

by **enhesa.**

# Regulatory Developments in Packaging | Europe.

March 2025



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# Navigating the European regulatory landscape on packaging

The entering into force of the EU's packaging and packaging waste regulation (PPWR) on 11 February started the clock on an investigation into substances of concern present in packaging that could result in restrictions on their use.

Article 5(2) of the PPWR states that, by 31 December 2026, the European Commission – assisted by ECHA – shall prepare a report on the presence of substances of concern in packaging and packaging components, to “determine the extent to which they negatively affect the re-use and recycling of materials or impact chemical safety”.

The sector could see further restrictions on substances of concern in packaging, adding to new restrictions on PFAS in food packaging under the PPWR, which will come into force in 2026, and existing limits on heavy metals.

Outside of the PPWR, the Commission agreed an amendment to the EU plastics FCM regulation, which came into force on 16 March. The new rules aim to enhance transparency on non-intentionally added substances (NIAS), but several sector groups have flagged concern that its new definition of ‘high purity’ presents a significant analytical challenge for manufacturers.

Last December, the EU executive also confirmed a ban on the use of bisphenol A and other bisphenols in plastics, varnishes and coatings, printing inks, adhesives, ion-exchange resins and rubbers in FCMs, which will enter into force in 2026.

Our highly respected Chemical Watch News & Insight offering provides in-depth, easy-to-understand coverage; the Chemical Watch Events & Training team hosts a world-class program of events including regular events on packaging and related topics; and our analyst team supports clients with expert services and regulatory data tools.


In this report, you will find a sample of Chemical Watch News & Insight reporting and information drawn from our range of solutions, as well as access to a webinar on packaging regulations in Europe and around the globe. This content demonstrates the depth and breadth of our coverage, as well as the impartial, easy-to-understand quality of our analysis and reporting.

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### Empower your business, create safer products.

At Enhesa Product Intelligence we empower our members to transform product safety management and unlock the full value of regulatory compliance within their business.

Discover how membership can help you achieve your compliance goals by joining us for one of our upcoming demos.

A smiling woman with dark hair pulled back, wearing a grey hoodie and a bright yellow safety vest, is holding a black handheld scanner. She is standing in a warehouse or factory setting with other workers in the background. A large cardboard box with a barcode is visible in the foreground on the right.

# News and insight: coverage highlights.

Read a curated sample of Chemical Watch News & Insight content, featuring regulatory updates and developments concerning packaging in Europe and around the globe.

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## ECHA to identify substances of concern in packaging

Future restriction proposals possible, as PPWR takes effect

12 February 2025

ECHA has commenced a study to identify substances of concern in packaging as part of its new tasks under the packaging and packaging waste [regulation](#) (PPWR), which entered into force on 11 February.

In early January, the European Commission called on the agency to conduct the study and include a list of substances of concern that could be prioritised for restrictions following the REACH process.

The [PPWR](#) aims to address the impact of packaging on human health and the environment, and improve the circularity of the sector while detecting and potentially regulating substances of concern.

The study, recently seen by Chemical Watch News & Insight, will also help the Commission:

- establish labelling on packaging to inform where substances of concern are present;
- assess packaging recyclability where those chemicals may negatively affect the reuse and recycling of packaging and packaging components; and
- look at the need to modify provisions related to [PFAS](#) content four years from the regulation's application date.

### Study scope

In addition to chemical properties, the Commission wants information on the regulatory status of the identified chemicals of concern under different legislation.

The EU executive has asked ECHA to include in the study a list of chemicals (by packaging material or type) that can foreseeably be used in the manufacturing of the packaging and packaging components.

And, if possible it said, the Commission would like to see a list of substances used in subsequent lifecycle stages, including during reuse or recycling of packaging waste.

ECHA's analysis should include whether the presence of the substance makes the reuse or recycling "more difficult or whether its presence makes reuse or recycling practically impossible from a technical and/or economic point of view".

The Commission is seeking agency input on the potential risks for workers and the environment caused by the substances, and whether there is a need to amend or repeal certain provisions to avoid overlapping with restrictions under REACH, the POPs regulation and food contact materials [legislation](#).

ECHA has until 21 September 2026 to submit the study to the EU executive, which has requested an intermediate draft by 20 March that year to keep the Commission services informed on progress and to discuss preliminary findings.

