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Packaging and Packaging Waste Regulation (PPWR) Regulation (EU) 2025/ 40

Frequently Asked Questions (FAQs)

Important: *This document is not legally binding and is without prejudice to further interpretation of the text provided by the European Commission. It should also be noted that the final interpretation of the PPWR lies with the Court of Justice of the European Union, and its enforcement is the responsibility of national competent authorities. Therefore, this FAQ document should not be construed as legal advice or relied upon for compliance purposes. Users should always refer to the text of the PPWR to confirm the nature and extent of the legal obligations applicable to them.*

Useful references:

PPWR Regulation: [Regulation \(EU\) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation \(EU\) 2019/1020 and Directive \(EU\) 2019/904, and repealing Directive 94/62/EC \(Text with EEA relevance\)](#)

European Commission PPWR guidance (June 2026): [eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C\(2026\)3702](#)

European Commission PPWR FAQs (August 2026): [FAQ on Packaging and Packaging Waste Regulation \(PPWR\) - Environment](#)

Commission’s Joint Research Centre technical proposal on waste-sorting labelling (January 2026): [JRC Publications - JRC technical proposal on EU harmonised waste sorting labels under the packaging and packaging waste regulation](#)

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General

1. Does Great Britain intend to align with PPWR?

The Government has not yet taken a decision on whether to align with PPWR in Great Britain, but a formal consultation process to consider regulatory consistency across the UK is being planned for early 2027.

2. Will UK businesses placing products on the EU market need to comply with PPWR definitions and requirements?

UK businesses placing packaging items on the Northern Ireland and/or EU markets will need to ensure that these items are compliant with the relevant PPWR definitions and requirements.

3. PPWR introduces changes to packaging definitions. Will the UK pEPR packaging scope change to reflect the EU changes (e.g. coffee pods)?

The PPWR packaging definition, under Article 3(1)(1), does not change the definition of packaging under the UK pEPR scheme or alter the scope of packaging captured under the UK pEPR scheme.

With regard to pEPR, Northern Ireland remains under the UK pEPR scheme. This [Commission Notice](#) sets out which parts of the PPWR regulations do not apply in Northern Ireland; these are largely related to waste management aspects of the regulation.

The PPWR packaging definition applies in Northern Ireland in relation to the PPWR requirements that [apply](#) there.

4. Are products first placed on the market before 12th August 2026 required to comply with the new PPWR requirements?

Products first lawfully placed on the EU and/or Northern Ireland market before 12th August 2026 will not be required to comply with the PPWR requirements that will apply from that date, subject to any relevant article-specific transitional arrangements. Compliance is required from the entry into force date of each of the individual articles, with transitional arrangements differing between provisions.

The EU [guidance](#) document states that the PPWR “does not foresee a transitional period for the exhaustion of stocks” for packaging containing PFAS that is produced before 12th August 2026. This means that food-contact packaging placed on the market after 12th

August 2026 must comply with PPWR PFAS limits, while packaging placed on the market before 12th August 2026 does not need to comply, and may remain on the market with no requirement to be withdrawn. There are no exceptions regarding packaging containing recycled material.

5. How should we interpret ‘placed on the market’?

According to PPWR Article 3, packaging should be considered to have been placed on the market when it is made available for the first time on the EU and/or Northern Ireland markets. This means supplied by the manufacturer or importer for distribution, consumption or use in the course of a commercial activity, whether in return for payment or free of charge.

Packaging that has already been placed on the EU or Northern Ireland markets before the date of application of relevant requirements, and which is in the stocks of distributors, including retailers and wholesalers, should not need to meet those PPWR requirements. Further information is available on page 12 of the European Commission’s [guidance](#).

6. Are products that are already held in warehouses or distribution centres considered to have been placed on the market?

Packaging that has been placed in the stocks of distributors, including retailers and wholesalers, before a PPWR requirement begins to apply does not need to meet that requirement. Therefore, packaged products that are held in EU/ Northern Ireland warehouses or distribution centres are considered to have been placed on the market.

7. Will requirements in the RAM (Recyclability Assessment Methodology) align with PPWR?

The UK Government intends to explore GB alignment with the PPWR, and a formal consultation process to consider regulatory consistency across the UK is being planned for early 2027.

The RAM is a methodology which is designed to assess the recyclability of packaging under pEPR regulations. The RAM reflects PackUK’s strategy of creating a circular economy and delivering a scheme which demonstrates good value for money for producers whilst ensuring efficient and effective recycling of packaging.

