

Southern Hemisphere Fruit Alliance

NEWSLETTER 6 | 2026



EU Packaging and Packaging Waste Regulation: FAQs

Our [Newsletter 3 of April 2026](#) and our [Newsletter 5 of July 2026](#) were dedicated entirely to the European Union's new [Packaging and Packaging Waste Regulation \(PPWR\) \(Regulation 2025/40\)](#). In this Newsletter, we provide answers to a number of frequently asked questions that we have received from our members.

I. SCOPE OF THE REGULATION

1. What types of packaging are governed by the new Regulation?



The regulation defines packaging as any item used to contain, protect, handle, deliver, or present products. That includes:

- sales packaging
- grouped packaging
- transport packaging (includes pallet angles, wrap, straps, etc.)

Note that the regulation applies to all materials, not just plastics but also paper, cardboard, glass, wood, aluminium, and steel. However, the specific requirements and targets under the regulation vary depending on the material type. The specific requirements also vary depending on the types of packaging, for example transport packaging does not need to be marked with symbols that guide consumers in the sorting and disposal of packaging waste.

2. Does the regulation apply only to fresh fruit, or also to frozen fruit and to fruit that is repackaged at destination?

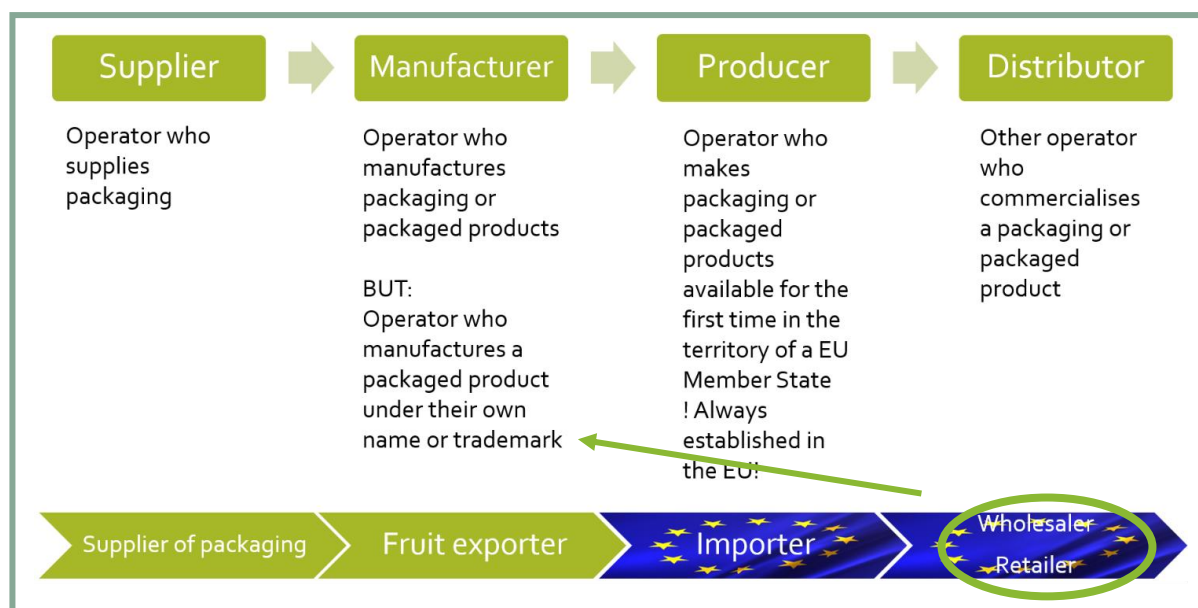
The regulation applies to any packaged product that is made available on the market of the European Union, whether it is fresh fruit, frozen fruit, or fruit sold in bulk. The fact that a product is repackaged at destination does not eliminate the need for its transport packaging to comply with the requirements of the regulation.

3. Does the regulation apply to fruit exported in bulk?

Yes. The regulation defines packaging as any item used to contain, protect, handle, deliver, or present products. That includes: sales packaging, grouped packaging, and transport packaging (includes pallet angles, wrap, straps, etc.). Thus, the regulation applies, as even products sold in bulk are packaged—not in individual consumer packaging, but in transport and grouped packaging.

