

PPWR & COSMETIC PACKAGING

Regulation (EU) 2025/40 — Regulatory Reference

Prepared by UAB “Global Packaging” | August 2026

This regulatory reference has been prepared based on the official text of Regulation (EU) 2025/40 on packaging and packaging waste (PPWR) and the European Commission’s 2026 PPWR guidance. It is intended to provide a factual reference for cosmetic and personal-care packaging. It does not constitute legal or regulatory advice.

1. PPWR at a Glance

Regulation (EU) 2025/40 on packaging and packaging waste establishes harmonised EU rules covering the full life cycle of packaging. It entered into force on 11 February 2025 and applies generally from 12 August 2026. The Regulation applies to all packaging, regardless of the material used, and to all packaging waste.

For cosmetic and personal-care packaging, the relevant framework includes requirements on substances in packaging, recyclability, recycled content in plastic packaging, packaging minimisation, labelling and information, conformity assessment, technical documentation, economic-operator obligations and extended producer responsibility (EPR).

2. Cosmetic Packaging and “Contact-Sensitive Packaging”

PPWR defines “contact-sensitive packaging” by reference to packaging intended for products covered by specified Union legislation, including Regulation (EC) No 1223/2009 on cosmetic products. Accordingly, packaging intended for cosmetic products can fall within the PPWR contact-sensitive category. This classification is particularly relevant to the recycled-content rules for plastic packaging.

The classification and the applicable requirement must always be assessed for the actual packaging type, format, material and intended use; exemptions and later implementing measures may affect the final obligation.

3. Recyclability — Article 6

PPWR requires packaging to be recyclable. The framework has two principal elements: (1) Design for Recycling, so that packaging is designed for material recycling; and (2) recycling at scale, meaning that packaging waste is effectively collected, sorted and recycled through relevant systems at the scale required by the Regulation.

From 1 January 2030, or 24 months after the relevant delegated act enters into force, whichever is later, packaging must comply with Design for Recycling criteria. The detailed criteria and calculation methodology are to be established by delegated acts.

Grade	Recyclability performance	Regulatory significance
A	≥ 95%	Highest recyclability performance grade
B	≥ 80%	Permitted under the 2038 threshold
C	≥ 70%	Minimum technical recyclability threshold initially
Below C	< 70%	Technically non-recyclable under the grading framework

From 1 January 2038, packaging must meet at least Grade B (80%), subject to the Regulation's applicable provisions, exemptions and implementing measures. The recycled-at-scale element becomes relevant from 2035 under the timetable and methodology established by Article 6.

4. Design for Recycling in Cosmetic Packaging

The final recyclability assessment is governed by the EU criteria adopted under PPWR, not by a supplier's general sustainability claim. For cosmetic packaging, the complete construction may matter: container, closure, pump or dispenser, labels, sleeves, adhesives, inks, coatings, metallisation and other components can influence sorting and recycling performance.

- Material combinations should be reviewed for compatibility with relevant sorting and recycling streams.
- Pumps and dispensers may contain multiple polymers and/or metal parts; their effect must be assessed under the applicable Design for Recycling criteria.
- Labels, sleeves, adhesives, printing and decorative finishes may affect identification, sorting, separation and recycling.
- A mono-material design may support recyclability, but mono-material construction alone does not establish PPWR compliance.

5. Minimum Recycled Content in Plastic Packaging — Article 7

Article 7 introduces minimum post-consumer recycled plastic content for plastic packaging. For cosmetic packaging classified as contact-sensitive packaging, PPWR distinguishes PET from other plastics.

Contact-sensitive plastic packaging	2030 level*	2040 level
PET as the major component	30%	50%
Plastic other than PET	10%	25%

*The Article 7 2030 requirements apply from 1 January 2030 or three years after the entry into force of the relevant implementing act establishing the methodology, whichever is later.

The Regulation provides calculation rules, exemptions and powers for further implementing/delegated measures. The percentage must therefore not be applied as a simplistic per-component marketing rule without checking the applicable packaging category, format, calculation methodology and exemptions.

6. Packaging Minimisation — Article 10

From 1 January 2030, manufacturers or importers must ensure that packaging placed on the market is designed so that its weight and volume are reduced to the minimum necessary to ensure its functionality, taking account of the performance criteria in Annex IV.

PPWR also addresses packaging with characteristics intended only to increase the perceived volume of the product, including unnecessary double walls, false bottoms and unnecessary layers. This does not create a blanket prohibition on every double-wall cosmetic jar: the actual design and functional justification must be assessed against Article 10 and Annex IV.