# How can companies best prepare for the requirements of the packaging and packaging waste regulation?

With the publication of the PPWR on 22 January and requirements beginning to apply from August 2026, Marie Escorneboueu and Aodhan McGourty from law firm Squire Patton Boggs guide companies through some of its most significant provisions, next steps and recommendations

04 February 2025

The packaging and packaging waste regulation (PPWR) introduces a vast number of new requirements, but several uncertainties remain when it comes to implementation. One reason for this is that the PPWR cannot provide the technical details needed to address the huge array of packaging that exists on the market. Accordingly, it leaves it to the European Commission to define the details of many requirements by way of delegated and implementing acts.

An important example of this is the PPWR's requirement in Article 6(1) that all packaging placed on the market be recyclable. The specific details will only become clear at a later stage, when the Commission has had the opportunity to adopt delegated acts containing design for recycling criteria and recyclability performance grades.

The PPWR requires the Commission to adopt those acts by 1 January 2028 for different categories of packaging, distinguished per predominant material. All packaging placed on the market will need to comply with these criteria by 1 January 2030 or 24 months after those acts enter into force (whichever is later). Packaging below a grade C (in other words, rated below 70%) packaging performance will not be allowed on the market from this date.

## Imported post-consumer plastic material

A further example of an area where the content of a Commission act will prove critical is imported post-consumer plastic material (PCR). Article 7(3) of the PPWR includes a "mirror clause" providing that imported PCR can be used to attain the PPWR's recycled content targets, but only where it meets emission limits and environmental requirements that are equivalent to those applicable in the EU.

However, the Commission will still need to adopt an implementing act establishing the methodology to assess such equivalence, which may well make or break the mirror clause's practical utility.

The implications of this are significant, as it could mean almost absolute protection for PCR originating in the EU (potentially culminating in a trade issue), or continued access to cheaper and more plentiful imported PCR.

## Substances of concern

Significant additional developments in the area of substances of concern can also be expected.

By 31 December 2026, the Commission – assisted by ECHA – must prepare a report on the presence of substances of concern in packaging and packaging components. It must also consider what follow-up measures are needed. This may include REACH restrictions, in the case of substances identified as primarily affecting human health or the environment, or requirements set under the PPWR's design for recyclability criteria, in the case of substances that negatively affect the reuse and recycling of materials.

Article 5 of the PPWR also includes a specific provision regarding the presence of per-and polyfluoroalkyl substances (PFAS) in food contact packaging. It will be important to monitor ongoing work at the REACH level to determine if it may impact the future of this provision.

## Packaging format exemptions

Another reason for the lack of certainty is that there are some limited instances where the PPWR provides for flexibility.

An interesting and topical example is Article 29(18), which empowers the Commission to exempt packaging formats from the regulation's reuse targets in Article 29, in light of the latest scientific and economic data and developments. Article 29(2) and (3) currently require companies to ensure that certain kinds of packaging they use to transport goods either within the same company or between companies within the same member state are 100% reusable by 2030.

However, the Commission has already launched an assessment with a view to exempting [pallet wrappings and straps](#) from this 100% requirement by way of a delegated act, provided the relevant conditions are met.

The PPWR also creates the potential for leeway on the minimum recycled content targets for plastic packaging contained in Article 7(1) and (2). The Commission can amend the minimum percentages, under certain conditions, if it emerges that compliance is excessively difficult due to the lack of availability or excessive prices of specific recycled plastics.

### National level developments

In terms of implementation, it is also important to note that while the PPWR provides for greater harmonisation among EU member states, companies still need to be mindful of developments at the national level.

There are several instances where the regulation gives member states the flexibility to depart from or go further than the requirements of the PPWR. For example, Article 29(15) of the PPWR permits member states to set more ambitious reuse targets than those provided for in Article 29.

Also, while the PPWR will harmonise the criteria for setting extended producer responsibility (EPR) fees based on packaging recyclability, member states remain free to take into account additional factors, such as recycled content.

While many of the requirements of concern to the industry will only take effect at a later date, this does not mean companies can sit back this year. Several requirements apply from 12 August 2026, which companies will need to prepare for now. This includes a requirement for manufacturers to get technical documentation and declarations of conformity in place for their packaging (at least in so far as the applicable Article 5 requirements on substances in packaging are concerned), as well as ensuring that packaging

bears the identification information referred to in Articles 15(5) and (6) and 18(3).

