

The Introduction of European Union's Packaging & Packaging Waste Regulation (PPWR) Impacts New Zealand Exporters

The European Union's Packaging & Packaging Waste Regulation (PPWR) represents a significant shift for participants across the supply chain, both in the EU and globally.

The regulation includes a ban on single-use plastics in various industries, sets phased targets for making packaging more recyclable and compostable, requires increased use for recycled materials, and introduces new rules for labelling.

The PPWR will impact economic operators including manufacturers, suppliers, importers, distributors, EU representatives acting on manufacturer's behalf and fulfilment service providers.

The rules will impact a wide range of supply chain participants from manufacturers and distributors, through to retailers and wider service providers.

As part of extend producer responsibility obligations, businesses will need to guarantee that packaging material placed on the EU market conforms with the key provisions of PPWR.

What The Regulation Includes

- **Recyclability of packaging:** From 2030, packaging will have to be designed at incrementally increasing grades of recyclability
- **Minimum recycled content:** The PPWR sets minimum targets for the percentage of recycled content across several categories of packaging. The targets will increase over time. The minimum recycled content requirements apply equally to packaging and packaged products that are made in or imported to the EU
- **Minimising substances of concern, including perfluoroalkyl and polyfluoroalkyl substances (PFAS):** From 2026, there will be an almost complete ban on PFAS in food contact packaging
- **Compostable packaging and labelling:** By February 2028, certain categories of packaging and labelling will need to be compostable
- **Packaging minimisation:** From January 2030, the PPWR aims to cut back on unnecessary packaging in two main ways:
 - Packaging sold in the EU will need to be designed to minimise its weight and volume to the greatest extent possible while remaining functional
 - Grouped packaging, transport and e-commerce packaging will need to adhere to a maximum empty space ratio of 50%.
- **Single-use plastics ban:** Several categories of single-use plastic packaging will be banned entirely
- **Re-use and re-fill targets:** The PPWR set staged re-use targets coming into force between 2030 and 2040, applying to areas such as transport, and in grouped and sales packaging such as pallets, plastic trays and crates



- **Harmonised labelling system and green claims:** By mid-2026, the European Commission will develop a harmonised EU label (including for e-commerce goods) that will indicate material composition of packaging and help consumers sort packaging waste, to be in place from August 2028.

Given the complexity of the various requirements under PPWR, its impact on specific sectors in New Zealand will be varied.

However, businesses trading both directly and indirectly in the EU market will need to conduct their own analysis on how this regulation will affect their operation. New Zealand exporters face an additional challenge due to the distance to Europe, which can require more protective packaging, creating potential compliance considerations as the regulation's recyclability, material and packaging minimisation requirements are introduced.

Businesses will need to guarantee that packaging material placed on the EU market will conform with the key PPWR provisions. In the instance of non-compliance, the goods could be rejected at the European boarder.

The requirements and targets of PPWR will come into effect in a staggered way, starting from mid-2026 through to at least 2040.

With the staggered implementation of the PPWR over the coming years, it is essential for affected businesses to assess both how and when they will have to comply with various elements of the PPWR or risk breaching their extended producer responsibilities.

Looking Ahead

To ensure compliance with PPWR, businesses need to collate information such as declarations and product information from suppliers for both local and imported products.

While the legal responsibility of PPWR compliance comes from the EU importer, brand owner or producer, exporters are increasingly required to provide evidence that their packaging complies with EU requirements.



How The Snell Advantage Can Help Your Business Manage Risk

Snell support this by supplying key compliance documentation, including material composition, recyclability information, recycled content data and declarations relating to PFAS and heavy metals. This supports customers in maintaining access to EU markets.

Due to the stringent and internationally recognised standards which enabled our achievement of FSSC 22000, our approach is rooted in strong supplier relationships with those whose values align with our own, which includes a commitment to ESG compliance.

For access to our Auckland record, see footnote 1.

For access to our Christchurch record, see footnote 2.

Our team of procurement specialists continue to work closely with our suppliers from across New Zealand, China, Malaysia, South Korea and many other countries to ensure compliance with the EU's new PPWR legislation which came into effect as of August 2026.

To understand how the EU's PPWR could impact your products, speak with your Snell Account Manager.

REFERENCE

[1] Foundation FSSC. *Public Register: FSSC Certified Organizations*. Retrieved from: <https://www.fssc.com/public-register/NZL-1-0262-971260/> [2] Foundation FSSC. *Public Register: FSSC Certified Organizations*. Retrieved from: <https://www.fssc.com/public-register/NZL-1-0262-741728/> Additional reference: Ministry of Foreign Affairs and Trade, *New EU rules on packaging and waste will transform its supply chain, March 2025*. Retrieved from: <https://www.mfat.govt.nz/en/trade/mfat-market-reports/new-eu-rules-on-packaging-and-waste-will-transform-its-supply-chain-march-2025>

Disclaimer: The material in this document is provided for general information purposes only. Snell endeavours to ensure that the information in this document is reliable and accurate at the time of publishing, August 2026. This document is the property of Snell Packaging & Safety Limited.

