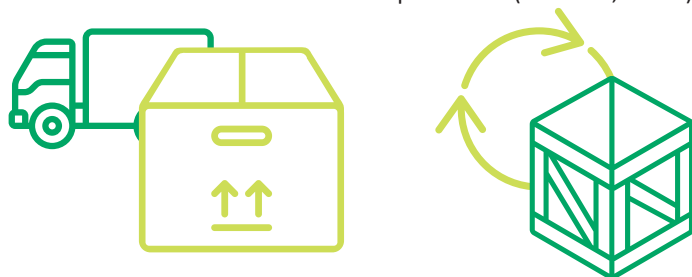
- **Extension of the prohibitions in accordance with the Single-Use Plastics Directive from February 12, 2029 (Article 67)**
  - o The bans on takeaway food packaging, beverage containers and cups for beverage made of ex-panded polystyrene (EPS) will be extended to include extruded polystyrene (XPS).
  - o Shrink wrap that is used in airports or train stations for the protection of luggage during transport.
  - o Chips of polystyrene and other plastics that are used to protect packed goods during transport and handling.
  - o Multi-pack plastic rings used as grouped packaging.

#### 4.3 REUSABLE AND REFILLABLE PACKAGING (ARTICLES 28 TO 33)

 **Status:** Details regarding this requirement (calculation specifications & guidelines) still pending!

As an incentive for waste prevention, obligations and targets for “refilling” are being introduced. Consumers can use their own or purchased packaging to fill up at the point of sale. Retailers meet the following requirements:

- **Provision of information** on the type of containers that can be used for refilling, hygiene standards, and information on the end user's personal responsibility regarding safety and health protection – If there is any doubt about the suitability of the containers, refilling may be refused.
- **Refill stations in retail outlets: From January 1, 2030 final distributors** with a sales area of more than 400 m<sup>2</sup> shall endeavour to use 10 % of that sales area for refill stations.
- Refill stations have to meet certain requirements (Annex VI, Part C).



To promote the use of **reusable packaging**, comprehensive targets are defined for the minimum proportion of reusable packaging.

| <b>SHARE OF REUSABLE PACKAGING</b><br>(Exception: micro-entrepreneurs and 1.000 kg/year)                                                                                                                                                | <b>FROM 2030</b> | <b>FROM 2040</b><br>("endeavour") |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-----------------------------------|
| Non-alcoholic & alcoholic beverages <sup>1)</sup>                                                                                                                                                                                       | 10 %             | 40 %                              |
| Grouped packaging in the form of boxes <sup>2)</sup>                                                                                                                                                                                    | 10 %             | 25 %                              |
| Transport packaging or sales packaging used for the transporting of products, including products distributed via e-commerce <sup>3)</sup>                                                                                               | 40 %             | 70 %                              |
| Transport packaging or sales packaging used for transporting products between sites of an enterprise/linked enterprise/partner enterprise (cross-border within the EU) or between enterprises within a member state (B2B) <sup>3)</sup> | 100 %            |                                   |

**Relevant transport and sales packaging used for the transport of products:** In the form of pallets, foldable plastic boxes, boxes, trays, plastic crates, intermediate bulk containers, pails, drums and canisters of any size and material, including flexible formats, pallet wrappings or straps.

An ongoing study by the EU Commission is investigating whether an exemption from the re-use targets for **pallet wrapping** and **straps** is justified and should be included. ("Study to assess a possible exclusion of pallet wrappings and straps from the re-use targets for transport packaging").

The **calculation specifications** for verifying the respective targets will be published **by June 30, 2027**. In addition, reporting obligations to the relevant authorities are implemented.

#### Current exceptions:

<sup>1)</sup> Packaging for perishable beverages and milk and milk products and their dairy analogies, wine, wine products, and spirituous beverages, or for sales areas not more than 100 m<sup>2</sup> – guidelines on affected products to follow by February 12, 2027.

<sup>2)</sup> Cardboard boxes

<sup>3)</sup> Packaging for the transport of dangerous goods, large machinery, equipment and raw materials (each in individual packaging), as well as flexible packaging in direct contact with food and feed; packaging in the form of cardboard boxes.

