

Wine Institute
Recycling Subcommittee
Meeting Materials – July 30, 2026

On July 15, 2026, USDA did a webinar for and with the woodpack (i.e., shipping pallet) industry entitled: *EU Packaging for Food and Beverage Exporters*. Relevant staff from Wine Institute attended and while we are unable to share a recording of the webinar, USDA encouraged us to share the webinar materials and helpful links to other resources with our members. Those materials are compiled here and listed below with hyperlinks to each section:

- Email from USDA to webinar attendees with links to other resources and the following five attachments.
- USDA's presentation deck entitled *The EU Packaging and Packaging Waste Regulation (PPWR)*.
- USDA's presentation deck entitled *Preparing for EU PPWR Compliance*.
- Woodpack Global's presentation deck providing a brief overview on the impact of the PPWR on wooden pallets.
- USDA's presentation deck entitled *USDA Foreign Agricultural Service—Packaging Innovation Program*.
- USDA report from April 2024 entitled *European Union Finalizes New Rules for Packaging and Packaging Waste Reduction*.

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Subject: July 15, 2026 Webinar Materials: EU Packaging for Food and Beverage Exporters
Date: Wednesday, July 15, 2026 1:02:59 PM
Attachments: [image002.png](#)
[SUSTA PPWR Webinar \(July 15, 2026\).pdf](#)
[Preparing for PPWR Compliance USDA 07-15-2026.pdf](#)
[2026.07.14.Presentation for U.S. exporters PPWR.pdf](#)
[FAS Packaging Projects Overview July 15 2026 for participants.pdf](#)
[European Union Finalizes New Rules for Packaging and Packaging Waste Reduction Brussels USEU European Union E42024-0012.pdf](#)

■ EXTERNAL EMAIL

Thank you for attending today's EU Packaging Webinar for Food and Beverage Exporters. Attached are the slides from the presenters, and the Foreign Agricultural Service's GAIN Report on the EU Packaging and Packaging Waste Regulation (*European Union Finalizes New Rules for Packaging and Packaging Waste Reduction*). Please feel free to share with other industry members and interested parties. We are working through issues with the webinar recording and will share it as a follow up to this email if we are able too.

Informational Resources and Guidance Documents on Implementing the EU Packaging and Packaging Waste Regulation (PPWR)

Full Text of the PPWR Regulation: <https://eur-lex.europa.eu/eli/reg/2025/40/oj/eng>

EU Commission FAQ on PPWR (March 2026):

https://environment.ec.europa.eu/publications/faq-packaging-and-packaging-waste-regulation-ppwr_en

Monitor this EU Commission press website for additional guidance documents:

https://ec.europa.eu/commission/presscorner/detail/en/ip_26_664

Foreign Agricultural Service (FAS) Resources

FAS's Global Agricultural Information Network (GAIN) Report Database:

https://www.fas.usda.gov/data/search?reports%5B0%5D=report_type%3A10251

Foreign Agricultural Import Regulations and Standards (FAIRS), European Union FAIRS Annual Report: <https://www.fas.usda.gov/data/gain/2025/12/european-union-fairs-country-report-annual> and Export Certificate Report Annual:

<https://www.fas.usda.gov/data/gain/2025/12/european-union-fairs-export-certificate-report-annual>

Other Sources of Information

EU PPWR Survival Guide: <https://www.euopen-packaging.eu/wp-content/uploads/2025/01/EUOPEN-PPWR-survival-guide-March-2026-2.pdf>

EUOPEN PPWR Conformity Assessment FAQ: <https://ppwrcatoolkit-euopen.eu/wp-content/uploads/2026/05/EUOPEN-FAQ-on-Conformity-Assessment-F.pdf>

FAQ on EUOPEN's Conformity Assessment Toolkit: <https://ppwrcatoolkit-euopen.eu/>

Guidance Document C/2026/3084: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C_202603084

CoA Template: Because USDA is not endorsing any DoC template, we suggest that you look at a few examples by searching for: "PPWR Declaration of conformity template."

We hope to have more webinars in the future. Please do not hesitate to reach out to Andrew Stephens (Andrew.Stephens@usda.gov) and Andrew Mack (Andrew.Mack@usda.gov) with any questions.

Andrew Mack

Agricultural Science Advisor

Trade Policy and Geographic Affairs | Processed Products Division



Foreign Agricultural Service

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United States Department of Agriculture
Foreign Agricultural Service

Packaging Compliance for U.S. Exporters to the EU

The EU Packaging and Packaging Waste Regulation

July 15, 2026

Sophie Bolla, Agricultural Specialist, U.S. Mission to the EU
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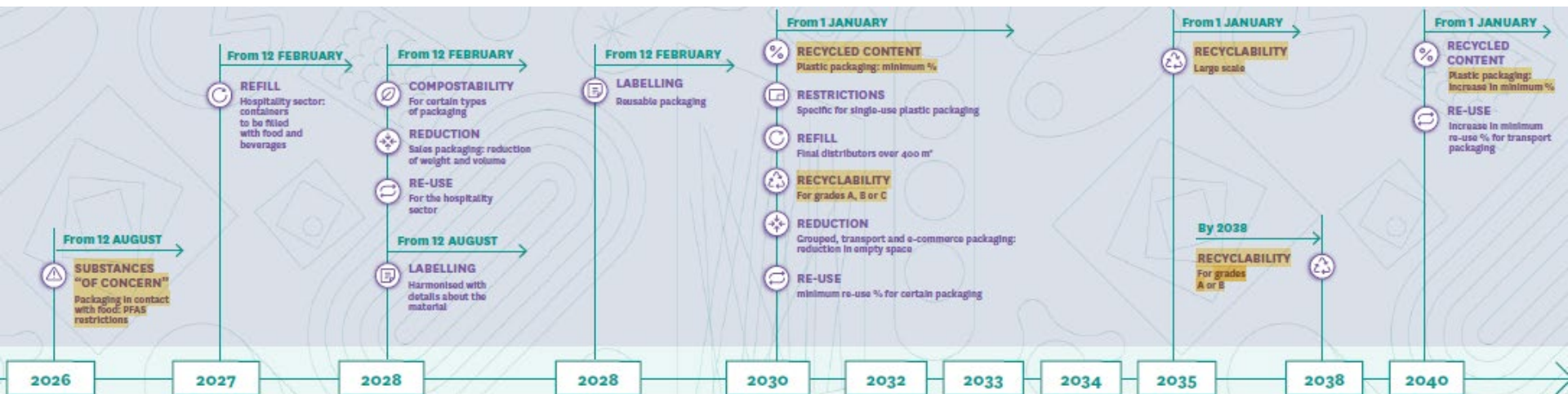


What is the Packaging and Packaging Waste Regulation (PPWR)?