The RAM aligns with current UK policy and we will continue to work closely across the four nations to ensure that it remains aligned to pEPR policy objectives.

8. Are there restrictions on sustainability claims re: labelling?

Labels must not mislead or confuse consumers regarding sustainability or waste sorting. Specifically, under PPWR Article 14 on environmental claims, claims around sustainability may only be made for packaging properties that exceed minimum requirements under PPWR.

In addition, the unfair commercial practices provisions of the Digital Markets, Competition and Consumers Act 2024 also apply to sustainability claims. The CMA (Competition and Markets Authority) has published guidance, the [Green Claims Code](#), which provides advice to business on making environmental claims about goods and services, and we recommend that businesses familiarise themselves with this guidance.

Declarations of Conformity: Article 39

9. Which PPWR requirements will need a Declaration of Conformity from 12th August 2026?

1. Article 5(4) on maximum heavy metals concentrations in all packaging
2. Article 5(5) on per- and polyfluoroalkyl substances (PFAS) restrictions in food-contact packaging
3. Article 11(1) on reusable packaging (if applicable)

10. Who will enforce DoCs, and what is the anticipated enforcement approach?

In relation to PFAS restrictions in food-contact packaging under Article 5(5), the Food Standards Agency (FSA) is responsible for implementing provisions for enforcement of food contact requirements. This is through separate food law powers, and not through the enforcement powers and provisions within the PPWR. Responsibility for wider PPWR conformity assessment does not sit with the FSA. The government will provide further guidance on the wider enforcement approach in due course.

A pragmatic initial enforcement approach will be adopted in Northern Ireland in relation to the Declaration of Conformity requirements for Articles 5(4), 5(5) and 11(1). Enforcement will be undertaken alongside existing checks in the longer term.

It is anticipated that businesses will already be compliant with the heavy metal restrictions set out in Article 5(4), as equivalent restrictions have been in force in the UK since 2015 under the Packaging (Essential Requirements) Regulations. Local authorities will continue to enforce these requirements. In relation to Article 11(1), PPWR reuse targets do not apply in Northern Ireland under the Windsor Framework.

11. What is the scope for DoCs, and how will this evolve over time?

Manufacturers will be required to prepare a Declaration of Conformity (DoC) for each packaging item/ type falling under PPWR Article 39, to demonstrate compliance with the requirements under PPWR Articles 5-12.

Manufacturers will be required to maintain and update technical documentation and prepare DoCs confirming that the packaging complies with the relevant PPWR requirements. Manufacturers must be prepared to submit DoCs and technical documentation to the relevant enforcement bodies if requested, and further details on preparing DoCs can be found under PPWR Article 39 and Annex VIII.

Over time, as further requirements begin to apply under PPWR Articles 6-12, the scope of the DoCs and required supporting technical documentation will expand accordingly. The government will provide further guidance on the wider enforcement approach in due course.

12. What are the technical documentation requirements for DoCs?

PPWR Article 39 states that the Declaration of Conformity must be supported by technical documentation as per Annexes VII and VIII. Annex VII states that the technical documentation should specify the applicable requirements, covering the design, manufacture and operation of the packaging as far as is relevant.

The technical documentation should contain as a minimum:

- (a) a general description of the packaging and its intended use;
- (b) conceptual design, manufacturing drawings and materials of components;
- (c) descriptions and explanations necessary to understand (b) and how the packaging operates;
- (d) a list of: (i) the harmonised standards, referred to in Article 36, applied in full or in part; (ii) the common specifications, referred to in Article 37, applied in full or in part; (iii) other relevant technical specifications used for measurement or calculation purposes; (iv) in the event of partly applied harmonised standards or common specifications, an indication of the parts which have been applied; (v) in the event of harmonised standards or common specifications not being applied, a description of the solutions adopted to meet the requirements referred to in point 1;
- (e) a description of how the assessments under Articles 6, 10 and 11 have been carried out; and
- (f) test reports

Not all of the above will be required for every packaging item, and manufacturers should exercise discretion in omitting items that do not apply and including additional information as needed to demonstrate compliance.

Technical documentation should be retained for 5 years (single-use packaging) or 10 years (reusable packaging).

13. What is the review period for the DoC and conformity assessment?

There is no set review period for DoCs under PPWR. Instead, DoCs should be reviewed whenever there are regulatory amendments or changes in relevant standards; when compliance-relevant changes are made to packaging items; and more generally as part of regular compliance management processes.