II. ROLES AND RESPONSIBILITIES

4. Who is who in the framework of the PPWR?



The regulation creates various categories of actors in the supply chain, each with their own responsibilities and requirements. The first actor is the supplier of the packaging, it is the company that fabricates the packaging material. The second actor is the “manufacturer”, or the operator who fabricates the packaged product. The third actor is the “producer”, this is the operator who places the packaged product on the market for the first time, in an EU member state. The fourth actor is the distributor, or any other operator who commercialises a packaged product in an EU member state.

Thus, in the supply chain of Southern Hemisphere fruits exported to the European Union, who is who? The first actor, the supplier of packaging material, is clear. The second actor, the “manufacturer”, is the one who manufactures the packaged product, so this would be the one who puts the fruit in a box, a clamshell, a net, a bag, ... The third actor is the one who puts that fruit on the EU market, or the importer. And the distributor is any actor who commercialises the fruit after that, for example the wholesaler or the retailer. However, the manufacturer is the operator who puts their name or trademark on the packaged fruit. Hence, for fruit labelled with the exporter’s label, the manufacturer is the exporter, while for fruit labelled with a supermarket label, it’s the retailer.

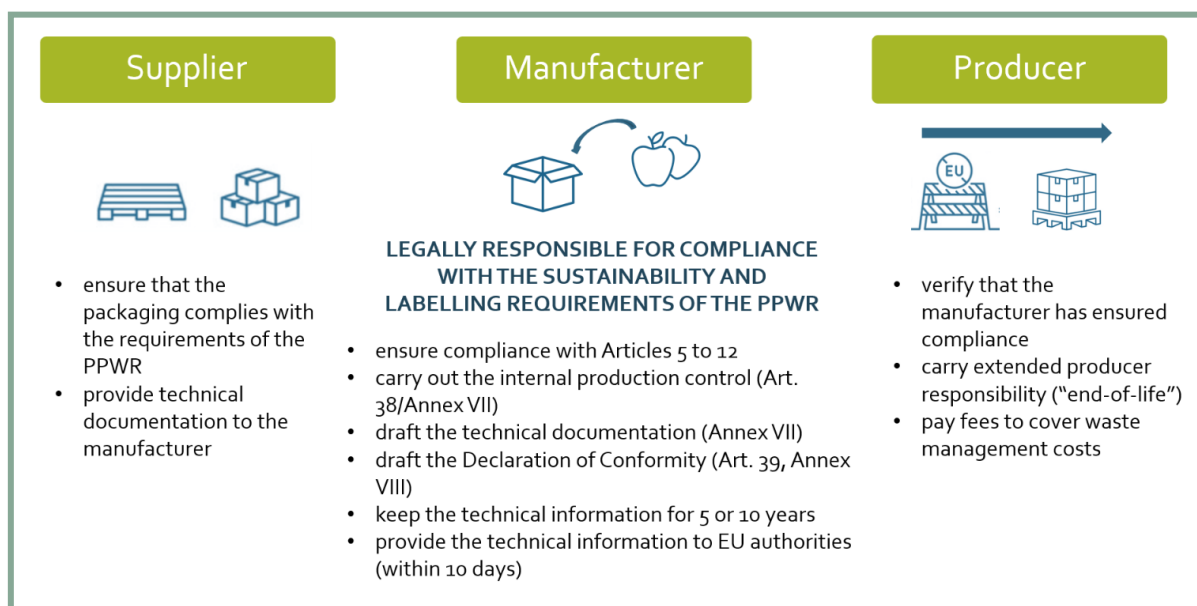
5. Is the Southern Hemisphere exporter the manufacturer or the producer under the PPWR?

The Southern Hemisphere exporter:
is never the **producer**;
CAN be the **manufacturer** if the fruit is labelled with the exporter's brand;
BUT if the fruit carries the brand of a European supermarket, then the EU
retailer is the **manufacturer**!



See also Question 2. The Southern Hemisphere exporter is never the producer, because the producer is by definition established within the EU. The Southern Hemisphere exporter CAN be the manufacturer, if the fruit is labelled with the exporter's brand. However, if the fruit package carries a supermarket brand, then the EU retailer is the manufacturer.

6. Who is responsible for what under the PPWR?



The manufacturer in the sense of the PPWR carries the legal responsibility for compliance with the labelling and sustainability requirements. The supplier of the packaging must of course make sure that their packaging complies with the sustainability requirements of the regulation, and provide the necessary technical information, if they want to sell their packaging to exporters to the EU, but carries no legal responsibility. The producer, or the importer, has "extended producer responsibility" for end-of-life of packaging (collection, sorting, recycling). This means that they have to register with a national producers register, pay fees to cover waste management costs, and submit packaging reports with data on the quantities of packaging and materials placed on the market. These obligations must be fulfilled in every Member States where the producer puts packaged products on the market.