- The PPWR introduces requirements over the entire life cycle of packaging in the EU and mandates that **all packaging placed on the EU market is recyclable**, including **transport packaging**.
- PPWR lays down the principle of free movement within the single market for packaging.
- PPWR also requires:
 - Max. 50% empty space ratio in transport packaging by 2030
 - Re-use targets for transport packaging within the EU.
 - Transport packaging in flexible format that is in direct contact with food and feed (ingredients) is exempt from re-use targets
 - Packaging Minimization by 2030
 - Minimum Recycled Content in Plastic Packaging by 2030



United States Department of Agriculture Foreign Agricultural Service



+ Declaration of conformity for packaging (Aug 2026)

Source: CONAI (Consorzio Nazionale Imballaggi), [link](#)



Conformity Assessment – August 2026!

- The PPWR requires every packaging type placed on the EU market to be backed by a signed Declaration of Conformity (DoC) from the manufacturer.
- There is no exemption for transport packaging. Different packaging types, such as pallets, pallet collars, wrappings and straps must have separate declarations of conformity.
- The DoC is a written self-declaration by the packaging manufacturer confirming that a specific packaging type meets some requirements of PPWR.
 - Requirements for substances in packaging
 - Recyclability
 - Minimum recycled content in plastic packaging
 - Packaging minimization
 - Reusability (if applicable)
 - Labeling
- This will apply as of **August 12, 2026**, so your importer may start to ask you for that document. Please check with your packaging manufacturer.



Food Contact Materials and the PPWR – August 2026!

- PPWR includes a ban on the use PFASs above certain thresholds in food contact packaging. (article 5)
- Please note that the PFAS restriction does not differentiate between intentionally added and unintentionally present PFAS.
- Additionally, the sum of the concentrations of lead, cadmium, mercury and hexavalent chromium resulting from substances in packaging, or its components, shall not exceed 100 mg/kg.
- These requirements will apply as of **August 12, 2026**, so your importer may start to ask you about the presence of PFASs and other contaminants in your packaging. Please check with your packaging manufacturer.



Mirror Clauses and Impacts on the Availability of Packaging for the EU Market

- Sustainability requirements for recycling plants
 - PPWR requires that recycled content needs to comply with strict requirements if recycled in the EU.
 - Plastic recycled in an installation located in a third country also needs to follow the same sustainability criteria as in the EU.
 - The European Commission has until January 1, 2026, to establish the methodology for the evaluation of recycling installations in third countries.
- Food safety requirements for recycled plastic used in food contact materials (Regulation 2022/1616)
 - The EU requires a competent authority in third countries to attest that recycling facilities complies with rules laid down by Reg 2022/1616.
 - Might become problematic once the minimum recycled content in plastic packaging kicks in.



Preparing for EU PPWR Compliance

July 15, 2026

Andrew Stephens,
Senior Policy Advisor, USDA/FAS

Disclaimer: The views in this presentation the author's own and do not necessarily reflect the view of USDA or the United States government

PPWR Economic Operators: Which One(s) are You?

- **Manufacturers** must ensure packaging complies and produce and sign the conformity documentation.
- **Suppliers** must support that compliance process with data and documentation. (Suppliers of packaging material)
- **Importers** must verify compliance before placing packaging on the EU market. Foreign importers need an authorized rep to be responsible for PPWR and EPR.
- **Distributors** must check key points before making packaging available.
- **Producers** must meet EPR registration, reporting and fee obligations in the relevant Member State.

Who is a "Manufacturer" under PPWR Art. 3(1)?

- A manufacturer is [entity] **who manufactures** packaging **or a packaged product**. It is not necessarily the [entity] that physically produces the packaging.
- Two elements need to be considered:
- (1) the role in the design or manufacturing of packaging criterion and
- (2) the trademark or the branding criterion. If the packaging or packaged product carries a certain name or trademark, **it can be assumed that the owner of that name or trademark is the 'manufacturer' ...**, as it will have the decisive power in the contractual relation with its suppliers and will therefore be able to determine also the packaging characteristics.
- The wording of **the definition of manufacturer indicates that there is always only one manufacturer in a supply chain within the meaning of the PPWR.**

Source: Commission's interpretation from Document C(2026)3702, June 2026

Declaring Conformity: PPWR Articles 5 through 12 -- What & When?

- Art. 5: Hazardous Substances (Target Year: 2026)
- Art. 6: Recyclability Mandate (2030)
- Art. 7: Recycled Plastic Content (2030 / 2040)
- Art. 8: Biobased feedstock in plastic packaging (N/A)
- Art. 9: Compostable Packaging (2030)
- Art. 10: Packaging Minimisation (2030)
- Art. 11: Reusable Packaging (2030 / 2040)
- Art. 12: Labelling & Information (2028–2029)

What Might Your Importer Ask For?

- Before placing packaging on the market, an importer shall ensure:
- Conformity assessment procedure (Article 38) is completed and the technical documentation (Annex VII, required under Art. 5 to 11) has been drawn up by the manufacturer;
- The packaging is labelled in accordance with Article 12 (forthcoming pictograms showing how to recycle)
- The packaging is accompanied by the required documents;
- The manufacturer has complied with the labeling requirements set out in Article 15.5 (e.g., packaging serial no. or other ID) and 15.6. (Manufacturer's contact info).

--Source: EUROPEN PPWR Survival Guide (2026)

Preparing the Declaration of Conformity

The three-part compliance chain for EU PPWR:

Technical Documentation / Technical File (Annex VII) – the evidence base for the conformity assessment and declaration.

