

## Background

The Packaging and Packaging Waste Regulation (PPWR) is an EU regulation intended to establish a harmonised framework for reducing the environmental impact of packaging placed on the EU market.

The primary objectives of the PPWR are to reduce packaging waste, promote recyclability and reusability, harmonise labelling, minimise volume and eliminate harmful substances.

The PPWR entered into force on the **11<sup>th</sup> February 2025** with the first set of requirements due to come into effect on the **12<sup>th</sup> August 2026**. Additional obligations across a wide range of environmental criteria will be introduced progressively through to 2040, supported by secondary legislation to provide further detail on specific technical requirements.

The full regulatory text can be found [here](#), with a supporting [Guidance Document](#) and [Frequently Asked Questions](#) released in March 2026.

As a non-EU company, Clays have **no direct legal obligations or designation** under the PPWR however recognise our responsibility to support our customers and the further downstream supply chain to comply with the legislation as relevant.

## August 2026 Requirements

The first set of PPWR requirements comes into effect from **12<sup>th</sup> August 2026**. All companies legally subject to the PPWR are obligated to provision documentation demonstrating that packaging placed on the EU market complies with the applicable requirements, specifically:



A **Declaration of Conformity (DoC)**, confirming that the packaging materials meets all applicable PPWR requirements.



Supporting **technical documentation** following a conformity assessment procedure, to evidence that the packaging meets all applicable PPWR requirements.

## August 2026 Requirements - Continued

Additionally, the PPWR restricts the concentration of **heavy metals** in packaging. The combined concentration of lead, mercury, cadmium and hexavalent chromium cannot exceed 100ppm. This requirement mirrors the limit set by the EU Packaging and Packaging Waste Directive (PPWD), as well as the UK Packaging Essential Requirements.

Food contact packaging is subject to additional limits of **Per- and poly-fluoroalkyl substances (PFAS)**. Since Clays do not supply food packaging, these limits are not applicable however as part of our wider supply chain due diligence, Clays intends to evaluate the presence of PFAS in our materials and assess opportunities to eliminate or substitute PFAS where feasible.

To support our customers with PPWR compliance, Clays maintains **documentation** covering the key environmental characteristics of our packaging, including:



Material composition



Packaging class



Post-consumer recycled content\*



Recyclability attributes



Heavy metal concentrations

This information is available **on request** to support customers and the further downstream supply chain to comply with the PPWR.

\*Post consumer waste refers to waste generated after a product has been used by an end consumer, as opposed to pre-consumer waste generated during manufacturing. PPWR only accepts post-consumer waste as recycled.

## Future Requirements

The PPWR additionally introduces a series of longer-term phased requirements across a wide range of environmental criteria, with specific targets and derogations for different packaging materials.

For a complete outline of these deadlines and their applicability, we recommend consulting further guidance on the PPWR.

Importantly, the regulation will be completed by further secondary legislation to define the more technical aspects of these requirements, particularly the release of designed for recycling (D4R) requirements and harmonised recyclability labelling.

- |                                  |
|----------------------------------|
| ▪ Recyclability                  |
| ▪ Post-consumer recycled content |
| ▪ Packaging minimisation         |
| ▪ Harmonised labelling           |
| ▪ Excessive packaging            |
| ▪ Environmental claims           |
| ▪ Reusability                    |
| ▪ Bans on packaging formats      |

Furthermore, the PPWR introduces additional requirements, such as the obligation for member states to establish Extended Producer Responsibility (EPR) schemes, which have no immediate relevance to Clays.

Clays will continue to monitor the developments in the PPWR to understand their implications and update our supporting documentation as relevant.

## Further information

Please note that the information in this statement reflects our interpretation of the PPWR. Given the complexity of the regulation, we advise our customers to seek legal advice to understand their compliance requirements.

EC summary page: [Packaging waste - Environment - European Commission](#)

Legislation: [Regulation - EU - 2025/40 - EN - PPWR - EUR-Lex](#)

March 2026 Guidance: [EUR-Lex - C\(2026\)3702 - EN - EUR-Lex](#)

March 2026 Frequently Asked Questions: [FAQ on Packaging and Packaging Waste Regulation \(PPWR\) - Environment](#)