Thus, it is the “manufacturer” who carries the legal responsibility for compliance with the labelling and sustainability requirements of the regulation. The manufacturer must:

1. ensure compliance with Articles 5 to 12;
2. carry out the internal production control (Article 38/Annex VII);
3. prepare the Declaration of Conformity and the supporting technical documentation (Annex VII);
4. draw up the Declaration of Conformity (Article 39, Annex VIII);
5. keep the technical information for 5 to 10 years; and
6. make the Declaration of Conformity and technical documentation available to the EU national authority (within 10 days).

7. Who is the “manufacturer” (and therefore responsible for the Declaration of Conformity) of transport packaging, such as pallets, angles, wrap, straps?

The “manufacturer” of transport packaging must be identified at the stage when the empty packaging has reached its final form. A package reaches its final form when it can be used as transport packaging without the need to add additional components or auxiliary elements. Therefore, in the case of generic or unbranded transport packaging, the “manufacturer” (= the operator who must draw up the Declaration of Conformity) is usually the company that physically manufactures the packaging. However, if the transport packaging bears a name or trademark, the company whose name or brand appears on the packaging shall be deemed to be a “manufacturer”.

Note: if a company places a sticker on the pallet for shipping purposes, this is *not* considered a trademark and that company should not be considered a “manufacturer”.

Two examples of who is considered the “manufacturer” of transport packaging:

- A cardboard box reaches its final shape even if it is unfolded and needs to be assembled. If the box bears a name or trademark, the company whose name appears or that owns the trademark is the “manufacturer”. In the case of unbranded standardised cardboard boxes, the company that physically manufactures the boxes will be the “manufacturer.”
- Wrap used to stabilise products on pallets should be considered packaging when sold in rolls, even if it is subsequently cut to wrap the pallet load. The “manufacturer” is the company that physically manufactures the wrap and markets it as packaging—if it is unbranded—and not the company that acquires the film and subsequently uses it to insure the goods.

8. If the packaging is marked with a supermarket label, who is responsible for the Declaration of Conformity?

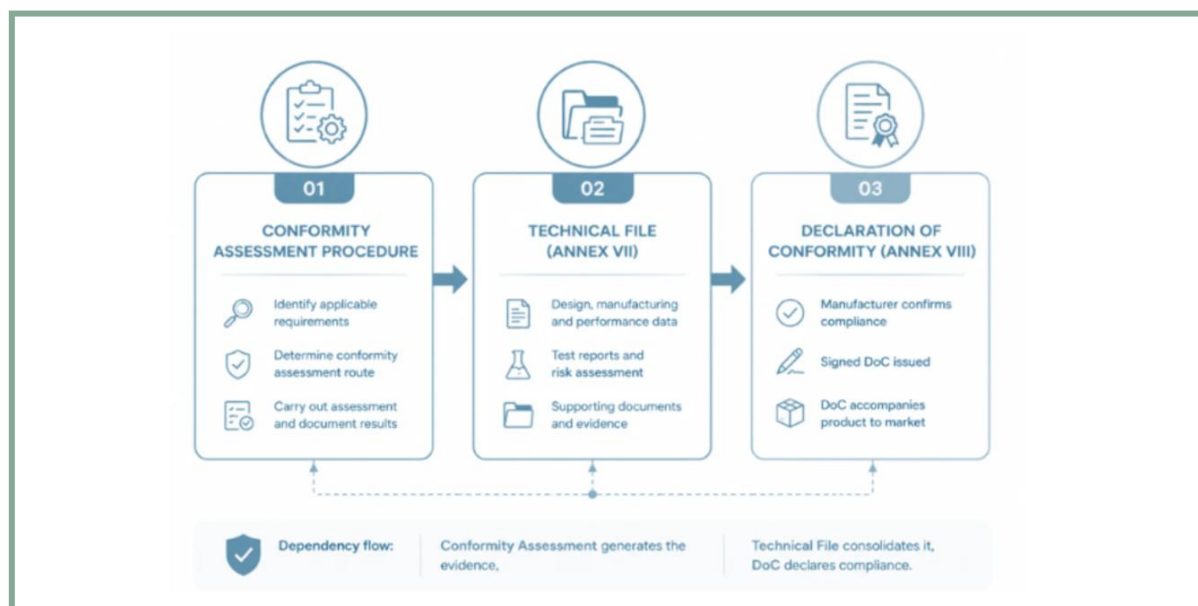
If the packaging bears a supermarket label, the retailer is the “manufacturer” under the PPWE; the retailer carries the legal responsibility to comply with the PPWR and must draft the Declaration of Conformity. In practice, the retailer will request the necessary information from its supplier; but in this case, it is the retailer who must draft and sign the Declaration of Conformity.