Conformity Assessment Procedure (Article 38) – the activity of evaluating the packaging against the regulation.

For example, Certificate of Analysis on heavy metals content and PFAS from an Accredited Lab

EU Declaration of Conformity (Article 39, Annex VIII) – the manufacturer-signed statement that incorporates the technical file.

DoC review checklist

Run through this list to ensure your supplier's documentation is complete.

- ✓ A unique DoC identification number
- ✓ Name and address of the manufacturer
- ✓ A statement of sole responsibility
- ✓ Unique identification of the packaging
- ✓ Object of the declaration
- ✓ Conformity statement
- ✓ References to harmonized standards or common specifications
- ✓ Notified body details
- ✓ Additional information relevant to the conformity claim
- ✓ Signature, place and date by manufacturer

PPWR Compliance Priority Planning

- **Build packaging technical dossiers now.** List required data and sources. Do not rely on verbal supplier claims.
- **Ask EU importers who owns each compliance obligation.**
Does importer expect you to prepare and sign the Declaration?
- **Do not wait for 2030;** buyer documentation expectations will arrive earlier.
 - Audit all plastic components – what potential for recyclability and recycled content by 2030?
 - Measure cube utilization, packaging weight, and empty space.
 - Evaluate packaging minimization – what can be reduced?
 - Document food-contact, substances, recyclability, recycled-content, and reuse evidence for all packaging materials.

How can Federal Agencies Help You?

Clarify Policy and Regulations:

- **USDA/FAS** works with **Department of Commerce, FDA, EPA**, and the U.S. Trade Representative (**USTR**) to engage with EU officials on policy issues.
- GAIN Reports published by FAS/Brussels provide updates on regulations.
- September 2026 U.S.-EU Technical Dialogue on Recycled Content in Packaging

Innovation for Packaging Solutions:

- FAS ASCE Project \$10 million R&D Funds for Specialty Crop Packaging
- USDA/Agricultural Research Service National Laboratories



United States Department of Agriculture
Foreign Agricultural Service



Thank you for your attention.

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and:

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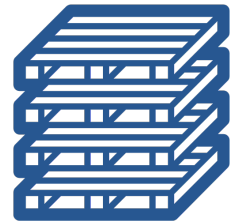
New Packaging Regulations for the EU

A brief overview on the impact of PPWR on wooden pallets

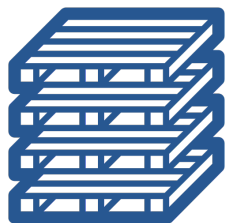
 **Woodpack
Global®**



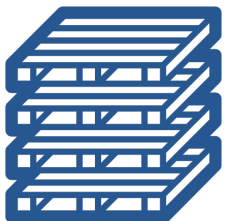
ABOUT US



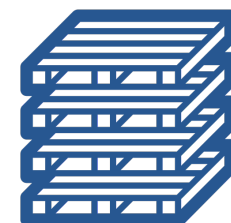
Non-profit with 18 full-time staff.
820 company members in 43 countries.



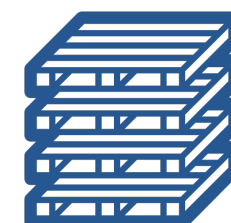
Pallet Foundation funds \$1.5 million R&D annually.



More than 1,600 attended Woodpack events in 2025
30% International Attendance.
PDS Classes in UK, Mexico, Canada



Advocacy presence:
Brussels / USA / Mexico



Pallet Design System™ (PDS).
Crate Design System™ (CDS).



THE USA ECONOMY MOVES ON WOOD PALLETS



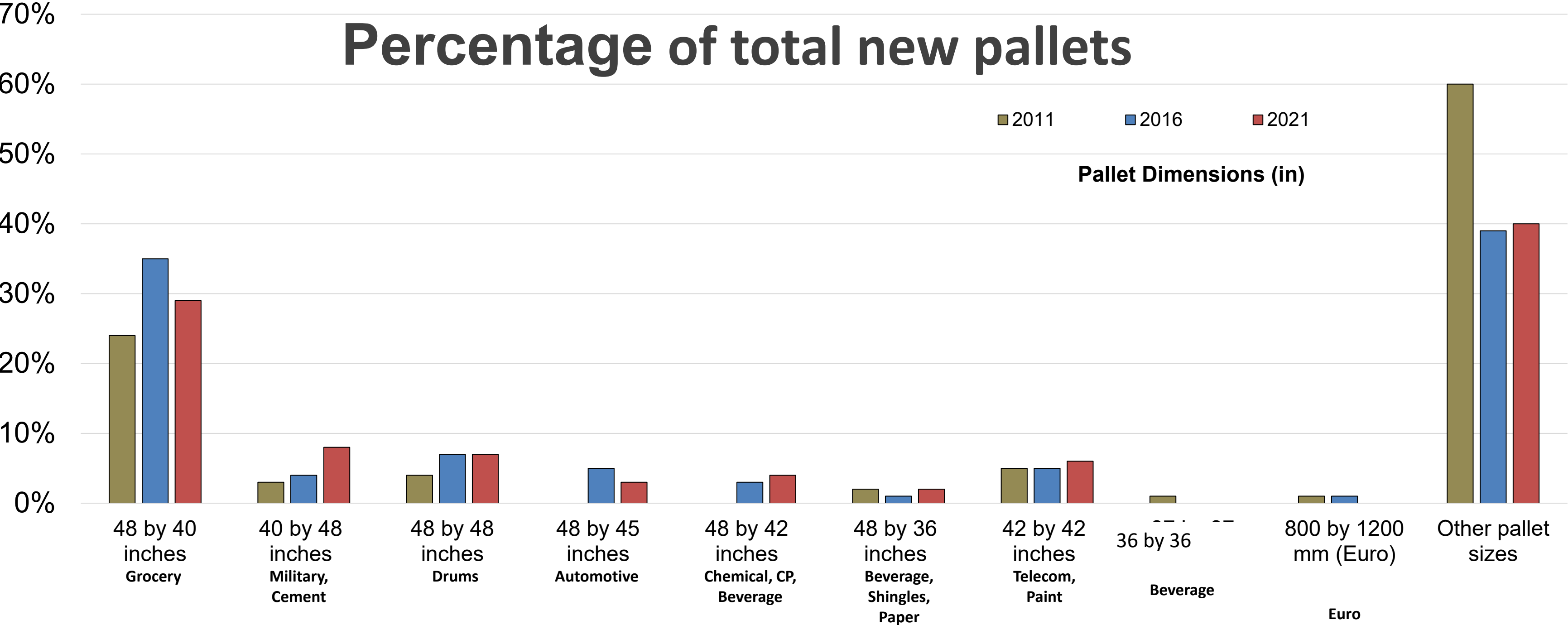
Industry celebrates **95%**
recovery/recycling rate.