#### **Additional refill obligation for the takeaway sector**

For the **takeaway sector** and HORECA-sector, which offers takeaway food and beverages, a **refill obligation** will apply **from February 12, 2027**: Consumers will be able to have food and beverages filled into their own containers.

**From February 12, 2028**, the **obligation to offer reusable packaging** within a re-use system will apply (exception: micro-entrepreneurs). **From 2030**, the proportion of reusable packaging should be **10 %** (“endeavor”).

#### **4.4 OBLIGATION RELATED TO RE-USE SYSTEMS (ARTICLES 26 AND 27)**

Re-use systems can be designed as “open” systems or “closed” systems. The criteria to be met in each case are defined in Annex VI (Part A), as are the requirements for reconditioning prior to re-use (Part B).

## 5. EXTENDED PRODUCER RESPONSIBILITY (ARTICLES 44 AND 45)

### 5.1 DEFINITION OF PRODUCER

“Producers” are responsible for assuming “extended producer responsibility” for packaging.

Producers are defined in Article 3 (1) point 15 as those **manufacturers, importers, or distributors who make packaging or packaged products available for the first time in the same Member State or make them available directly to end users** (private or commercial) **in another Member State** regarding:

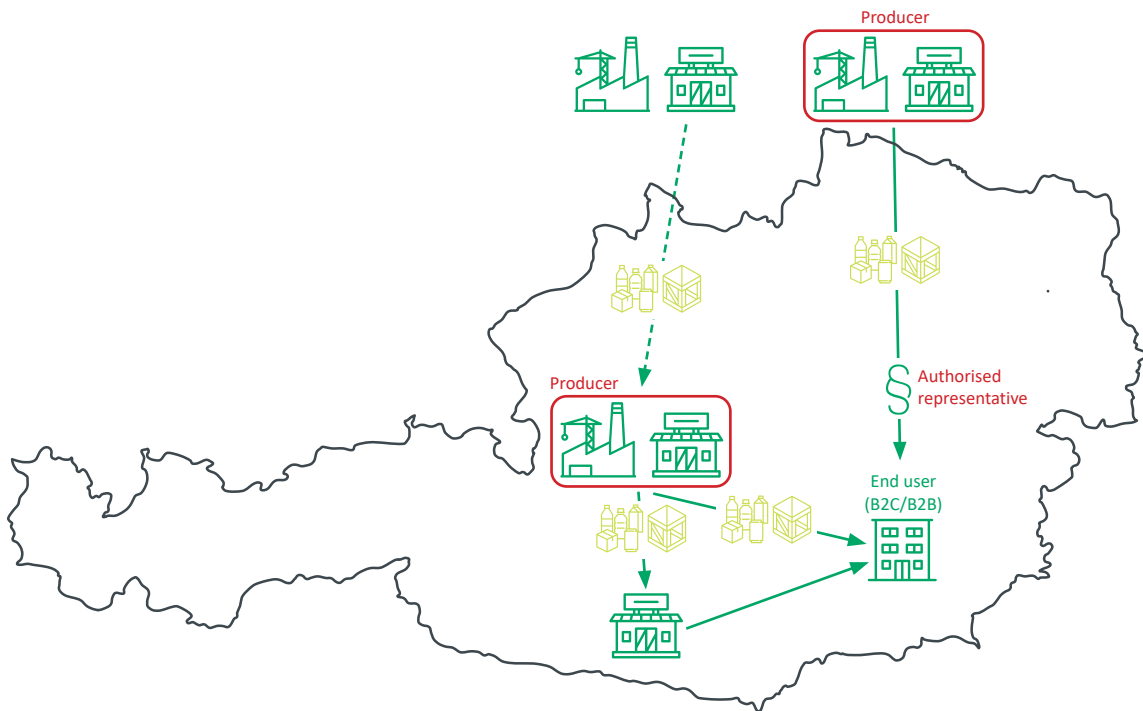
- transport packaging, service packaging, or primary production packaging (packaging for unprocessed products from primary production)
- products packaged in packaging other than those referred to above

If the distribution to end users takes place in another Member State, the appointment of an authorized representative for extended producer responsibility is required.

Furthermore, the term “producer” includes any manufacturer, importer or distributor who unpacks packaged products (e.g., for further distribution) without being an end user themselves, unless another person already fulfills the role of producer.