9. What is an authorised representative and do third country exporters need one?

Article 17 of the PPWR stipulates that a non-EU “manufacturer” may appoint, by a written mandate, an “authorised representative”. This representative can draw up the Declaration of Conformity, hold the Declaration of Conformity and technical file, and act as a point of contact for authorities. Note that the appointment of an authorised representative is not obligatory, but may make contacts with national authorities easier, for example when asked to provide the Declaration of Conformity and technical information, which have to be presented within 10 days. It is also important to note that while the representative may draw up and hold the Declaration of Conformity and technical documentation, the manufacturer remains legally responsible for compliance with the regulation.

III. TECHNICAL DOCUMENTATION AND DECLARATION OF CONFORMITY

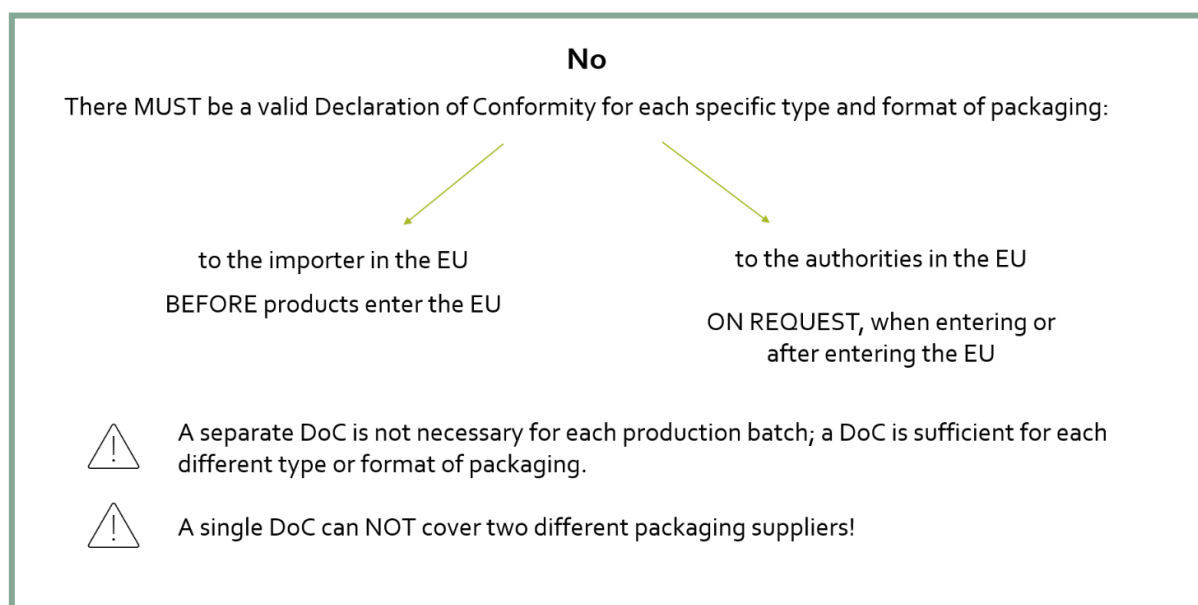
10. What is the relation between the internal production control, the technical documentation, and the Declaration of Conformity?



These three required elements should be seen as interdependent steps towards compliance.

