



EU-PPWR Guidance Factsheet

Preparing Almond Export Packaging Documentation for the European Union Packaging and Packaging Waste Regulation (PPWR)

This factsheet summarizes key PPWR requirements and practical documentation steps for almond exporters, handlers, and packers serving the EU market. It is not the “definitive” guidance since there are different timelines and provisions that come into consideration. Suppliers and importers need to work closely to ensure they are complying with requirements.

Overview

The EU Packaging and Packaging Waste Regulation (PPWR) (Regulation (EU) 2025/40)¹ replaces the prior Packaging Waste Directive. It entered into force on 11 February 2025 and general application from 12 August 2026 for businesses placing packaging on the EU market, including primary, secondary, and transport packaging.

PPWR focuses on recyclable, minimized, clearly labelled packaging; recycled-content targets for plastics; reuse requirements for certain products; and limits on harmful substances. Two substance limits apply from day one, regardless of packaging format: a combined 100 ppm (mg/kg) cap on four heavy metals (lead, cadmium, mercury, hexavalent chromium), and, for food-contact packaging only, PFAS limits of 25 ppb per substance and 250 ppb combined (Article 5, PPWR).

The EU has advised that the enforcement of the obligations applicable as from August 12, 2026, should not disrupt trade flows, supply chains or consumer access to goods. The Commission has asked market surveillance authorities to – rather than following a sanction-oriented approach – support the responsible economic operators in complying with the new rules, for instance with awareness-raising, requests for information or requests for corrective action with a reasonable timeline for adaptation.²



[1] Source: European Union, Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR). EUR-Lex.

Extended Producer Responsibility (EPR)

Extended Producer Responsibility (EPR) generally makes the company placing packaged goods on the EU market responsible for collection, recycling, take-back, fees, reporting, and related waste-management obligations.

For U.S. almond exporters: EU buyers or importers will usually manage EPR registration and fees, but exporters should confirm roles and be ready to provide packaging weights, material categories, supplier documentation, and shipment-format details.

Key PPWR Dates	Key Requirements
Aug . 12, 2026	General application date, when substantive PPWR duties become binding (see substance limits below). Importers may begin requesting packaging documentation, including supplier declarations and supporting evidence. NOTE: there are numerous questions regarding transport packing see section below.
Aug . 12, 2026	Limits for PFAS in food contact materials – 25 ppb per single substance, 250 ppb combined; a 50 mg/kg total-fluorine result triggers a duty to show the PFAS/non-PFAS split (Art. 5(5)).
Aug . 12, 2026	Heavy-metal limit: combined 100 ppm (mg/kg) cap on lead, cadmium, mercury and hexavalent chromium–applies to all packaging, not only food-contact (Art. 5(4); carried over from the prior Packaging Waste Directive).
August 2028	Harmonized labeling for sorting purposes
2030	Main deadline for recyclability, minimum recycled content in plastic packaging, packaging minimization, and empty-space limits.
2035	Packaging should demonstrate recycling at scale.
2038	Only recyclability grades A and B remain marketable; grades C- E may no longer be placed on the market.

[2] Source: European Commission. Packaging and Packaging Waste Regulation (PPWR): Frequently Asked Questions, 2026.

Almond Industry To-Do

1. Clarify documentation roles with your packaging supplier(s). Two different obligations apply to two different parties, and they should not be confused:

- The packaging supplier's job (Article 16 PPWR): The supplier must give the manufacturer all the technical information and documentation needed to demonstrate that the packaging complies with the PPWR – material composition, food-contact status, heavy-metal and PFAS test results, recyclability and recycled-content data, and so on. This is raw supporting evidence, not a formal compliance declaration. Suppliers cannot refuse to provide it once asked (Article 16(1)).
- The manufacturer's job (Article 39 PPWR): Only the manufacturer – meaning whichever company places the packaging on the EU market under its own name or trademark – may draw up the EU Declaration of Conformity. This is the single, formal, legally binding document that states the packaging complies with the PPWR. The manufacturer builds it using the supplier's Article 16 data, but the supplier cannot issue it, and providing good documentation does not shift legal responsibility onto the supplier: the manufacturer remains the party legally accountable for compliance, even if someone else (a lab, a certification body, an authorised representative) helped assemble the paperwork.

For almond exporters, the practical question is which one you are: ³

- If your packaging carries your own name or brand, you are likely the manufacturer under the PPWR, and **the Declaration of Conformity obligation falls on you** – your packaging suppliers' declarations are only the input.

- If your **EU importer is treated as the manufacturer instead, that obligation sits with them**, but you should still collect and pass along the same supplier data, since they will need it to issue the Declaration on their end.

2. Map packaging components. Include liners, bags/ FIBCs, cartons, pallets, stretch wrap, straps, slip sheets, labels, inks, and adhesives.

3. Build a packaging file. Keep specifications, bills of materials, dimensions, weights, supplier names, food-contact records, recyclability evidence, and recycled-content information by export format.

4. Request supplier declarations now. Prioritize plastics and other components likely to trigger buyer documentation requests.