7. Substances in Packaging — Article 5

Packaging must be manufactured so that the presence and concentration of substances of concern are minimised, including with regard to emissions and waste-management outcomes. PPWR retains the

concentration limit for the sum of lead, cadmium, mercury and hexavalent chromium in packaging or packaging components at 100 mg/kg, subject to the Regulation's exemptions and conditions.

PPWR also contains specific PFAS restrictions for food-contact packaging. Those PPWR food-contact PFAS limits should not be presented as a general PPWR PFAS ban for all cosmetics packaging.

8. Labelling and Information — Articles 12–14

PPWR introduces harmonised labelling and information rules, including material-composition sorting information. The detailed harmonised labels, pictograms, specifications and certain application dates depend on implementing acts. Statements should therefore distinguish between requirements already fixed directly in PPWR and technical details that are still governed by implementing measures.

PPWR permits or requires digital data carriers for specified information in certain circumstances. It should not be described as imposing a universal “Digital Product Passport” on every cosmetic package.

9. Conformity Assessment, Technical Documentation and EU Declaration of Conformity

PPWR establishes conformity-assessment obligations. Manufacturers must prepare the technical documentation required by Article 38 and Annex VII for the applicable packaging requirements and draw up the EU Declaration of Conformity where conformity has been demonstrated. Annex VIII sets out the model structure for that declaration.

The technical file can include, as applicable, a description of the packaging and intended use, design/manufacturing information, applicable requirements, standards or technical specifications, calculations, assessments and test reports.

The European Commission's 2026 guidance should also be consulted because it clarifies practical questions concerning when conformity assessment is required for packaging and components within the supply chain.

10. Economic Operators and Supply-Chain Responsibilities

PPWR assigns obligations according to the legal role performed in the supply chain. Relevant concepts include manufacturer, supplier, importer, distributor and producer. A company's obligations cannot be determined from its commercial title alone; they depend on what the company actually does in the relevant transaction.

- Manufacturers: verify and demonstrate conformity with applicable PPWR requirements and fulfil the manufacturer obligations.
- Suppliers: provide manufacturers with the information and documentation necessary to demonstrate conformity where required by PPWR.
- Importers: before placing packaging from a third country on the Union market, fulfil the importer verification and information obligations applicable under PPWR.
- Distributors: act with due care and verify applicable marking/documentation requirements before making packaging available on the market.
- Producers for EPR: fulfil registration, reporting and financial/organisational responsibilities applicable under the EPR framework.

11. Extended Producer Responsibility (EPR)

PPWR strengthens and harmonises the framework for Extended Producer Responsibility. The entity qualifying as a 'producer' for a particular Member State and supply arrangement may be subject to registration, reporting and financial or organisational responsibility for packaging waste. EPR responsibilities must be assessed separately from the commercial role of packaging supplier.

PPWR also links recyclability performance to future EPR fee modulation, so packaging design may have both regulatory and waste-management cost implications.

12. PPWR Timeline

Date	PPWR milestone
11 February 2025	Regulation (EU) 2025/40 entered into force.
12 August 2026	PPWR generally applies.
2030	Major requirements begin to apply under their specific legal trigger dates, including Design for Recycling, recycled-content and packaging-minimisation provisions.
2035	Recycled-at-scale requirements enter the recyclability framework according to Article 6 and implementing methodology.
2038	Recyclability threshold tightens to at least Grade B ($\geq 80\%$), subject to applicable provisions.
2040	Higher minimum recycled-content targets apply under Article 7.

13. Regulatory Disclaimer

The information in this document is provided for general informational purposes only and does not constitute legal, regulatory or compliance advice.

Regulation (EU) 2025/40 contains requirements with different application dates, exemptions and provisions that depend on delegated and implementing acts. The requirements applicable to a specific packaging solution depend on factors including packaging type, material, format, intended use, market and the economic operator's role in the supply chain.

Customers remain responsible for determining and fulfilling the legal requirements applicable to their products and packaged goods.

14. Official EU Sources

- Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste — EUR-Lex, CELEX 32025R0040.
- European Commission, Commission Notice — Guidance document for Regulation (EU) 2025/40 on packaging and packaging waste, Official Journal, 10 June 2026 (C/2026/3084).
- European Commission — FAQ on Packaging and Packaging Waste Regulation (PPWR), 30 March 2026.
- European Commission — Packaging and Packaging Waste / PPWR policy and implementation information.