Article 38 of the PPWR requires the manufacturer to carry out a conformity assessment for each type of packaging placed on the market, following the procedure set out in Annex VII. In other words, it is a process that the manufacturer must follow to verify compliance of the packaging with the sustainability and labelling requirements of the regulation. No notified body is involved: the manufacturer assesses conformity internally. This conformity assessment process generates the technical information that is compiled as the so-called "technical documentation", with data on packaging design, manufacturing and performance of the packaging, test results, an analysis of the risks of non-conformity. Note that it is the manufacturer of the packaged product and not necessarily the supplier of the packaging who compiles the technical documentation and assumes full legal responsibility for the result. However, the supplier of the packaging must provide mandatory data and material test evidence to include in this file. Meanwhile, Article 39 requires the preparation of a Declaration of Conformity in accordance with the model in Annex VIII. With this Declaration, the manufacturer certifies compliance with the sustainability requirements set out in Articles 5 to 12. Conformity is accredited by the Declaration of Conformity and the technical file that supports it. A Declaration of Conformity without a technical file to support it is an empty statement; a technical file without a signed Declaration of Conformity implies that there is no formal declaration of conformity.

11. Should I send a physical Declaration of Conformity with each shipment?



A physical Declaration of Conformity does not need to accompany each individual logistics shipment. A valid Declaration of Conformity **MUST EXIST**—along with the technical documentation supporting it—for each specific type of packaging, and it must be available to authorities upon request. Note that a separate declaration is required for each specific design or packaging format, and not one for each shipment!

The manufacturer must make the Declaration of Conformity available to two main parties:

1. the importer in the EU, so they can check compliance and keep a copy on file—**BEFORE** the goods enter the EU; and
2. the EU authorities: if the fruit is inspected by national control or customs authorities, they will require the Declaration of Conformity, upon or after entry into the EU.

12. I ship my fruit in boxes of five kilos, which carry my label. Should I, the exporter, issue the Declaration of Conformity?

Yes. If the box bears a name or trademark, the company whose name appears or that owns the trademark will be the "manufacturer" (and therefore responsible for the Declaration of Conformity). Note that if a company places a sticker on the box for shipping purposes, this is not considered a trademark and such a company should not be considered a "manufacturer".

13. Should a Declaration of Conformity also be issued for non-food contact packaging?

Yes. A Declaration of Conformity is required for all types of packaging, including those materials that are not in contact with food. The PPWR applies generally to all packaging (transport, grouped, and consumer), regardless of whether it comes into contact with food.

14. Should a Declaration of Conformity be issued for materials including grouped packaging (e.g. cardboard boxes) and transport packaging (e.g. pallets, strapping bands, angles, plastic wrap, etc.)

Yes. See 13. There is no exemption for transport packaging. Different types of packaging—such as pallets, pallet frames, wrapping, and strapping—must undergo independent evaluations and have separate Declarations of Conformity.

15. Do labels that are attached to a clamshell require a separate Declaration of Conformity declaration?

A clamshell package and the labels attached to it are considered a single packaging unit. A single Declaration of Conformity is issued for the final configuration of the package as a whole (e.g., "clamshell with labels attached"). However, the technical dossier must break down the information corresponding to each of the components of that configuration. In other words, for a clamshell package with a label, a single Declaration for the unit as a whole is sufficient, although the technical dossier must include relevant information on all the individual components that make up that unit.

16. My apples are shipped in cardboard boxes, and each apple has a PLU sticker. Do the PLU stickers require a separate Declaration of Conformity?

See also 15. The PPWR requires a Declaration of Conformity for each distinct "package type", and PLU stickers do not constitute a separate type of packaging in and of themselves. Instead of generating a separate Declaration of Conformity and technical documentation for the box and for the PLU label, a single Declaration of Conformity is issued for the final configuration of the package as a whole (e.g., "cardboard box with PLU labels"). However, the technical dossier must break down the information corresponding to each of the components of that configuration. You must prove that the PLU stickers comply with e.g. the heavy metal limits and mandatory industrial compostability standards (which will come into force on 12 February 2028). The label manufacturer must provide the exporter with detailed material specifications and laboratory tests to enable the exporter to complete the technical dossier.

17. Can the declaration of conformity be issued internally by the supplier or does it require an external entity?

The Declaration of Conformity is issued by the "manufacturer", in accordance with Annex VIII. The PPWR does not require, as a general rule, that it be issued by a third party, but it does require that it be supported by reliable technical information. External tests, certificates, or verifications may be required to support technical claims.

18. Should the Declaration of Conformity and technical documentation be drafted in English?

The Declaration of Conformity must be drafted in a language that is “easily understandable” by the national authorities of the various Member States. In international operations, English is usually accepted commercially, but some Member States may require that the documents be drafted in their national language. If the analyses are in Spanish, it is recommended to keep both the original and the translated version.