Every day, close to
2 billion
pallets are used in
the United States alone.

More than
90 percent
of all products move
around the U.S. on
wooden pallets.



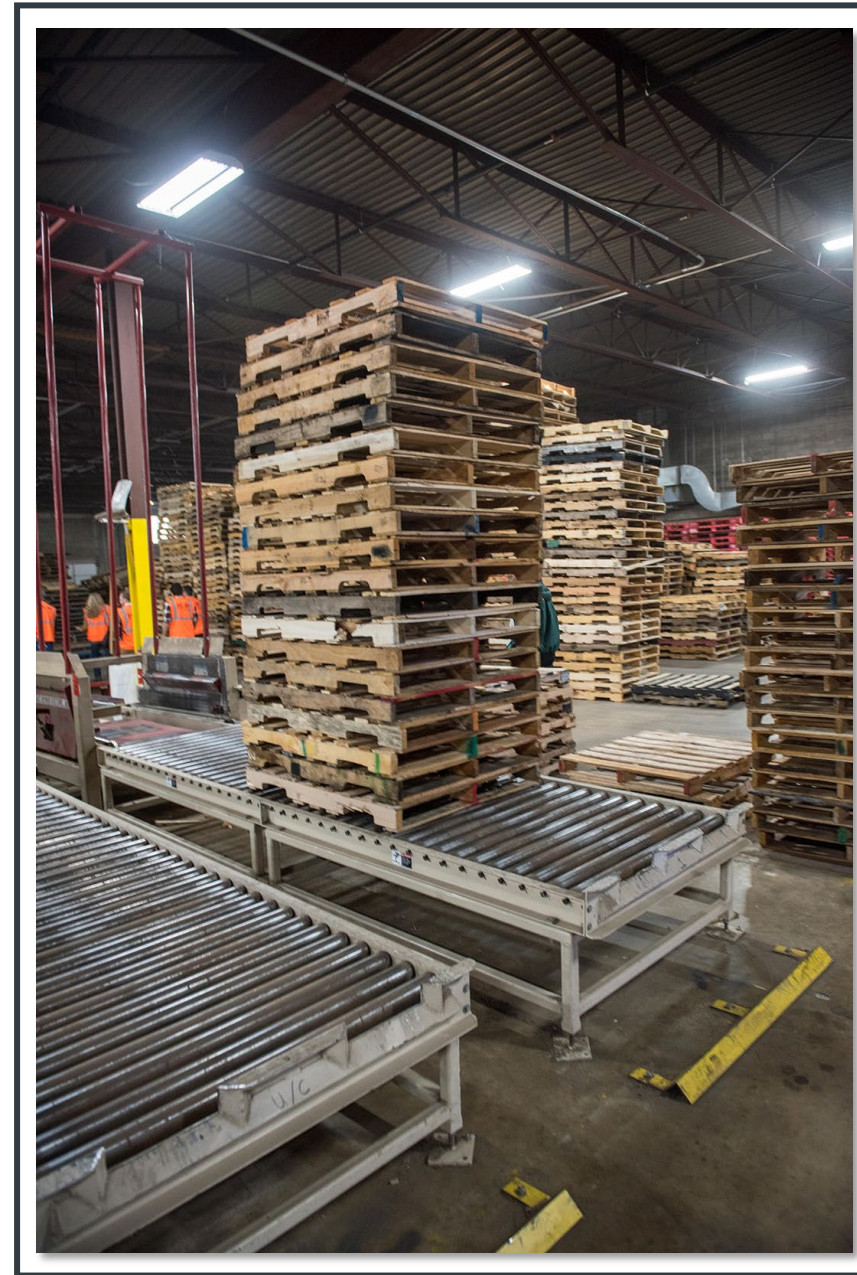
STANDARD-SIZED PALLETS VARY BY SECTOR



European Pallets are Primarily Block/Four-Way The US is the Opposite



19% Block/Four-Way, 77% Stringer/Two-Way, 4% “Other”





Woodpack's Focus: Reuse Exemption

Most challenging for non-EU pallet users

The reuse requirements were drafted without taking into account the totality of how the industry operates. For example:

- Originally, if you had a custom-designed pallet, it would need to go back to its origin to be *reused*, requiring complicated reuse logistics.
 - You have to demonstrate that each pallet has a minimum number of reuse cycles/rotations.
-





Woodpack Efforts Limited Disruption to the Supply Chain

**You can use
any wooden
pallet to ship
to the EU –
stringer or
block**

Import/Export Exemption

Pallets are exempt
from the *reuse*
requirements until
they reach the
importer

Custom Packaging Exemption

Any custom-built
packaging is exempt
from *reuse*
requirements when
used for the product
it was designed for



August Compliance Requirements



Declaration of Conformity

Needed for each pallet type that you use. Must be kept on file. (Annex VIII)

Technical file

The supporting technical file on which the Declaration of Conformity is based (Annex VII)

Article 5 compliance

Confirm compliance with restrictions on substances of concern, including heavy-metal limits.

Unique identifier

Each Declaration of Conformity has a unique identification number for each pallet design/type.