The prerequisite for the role of “producer” is therefore the existence of the status of “manufacturer”, “importer” or “distributor” (see Chapter 2).

“Suppliers” (those companies that supply packaging or packaging materials to a manufacturer) are therefore not covered by the definition of producer under the PPWR.



## 5.2 REGISTRATION AND REPORTING

 **Status: National rules regarding licensing and producer responsibility organisations to be defined!**

Producers are required to register in a **national electronic register**:

- **The register** shall be established by the Member State within 18 months after an implementing act which will be published by February 12, 2026 (→ **target date: August 12, 2027**).
- **Annual reporting** of quantities placed on the market shall be made **by June 1 for each complete preceding calendar year** (by collection and recovery scheme operator, producer, or authorised representative) according to 22 packaging categories in accordance with Annex II Table 1 PPWR (⇒ first calendar year to be reported not yet known!)
- **Simplifications**: If the annual volume of packaging is less than 10 tons, a report in accordance with the packaging materials specified in Annex IX, Part B, Point 2, Table 1 PPWR is sufficient.

**All relevant formats** will be defined in a specific **implementing act** to be adopted by February 12, 2026:

- Definition of formats for registration and for reporting to the register
- Definition of the required granularity, packaging types, and material categories of the data to be reported (changes to the packaging categories intended for reporting are still possible)

### National rules regarding licensing and producer responsibility organisations

The requirements applicable within Austria and any possible changes of licensing (number and definition of license categories, mandatory participants in producer responsibility organisations) as well as requirements for producer responsibility organisations are defined at national level.

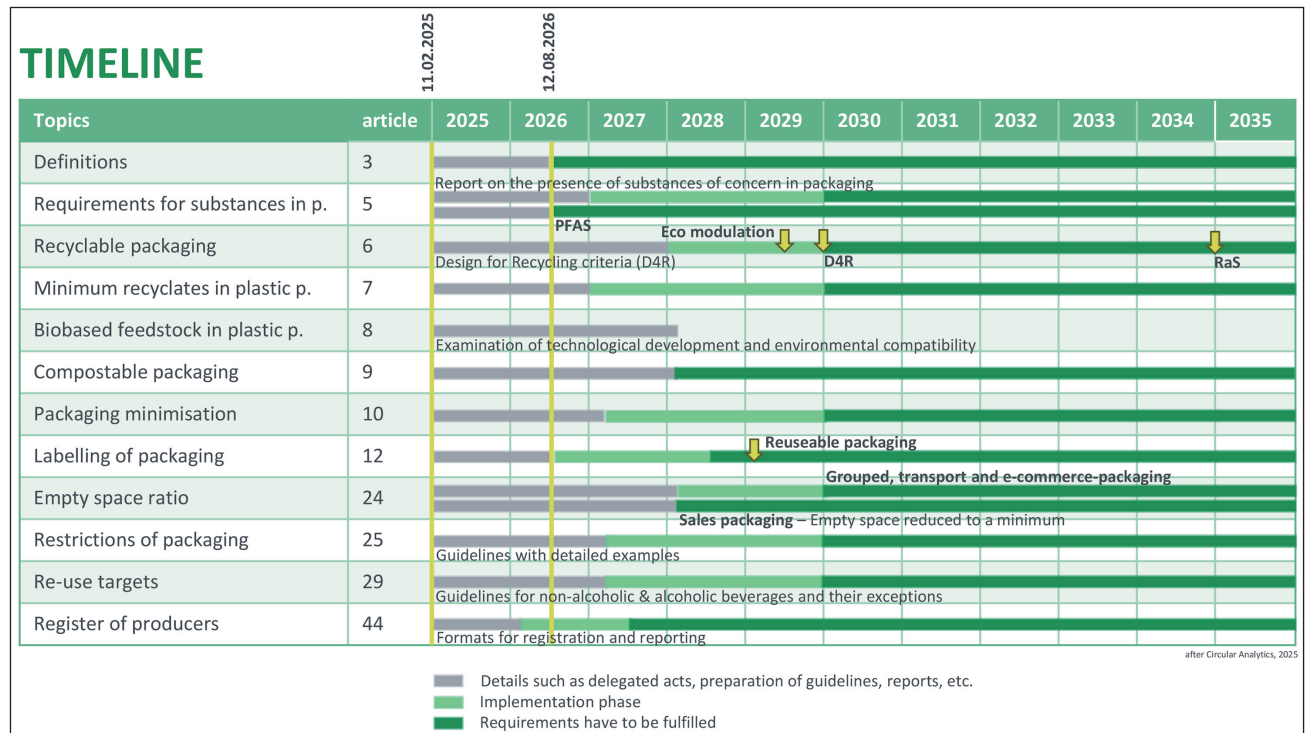
### Reporting categories – Extract from Annex II, Table 1:

|    | PREDOMINANT PACKAGING MATERIAL | PACKAGING TYPE                                                                                 | FORMAT (illustrative and non-exhaustive)                                                                                                                                                                                    | COLOUR/OPTICAL TRANSMITTANCE       |
|----|--------------------------------|------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|
| 1  | Glass                          | Glass and composite packaging, of which the majority is glass                                  | Bottles, jars, flacons, cosmetics pots, tubs, ampoules, vials made of glass (soda lime silica), aerosol cans                                                                                                                | ---                                |
| 2  | Paper/cardboard                | Paper/cardboard packaging                                                                      | Boxes, trays, grouped packaging, flexible paper packaging (e.g. films, sheets, pouches, lidding, cones, wrappers)                                                                                                           | ---                                |
| 3  | Paper/cardboard                | Composite packaging of which the majority is paper/cardboard                                   | Liquid packaging board, and paper cups (i.e. laminated with polyolefin and with or without aluminium), trays, plates and cups, metallised or plastic laminated paper/cardboard, paper/cardboard with plastic liners/windows | ---                                |
| 4  | Metal                          | Steel and composite packaging of which the majority is steel                                   | Rigid formats (aerosols cans, cans, paint tins, boxes, trays, drums, tubes) made of steel, including tinplate and stainless steel                                                                                           | ---                                |
| 5  | Metal                          | Aluminium and composite packaging of which the majority is aluminium – rigid                   | Rigid formats (food and beverage cans, bottles, aerosols, drums, tubes, cans, boxes, trays) made of aluminium                                                                                                               | ---                                |
| 6  | Metal                          | Aluminium and composite packaging of which the majority is aluminium – semi-rigid and flexible | Semi rigid and flexible formats (containers and trays, tubes, foils, flexible foil) made of aluminium                                                                                                                       | ---                                |
| 7  | Plastic                        | PET – rigid                                                                                    | Bottles and flasks                                                                                                                                                                                                          | Transparent clear/coloured, opaque |
| 8  | Plastic                        | PET – rigid                                                                                    | Rigid formats other than bottles and flasks (including pots, tubs, jars, cups, mono- and multilayer trays and containers, aerosol cans)                                                                                     | Transparent clear/coloured, opaque |
| 9  | Plastic                        | PET – flexible                                                                                 | Films                                                                                                                                                                                                                       | Natural/coloured                   |
| 10 | Plastic                        | PE – rigid                                                                                     | Containers, bottles, trays, pots and tubes                                                                                                                                                                                  | Natural/coloured                   |
| 11 | Plastic                        | PE – flexible                                                                                  | Films, including multilayer and multimaterial packaging                                                                                                                                                                     | Natural/coloured                   |

