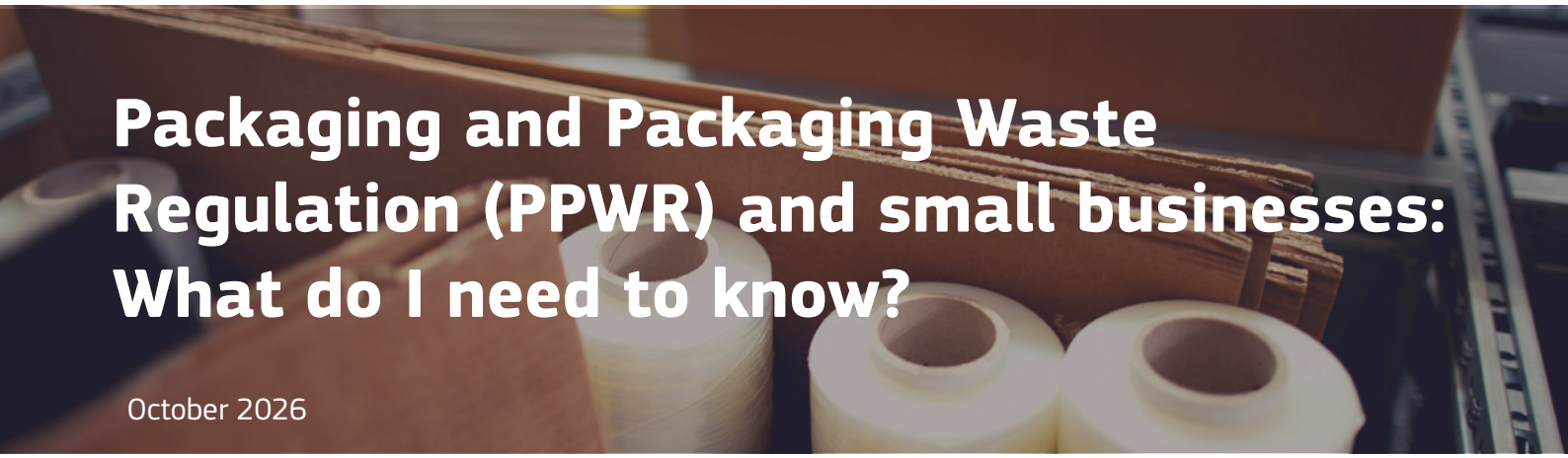
European Commission

Environment



Packaging and Packaging Waste Regulation (PPWR) and small businesses: What do I need to know?

October 2026

1. Introduction: why the PPWR matters for smaller businesses

For companies across the EU and beyond, the PPWR provides **greater legal certainty** and a **more harmonised set of rules** on packaging and packaging waste. It will lead to **less packaging and less waste to manage**, which means **lower costs for the European business community** and for **citizens.** Moving towards more sustainable packaging will mean some potentially challenging changes, especially for smaller businesses and those directly involved in producing packaging.

The packaging sector is a fast-moving and innovative market. SMEs and start-ups are well placed to develop the new circular products, services and business models encouraged by the PPWR. It paves the way for resilient value chains, from the point at which packaging is designed until it is re-used or re-integrated into high-quality products – fostering innovative, “green” jobs in a low carbon packaging industry.



2. I'm a small business. What do I have to do now?

The PPWR started applying across the EU on 12 August 2026. However, its rules do not all apply immediately but will be phased in gradually, to allow time for businesses to adapt (many of the PPWR's main provisions will not apply until 2030 or beyond).
For the time being, businesses who are considered as **'manufacturers'**, **'importers'** or **'producers'** under the PPWR (please see **section 3** for guidance on this) only need to ensure they comply with a **limited number of rules**. These include:

- For 'manufacturers' / 'importers' **The requirement to draw up a declaration of conformity (DoC) for packaging**[1]: for now, given that only a limited number of PPWR rules are applicable, the declaration of conformity only needs to cover the PPWR's requirements on **substances of concern**[2] – namely the *heavy metal concentration limits* set out for lead, cadmium, mercury and hexavalent chromium, and the *PFAS limits for food-contact packaging*. As the heavy metal concentration limits were already in place under the previous Packaging and Packaging Waste Directive, the main novelty introduced by the PPWR is the PFAS restriction[3].

