

EU PACKAGING & PACKAGING WASTE REGULATION

PPWR Compliance Cosmetic Packaging Guidelines

Regulation (EU) 2025/40 — Implementation Roadmap and Brand Action Plan, 2026–2040



2026

General Application



2030

Key Inflection Point



2040

Final Targets

What Is the PPWR?

Legal Status	Regulation (EU) 2025/40 — entered into force 11 February 2025
Application Date	Directly applicable across all 27 EU member states from 12 August 2026 (no national transposition required)
Supersedes	Replaces the previous Packaging Directive (94/62/EC) with substantially stricter, directly binding requirements
Objective	Reduce packaging waste and promote reuse and recycling in support of the EU's 2050 climate-neutrality goal

Why It Matters Especially for Cosmetic Brands

- Luxury multi-material formats combining glass, metal, and plastic are the industry standard
- High-function components like airless pumps and composite caps significantly lower recyclability grades
- Premium heft cues (double walls, thick bases) directly conflict with packaging-minimization requirements

This material is based on the published regulation text and industry guidance as of September 2026; some dates and figures may change once implementing acts are finalized.

PPWR Implementation Timeline, 2025–2040



1 January 2030 is the single most critical inflection point — Design for Recycling, minimum recycled content, the empty-space cap, reuse targets, and specific single-use packaging bans all take effect simultaneously.

12 August 2026 — Full Enforcement Begins

- 1 General Application Begins** Most PPWR provisions take direct effect across the EU
- 2 Substance Restriction Compliance** Mandatory compliance with limits on PFAS and other substances of concern, and heavy metals
- 3 Reusable Packaging Criteria** Must meet reusability and reuse-system requirements
- 4 EPR Registration Begins** Register for Extended Producer Responsibility in every member state where products are sold
- 5 Documentation Obligations** Begin preparing and retaining the EU Declaration of Conformity (DoC) and technical documentation

Brand Action Build your packaging material, weight, and composition database now — EPR registration and technical documentation are impossible without accurate data.

2027–2028 — Labelling and Special-Category Transitions

2027

HORECA Reusable Containers Permitted

Hotels, restaurants, and cafés must allow customers to bring their own reusable containers for takeaway — an indirect effect on cosmetic brands via the spread of refill culture

2028.02.12

Packaging Minimization + Compostability Mandate

Sales packaging (primary packaging) must be reduced to the 'minimum necessary for its function.' Tea bags, coffee pods, and fruit stickers become subject to mandatory industrial composting

Around Aug 2028

Harmonized Sorting Labels

Timing depends on finalization of the implementing act, but a common EU sorting label and QR-code requirement to guide consumer disposal is expected to apply

Brand Action Reserve space for the harmonized label on your artwork masters now, so it can be applied the moment the implementing act is finalized.

1 January 2030 — Five Obligations Take Effect Simultaneously

1

Design for Recycling Becomes Mandatory

Packaging below recyclability grade C (under 70%, i.e. grade D or E) is effectively barred from the EU market.

2

Minimum Recycled Content (PCR)

Mandatory minimum ratios apply by plastic packaging type. Exact figures vary by category and will be set by implementing acts.

3

50% Empty-Space Cap

The empty-space ratio in grouped, e-commerce, and transport packaging may not exceed 50%.

4

First Reuse Targets Apply

Reusable-packaging conversion targets take effect for the first time in specific categories.

5

Specific Single-Use Packaging Banned

Designated single-use formats, such as small hospitality amenities (shampoo, body lotion, etc.), become restricted.

The specific grace periods and criteria for grade D/E packaging may be adjusted through detailed implementing acts.

2035–2040 — Long-Term Targets

2035.01.01	Recyclable at Scale	Packaging must be recyclable at the scale of actual, operating infrastructure — not merely in theory.
2038.01.01	Grades A/B Mandatory Across the Board	All packaging must achieve recyclability grade A or B; grade C is also phased out of the market.
2040.01.01	Higher Recycled-Content Thresholds	Minimum recycled-content (PCR) thresholds rise substantially compared with 2030.

Member-state waste-reduction targets (per capita, vs. 2018) 2030: –5% · 2035: –10% · 2040: –15%

Why Cosmetic Packaging Is Especially Exposed

1 Multi-Material Luxury Formats

Glass + metal + plastic combinations are the industry standard → lower recyclability grades than single-material designs

2 High-Function Components

Springs and metal parts in airless pumps and composite caps → essentially impossible for consumers to separate and recycle

3 Premium-Heft Design

Double-wall glass, thick bases, oversized cartons → directly conflict with packaging-minimization requirements

4 Over-Packaging Practices

Samples, gift sets, inner boxes, etc. → directly targeted by the 50% empty-space cap

PPWR Suitability by Container Material

Material	Expected Recyclability Grade	PPWR Risk	Recommended Direction
Glass (single material)	Grade A possible	Weight / carbon-footprint concerns	Lightweight design; avoid double-wall structures
PET / HDPE / PP (single plastic)	Grade A–B	PCR sourcing required	Secure 30–35%+ recycled content early
Multilayer / composite plastics (e.g., EVOH barrier)	Grade D–E	High risk of market restriction	R&D on mono-material barrier alternatives
Aluminum (single material)	Grade A possible	Watch internal coatings/linings	Minimize coatings; keep single-material
Mixed-material combinations (luxury combos)	Mostly grade E	Top priority for redesign	Convert to separable structures