Final Takeaways

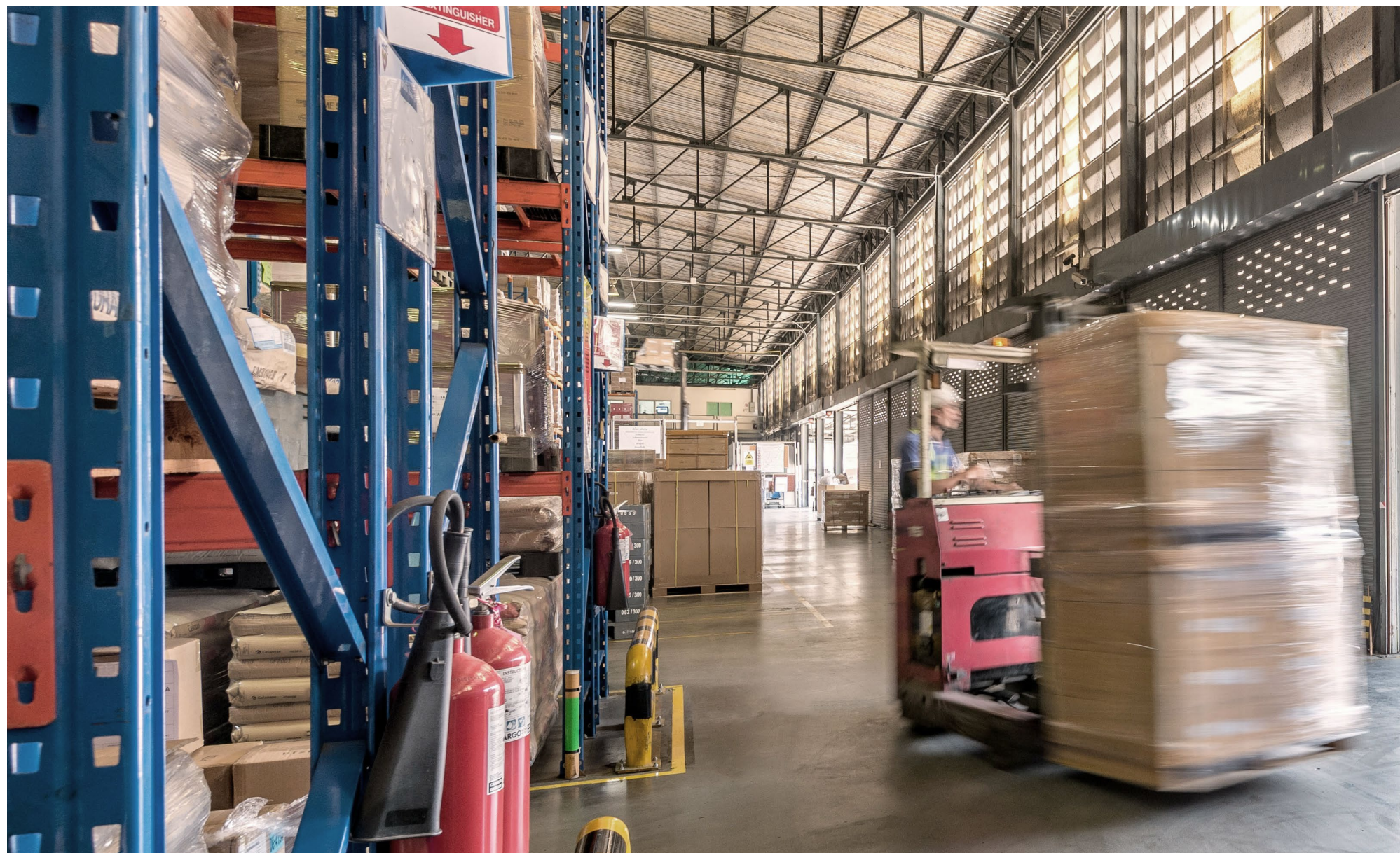
01.

All wood pallets
can be used to
ship to the EU

02.

Woodpack is
developing a
compliance toolkit for
the industry





Pallets
move
the
world®

Jason Ortega, JD, MBA, CAE
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USDA Foreign Agricultural Service Packaging Innovation Program

USDA Foreign Agricultural Service
Global Programs – Assisting Specialty Crop Exports
Updates for U.S. Exporters
July 2026

FAS-Funded Projects on Packaging Trade Barriers

ASCE Packaging Innovation Program for Specialty Crops (ASCE)	Foundation for Fresh Produce of IFPA, Clemson
Packaging Regulatory Alignment Roadmap (for Canada) (TASC)	Western Growers Assoc with QFresh Lab, CPMA
Identifying Packaging Barriers to Specialty Crops and Wine Exports to EU, focus on France (TASC)	Michigan State University (Rafael Auras)
Food-safe Antimicrobial Coating for Reusable Packaging for specialty crop exports to EU (TASC)	IFPA with Wintermute Biomedical, Illinois Inst. of Tech.
Mapping U.S. Tree Nut Export Supply Chains to EU (TASC)	Cal Poly San Luis Obispo (Jay Singh)
Meeting EU Circularity Requirements for U.S. Specialty Crop Exports: Evaluation of Reverse Logistics for Reusable Packaging	IFPA with Univ. Florida and Reusable Pkg Assoc
PHA adhesives for Biodegradable Produce Stickering (TASC)	Phaxtec (Anindya Mukherjee)
Alleviating Specialty Crop Export Barriers to France With Home Compostable Stickers (TASC)	IFPA with Sinclair and USDA ARS PWA/WRRC

FAS Assisting Specialty Crop Exports (ASCE) Packaging Innovation Program

- FAS Partners: [Clemson University](#) and [Foundation for Fresh Produce \(IFPA\)](#)
- Funding packaging innovations to help U.S. growers meet emerging export market requirements: EU and Canada
- 35 technologies funded so far
- Opportunities for ag and packaging industry collaboration
- Another funding round this fall





Details on projects funded through
FAS ASCE Packaging Innovation
Program for Specialty Crops via
FAS Partners:

Clemson University
and Foundation for Fresh Produce
(IFPA)

Snapshot of Some ASCE-funded Projects

- **Fiber / Structural Packaging**

*Strong export alignment,
replaces plastic formats*

- Corumat, NNZ, Peel on, Sway, Paramount / R3RD, Graphic Packaging International, Chicora