|    | <b>PREDOMINANT<br/>PACKAGING<br/>MATERIAL</b> | <b>PACKAGING TYPE</b>                                                  | <b>FORMAT<br/>(illustrative and non-exhaustive)</b>                                                                                                                                 | <b>COLOUR/<br/>OPTICAL TRANS-<br/>MITTANCE</b> |
|----|-----------------------------------------------|------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
| 12 | Plastic                                       | PP – rigid                                                             | Containers, bottles, trays, pots and tubes                                                                                                                                          | Natural/coloured                               |
| 13 | Plastic                                       | PP – flexible                                                          | Films, including multilayer and multi-material packaging                                                                                                                            | Natural/coloured                               |
| 14 | Plastic                                       | HDPE and PP – rigid                                                    | Crates and pallets, corrugated board plastic                                                                                                                                        | Natural/coloured                               |
| 15 | Plastic                                       | PS and XPS – rigid                                                     | Rigid formats (including dairy packaging, trays, cups and other food containers)                                                                                                    | Natural/coloured                               |
| 16 | Plastic                                       | EPS – rigid                                                            | Rigid formats (including fish boxes / white goods and trays)                                                                                                                        | Natural/coloured                               |
| 17 | Plastic                                       | Other rigid plastics (e.g. PVC, PC) including multimaterials – rigid   | Rigid formats, including. intermediate bulk containers, drums                                                                                                                       | ---                                            |
| 18 | Plastic                                       | Other flexible plastics including multimaterials – flexible            | Pouches, blisters, thermoformed packaging, vacuum packaging, modified atmosphere/ modified humidity packaging, including flexible intermediate bulk containers, bags, stretch films | ---                                            |
| 19 | Plastic                                       | Biodegradable plastics – rigid (e.g. PLA, PHB) and flexible (e.g. PLA) | Rigid and flexible formats                                                                                                                                                          | ---                                            |
| 20 | Wood, cork                                    | Wooden packaging, including cork                                       | Pallets, boxes, crates                                                                                                                                                              | ---                                            |
| 21 | Textile                                       | Natural and synthetic textile fibres                                   | Bags                                                                                                                                                                                | ---                                            |
| 22 | Ceramics or porcelain stoneware               | Clay, stone                                                            | Pots, containers, bottles, jars                                                                                                                                                     | ---                                            |

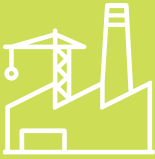
## 6. TIMELINE

Overview of the timeline for the application of the individual requirements:



## 7. EXAMPLES OF ROLE DISTRIBUTION AS DEFINED BY THE PPWR

### 7.1 EXAMPLES –SALES PACKAGING / TRADEMARK

| <br><b>SUPPLIER OF THE EMPTY SALES PACKAGING</b> | <br><b>MANUFACTURER'S TRADEMARK IN AUSTRIA<br/>FILLER/PACKER</b>                                                                                                                                            | <br><b>RETAILER IN AUSTRIA</b> |
|-----------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| <b>Supplier</b><br>supplies packaging or packaging materials to a manufacturer                                                    | <b>Manufacturer</b><br>designs or manufactures packaging or packaged products under its own name or trademark or has packaging or a packaged product designed or manufactured under its own name or trademark<br><br><b>Producer</b><br>when first making available in the same Member State | <b>Distributor</b><br>Company in the supply chain that makes packaging available on the market                    |

### 7.2 EXAMPLE – SALES PACKAGING/TRADEMARK (IMPORT FROM GERMANY TO AUSTRIA)

| <br><b>SUPPLIER OF THE EMPTY SALES PACKAGING</b> | <br><b>MANUFACTURER'S TRADEMARK IN AUSTRIA<br/>FILLER/PACKER</b>                                                           | <br><b>WHOLESALE IN AUSTRIA<br/>[no commercial (B2B) end users]</b>                      |
|-------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Supplier</b><br>supplies packaging or packaging materials to a manufacturer                                                      | <b>Manufacturer</b><br>designs or manufactures packaging or packaged products under its own name or trademark or has packaging or a packaged product designed or manufactured under its own name or trademark | <b>Distributor</b><br>Company in the supply chain that makes packaging available on the market<br><br><b>Producer</b><br>when first making available in the same Member State |