19. I buy the same type of packaging from different suppliers. Can I use the same Declaration of Conformity for packaging from both of them?

No. Packaging is considered to be of the same type if it matches perfectly on four different fundamental criteria: identical material and chemical composition; identical functional format and design; identical conformity attributes; and same origin in the supply chain. Only individual packaging that matches on all four criteria is considered the same packaging “type” and can be covered by a single Declaration of Origin. Thus, if an exporter purchases exactly the same packaging, but from two different suppliers, they will need two different Declarations of Conformity and two different dossiers with the technical information.

IV. SUSTAINABILITY AND LABELLING REQUIREMENTS

20. What are the sustainability and labelling requirements imposed by the regulation?

Art. 5 - Art. 12

-  • Substances of concern: PFAS and heavy metals by 12 August 2026
-  • Recyclability: all packaging must be recyclable by 2030
-  • Recycled content: minimum recycled plastic content
-  • Reuse: definition of reusable packaging and specific reuse objectives
-  • Minimization: format restrictions and empty space limits
-  • Labelling: material composition labels + sorting symbols for waste collection



Broadly speaking, the regulation aims to minimise the presence of hazardous substances in packaging, mandates that all packaging on the EU market be recyclable by 2030, sets minimum recycled plastic content targets, and introduces harmonized labels to improve waste sorting and disposal.

- The limits on hazardous substances in packaging include a ban on PFAS in food contact packaging, and limits on heavy metals in all packaging, by 12 August 2026.
- All packaging must be recyclable by 2030, and must be effectively recycled at scale by 2035. Non-recyclable materials are gradually phased out by 2038. The regulation further sets minimum recycled content targets for different packaging materials, with specific targets for 2030 and 2040. It defines reusable packaging and specific reuse targets. As for packaging minimisation, the regulation aims to reduce packaging weight and volume to the absolute minimum necessary. It prohibits double walls, false bottoms, and excess layers, and sets a 50 percent maximum limit on empty space by 2030.
- As for labelling, the regulation mandates harmonised material composition labels, clear separate waste collection sorting symbols, and digital data carriers (QR codes) linked to recyclability and disposal information to help consumers sort their packaging waste.
- An important detail is the requirement that all sticky labels attached to fruit, for example PLU stickers, are at least industrially compostable by 2030. The individual EU member states can require that these labels are home-compostable, which is harder to achieve by the suppliers of such labels.

21. Article 36 stipulates that packaging that is in conformity with “harmonised standards” shall be presumed to be in conformity with the requirements of the PPWR. Is there a list of these harmonised standards?

Article 36 states that if an operator subjects packaging to tests or calculations using “harmonised standards” (published in the Official Journal of the EU), the packaging is automatically presumed to be in conformity with the PPWR. A specific list of new harmonised standards under PPWR has not yet been published. The PPWR succeeds the old Directive 94/62/EC, so pre-existing standards—such as EN 13432 (composting) or EN 13431 (energy recovery) (see list below)—are currently used as base technical references while the European Commission prepares updated standardisation requests. In other words, the older EN standards linked to Directive 94/62/EC provisionally cover the needs until new specifications on recyclability and compostability in accordance with PPWR are drawn up by the competent standardisation bodies. Relevant pre-existing standards include:

- EN 13427: establishes procedures for the use of European standards to comply with essential requirements relating to packaging and its waste.
- EN 13428: requires manufacturers to reduce the weight and volume of packaging to the minimum possible level compatible with safety and hygiene.
- EN 13430: defines standards to assess whether packaging can be recycled into raw materials.
- EN 13431: establishes criteria for energy recovery through waste incineration.
- EN 13432: specifies the requirements for packaging that can be recovered through composting and biodegradation.

22. Article 37 stipulates that packaging that is in conformity with “common specifications” shall be presumed to be in conformity with the requirements of the PPWR. What are these “common specifications”?

Article 37 supplements Article 36. It provides that, if official “harmonised standards” are not yet available (see Article 36), the European Commission can step in and draw up its own direct technical standards, called “common specifications”. Packaging that meets these common EU specifications is treated in the same way as packaging that complies with Article 36; that is, they are considered legally compliant. To date, the European Commission has not published any “common specification” under Article 37. It continues to prioritise harmonised standards developed by European standardisation bodies such as CEN and CENELEC (in accordance with Article 36). The Commission can only legally intervene to draw up common specifications (Article 37) if the official standardisation bodies are seriously delayed or refuse to draw up such standards. Rather than establishing common specifications, the European Commission is currently focusing on guidance documents and FAQs to clarify the rules that apply immediately, before the main compliance deadlines expire.