- **Compostable / Biopolymer Materials**

*High sustainability potential,
scaling in progress*

- Northern Technologies / Natur-Tec, PurePour Foods

- **Recycled/Recyclable**

*Strong export alignment, ease
of integration into existing
formats and operations*

- Biologiq: Increase PCR in films and protective packaging
- Michigan State Univ.: Recyclable coatings for corrugated boxes
- Clemson Univ: Recyclable barrier coatings for paper packaging
- NaturSweet: PCR clamshells
- Singularity: Recyclable packaging
- It's Fresh Limited: Recyclable film

2025 ASCE-Funded Projects and Companies

- **Akorn Technology, Inc.:** Advancing a validated, edible thin-film coating for cucumbers and bell peppers through commercial scale pilots with industry partners.
- **BioLogiQ Inc:** Piloting and validation of BioLogiQ's certified plant-based materials for specialty crop packaging and scale-up, including a compostable design and another utilizing post-consumer recycled plastic which meets foreign requirements; relevant for many fruits, vegetables, and greens, as well as for pallet wrap and pallets for shipping.
- **Clemson University:** Development and testing of cross-linked starch-based barrier coating material for paper packaging of almonds; and a project on compostable price-look-up stickers and labels from plant-derived plastics for products such as apples, pears, peppers, cucumbers, and melons, to maintain foreign market access where compostable labels are required.
- **Corumat, Inc.:** Developing prototypes for fresh produce applications and conducting pilots of their compostable bioplastic styrofoam-like packaging which can be used for box liners, boxes, and clamshells, with applicability for berries, tree fruit, and fresh-cut produce, which will meet the requirements in export markets.

- **It's Fresh Limited:** Active ethylene-controlling, paper-based packaging for export and retail which extends shelf life and reduces food waste for raspberries, blueberries, and strawberries, and other ethylene-sensitive fruits such as avocado.
- **Kwik Lok:** Testing and field pilots of compostable bag closures and labels that also contain traceability data.
- **Metalchemy:** Development of biodegradable antimicrobial agar-cellulose active packaging to extend the shelf life and reduce food waste, with applicability to maintaining exports of table grapes, berries, mushrooms, and tomatoes.
- **Michigan State University:** Pilot-scale testing of recyclable and compostable all-purpose corrugated boxes relevant to bulk and retail packaging of a variety of fruits, vegetables, herbs, and nuts.
- **Nat4Bio:** Finalize formulation and packaging trials of biopolymer coating for produce for citrus, with applicability for apples, and pears, and blueberries.
- **NaturSweet:** Testing and transitioning fresh tomato packaging to recycled PET to meet export market requirements, including validating packaging performance through lab-scale testing, shelf-life studies, and real-world shipping trials.

- **NNZ, Inc.:** Prototypes and testing for commercial scalability of stackable compostable trays for logistics efficiency and regulatory compliance in key export markets.
- **Nvirovate Materials:** Design and testing compostable produce-look-up labels for compliance with foreign regulatory requirements, with validation and deployment in pre-pilot scale for apples.
- **PakItGreen, Inc.:** Refining and prototypes of oxygen and moisture barrier coated bags for fiber-based packaging of salads and other fresh-cut produce.
- **PeelON:** Optimizing and piloting compostable plant-based thin film and bags to meet foreign packaging requirements and relevant for crops such as leafy greens, citrus, grapes, blueberries, and fresh herbs.
- **SAVRpak:** Testing and optimizing a moisture-absorbing pad which eliminates the need for cold storage in transportation, with testing focused on avocados.
- **Sway:** Scaling and commercializing compostable seaweed-based packaging, creating home-compostable replacement for plastic to meet export market requirements, with applications for table grapes, cherries, citrus, apples, leafy greens, and peppers.

- **University of Georgia Research Foundation:** Scale-up and pilot production of home compostable label adhesive for fresh produce as required by export markets, with applicability to stone fruit, apples, pears, citrus, onion, and other vegetables.
- **University of Maine:** Development of fully recyclable cellulose-based packaging in line with export requirements, for exports of strawberries and blueberries, with eventual applicability to bagged salads and other ready-to-eat produce.
- **University of Missouri:** Development of novel translational sprayable coating materials for antimicrobial food packaging, focused on cherry tomatoes exports.
- **Vireo Advisors:** Advancing commercialization of a cellulose-based food coating by establishing a food-grade production process and achieving regulatory approval for produce applications, including cherries and blueberries.
- **Virginia Tech:** Scaling up chitin nanofiber packaging technology with passive cooling, leading to a longer shelf life for strawberries.

2026 ASCE-Funded Projects and Companies

- **Graphic Packaging International:** Project focus: Compostable paperboard clamshell replacement with shelf-life extension for fresh produce
- **It's Fresh Limited:** Project focus: Development of a recyclable film for cardboard punnets and pre-made salads that prolongs shelf-life and reduces food wastage.
- **Metalchemy Limited:** Antimicrobial REearthable trays for sustainable specialty crop packaging
- **Northern Technologies International / Natur-Tec:** PFAS & PVDC-Free Compostable Barrier Laminates for Moisture/Oxygen-Sensitive Dried Fruits and Tree Nuts
- **Paramount Planet Produce, LLC:** Ocean compostable fish friendly packaging innovation
- **PurePour Foods, LLC:** Development of compostable dual-format packaging ("PurePack Duo™") for seed-oil-free dressings
- **Singularity:** Performance enhancing additive for recycle ready flexible packaging for food

2026 ASCE-Funded Projects and Companies

- **Sway:** Piloting compostable seaweed-based flexible film TPSea Flex™, an LDPE thin-film replacement for vented polybags (root vegetables, potatoes, citrus, apples), gusseted, zippered stand-up pouches (grapes, peppers).
- **NEXTLOOPP:** Creating a food-grade recycled polypropylene to meet EU requirements and specifically engineered for U.S. specialty crop exports for nuts and fresh-cut produce.
- **Michigan State University:** Advancing a transparent home-compostable flexible packaging structure that provides both high oxygen and water-barrier performance; covers nuts, seeds, trail mixes, salad kits, fresh-cut fruit, and snack vegetables.
- **Virginia Tech:** Optimizing a fully bio-based multilayer packaging system featuring a water-dispersible PHA barrier layer from industrial hemp residues as a high oxygen barrier.
- **117 Global/D2G Global and Clemson University:** Commercial validation of a patented, compostable paper-foam insulation system as a drop-in replacement for expanded polystyrene (EPS) in grape and cherry export cartons.