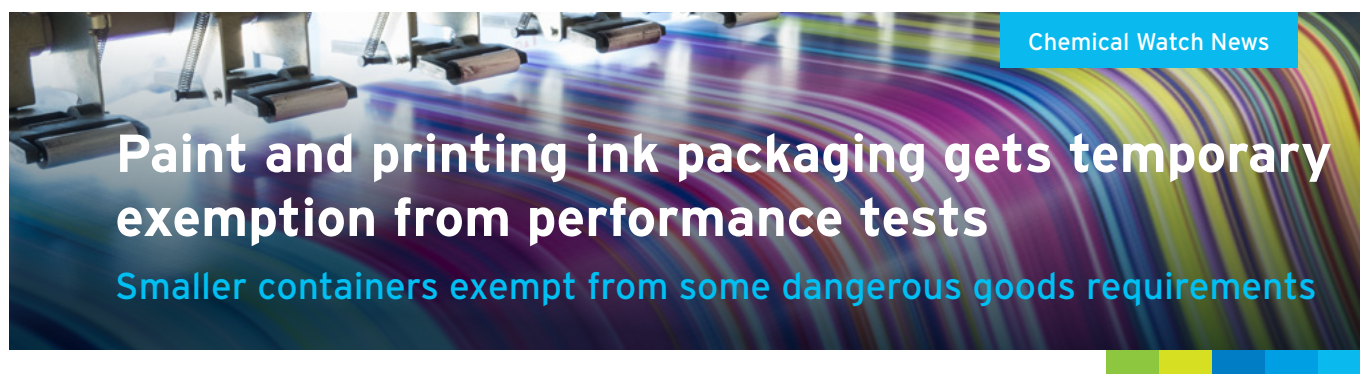
### Avoiding common pitfalls

We see a lot of companies feeling completely overwhelmed by the sheer number of requirements the PPWR contains and struggling to get to grip with many of its technical concepts. The fact that many of the specifics are lacking from the PPWR only adds to that difficulty. Even seemingly smaller issues that do not receive a lot of attention can pose challenges for companies in terms of implementation. For example, putting a system in place that matches declarations of conformity with packaging placed on the market is easier said than done.

Companies and sectors that have recognised early on how specific provisions of the PPWR affect their interests are already organising their advocacy strategies. Some have already started a data-gathering exercise that will allow them to contribute to the Commission's work from a very early stage to ensure their position is considered. Preparedness in this context is crucial because the Commission has already begun to work on the secondary legislation, such as on derogations from reuse targets for transport packaging.

Despite all the unknowns, we would also underline the importance for companies to use the time available to them now to prepare as much as possible. A good place for companies to start is to perform a supply chain analysis to understand whether they or their suppliers, customers or affiliates bear responsibility for a particular requirement under the PPWR and, if so, identify what they will need to do during the transition period and beyond.

It is also a good idea for companies to plan with some degree of adaptability. Since many of the specifics will be contained in secondary acts, companies would be wise to keep in mind that old expression that "the devil is in detail".



24 January 2025

The UN Sub-Committee of Experts on the Transport of Dangerous Goods (SCETDG) has agreed to a temporary exemption for performance test requirements for paint and printing ink packaging until suitable UN-approved packaging becomes available.

The World Coatings Council (WCC) proposed the exemption, which was agreed at the SCETDG's December meeting.

A new special provision will be added to the UN Model Regulations from 2027, exempting plastic paint packaging with removable lids

from performance tests until 31 December 2034. This exemption only applies to packages containing quantities of between five and 20 litres and these packages will still have to pass a stacking test and adhere to general provisions.

It applies to paints and printing inks classified as environmentally hazardous substance, liquid, not otherwise specified (UN 3082). The paints must contain less than 1% of biocidal substances with a multiplying (M) factor of 10, 100 or 1,000. The M-factor is used for classifying mixtures containing substances with high aquatic toxicity.

The WCC paper had initially proposed an exemption for packaging containing quantities of between five and 30 litres but, following discussions during the meeting, the WCC submitted an additional informal paper with a revised proposal to narrow the scope of the special provision to a maximum of 20 litres.

Packaging containing five litres or less is already exempt from most of the requirements of the Model Regulations.

### UN-approved packaging less sustainable

The paint industry has moved from solvent- to water-based products, but these require [biocidal](#) preservatives that were [classified](#) as environmentally hazardous substances under the CLP in 2020. As a result, certain paints and printing inks now fall under the dangerous goods regulations and must use UN-approved packaging.

However, paint packaging often needs to be opened and resealed and there has been an [ongoing](#) issue with a lack of suitable available packaging.

In 2023, the Working Party on the Transport of Dangerous Goods (WP.15) committee added a transitional period to the international rules for transport of dangerous goods by road (ADR) to allow the use of non-UN packaging for paint in quantities of between five and 30 litres. This was [extended](#) to June 2027.