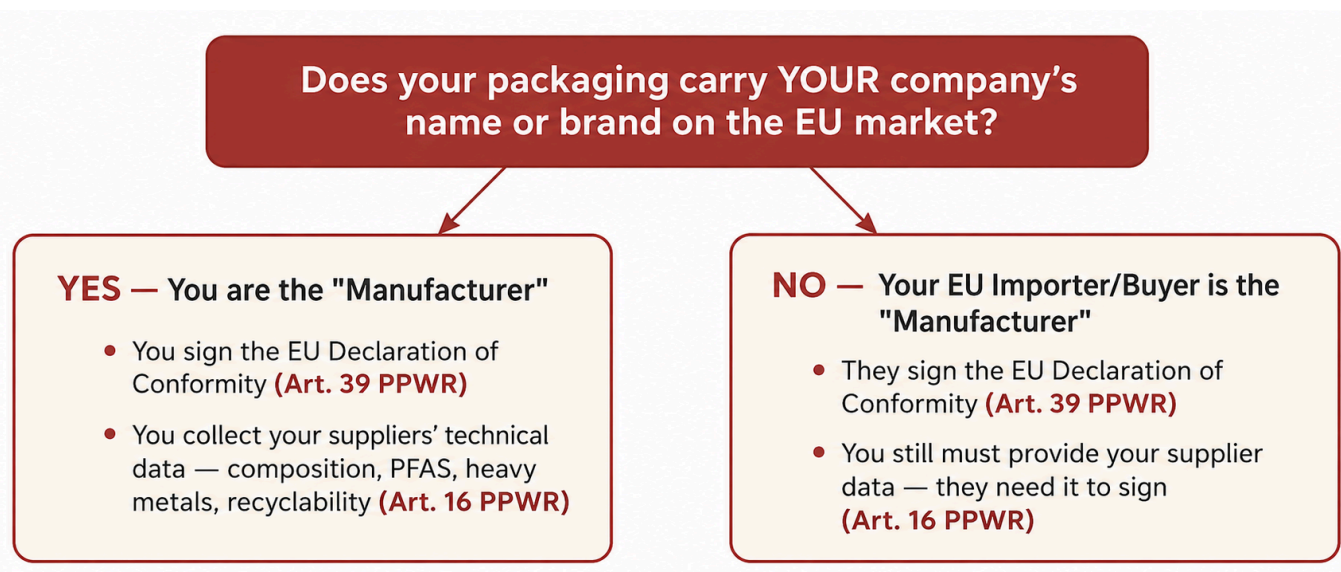
5. Measure packaging and empty space. Track weights, dimensions, and pallet utilization while maintaining product protection.

6. Confirm importer roles. Clarify who handles EPR, reporting, fees, and any reuse obligations.

7. Create a buyer-ready packet. Prepare a concise set of documents explaining the packaging system and supporting evidence.

For questions or additional information, please reach out to regulatoryissues@almondboard.com

Annex (decision tree regarding conformity upon marketing)



[3] European Commission, Guidance Document for Regulation (EU) 2025/40 on Packaging and Packaging Waste, Section 2, "Definition of a Manufacturer of Packaging."

What EU Buyers May Ask For

EU buyers may ask for material composition, food-contact status, supplier declarations, recyclability and recycled-content evidence for plastics, and support for any reuse claim.

Transport packaging—such as pallets, wraps, straps, pallet collars, and slip sheets—requires component-level documentation rather than a single shipment-wide statement.

Transport Packaging

For almond exports, transport packaging should be documented separately because PPWR recyclability and documentation expectations also apply to these components. In addition, there are differences in percentage requirements. Work with your packaging supplier to obtain the relevant information.

- Identify each transport-packaging component used for EU shipments.
- Confirm material type, dimensions, weight, and supplier specifications.
- Request supplier declarations or equivalent documentation where available.
- Support any reuse claim with documented evidence.
- Keep pallet, wrap, strap, and slip-sheet records separate from primary and secondary packaging files.

Common Packaging Types Reviewed Under PPWR

Packaging Components	Role/Material	Deadline Focus	Documentation Check
Corrugated cartons 	Primary/secondary; paperboard or corrugated fiberboard.	Board grade, coatings, inks, adhesives, labels, dimensions, weights, recyclability evidence.	2026: documentation 2030: recyclability/minimization 2035: recycling at scale
Liners or inner bags 	Primary/food-contact; PET, PE, PP, mono-material, multilayer, or other flexible plastic.	Resin, structure, additives, food-contact status, supplier declaration, recyclability path, recycled-content classification. As the food-contact layer, also confirm PFAS test results ($\leq 25/\leq 250$ ppb) and heavy-metal compliance (≤ 100 ppm combined).	2026: supplier file and PFAS documentation 2030: Minimum recycled content PET / 10% non-PET contact-sensitive plastic 2040: 50% / 25%
FIBC or super sack 	Primary/secondary/bulk transport; typically woven PP, with liner, coating, stitching, labels, loops.	Polymer type, liner/coating, food-contact relevance, recyclability route, reuse support if claimed.	2026: documentation, including for PFAS and heavy metals 2030/2040: recycled-content targets if plastic applies
Wooden pallets 	Transport; wood, treatment markings, repair components, pooled pallet records.	Specification, treatment, repair/reuse records, pooling documentation, end-of-life route.	2026: buyer requests 2030: recyclability/minimization 2040: recycling at scale
Stretch wrap and plastic straps 	Stretch wrap and plastic straps Transport; plastic film, strapping, or flexible stabilization materials.	Resin, additives, color, supplier declaration, recyclability path, collection route, recycled-content status.	2026: component file 2030: 35% minimum recycled content 2040: 65%
Slip sheets, corner boards, pallet collars 	Transport; paper, fiberboard, wood, plastic, composite, or mixed material.	Material type, dimensions, weight, supplier declaration, recyclability route, reuse evidence if claimed.	2026: documentation 2030: recyclability/minimization; plastic may trigger 35% 2035/2040: scale/recycled content