- More information on all ASCE-funded projects available on the USDA FAS Website:

<https://www.fas.usda.gov/programs/assisting-specialty-crop-exports-asce-initiative/packaging-innovation-lab>

- Contact us at ASCEadmin@usda.gov
Elizabeth.Leonardi@usda.gov, Jill.Luxenberg@usda.gov

Voluntary Report – Voluntary - Public Distribution

Date: April 26, 2024

Report Number: E42024-0012

Report Name: European Union Finalizes New Rules for Packaging and Packaging Waste Reduction

Country: European Union

Post: Brussels USEU

Report Category: Policy and Program Announcements

Prepared By: Sophie Bolla

Approved By: Joseph Taylor

Report Highlights:

In March 2024, the Council of the European Union and European Parliament concluded negotiations on the EU's Packaging and Packaging Regulation. The current text is going through a legal review but is now de-facto final and is expected to be formally adopted in the coming months. The Regulation introduces waste reduction targets and requires that all packaging placed on the EU market is recyclable and carries recycling labeling. The Regulation also introduces new requirements for packaging minimization, minimum recycled content in plastic packaging, re-use targets for packaging, and bans certain packaging formats.

On November 30, 2022, the European Commission published [its proposal](#) for a Packaging and Packaging Waste Regulation (PPWR) as part of the European Green Deal¹.

In March 2024, the European Commission, the European Parliament, and the Council of the European Union reached a political agreement on the proposal. The [Regulation](#) was adopted in April 2024 by the European Parliament.

General Requirements

The PPWR requires each Member State to progressively reduce the packaging waste generated per capita compared to a 2018 baseline level by at least 5 percent by 2030, 10 percent by 2035 and 15 percent by 2040.

The PPWR also details recycling targets of packaging waste that Member States must meet:

Recycling targets by December 31, 2025 (by weight)	Recycling targets by December 31, 2030 (by weight)
65% of all packaging waste	70% of all packaging waste
50% of plastic	55% of plastic
25% of wood	30% of wood
70% of ferrous metals	80% of ferrous metals
50% of aluminum	60% of aluminum
70% of glass	75% of glass
75% of paper and cardboard	85% of paper and cardboard

To reach those objectives, the PPWR introduces requirements over the entire life cycle of packaging. The PPWR also mandates that all packaging placed on the EU market is recyclable.

This report looks at some of the requirements that will impact U.S. exports of agricultural commodities and processed food and beverages to the European Union. Please note that the information contained in this report is based on a preliminary review of the current text of the Regulation. It should not be viewed as a definitive reading of the rules in question or of the implications for U.S. agricultural trade interests. Import approval for any product is subject to local rules and regulations as interpreted by Member State officials at the time of import.

Definitions

The Regulation establishes definitions that will create new requirements for products that are placed on the EU market. Please find below a non-exhaustive list:

Packaging is defined as “an item, irrespective of the materials from which it is made, that is intended to be used by an economic operator for the containment, protection, handling, delivery or presentation of

¹ For more information about the Commission’s proposal, please see GAIN Report [European Commission Proposes New Rules on Packaging and Packaging Waste](#).

products to another economic operator or to an end-user and that can be differentiated into packaging formats based on its function, material and design, including:

[..]

(f) permeable tea, coffee or other beverage bags or soft after-use system single-serve units that contain tea, coffee or other beverage and are intended to be used and disposed of together with the product;

(g) non-permeable coffee, tea or other beverage system single-serve unit intended for use in a machine and which is used and disposed of together with the product;”

Transport packaging is defined as “packaging conceived so as to facilitate handling and transport of one or more sales units or a grouping of sales units, in order to prevent damage to the product from physical handling and transport, but excluding road, rail, ship and air containers.”

Compostable packaging is defined as “packaging that biodegrades or is capable of undergoing biological decomposition, combined, if necessary, with physical treatment, only in industrially controlled conditions, including anaerobic digestion, resulting ultimately in conversion into carbon dioxide or in the absence of oxygen, methane, mineral salts, biomass and water and does not hinder or jeopardize the separate collection and the composting and anaerobic digestion process.”

Harmonization of Rules across the Member States

The PPWR updates a 1994 Directive and aims to harmonize the growing fragmentation of packaging rules in the European Union that have become internal trade barriers that disrupt the single market.

The Regulation lays down the principle of free movement within the single market for packaging to ensure that sustainability and labeling requirements are met throughout the EU. Indeed, Member States cannot prohibit, restrict, or impede the placing on the market of packaging that complies with the sustainability, labeling, and information requirements set out in the Regulation.

Additionally, in case some Member States choose to maintain or introduce additional national sustainability or information requirements, those requirements shall not conflict with those laid down in the PPWR. Member States shall not prohibit, restrict, or impede the placing on the market of packaging that complies with the requirements under the Regulation for reasons of non-compliance with those national requirements.

Labeling requirement

The PPWR requires that all packaging be marked with an EU-harmonized label containing information on its material composition to facilitate consumer sorting. The Commission is tasked with the establishment of this label and the specifications for the labeling requirements and formats, including when provided through digital means, for the labeling of packaging through an implementing act.

Except for e-commerce packaging, this requirement does not apply to transport packaging or packaging part of a deposit and return system.

Additionally, reusable packaging shall also bear a label informing users that the packaging is reusable.

Please note that the information contained in the labels and QR code or other types of digital data carrier shall be made available in one or more languages which can be easily understood by end users as determined by the Member State in which the packaging is to be made available on the market.

Rules that Specifically Impact the Food and Beverage Sector

While many provisions will impact all economic sectors, the PPWR will particularly impact the food and beverage sector. Please find below information on some of the requirements. Please note this is not an exhaustive list.