It should be noted that the conformity assessment procedure under Annex VII (3) requires the manufacturer to take all necessary steps to ensure the compliance of the manufacturing process. In practical terms, this means that any manufacturing changes (e.g. changing paper supplier) may potentially require updates to technical documentation and the DoC for that packaging item.

14. Who is responsible across the supply chain (e.g. retailer versus manufacturer, exporter versus distributor/importer)?

Not all parties in the supply chain will hold the same responsibilities. We recommend referring to the recitals in the Regulation and the definitions, before referring to the specific requirements to understand who is responsible for what.

Recital (76) states that “The manufacturer, having detailed knowledge of the design and production process, is best placed to carry out the conformity assessment. Conformity assessment under this regulation should therefore remain solely the obligation of the manufacturer.”

Furthermore, the suppliers of the materials to the manufacturer will need to ensure all relevant information and details are passed to them.

Recitals 79, 80, 81 and 82 provide further insight as to the roles and responsibilities of distributors and importers.

PFAS: Article 5(5)

15. What is the scope for Declarations of Conformity (DoCs) in relation to PFAS restrictions under Article 5(5)?

DoC requirements relate to Articles 5 – 12. Among the first of the DoC requirements to come into force on 12th August 2026 is Article 5(5) on PFAS restrictions in food-contact packaging. Any food safety issues relating to the use of PFAS in food packaging will be enforced through separate food law powers and not through the enforcement powers and provisions within the PPWR.

The DoC does not replace business operators' legal duties to provide a separate Declaration of Compliance related to food safety requirements, in accordance with the food-contact materials legislative framework.

Business operators must provide a Declaration of Compliance for relevant food-contact materials, such as plastics, in addition to the Declaration of Conformity required under PPWR.

Compliance with Article 5(5) on PFAS restrictions must be supported by appropriate technical documentation demonstrating conformity with the applicable limit values. Businesses should retain technical documentation sufficient to demonstrate compliance with applicable legal requirements. This may include, where required, declarations of compliance under food contact material legislation, supplier information, analytical evidence and any other supporting records necessary to demonstrate due diligence and support compliance if challenged.

16. Very few labs currently have the capability for accurate PFAS analysis (e.g. pyrolysis GC-MS). Should labs be required to hold specific accreditation, and if so, what?

Although there is no harmonised and/or accredited test method, we nevertheless recommend that any testing is carried out by a laboratory with sufficient accreditation. According to UKAS (United Kingdom Accreditation Service), it appears appropriate for laboratories to hold ISO/IEC 17025 accreditation. They should be able to advise on what testing can be carried out, in accordance with the published guidance.

17. What testing standard or methodology should be used for PFAS, what is the scope, and how frequently will testing be required?

At present, there remains no fully harmonised EU methodology applicable across all food-contact packaging materials and matrices. The Commission [guidance](#) describes a

recommended stepwise approach to support verification of compliance and enforcement activities, beginning with the quantification of total fluorine. Where fluorine levels exceed the relevant PPWR threshold, additional analytical methods may be used to determine whether the fluorine is attributable to PFAS and whether the applicable concentration limits are exceeded. The [EU FAQ](#) document on PPWR also offers useful additional information.

Testing Standard:

There is not yet a single harmonised EU testing standard. EU [guidance](#) notes that “several protocols and methodologies to test the presence of PFAS in different matrices exist, but there is no harmonised methodology for PFAS in food contact packaging at EU level. In this context, the following stepwise approach, based on state-of-the-art analytical capacities and a meta-analysis of PFAS testing of the relevant matrices, is recommended to enforce the PFAS limits as of their application date, i.e. 12th August 2026:

(1) Total Fluorine (TF) quantification (step 1): If TF is below 50 mg/kg, sample could be considered compliant.

(2) If TF is above 50 mg/kg, methods such as pyrolysis-GC/MS can be used to confirm whether the fluorine is organic (PFAS) or inorganic in step 2. If the organic fluorine is below 50 mg/kg, the sample could be considered compliant.

(3) Direct TOP (total oxidizable precursors) analysis is recommended to check compliance with the 25 µg/kg (17) and 250 µg/kg concentration limit in step 3.

On the basis of the evidence currently available to the Commission, all samples compliant with test (1) are also compliant with tests (2) and (3).”

The FSA is unable to advise on specific standards or methods, and recommends obtaining advice from accredited laboratories able to consider the specific needs of your business. EU guidance suggests fluorine screening as a first step.

Scope:

This will include all food contact packaging.

