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EU PACKAGING & PACKAGING WASTE REGULATION

EU PPWR Workwear Packaging Reference

What counts as packaging, who pays the EPR fee, and the article-level thresholds that govern your bags, cartons, inserts and labels before 2030.

Version 1.0

Last updated: September 7, 2026

DISCLAIMER

This reference is operational guidance written from a China-side workwear factory's perspective. It is not legal, tax, or compliance advice. PPWR thresholds and national EPR schemes evolve; validate every obligation against the current consolidated text of Regulation (EU) 2025/40 and your destination market.

Regulation (EU) 2025/40 | Document ID: SPEC-PPWR-001 | Replaces Directive 94/62/EC

1. The Regulation at a Glance

PPWR governs every packaging component placed on the EU market with B2B workwear. It is a full regulation, not a directive, so it applies directly in every member state without national transposition.

DATE	MILESTONE
2025-01-22	Adopted and published in the Official Journal — Regulation (EU) 2025/40.
2025-02-11	Entered into force. Repeals Directive 94/62/EC (PPWD).
2026-08-12	All packaging placed on the market must meet recyclability and documentation rules; EU declaration of conformity and EPR registration apply.
2028-02-12	Compostable packaging conformity; packaging-minimisation reporting obligations apply.
2028-08-12	Harmonised labelling / material-identification and waste-collection-container marking applies.
2029-02-12	Reusable-packaging labelling applies.
2030-01-01	Recyclability Grade C (70%) minimum; minimum recycled content; void-space cap ≤50%; reuse targets.
2038-01-01	Recyclability Grade B (80%) minimum.

2. What Counts as Packaging

PPWR defines packaging as any item used to contain, protect, handle, deliver or present goods, from raw materials to processed goods. For workwear that means far more than a box: individual polybags, hanger bags, fold sleeves, carton inserts, master cartons, pallet wrap, corner protectors, void fill, and shipping envelopes all carry separate obligations.

LEVEL	WORKWEAR EXAMPLES	WHAT DRIVES THE OBLIGATION
Primary	Garment polybag, hanger bag, fold sleeve, accessory bag	Recyclability + recycled content + substance limits
Grouped / secondary	Inner carton, set bundle, branded sleeve, divider	Recyclability evidence; minimisation
Transport	Master carton, pallet wrap, corner protector, void fill	Void-space cap; design-for-recycling of wrap/board
E-commerce	Shipping envelope, return mailer, sealing tape, insert	Reuse-tracking; minimisation; label data

Small components count too: cardboard labels, sealing tape, films and sachets are packaging under PPWR, even when a team treats them as incidental. Left out of the file, they become the most common gap in a release-gate audit.

Useful exemption: sales packaging made from lightweight wood, cork, textiles, rubber, ceramic, porcelain or wax is exempt from the recyclability criteria. That matters if you ship in a reusable textile tote rather than a polybag — but the polybag itself is not exempt.

3. Who Carries the Obligation

PPWR splits two roles that teams routinely collapse. The manufacturer answers for packaging conformity — design, the technical file and the EU declaration of conformity. The producer — whoever first makes packaging available in a member state where it becomes waste — registers for EPR and pays the fees.

ROLE	OWNER	CORE DUTY
Manufacturer	The company that produces the packaging or the garment	Technical file, declaration of conformity, conformity assessment
Producer (EPR)	First to make packaging available where it becomes waste — can be importer, own-brand seller or distributor	National EPR registration, reporting, fee payment
Importer	Places non-EU goods on the EU market	Verifies the manufacturer's file; registers for EPR
Own-brand seller	Packages under its own label	Assumes manufacturer obligations on top of EPR

4. Article-by-Article Requirements

These are the thresholds that actually change packaging for a workwear brand. Validate against the current consolidated text before you lock a spec.

Article 5 — Hazardous substances

REQUIREMENT	LIMIT	APPLIES FROM	PACKAGING
Pb + Cd + Hg + Cr(VI) sum	≤ 100 mg/kg	Current	All packaging
REACH Annex XVII restricted substances	Per entry	Current	All packaging
Food-contact packaging (EC) 1935/2004	Migration limits	Current	Food-contact
PFAS — target substances	≤ 25 ppb	2026-08-12	Food-contact
PFAS — sum incl. precursor degradation	≤ 250 ppb	2026-08-12	Food-contact
PFAS — total incl. polymeric	≤ 50 ppm	2026-08-12	Food-contact

Article 6 — Recyclability grades

THE RECYCLABILITY RATING	MINIMUM GATE	FROM
Grade A — designed for recycling	≥ 95%	Recyclable from 2026-08-12; A targeted at 2035
Grade B	≥ 80%	Grade B minimum from 2038-01-01
Grade C	≥ 70%	Grade C minimum from 2030-01-01

From 12 August 2026 every packaging unit on the EU market must be recyclable and evidenced; the grading benchmarks tighten in stages. Recyclability is judged against EN 13430:2004 and the design-for-recycling criteria — a mono-material bag scores far better than a multi-layer laminate.

