Navigating PPWR

Repak Membership Team

Navigating the Packaging and Packaging Waste Regulation (PPWR)
Repak & Enterprise Ireland
Gary Browne
11/11/2026.



About Repak

Repak is central to Ireland's Packaging Design, Collection and Recycling System

Licensed EPR Operator: Operates Ireland's approved packaging EPR scheme under a 10-year DCEE licence, delivering stability and system-wide impact for Members.

Recycling System Delivery: Funds and coordinates Ireland's recycling system on behalf of producers, supporting consistent service across household and commercial waste streams.

Stakeholder Alignment: Brings together Members, recovery operators and local authorities to deliver EU and national obligations effectively.

Sustainable Packaging Design: Supports producers to reduce packaging, increase reuse and refill, and improve recyclability in line with EU requirements.

Member progress



Our members achieved 115% of their packaging recycling obligations in 2025



Additional 60,000 tonnes recycled in 2025, largest increase in the last 10 years



All EU targets exceeded across packaging materials, driven by our members



Consistently strong recycling outcomes across paper, glass, steel and wood

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What is PPWR?

The **Packaging and Packaging Waste Regulation (PPWR)** is the EU's new law that replaces the old Packaging and Packaging Waste Directive (PPWD). It applies from **12 August 2026** affecting all businesses placing packaging on the EU market. It aims to ensure only one producer per packaging unit for clarity in EPR and legal responsibility.

PRODUCER
Country-specific role



In Ireland, obligated **producers** include:

- **Manufacturers** who make packaging, drive the specification of a packaging item or apply their brand name or trademark to it.
- **Importers** that import packaging or packaged goods from a non-EU country into the EU, and place it onto the market.
- **Distributors** who resell or pass on packaging or packaged goods without being a **Manufacturer** or **Importer** themselves.



OBLIGATION

Fund the management of packaging waste

PPWR Objectives

1. Packaging Waste Reduction: Achieve a 5% reduction by 2030, 10% by 2035, 15% by 2040
2. Make all Packaging Recyclable by 2030
3. Increase Use of Recycled Content in Plastic Packaging: 30% by 2030, 50% by 2040
4. Promote Reuse and Refill systems to reduce single use packaging
5. Enforce bans on certain single use formats

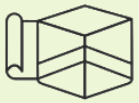
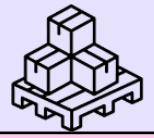
Find out if you are a Producer using Repak's **Producer Definition tool** available **HERE**

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Definition of ‘Packaging’

The term “packaging” is comprehensively defined in Article 3, Paragraph 1, Number 1 of the PPWR. It refers to articles, regardless of the materials used, that are employed for the containment, protection, handling, delivery, or presentation of products.

The PPWR specifies various types of packaging that are relevant for businesses:

	Packaging Type	Definition
	**Sales Packaging (Primary)**	Conceived as a sales unit to the end user at the point of purchase
	**Grouped Packaging (Secondary)**	Groups a certain number of sales units at the point of purchase (removable without affecting the product)
	**Transport Packaging (Tertiary)**	Facilitates handling and transport to prevent damage during distribution. This include e-commerce packaging.
	**Service Packaging (filled POS material)**	Conceived to be filled at the point of sale
	**Primary Production Packaging**	Items designed and intended to be used as packaging for unprocessed products from primary production

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Key PPWR Packaging Classification Updates

The PPWR introduces important updates to how packaging is classified. The examples below highlight some of the most significant changes impacting producers and compliance obligations.

For a complete list of classifications, Repak has launched a **new Packaging Classification Tool** available HERE

✅ NOW Classified as Packaging (Key PPWR Updates)

- Tea bags & coffee pods (despite containing product residue)
- Single-serve capsules
- Labels & stickers on products (including fruit stickers)
- Adhesive tape for sealing
- Sandwich bags sold filled
- Cups sold containing beverages

❌ NOT Classified as Packaging under PPWR

- Integral product parts (unless disposed separately)
- Paints/inks/adhesives applied directly to product
- Items sold empty by final distributor (unless designed for POS filling)
- Product components inseparable from product function