Frequency of testing

The EU does not appear to have set out any fixed period for such testing, and so the recommendation is likely to be that there is sufficient compliance documentation for each packaging type, and to keep this under regular review and up to date.

18. Are risk-based approaches to testing acceptable?

Currently, we do not endorse or recommend risk-based approaches to testing as an alternative to demonstrating compliance with the requirements set out in the PPWR. The FSA recommends obtaining advice from accredited laboratories able to consider the specific needs of your business.

Waste-sorting labelling: Articles 12 and 13

19. Does the UK intend to align with PPWR on waste-sorting labelling?

The Government has been committed to the introduction of mandatory waste-sorting labelling for some time. The EU PPWR labelling requirements will apply in Northern Ireland under the Windsor Framework.

In developing labelling policy for England, Scotland and Wales, the three governments will review the PPWR implementing act on labelling following publication and explore the potential for consistency across our approaches. We will seek to minimise the costs and complexity of labelling arrangements for businesses trading across multiple markets.

20. When will the requirements come into force?

Businesses placing packaging on the market in Northern Ireland and/ or the EU will have two years to implement waste-sorting labelling requirements, following the publication of the Commission's implementing act. This act is expected to be published by 12th August 2026. If this is delayed, businesses will still have two years to implement the changes from the point that the implementing act is published.

In addition, under PPWR Article 12(12), packaging that is not PPWR-labelling-compliant, and which is manufactured in the EU or imported before the deadline, can be made available on the market for up to three years from the date of entry into force of the implementing act.

On potential GB alignment, implementation timescales are being considered. We are aware that businesses will need sufficient time to make changes to labelling, and we will factor that into our planning.

21. Will QR codes be mandatory for labelling?

Under PPWR, waste-sorting labelling would not require the use of QR codes; these would be optional rather than mandatory. The UK Government is unlikely to mandate the use of digital waste-sorting labelling.

22. What will happen to OPRL labelling?

In the UK, OPRL labelling is applied to packaging on a voluntary rather than a mandatory basis. Given space constraints on packaging, we do not anticipate that businesses will continue to use OPRL labelling once PPWR waste-sorting labelling becomes mandatory for packaging placed on the market in Northern Ireland and/or the EU. We encourage the use of the OPRL label for the time being, and will provide further information following publication and review of the implementing act.

Moreover, alphanumeric labelling as per Commission Decision 97/ 129 of 28 January 1997 will not be permitted alongside PPWR waste-sorting labelling.

23. What if there is insufficient space on packaging for new labelling?

Under PPWR Article 12(5), if the size or nature of a packaging item means that label application is not possible or warranted, then the label or QR code should be displayed on grouped packaging. If it is not possible to display the label on grouped packaging, then labelling information should be provided through a single QR code.

24. Where on packaging should the waste-sorting labels be positioned?

This will depend on the content of the implementing act.

The EU's Joint Research Centre [proposal](#) on labelling (chapter 4.1.6, page 87) indicates that clear recommendations on placement will be given in user manuals for waste-sorting labelling. It also states that labels should be “*visible, legible, and durable at the point of disposal and must never be obscured (for example, placed under folds, seams [...]) Labels should be positioned in intuitive and visible areas, ideally close to other key consumer information such as barcodes, ingredient lists, or recycling symbols—while maintaining sufficient spacing to preserve visual distinction.*”

25. Does waste-sorting labelling apply to transport packaging?

Under PPWR Article 12(1), transport packaging is exempt from the waste-sorting labelling requirement, with the exception of e-commerce packaging.

26. Does waste-sorting labelling apply to unbranded packaging?

The Regulation and the EU's Joint Research Centre proposal lack clarity here. The implementing act may provide further information on this question. The binary recyclability labelling proposed under pEPR offered various alternatives to direct labelling for filled, unbranded packaging (e.g. displaying recyclability information where the product is sold, or alongside the product description if sold online); it may be that similar options are made available under PPWR.

27. What is the intended enforcement approach during the transition period?

During the transition period for labelling, businesses are not expected to be fully compliant. The role of an enforcement authority is not just to enforce the law, but to support and guide businesses to comply with regulations, helping them understand their responsibilities and achieve the right outcomes.

However, we would strongly encourage businesses to take steps towards compliance as early as possible and not wait until the formal entry-into-force date.

28. When can we expect finalised UK guidance to be published?

Guidance will be published in good time to ensure compliance. We are working to finalise timelines and will provide further information following publication of the implementing act.