Article 7 — Minimum recycled content (plastic)

PLASTIC PACKAGING CATEGORY	2030	2040
Contact-sensitive, PET (non single-use bottle)	30%	50%
Contact-sensitive, other plastic (non single-use bottle)	10%	25%
Single-use plastic beverage bottles	30%	65%

PLASTIC PACKAGING CATEGORY	2030	2040
All other plastic packaging — where a workwear polybag sits	35%	65%

A standard polyethylene workwear bag falls in the final row: from 1 January 2030 it should carry 35% post-consumer recycled content, and 65% by 2040 — with a GRS or equivalent transaction-certificate trail to prove it. That is why “recycled content” stops being a marketing claim and becomes a hard spec.

Articles 10 & 24 — Packaging minimisation / void space

REQUIREMENT	LIMIT	FROM
Void-space cap — grouped, transport and e-commerce packaging	≤ 50%	2030-01-01
Sales packaging	Minimise to smallest suitable size	Ongoing

This is the hard ceiling behind the empty-space formula. An oversized carton around a bulky FR suit or a mixed employee kit is not just freight waste — it is a non-compliance risk after 2030. Pack by size set, right-size the carton, and cut void fill.

Articles 11 & 12 — Reuse targets and labelling

REQUIREMENT	2030	2040
Transport packaging reuse target	40%	70%
E-commerce packaging reuse target	10%	25%

Harmonised labelling for material identification, recycled content, bio-based content and reusable packaging applies from 12 August 2028 (one labelling milestone shifts to 12 February 2029).

Articles 38 & 39 — Declaration of conformity (DoC)

The manufacturer prepares an EU declaration of conformity and a technical file under the internal production-control procedure (Annex VII, Module A). The DoC is kept alongside the technical file and produced to national authorities on request. Retention is 5 years after a single-use unit places on the market and 10 years for a reusable unit.

Article 44 — EPR registration

The producer registers for extended producer responsibility with the national register of each member state where packaging becomes waste — from 12 August 2026. That is separate from, and additional to, the PPWR conformity file.

5. The Release-Gate File

Carry one evidence record per SKU the way the conformity file expects. A single record covers compliance, freight and the delivery gate.

RECORD ITEM	WHY IT MATTERS
Packaging bill of materials	Every component by SKU: material, gauge, print area, closure, weight, supplier
Material spec + recycled-content declaration	Must match the GRS / transaction certificate — the most common rejection point
Recyclability / design-for-recycling evidence	Grade rating against EN 13430:2004
Chemical declaration	Heavy metals, restricted substances, inks and adhesives
Void-space + unit-economics check	Freight density and the $\leq 50\%$ cap
Physical handling test	Drop, seal, puncture and barcode scans after humidity

6. Enforcement Outlook

Compliance is being enforced, not just written down. The EU Safety Gate (RAPEX) notifies non-compliant products placed on the market, and notification volumes have risen year on year. The European Chemicals Agency's REF-16 enforcement project (2027–2028) targets restricted substances under REACH Annex XVII across all sales channels — including online — so packaging and accessory components are firmly in scope.

Sanctions are set by national law rather than one EU-wide figure, and they vary widely by country. Expect that a packaging supplier's green catalogue is a starting point, not proof, and that the audit starts with documents.

Alongside PPWR, the chemical levers that reach packaging are set and enforced publicly:

ENFORCEMENT LEVER	PUBLISHED POSITION
REACH SVHC candidate list	253 substances in 35 batches; an article containing $>0.1\%$ triggers a communication duty and a SCIP database notification.
REACH Annex XVII restrictions	83 restriction entries as of April 2026 — organotins, PAHs, phthalates, C9-C14 PFCAs, and a new 2,4-DNT entry.
EU POPs Regulation (EU) 2019/1021	32 banned substances including SCCPs, PFOA and PFHxS — many are flame retardants or plasticisers found in plastic and foam packaging parts.
New PFHxA restriction (Annex XVII #79)	Territory entry binding textiles, leather and food-contact paper from 10 October 2026, and other products from 10 October 2027.

LANTAOWORK PPWR REFERENCE

Back the packaging claim with a file that survives a 2030 re-audit.

Send your packaging bill of materials and destination markets — we return a per-SKU release-gate file, an evidence checklist, and a quote before you commit.

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