  → *If your business is considered a 'manufacturer' of packaging under the PPWR, but does not physically manufacture this packaging itself, the* **physical manufacturer/supplier** *is legally obliged[4] to provide you with the data and technical documentation needed to draw up a declaration of conformity and demonstrate the packaging's compliance.*

- For 'manufacturers' / 'importers' **The requirement to ensure packaging is marked so it can be traced to its manufacturer and linked to its declaration of conformity**[5] for market surveillance purposes.

  → *Though the PPWR requires packaging to be marked with a type/batch/serial number/other identifier, as well as with the manufacturer's contact details, there is no need to re-package or destroy packaging already produced, if it does not have these markings. Instead, this information can be provided via* **accompanying documentation** *(such as invoices or other) or via* **digital means**, *provided it can easily link the packaging to its manufacturer and declaration of conformity.*

- For 'producers' The requirement to appoint an **authorised representative** for extended producer responsibility (EPR) purposes.

  → *Please note that the Commission has* **proposed to suspend the authorised representative requirement** *to reduce burden on businesses in the EU and negotiations are ongoing at EU level. Please see more information in the guide on EPR for small businesses.*

1 See Article 15 in conjunction with Article 39 PPWR
2 Article 5 PPWR
3 See Article 15(5) and 15 (6) PPWR
4 See Article 16 of the PPWR
5 See Article 15(5) and 15 (6) PPWR



3. How do I know if the above rules apply to me?

- **Am I a 'manufacturer'?**

  You are considered a 'manufacturer' of packaging under the PPWR when you have packaging or a packaged product designed or manufactured under your own name or trademark. This means that, even if you are not the physical manufacturer of the packaging (i.e. you have your packaging made by another company, or buy it from another company), **if you market that packaging with your own brand or trademark, you are considered to be the 'manufacturer'** for the purpose of the PPWR.

  → *For example, if a company buys generic packaging and subsequently affixes a label or sticker with its own brand or trademark to that packaging, it becomes the 'manufacturer' under the PPWR[6].*

  Conversely, if you have your packaging made by another company, or buy it from another company, and then use that packaging **without putting your own name or trademark** on it, you are **not considered to be the manufacturer** of that packaging for the purpose of the PPWR.

  → *For example, if a small business uses generic, unbranded transport packaging – such as cardboard boxes, tape or pallets – and at no point adds its brand or trademark to this transport packaging, it will not be considered the manufacturer of this packaging under the PPWR. Instead, the entity that supplied/physically manufactured the packaging is considered the manufacturer and needs to bear the related responsibilities.*

- **Am I an 'importer'?**

  You are an importer if you place packaging or packaged products from a third country on the EU market. The obligations on importers are the same as for manufacturers.

