

Packaging and Packaging Waste Regulation (PPWR) – Information obligations of suppliers (Art. 16)

Regulation (EU) 2025/40 on packaging and packaging waste (hereinafter, the **PPWR**) entered into force on **11 February 2025** and will apply from **12 August 2026**.

Sealed Air, as supplier of packaging materials, according to Article 16, shall provide the manufacturer with the information necessary to demonstrate the conformity to the requirements of Articles 5 to 11 of the above-mentioned Regulation.

Sealed Air is fully engaged in ongoing discussions at various levels and we closely monitor legislative developments and proactively advance our solutions to ensure alignment with current and future PPWR requirements.

Based on the current legislative scenario, we are pleased to provide you with the following information for all products manufactured or distributed by Sealed Air within the European Union and the European Free Trade Area:

- Requirement for substances in packaging (Article 5) – 12 August 2026

Packaging placed on the market shall be manufactured so that the presence and concentration of **Substances of Concern** (SoC) are minimized. The Commission shall monitor the presence of SoC in packaging and shall take, where appropriate, the relevant follow-up measures; a report on this matter should be prepared by **31 December 2026**.

From **12 August 2026**, Article 5 is applicable to packaging placed on the market and we confirm the compliance with the following requirement:

- *Article 5(4)*: the sum of the concentrations of lead, cadmium, mercury and hexavalent chromium resulting from substances present in our packaging materials does not exceed 100 mg/kg. This requirement has been carried over from the Packaging and Packaging Waste Directive 94/62/EC.
- *Article 5(5) (PFAS)*: not applicable to non-food packaging.

- Recyclable packaging (Article 6) – 1 January 2030

Article 6 describes the **recyclability** requirements of packaging.

Article 6(1) states that 'All packaging placed on the market shall be recyclable'.

As this Article does not have a specific deadline, it can be interpreted as applying from 12 August 2026.

However, Article 6(1) should be read in conjunction with Article 6(2) which describes the conditions for packaging to be considered 'recyclable' under PPWR.

Article 6(2): '*Packaging shall be considered to be recyclable if it fulfils the following conditions*':

- (a) it is **designed for material recycling**, which enables the use of resulting secondary raw materials that are of sufficient quality when compared to the original material that they can be used to substitute primary raw materials.

Point (a) applies from **1 January 2030** or 24 months from the date of entry into force of the delegated acts, whichever is the latest. Such delegated acts, according to Article 6(4) will set design for recycling requirements and the related assessment methodology and shall be adopted by the Commission **by 1 January 2028**.

As also clarified in the Commission Notice of 5 June 2026 (hereinafter, the Commission Notice)¹, until the date of application of Article 6(2)(a), i.e. from 2030, manufacturers must comply only with requirements in accordance with the PPWR, including packaging recoverable in the form of energy.

- (b) when it becomes waste, it can be **collected separately** in accordance with Article 48(1) and (5), sorted into specific waste streams without affecting the recyclability of other waste streams and recycled at scale, on the basis of the methodology set out in accordance with paragraph 5 of this Article.

Point (b) applies from **1 January 2035** or five years from the date of entry into force of the implementing acts whichever is the latest.

Moreover, the Commission Notice states that “**manufacturers**” **do not need to perform the conformity assessment procedure** in accordance with Article 38 and Annex VII of the PPWR for recyclability until the entry into force of the delegated act under Article 6(4) PPWR.

Such interpretation is also confirmed in several parts of the Commission’s FAQ², such as in Paragraph I, page 5: “*The PPWR entered into force on 11 February 2025, and its general application date is 12 August 2026, but certain provisions apply later (e.g., recyclability, recycled content targets, packaging bans and reuse targets by 2030).*”

“*Recyclability: All packaging must be recyclable in an economically viable way by 2030 (Article 6)*”.

- Minimum recycled content in plastic packaging (Article 7) – 1 January 2030

By 2030, any plastic part of packaging will have to contain a minimum percentage of **recycled content** recovered from post-consumer plastic waste and calculated as an average per manufacturing plant and year. The target percentage of recycled content depends on whether the packaging is contact sensitive or not (Art. 7; comma 1 and 2). **By 2040** such percentage will be further increased.

Compliance with this Article cannot be demonstrated yet as key specifications will be defined through secondary legislation.

Sealed Air is actively working to design our material in order to be able to contain the minimum percentage of recycled content.

¹ C(2026) 3702 of 5 June 2026 - Commission notice Guidance document for Regulation (EU) 2025/40 on PPWR

² European Commission: Directorate-General for Environment, *Packaging and Packaging Waste Regulation (PPWR) – Frequently asked questions*, Publications Office of the European Union, March 2026

- Biobased feedstock in plastic packaging (Article 8)

The Commission shall review the state of technology development and environmental performance of biobased plastic packaging by **12 February 2028** and based on that the Commission will present a legislative proposal.

- Compostable packaging (Article 9) - 12 February 2028

Not applicable. Sealed Air packaging does not fall under the definition of “compostable packaging” referred to in Article 3 (50).

- Packaging minimisation (Article 10) - 1 January 2030

By 1 January 2030, packaging placed on the EU market shall be designed so that its weight and volume is reduced to the minimum necessary to ensure its functionality, considering its shape and material from which the packaging is made, and the specific packaged product and intended use. This assessment must consider multiple performance criteria (e.g. protection, safety, logistics, etc.) and identify the point beyond which further reduction would compromise functionality.

By 12 February 2027, the PPWR mandates the Commission to request CEN to prepare a harmonised standard or update the existing one under PPWD (*EN 13428:2004*) with methodology to assess the compliance with packaging minimisation requirements. Until the end of 2029 the existing standard will remain in effect.

As a packaging supplier, Sealed Air can **support providing technical data and information** to contribute to this assessment, in particular manufacturing processes efficiency and waste reduction. The final compliance depends on the **overall packaging configuration, packaged product, and distribution conditions**, which remain under the manufacturer’s responsibility.

- Reusable packaging (Article 11) – 12 August 2026

Not applicable. Sealed Air packaging material is not considered a reusable packaging. This article will be re-evaluated after the publication of the delegated act in 2027.

Regulatory Affairs Department

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