Design for Recycling — Container Design Principles

- 1 Favor Mono-Materials**

Unify the body, cap, pump, and label within the same polymer family so the item can be recycled without material separation
- 2 Enable Easy Disassembly**

Use joining methods consumers can easily take apart (snap-fit, screw joints, etc. instead of adhesives)
- 3 Minimize Color and Opacity**

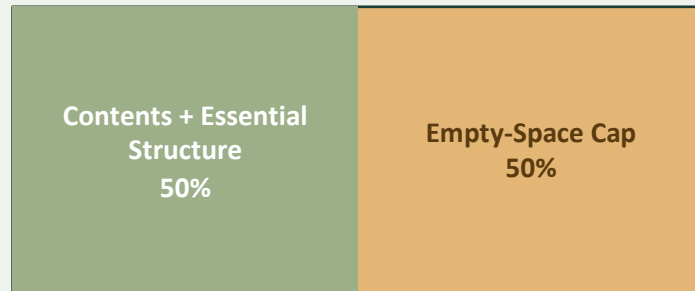
Dark, opaque plastics interfere with optical sorting — prefer clear or natural colors
- 4 Label and Ink Compatibility**

Use labels from the same material family as the container; avoid adhesives and inks that hinder recycling
- 5 Replace High-Function Components**

Consider replacing dissimilar parts, such as the metal springs in airless pumps, with recycling-friendly materials

Packaging Minimization — Managing Empty Space

Maximum Allowed Empty Space



Grouped, e-commerce & transport packaging (from 1 Jan 2030)

- Sales (primary) packaging itself must also be reduced to the 'minimum necessary for its function' from 12 Feb 2028
- Double-wall glass, thick bases, unnecessary layers, oversized cartons, and decorative inserts are hard to justify on marketing grounds alone
- Brand action: calculate empty-space ratios during the mock-up stage and redesign to balance perceived volume against regulatory risk

Logistics & E-Commerce Packaging Response

Grouped, transport, and e-commerce packaging are all explicitly covered by the regulation

Void-fill materials (air cushions, bubble wrap, polystyrene chips, paper filler) also count toward the empty-space calculation

Applicable Channels Applies across all channels — beauty subscription boxes, influencer mailers, promotional launch kits, and D2C order packaging

Brand Action

- Rebuild the secondary packaging (shipping box) size matrix
- Minimize void fill and evaluate recycling-friendly alternatives
- Introduce automated box-size matching by SKU
- Apply the same standards to subscription and promotional boxes as regular SKUs

Labelling and Information Requirements

1

Harmonized Sorting Label + QR Code

Expected to apply around 2028, once the implementing act is finalized — a common EU symbol will guide consumer sorting

2

Alongside Existing Cosmetics Labelling

Manage ingredient and warning labels under Regulation (EC) No 1223/2009 together with PPWR labels

3

Separate Marking for Reusable Packaging

Reusable packaging is expected to require additional reuse-related labels and QR information (around 2029)

Brand Action Reserve label slots on your artwork masters now, and build a flexible design system that can be updated the moment the implementing act is finalized.

Documentation and EPR Compliance Framework

EU Declaration of Conformity & Technical Documentation

Mandatory preparation and retention of the Declaration of Conformity and technical documentation (from Aug 2026)

EPR Registration

Separate Extended Producer Responsibility registration required in every EU member state where products are sold

Grade-Linked Fees

EPR fees are linked to packaging recyclability grade — lower grades are expected to cost more

Detailed Criteria Finalized in Stages

Numerous delegated and implementing acts — covering Design for Recycling criteria, label formats, and registration formats — are finalized in stages during 2027–2028

→ An ongoing monitoring process is needed to update your compliance checklist as each detailed criterion is finalized.

Brand Implementation Roadmap (2026–2030)



The Risk and Opportunity of Acting Early

Risks of Inaction

- Possible restriction from the EU market in 2030
- Sharply higher EPR costs for low-grade packaging
- Costly last-minute rebranding and redesign
- Production disruption from delayed supply-chain restructuring

Opportunities from Acting Early

- Competitive advantage in sustainability marketing
- Cost stability through early PCR sourcing
- Simplified SKUs and palettes through mono-material conversion
- Regulatory readiness itself becomes a brand-trust asset

meridiem is here to help

An AI-Matching Platform for Premium Cosmetic & Medical Packaging Sourcing

1

Packaging Audit

Pre-assess current packaging's
recyclability grade and diagnose risk

2

Material & Supplier Matching

AI-matched PPWR-compliant
alternative materials and suppliers

3

Prototyping & Documentation

Prototype production and support
for regulatory documentation

4

Phased Transition Execution

Sequential, SKU-by-SKU conversion
aligned with the 2030 roadmap

Meridiem Corporation

inquiry@meridiem.kr | www.meridiem.kr