



One EU packaging law now applies in all 27 member states.

Regulation (EU) 2025/40 has applied directly since August 12, 2026 to every company that places packaging or packaged products on the EU market, wherever it is based. Most of the numbers that will set your costs still wait on Commission acts.

What already applies

PFAS limits

Food-contact packaging must meet the Art. 5(5) PFAS limits, including 25 ppb for any single PFAS.

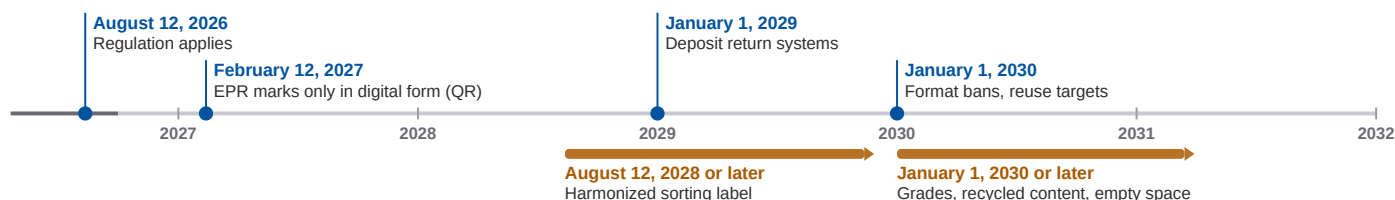
Declaration of conformity

Packaging placed on the market needs an EU declaration of conformity and technical documentation (Arts. 38 and 39).

EPR in every market

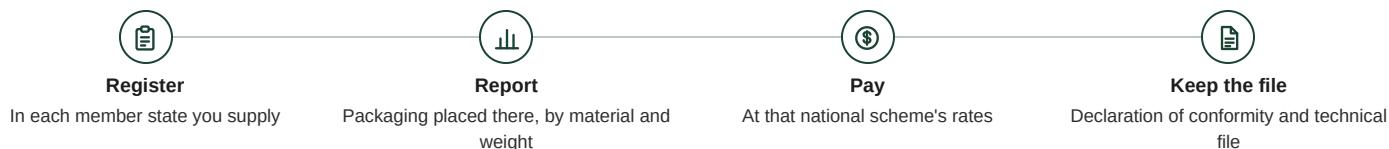
Producers register and pay in each member state they supply, at that scheme's own rates (Arts. 44 and 45).

What is fixed, and what waits on an act



Fixed date Set in the Regulation **Earliest date** The later of this date or a set time after a Commission act

What compliance looks like in each member state



Who carries it

The producer, under five independent tests in Art. 3(1)(15). Which test applies depends on where you are established, which market you supply, and whether you sell direct to end users, so the producer can differ by member state.

What drives the cost

National rates by material and format today. From about mid-2031, fees must also follow the recyclability grade (Art. 6(8)).

Decisions to make now

- Which test makes you the producer, market by market
- Who owns PPWR internally, and with what budget
- Whether your formats clear Grade C
- When to ask suppliers for material data

- Price your packaging** ppwratlas.com/fee-calculator
- Your obligations by market** ppwratlas.com/countries
- If this just landed on your desk** ppwratlas.com/prepare

Questions on your own portfolio: Dave Hartter, Principal, dave@hartteradvisory.com, linkedin.com/in/davehartter

Independent reference, status as of October 1, 2026. Not legal advice: key thresholds await delegated and implementing acts, and twelve annulment actions are pending at the EU General Court. Verify obligations and dates against the Official Journal and with counsel before acting. © 2026 Hartter Advisory, LLC.

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