



Back in the PPWR: Revisiting the EU Framework for Packaging Sustainability

Intro (0:00 – 1:46 min)

Trade Press (1:47 min – 5:50 min)

- [US lawmaker introduces bill to review 'legacy' GRAS designations | Enhesa](#)
- [US FDA official charts path ahead for food chemical regulations | Enhesa](#)
- [Judge blocks Oregon department from enforcing EPR law for NAW members | Enhesa](#)
- [State MAHA Laws Hit Roadblock in Texas Labeling | FDA Week](#)

Disclaimer (6:09 min – 6:39)

As a quick disclaimer to listeners, this episode was recorded just prior to the publication of the PPWR Guidance Document and FAQ. Although the guidance has now been released on 30 March 2026, it does not alter the substance of the discussion in this episode. Most implementing and delegated acts are still pending, though the FAQ may offer some additional clarity on these issues.

- **PPWR FAQ:** [FAQ on Packaging and Packaging Waste Regulation \(PPWR\)](#)
- **PPWR Guidance Document:** [Guidance document on Packaging and Packaging Waste Regulation \(PPWR\) - Environment](#)
- [European Commission Publishes Final PPWR Guidance in Advance of August 2026 Application Date | PackagingLaw.com](#)

Main Content (6:39 min – 24:01 min)

- Company preparation for PPWR compliance (6:39 min – 8:29 min)
 - Companies are actively preparing for the EU Packaging and Packaging Waste Regulation (PPWR) (for initial overview of PPWR see <https://www.packaginglaw.com/special-focus/new-eu-packaging-and-packaging-waste-regulation-highlights-and-challenges-ahead>)
 - Companies are facing challenges such as:
 - understanding their roles in the supply chain
 - meeting new requirements like PFAS restrictions
 - ensuring proper documentation by the August 2026 application date

- Status of European Commission Guidance and FAQ (8:29 min – 15:18 min)
 - Guidance documents for the PPWR are still in draft form with ongoing discussions among Member States and some disagreements, particularly regarding PFAS measurement in food packaging; expected to be finalized very shortly
 - Draft version on note for guidance
 - Addresses ban on additional ‘single-use plastics’ and different interpretation of this term to that in the Single-Use Plastics Directive
- Progress on Delegated and Implementing Acts (15:18 min – 19:40 min)
 - European Commission's progress with delegated and implementing acts under the PPWR, including a recent delegated decision on exemption from 100% reuse obligation related to pallet wrappings and straps in transport packaging.
- Interpretation and Implementation Challenges of PPWR (19:40 min – 21:49 min)
 - Ambiguous definitions, varying requirements for different packaging types, and the need for case-by-case analysis, especially regarding exemptions and recycled content requirements.
- Ongoing Industry Questions and Need for Further Clarification (21:49 min – 23:28 min)
 - Despite the information provided, many questions about the PPWR remain, and further clarification and updates will be necessary as implementation approaches.
 - Steps towards harmonization

Upcoming Events (24:09 – 25:37)

- Seminar on April 8 – 9, 2026 – [2026 Sustainability Marketing and Compliance Intensive | Keller and Heckman](#)
- Seminar on April 14 – 15, 2026 – [2026 Advanced Pesticides Seminar | Keller and Heckman](#)
- Seminar on April 21 – 22, 2026 – [2026 Paper Packaging Law Seminar | Keller and Heckman](#)