## 8. CHECKLIST/SUMMARY

| ROLE                                                    | SUPPLIER                                                                            | MANUFACTURER                                                                                                                                                                           | IMPORTER                                                                | DISTRIBUTOR                                                                                                | PRODUCER                                                                                                     |
|---------------------------------------------------------|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| Sustainability obligations and other obligations        | Supplies packaging or packaging material to a manufacturer                          | Designs or manufactures packaging or packaged products under its own name or trademark or has packaging or a packaged product designed or manufactured under its own name or trademark | Places packaging from a third country (outside the EU) on the EU market | Company in the supply chain that makes packaging available on the market                                   | Are responsible for “extended producer responsibility”<br><br>Can be a manufacturer, importer or distributor |
| Art. 5<br>Requirements for substances in packaging      | Provision of information and documentation to manufacturers for proof of conformity | Primary responsibility for compliance                                                                                                                                                  | Ensures compliance                                                      | Due diligence regarding compliance                                                                         |                                                                                                              |
| Art. 6<br>Recyclable packaging                          |                                                                                     |                                                                                                                                                                                        |                                                                         |                                                                                                            |                                                                                                              |
| Art. 7<br>Minimum recycled content in plastic packaging |                                                                                     |                                                                                                                                                                                        |                                                                         |                                                                                                            |                                                                                                              |
| Art. 8<br>Biobased feedstock in plastic packaging       |                                                                                     |                                                                                                                                                                                        |                                                                         |                                                                                                            |                                                                                                              |
| Art. 9<br>Compostable packaging                         |                                                                                     |                                                                                                                                                                                        |                                                                         |                                                                                                            |                                                                                                              |
| Art. 10<br>Packaging minimisation                       |                                                                                     |                                                                                                                                                                                        |                                                                         |                                                                                                            |                                                                                                              |
| Art.11<br>Reusable packaging                            |                                                                                     |                                                                                                                                                                                        |                                                                         |                                                                                                            |                                                                                                              |
| Art. 12<br>Labelling of packaging                       |                                                                                     |                                                                                                                                                                                        |                                                                         |                                                                                                            |                                                                                                              |
| conformity assessment procedure                         |                                                                                     | Creation                                                                                                                                                                               | Present                                                                 |                                                                                                            |                                                                                                              |
| technical documentation                                 |                                                                                     | Creation                                                                                                                                                                               | Present                                                                 |                                                                                                            |                                                                                                              |
| EU declaration of conformity                            |                                                                                     | Creation                                                                                                                                                                               | Present                                                                 | Recommendation:<br>Check for the presence of the declaration of conformity or request that it is presented |                                                                                                              |
| Submission of documents to national authorities         |                                                                                     | Within 10 days in one or more languages that the authorities understand                                                                                                                | Within 10 days in one or more languages that the authorities understand | Existing documents in one or more languages that the authorities understand                                |                                                                                                              |
| Retention obligation for documents                      |                                                                                     | 5 years (single-use packaging), 10 years (reusable packaging)                                                                                                                          | 5 years (single-use packaging), 10 years (reusable packaging)           |                                                                                                            |                                                                                                              |

| ROLE                                                                                   | SUPPLIER | MANUFACTURER                                                                                  | IMPORTER                                                                                      | DISTRIBUTOR                                                                                   | PRODUCER                                                                                                            |
|----------------------------------------------------------------------------------------|----------|-----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|
| Changes to packaging or updates to the standards or specifications used for assessment |          | Primarily responsible (if necessary, perform conformity assessment again)                     |                                                                                               |                                                                                               | <p>Are responsible for “extended producer responsibility”</p> <p>Can be a manufacturer, importer or distributor</p> |
| Non-conformity of packaging                                                            |          | Implement corrective measures (recall if necessary) and inform and cooperate with authorities | Implement corrective measures (recall if necessary) and inform and cooperate with authorities | Implement corrective measures (recall if necessary) and inform and cooperate with authorities |                                                                                                                     |
| Identification of packaging by e.g. type, batch, or serial numbers                     |          | Primarily responsible for compliance                                                          | Ensures compliance                                                                            | Verifies that compliance is met                                                               |                                                                                                                     |
| Information about manufacturer                                                         |          | Primarily responsible for compliance                                                          | Ensures compliance                                                                            | Verifies that compliance is met                                                               |                                                                                                                     |
| Information about importer                                                             |          |                                                                                               | Primarily responsible for compliance                                                          | Verifies that compliance is met                                                               |                                                                                                                     |
| Information provided is clear, understandable and legible                              |          | Ensures compliance                                                                            | Ensures compliance                                                                            |                                                                                               |                                                                                                                     |
| Producer is listed in the producer register                                            |          |                                                                                               |                                                                                               | Verifies that compliance is met                                                               |                                                                                                                     |

## 9. DISCLAIMER

We would like to point out that, even though we strive to provide the best possible service to our customers and check the facts to the best of our knowledge and belief, our information and advice can only be provided without obligation and without guarantee. Comprehensive legal advice cannot be provided within the scope of this information. It can never be ruled out that facts may be assessed differently if the information is incomplete, that the Ministry of the Environment (BMLUK), VKS auditors, or courts/authorities may have different interpretations and legal opinions, or that there may be uncertainties regarding new legal situations, particularly in legal matters.