23. Article 6 states that all packaging placed on the EU market shall be recyclable. Will this requirement be in force from 12 August 2026?

Article 6 states that, by 1 January 2030, all packaging must be designed for recycling and comply with a degree of recyclability performance (A, B or C) defined in the regulation, the detailed assessment criteria of which will be specified in delegated acts. From 2030, packaging that does not reach at least the lowest classification grade will not be allowed to be placed on the EU market. From 1 January 2038, packaging classified in grade C will be phased out, so that only those classified in grades A and B will remain on the market. The exact percentage thresholds for each grade are detailed in the annexes and in future supplementary acts.

Thus, while the general application of the regulation begins on 12 August 2026, the specific conformity assessment procedures and percentage thresholds for each grade are still being defined. Operators should follow up on delegated acts as they are adopted. 1 January 2028 is the deadline for the European Commission to adopt delegated acts.

24. What limits does the regulation impose regarding PFAS in packaging?

The PPWR imposes limits on PFAS in food contact packaging only. From 12 August 2026, food contact packaging exceeding the PFA limits set out in Article 5 may not be placed on the market: 25 ppb for any individual PFAS measured by targeted analysis; 250 ppb for the sum of PFAS measured as the sum of targeted analysis; and 50 ppm for total PFAS, including polymers, measured as total organic fluorine. Thus, there is no absolute ban or “zero PFAS” rule.

25. Article 5 sets out the maximum content for PFAS in food contact packaging. There are three limits; which one applies when?

Since PFAS are made up of thousands of different chemicals, the EU regulates them in groups using three different limits of analysis. These limits apply in all circumstances.

5(a): 25 ppb for any individual PFAS

The text: the concentration of any single PFA chemical cannot equal or exceed 25 parts per billion (ppb).

The meaning: if a laboratory tests a package and detects even a specific, concrete PFAS compound (e.g. PFOA or PFOS) at a concentration of 25 ppb or higher, the packaging is non-compliant.

5(b): 250 ppb for the sum of targeted PFAS

The text: the total cumulative concentration of all PFAS compounds measured together cannot equal or exceed 250 ppb.

The meaning: even if each individual PFAS molecule is kept below the safe limit of 25 ppb set forth in point (a), their sum cannot reach a high total. For example, if a lab detects 12 different types of PFAS, each at 22 ppb, they meet point (a). However, its sum would be 264 ppb, breaching point (b) and making the packaging illegal.

5(c): 50 ppm for total PFAS (including polymeric PFAS)

The text: the absolute maximum threshold for all PFAS, explicitly including plasticized or polymeric PFAS, is set at 50 parts per million (ppm). It should be noted that ppm represents a significantly larger amount than ppb (50 ppm = 50 000 ppb).

The meaning: this general limit encompasses heavy fluoropolymers or polymer processing additives used in plastics molding or in high-barrier layers. This ensures that massive polymer chains, which escape ultra-sensitive "ppb" level fluid testing, remain macroscopically restricted.

There is currently no harmonised EU methodology for the analysis of PFAS in packaging. However, the Commission has indicated that work is being done on this with the aim of developing a harmonised analysis protocol. In the meantime, manufacturers should seek appropriate assurances from their suppliers and consider testing where necessary, taking into account that screening methods, such as total fluoride analysis, can help detect the possible presence of PFAS, but by themselves do not allow the identification of specific PFAS substances or necessarily demonstrate compliance with each of the thresholds set out in Article 5(5).

26. Does every batch need to be tested for PFAS?

There is no legal obligation to test for PFAS in every manufacturing batch; However, it is necessary to maintain a solid and review-ready record of evidence, broken down by type of packaging and supplier. Suppliers' self-declarations that are not supported by verifications are insufficient; technical dossiers require valid test data or accredited certificates of analysis for each type of material.

27. Do the limits on heavy metals apply to food contact packaging only?

No. While the restrictions on PFAS apply strictly to packaging intended to come into contact with food, heavy metal concentration limits apply to *all* packaging and packaging components placed on the EU market.