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PPWR 2025-2030 Overview

Prevention Targets	Re-use and Refill Targets	Recyclable Packaging	Minimum Recycled Content in Plastic Packaging	Compostable Packaging
Packaging waste generated per capita should be reduced compared to 2018 baseline by at least: **-5% by 2030**	New % targets to be made available in reusable packaging within a system for re-use or by enabling refill. **By 2030 percentages range from 10-100% across categories**	By 2030 packaging that does not meet 70% recyclability threshold cannot be placed on EU market	Any **plastic part of packaging** placed on the market must contain minimum %s of recycled content recovered from post-consumer plastic waste by: **1 January 2030**	36 months after the regulation takes effect, specific packaging shall be compatible for composting in industrial bio-waste treatment facilities
Prevention targets: **-10% by 2035** **-15% by 2040**	Transport, group and alcoholic and non-alcoholic packaging are affected	In 2038 the recyclability threshold will be moved to 80%	Categorised per packaging type and format calculated as an average per manufacturing plant and year	Packaging, including biodegradable plastic polymers types to allow material recycling in line with Article 6 without affecting the recyclability of other waste streams

View the full **PPWR Legislation Timeline** available on the Repak website **HERE**

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PPWR Declaration of Conformity – LIVE 12 AUG

A PPWR Declaration of Conformity (DoC) is a formal, written statement by the manufacturer confirming that a specific packaging type complies with the Packaging and Packaging Waste Regulation (EU) 2025/40. See **Article 39** of the legislation.

From **12 August 2026**, it is a mandatory compliance document for all packaging placed on the EU market. Without a valid DoC, packaging cannot legally be placed on the EU market.



A DoC is required for every individual packaging type and:

- Must follow the structure set out in **Annex VIII** of the PPWR
- Must be supported by a technical file, set out in **Annex VII**

Who is responsible?

Manufacturers

- Under PPWR, the 'Manufacturer' is not necessarily the business that physically produces the packaging, but often the business that places it on the EU market under its own name or trademark
- Create and sign the DoC and maintain technical documentation

Importers

- Important to note that Importers do not create the DoC, but must hold a copy and keep it available for market surveillance authorities
- Verify the DoC and technical documentation are complete before placing packaging on the market

Distributors

- Check that packaging meets identification and labelling requirements
- Prevent non-compliant packaging from being placed on the market

View our **Declaration of Conformity Guide HERE**

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Preparing for PPWR: Practical actions 2026-2028

Map Your Packaging Portfolio	Identify primary, secondary and transport packaging, own-brand and imported products, and service packaging and e-commerce packaging
Engage Suppliers Early	Request technical specifications, understand material composition and discuss future PPWR compliance requirements
Review Internal Systems	Capture packaging data at SKU level, categorise packaging by supplier and material type, and assess data availability for future reporting requirements.
Assess Future Risk Areas	Assess recyclability performance, recycled plastic content, reuse and refill opportunities, and the presence of Substances of Concern (including PFAS and other restricted substances).
Build an Internal PPWR Transition Plan	Assign clear ownership within the business, establish supplier engagement initiatives, and identify packaging that requires redesign or further assessment.

Get PPWR ready with the **PPWR Checklist** available on the Repak website **HERE**

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PPWR - Summary of Key Implications

Key Areas of Change	Why it matters	Key Risks if not addressed
• Packaging design & recyclability requirements • Labelling and consumer information • Reuse and recycled content targets • Enhanced EPR reporting obligations	• Increased data, reporting and verification requirements • Potential cost implications for obligated businesses • Higher compliance and enforcement requirements • Need for system, process and capability changes	• Market access and non-compliance risk • Operational and supply chain disruption • Financial and Reputational risk • Specific Technical risks – PFAS / SoC restrictions • Operational bottlenecks close to legal implementation deadlines • Increased Fees – e.g. low recyclability

View the full **PPWR Overview Guide** available on the Repak website **HERE**

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Repak Supports

Our team is committed to providing best in class support and advice on PPWR and the implications for your business. We offer a wide range of supports and services to Members including:

Member Resources & Guidance

- Access our dedicated PPWR Hub with up-to-date guides, tools and digital resources **HERE**

Packaging Expertise

- Technical guidance on packaging design & optimisation
- Find our detailed Packaging & Design Guide **HERE**

Reporting & Audits

- Expert support with Stats reporting, audits and training

Member Insights

- Practical innovation case studies **HERE**





- Contact your **Repak Account Manager** or email **membershipservices@repak.ie**
- Visit our **Member Hub** on to access all member support
- Follow **@repakrecycling** to keep up to date with the latest PPWR news



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Thank You

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