

INFORMATION NOTICE – EU REGULATION 2025/40 (PPWR)

Subject: Entry into force of obligations – European Regulation 2025/40 (PPWR)

Dear Sir or Madam,

In relation to European Regulation 2025/40 on Packaging and Packaging Waste (PPWR), we would like to remind you of the imminent entry into force of certain obligations applicable to the manufacturer, defined (Art. 3.13 PPWR) as “any natural or legal person who manufactures packaging or packaged products, or has them manufactured, and is responsible for compliance with the packaging sustainability requirements.”

This represents an important shift in roles within the private label (PL) / distributor brand framework. For better understanding, please refer to the following practical example:

In the case of packaged products marketed under a distributor’s brand, when the distributor defines or controls the packaging design and markets the product under its own brand, it may acquire the status of packaging manufacturer and producer, thereby assuming the corresponding responsibilities under the PPWR. In such cases, the supplier or external packer does not acquire the status of packaging manufacturer, without prejudice to its obligation to provide the manufacturer with the necessary technical information regarding the packaging.

1. Changes in roles and responsibilities

- The retailer and/or brand owner must declare all packaging under private label, as well as service packaging associated with its brand.
- RGC, as the packer, is obliged to share the technical information of the packaging with its customers.
- The retailer and/or brand owner must consider this technical information for the relevant declaration, provided that the packaging format is not modified.

Furthermore, please be informed that RGC remains at your full disposal to provide the relevant technical packaging information upon express request to your account’s commercial contact.

2. Changes in Extended Producer Responsibility (EPR) marking

Under Article 12.9 of the PPWR, physical EPR labels are prohibited. Information regarding EPR may only be provided in digital format and on a voluntary basis from February 2027 onwards. Therefore, any symbol associated with EPR must be removed from packaging if currently printed.

- **Date of application:**
Article 12.9 stipulates that identification of compliance with EPR “shall only be achieved through a corresponding symbol included in a QR code or another standardized and open digital marking technology.” This prevents the use of EPR symbols (such as the Green Dot) as standalone printed elements from 12 February 2027. Identification remains voluntary, and if used, must be provided exclusively via digital means (e.g. QR codes) from that date onwards.
- **Stock:**
This article governs the placing on the market; therefore, it does not require withdrawal or retroactive adaptation of products already placed on the market before 12 February 2027.

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- **Other marking transitions:**

The coexistence of different milestones implies a progressive transition rather than the simultaneous implementation of all requirements:

- **2027:** EPR identification via digital solutions, with removal of traditional printed symbols.
- **2028:** new harmonised European labelling system, mandatory for all packaging, regardless of EPR.

In light of these changes, please be informed that RGC is already removing the EPR-related symbol from its packaging where applicable.

Should you have any questions or require further clarification, please do not hesitate to contact us.

Yours faithfully,

Romar Global Care
Environment Department