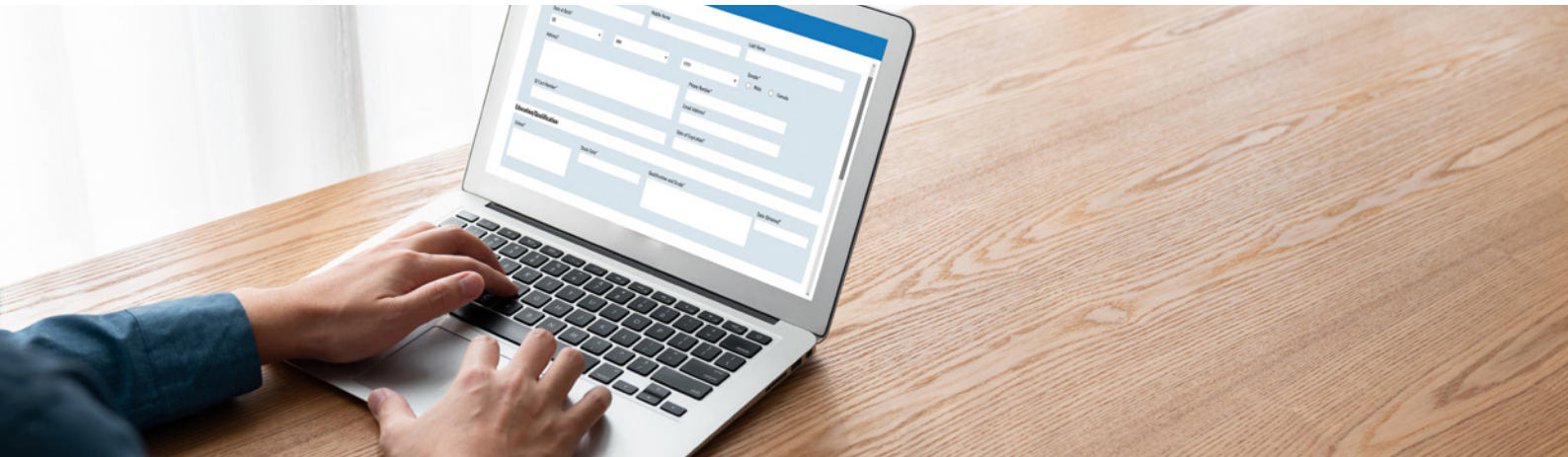
- **Am I a 'producer'?**

  You are a producer if you make packaging or packaged products available for the first time in the Member State where you are located, or directly to consumers in another Member State.

  → *'Producers' and 'manufacturers' are defined under the PPWR for different purposes. While the 'manufacturer' must bear overall legal responsibility for the compliance of the packaging with the PPWR rules, the 'producer' has extended producer responsibility – meaning it must pay for the collection and recovery of packaging in the Member State in which that packaging is expected to become waste.[7]*

6 If a company adds a sticker on the box for shipment purposes, it is not considered to be branding, and this company should not be considered 'manufacturer'.

7 This obligation is set out in the EU's Waste Framework Directive 2008/98



4. Do I qualify for any exemptions?

If you are a **micro-enterprise**[8], the PPWR grants certain **exemptions** from the rules described above:

- **An exemption, under certain conditions, from the obligations on 'manufacturers'**: if you have packaging or a packaged product designed or manufactured under your own name or trademark, and if the company supplying/physically manufacturing the packaging is located **within the EU**, then it is the **supplier/ physical manufacturer** of the packaging that becomes the 'manufacturer' under the PPWR and must assume the related responsibilities, including drawing up the declaration of conformity and ensuring the marking/ traceability of the packaging. You are exempt.
- **An exemption, under certain conditions, from 'producer'/EPR-related obligations**: if you are also the producer of the packaging, you will be exempted from the EPR-requirements when the supplier of the packaging materials is established **in the same Member State.**

5. What's coming later and how will that affect me as a small business?

Other PPWR rules will apply progressively over the coming years[9]. These include rules on:

- recyclability of packaging
- minimum recycled content in plastic packaging
- packaging minimisation
- labelling
- bans on certain single-use plastic packaging
- packaging re-use targets
- refill and re-use obligations for the take-away sector
- other related requirements

For several of these measures, the PPWR provides exemptions or lighter obligations for smaller businesses, including:

- for micro-enterprises, exemptions from re-use targets[10] and re-use offer obligation for the take-away sector[11]
- for smaller businesses placing less than 1 000 kg of packaging on the market per year, more proportionate EPR reporting requirements

To become fully operational, many of these rules require additional supporting measures or guidelines, and the Commission is currently working to prepare these. This process is a collaborative one, built around consultation, calls for evidence, feedback on draft texts and tailored outreach. **The voice of small businesses is essential in this** – to ensure the PPWR works in practice, across supply chains of all sizes and for the environment. Please follow the Commission's Have Your Say website[12] for news on upcoming consultation opportunities – and take part!

8 Please see Commission Recommendation 2003/361/EC: a micro-enterprise is an enterprise with fewer than 10 employees and an annual turnover of less than €2 million.
9 Please see the PPWR implementation page: https://green-forum.ec.europa.eu/green-business/packaging-and-packaging-waste-regulation-implementation_en
10 Article 29 PPWR
11 Article 33 PPWR
12 https://ec.europa.eu/info/law/better-regulation/have-your-say_en

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