28. Does the PPWR concern adhesives and ink used in packaging?

Yes, the PPWR applies to adhesives used in packaging, which are considered an integral part of the packaging. Any element that ends up on the final packaging placed on the market— including labels, label adhesives, tapes, promotional materials or late-stage additions—must be considered. These elements influence the overall recyclability and compostability of packaging, are subject to the restrictions on substances of concern, and must be included in the packaging's Declaration of Conformity and in the supporting technical documentation.

29. What does it mean to indicate packaging performance in the technical file?

The PPWR incorporates principles of packaging minimisation and evaluation of packaging performance. In practical terms, the technical dossier must demonstrate that the packaging does not exceed what is necessary to fulfill its function, which is to prevent significant product damage, loss, deterioration, or waste. Packaging may protect fruit against mechanical or chemical damage, vibration, compression, humidity, moisture loss, oxidation, light, oxygen, microbiological infection, pests, deterioration of organoleptic properties, etc.; the technical dossier must include references to specific EU law setting out requirements on product quality. The technical information must demonstrate

that no further reduction of the packaging weight or volume is possible without endangering the packaging functionality, including safety and hygiene, for the packaged product, packaging and user. Note that the strict legal enforcement for specific packaging minimisation and empty space limits (maximum 50 percent void space) does not formally apply until 1 January 2030.

30. Must all plastic packaging contain 30 percent recycled material from 2030?

The PPWR sets minimum recycled content targets for certain plastic packaging from 2030, with percentages varying by type of packaging and material. Not all packaging has the same percentage and there are exceptions.

31. Do pallet straps, corners, and wrap also need to be labelled?

This depends on what is meant by "labelling". Transport packaging is generally exempt from consumer-directed sortability labelling, as it does not reach final households. However, labelling of packaging to identify the manufacturer is a different matter. Manufacturers shall indicate on the packaging (including transport packaging), on a QR code, or other data carrier their name, registered trade name or registered trademark, as well as their postal and email address. If this is not possible, the required information will be provided as part of the information via the QR code or other type of digital data carrier or in a Declaration of Conformity accompanying the packaging or packaged product.

V. MISCELLANEOUS

32. Will all prepacked fruit in plastic packaging weighing less than 1.5 kg be banned?

Annex V of the PPWR bans single-use plastic packaging for less prepacked fresh fruit weighing less than 1.5 kg. This type of packaging includes plastic nets, plastic bags, small plastic clamshells, and trays, all of which will be banned by 1 January 2030. However, Member States may choose to allow exemptions from this ban 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 and non-organic fruits. It will be up to the individual Member States to decide whether or not to allow such exemptions. By February 2027, the Commission will publish guidelines to explain Annex V in more detail, including examples of fruits and formats that qualify for an exemption from the ban. The guidelines will help Member States decide which products to exclude from the ban by defining specific criteria (e.g. water-retention needs, physical protection needs, etc.). But right now, it remains unclear what parameters will be proposed by the Commission to guide Member States in such decisions.

33. I import my packaging from the EU. Can I assume that it complies with the PPWR?

No. The fact that the material comes from the EU is not enough; the packaging, when exported to the EU, will still require a Declaration of Conformity and supporting technical information that demonstrates its compliance with the PPWR requirements.

34. Does the PPWR apply to "old" stocks of packaging too?

Yes! There is no phase-out or grace period for old stocks—any non-compliant packaging cannot be introduced to the EU market after 12 August. The packaging you have in stock or even the packaging that is on the water right now will not be allowed entry into the EU after 12 August, unless it complies with the PPWR.

35. What happens when your goods do not comply with the regulation?

If your packaging is non-compliant, your products cannot be legally sold in the EU. They may be blocked at customs, recalled from shelves, or rendered unsellable. But it doesn't end there. The PPWR each EU Member State to establish a penalty framework that is "effective, proportionate, and dissuasive." Penalties must be set by February 2027. While it is still unclear what the exact penalties will be for all countries, what is clear is that the penalties will be severe. It is the EU importer who will be fined by the authorities; third country suppliers are unlikely to be fined directly by national authorities. However, most standard supply contracts contain strict indemnity clauses. EU buyers will probably pass all costs—including national administrative fines, customs storage fees, and product disposal costs—back to the third-country seller. The reputational damages should also be considered. National authorities may publish details of enforcement actions, damaging brand reputation. Environmental groups and journalists may also report on violations. And of course buyers will demand compliance; failure to ensure compliance and provide proof thereof may end business relationships.

For more information, see also the European Commission's recent list of frequently asked questions:

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

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