Packaging Minimization

The PPWR aims to minimize the weight and volume of packaging. Therefore, by January 1, 2030, manufacturers or importers will need to ensure that the packaging placed on the EU market is designed so that its weight and volume is reduced to the minimum necessary for ensuring its functionality taking account of the shape and material of the packaging. Annex IV lays down the methodology for packaging minimization assessments. Packaging with characteristics that are only aimed to increase the perceived volume of the product, including double walls, false bottoms, and unnecessary layers will not be allowed.

However, there is an exemption to the packaging minimization requirement if:

- the packaging design is protected by a Community design;
- the packaging design is protected by design rights;
- the shape of the packaging is a trademark;
- the packaged product or beverage belongs to geographical indications protected under Union legislation including Regulation (EU) No 1308/2013 for wine and Regulation (EU) 2019/787 for spirit drinks;

This exemption applies only to design rights and trademarks protected by the date of entry into force of the Regulation.

Minimum Recycled Content in Plastic Packaging

The PPWR requires that as of January 1, 2030, any plastic part of packaging placed on the market shall contain a minimum percentage of recycled content recovered from post-consumer plastic waste, per packaging type and format.

From January 1, 2030	From January 1, 2040
30 % for contact sensitive packaging, except single use beverage bottles, made from polyethylene terephthalate (PET) as the major component;	50 % for contact sensitive packaging, except single use beverage bottles, made from polyethylene terephthalate (PET) as the major component
10 % for contact sensitive packaging made from plastic materials other than PET, except single use plastic beverage bottles	25% for contact sensitive packaging made from plastic materials other than PET
30 % for single use plastic beverage bottles	65 % for single use plastic beverage bottles
35 % for all other plastic packaging	65 % for all other plastic packaging

The Regulation requires that recycled content recovered from post-consumer plastic waste needs to comply with strict requirements if recycled in the EU. The Regulation also requires that plastic content recycled in an installation located in a third country needs to follow the same sustainability criteria as in the EU. The European Commission is tasked with a deadline of January 1, 2026, to establish the methodology for assessing, verifying, and certifying, including through third-party audit, the equivalence of the rules applied in case the recycled content recovered from post-consumer plastic waste is recycled or collected outside the EU.

Re-Use Targets for Packaging

The PPWR aims to increase the re-use of packaging in the European Union. Therefore, it introduces re-use targets for some categories of packaging:

Product	% of such packaging is reusable within a system for re-use from Jan 1, 2030	% of such packaging is reusable within a system for re-use from Jan 1, 2040
Transport packaging used within the EU <u>Exemptions:</u> ○ Packaging in flexible format in direct contact with food, feed, and food ingredients ○ Cardboard boxes	40%	70%
Grouped packaging in the form of boxes <u>Exemptions:</u> ○ Cardboard boxes	10%	25%
Alcoholic and nonalcoholic beverages <u>Exemptions:</u> ○ Beverages carrying a “use-by” date ○ Milk and milk products ○ Wine ○ Spirits	10%	40%

Specific Forbidden Packaging Format

The PPWR bans certain packaging in the formats and for the purposes listed in Annex V to the proposal. Please find below a non-exhaustive list of banned packaging formats starting from January 1, 2030:

	Packaging format	Restricted use	Illustrative examples
1.	Single-use plastic grouped packaging	Plastic packaging used at the point of sale to group goods sold in bottles, cans, tins, pots, tubs, and packets designed as convenience packaging to enable or encourage consumers to purchase more than one product. This excludes grouped packaging necessary to facilitate handling	Collation films, shrink wrap
2.	Single use plastic packaging for unprocessed fresh fruit and vegetables	Single use plastic packaging for less than 1.5 kg pre-packed fresh fruit and vegetables. Please note that Member States may set up exemptions to this restriction 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 in compliance with requirements in regulation EU 2018/848, on certification or labeling, without entailing disproportionate economic and administrative costs.	Nets, bags, trays, containers
3.	Single use plastic packaging	Single use plastic packaging for foods and beverages filled and consumed within the premises in the HORECA sector, which include all eating areas inside and outside a place of business, covered with tables and stools, standing areas, and eating areas offered to the end users jointly by several economic operators or third party for the purpose of food and drinks consumption.	Trays, disposable plates and cups, bags, boxes
4.	Single use plastic packaging for condiments, preserves, sauces, coffee creamer, sugar, and seasoning in	Single use plastic packaging in the HORECA sector, containing individual portions or servings, used for condiments, preserves, sauces, coffee creamer, sugar and seasoning, except	Sachets, tubs, trays, boxes

	HORECA sector	in the following cases: a) such packaging is provided together with take-away ready-prepared food intended for immediate consumption without the need of any further preparation; b) such packaging is required to ensure safety and hygiene in establishments where there is a medical requirement for individualized care, such as hospitals, clinics, nursing homes.	
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The Commission is required to publish guidelines within 24 months from the entry into force of the Regulation to explain in more detail Annex V, including examples of the packaging formats in scope, any exemptions to the restrictions, and provide an exemplificative list of fruits and vegetables excluded from point 2.

Specific requirements for tea bags, coffee pods and fruit stickers

Within 36 months following the entry into force of the Regulation, the following products shall be compostable in industrially controlled conditions in bio-waste treatment facilities and shall be compatible, when required by the Member States, with home composting standards:

- sticky labels attached to fruit and vegetables.
- permeable tea, coffee or other beverage bags or soft after-use system single-serve units that contain tea, coffee or other beverage.

Use of per- and polyfluorinated alkyl substances (PFAS) in food contact materials

The Regulation includes a ban on the use of per-and polyfluorinated alkyl substances (PFASs) above certain thresholds in food contact packaging. The thresholds are laid down in Article 5 of the Regulation. This ban will enter into force 18 months after the entry into force of the Regulation.

Next Steps

The text of the Regulation is expected to be formally adopted by the Council sometime before the summer of 2024. Following formal adoption, the text will be published in the Official Journal of the European Union. It will enter into force 20 days after publication and will start to apply 18 months after the entry into force.

Attachments:

No Attachments.