The WCC said in its paper that, to comply with the rule change, the paint industry would either have to change preservatives, change to metal packaging with an inner liner (for products that can be packed in metal), or use five litre containers that are exempt from the rules.

However, changing preservatives is becoming difficult as more become classed as environmentally hazardous. Furthermore, using five litre containers instead of larger ones will create more packaging waste.

The WCC also said that UN-approved packaging has a higher carbon footprint as it is heavier and would not help to meet the UN Sustainable Development Goals.



18 December 2024

Restrictions on the use of PFAS in food packaging will come into force in 2026, following the EU Council of Ministers' approval of the packaging and packaging waste regulation (PPWR) on 16 December.

The rules will restrict the placing on the market of food contact packaging containing per- and polyfluoroalkyl substances if they exceed the following thresholds:

- 25ppb for a single PFAS;
- 250ppb for a group of PFAS measured as a targeted sum; and
- 50ppm for all PFAS, including polymeric PFAS.

These thresholds, proposed by the Council's Belgian presidency in February as part of a [compromise](#) agreement to move the legislation forward, are the same as those [proposed](#) under the broader EU-wide REACH restriction.

To avoid overlap with restrictions under other EU legislation, such as the PFAS REACH restriction, the final text requires the European

Commission to carry out an evaluation to assess the need to amend or repeal these provisions within five and a half years.

The regulation also requires manufacturers to limit heavy metals and other substances of concern in the design of packaging, as required under the chemicals [strategy](#) for sustainability (CSS).

"Substances of concern as constituents of packaging material or of packaging components should be minimised with the objective to ensure that packaging, as well as materials recycled from packaging, do not have any adverse effect on human health or the environment throughout their lifecycle," the regulation says.

"Importantly, the PPWR provides the food packaging industry/supply chain with the necessary regulatory certainty to work towards an effective phase out of PFAS (including polymeric PFAS)," Dorota Napierska, toxic-free circular economy policy officer at NGO Zero Waste Europe, told Chemical Watch News & Insight.

“We are now of course keen to see how the new rules will be implemented and enforced, especially that issues related to a lack of analytical methods (and PFAS present in packaging as a result of contamination rather than intentional use) have been brought up by the industry,” she added.

The regulation will be published in the EU Official Journal in the first quarter of 2025 (date to be confirmed) and enter into force 20 days later, with restrictions applying after a transition period of 18 months. When in force, the PPWR will repeal the existing packaging and packaging waste directive (PPWD).

### Ambitious targets

The [PPWR](#) covers the full lifecycle of packaging and aims to significantly reduce the generation of packaging waste by setting binding re-use targets, restricting certain types of single-use packaging and requiring economic operators to minimise the packaging used.

Among its targets are to:

- require a minimum percentage of recycled content in some plastic packaging, such as beverage bottles;
- require all packaging put on the market to be recyclable by 1 January 2030;
- reduce packaging waste 5% by 2030, 10% by 2035 and 15% by 2040.

There are more than 40 pieces of secondary legislation to facilitate the PPWR implementation, said EU packaging trade body European. There are also follow up actions still expected, such as regulatory assessments and guidance, meaning regulators will need to manage an intense workload, it said.

Chemical Watch News

## European Commission proposes stricter requirements for plastics in FCMs

Changes could have big impact on industry, law firm warns

15 March 2024

The European Commission has published a draft regulation proposing additional requirements for the use of plastics in food contact materials (FCMs).

Released on 13 March, the 18th amendment to the plastics FCMs regulation aims to align rules with the regulation on recycled plastics and the [biocidal](#) products regulation (BPR).

Other changes include the introduction of purity criteria for all substances used in the production of plastic materials and articles, including those obtained from waste or from natural origin.

These proposed stringent quality requirements may create “significant obstacles” for the continued use of plastics in FCMs in the EU, law firm Keller and Heckman said in a recent blog post.

The draft amendment would also impact the migration testing of multi-layer materials and necessitate repeat testing. The Commission’s proposal is open for comments until 10 April.

### Recent developments

The Commission has recently been ramping up action on substances in FCMs. In February, it [published](#) a draft regulation proposing a ban on the use of BPA and other bisphenols in the products. A public consultation on that draft text has just [closed](#).

Meanwhile, the Commission is revising the 20-year-old FCM regulation, with a [proposal](#) postponed until at least 2025.

And earlier this month, the European Parliament and EU Council of Ministers agreed to restrict PFAS in food packaging under the European Commission’s proposed packaging and packaging waste regulation (PPWR).

## EU agreement paves way for proposed PFAS food packaging ban

Provision would be revisited in four years to avoid regulatory overlap on the substances

06 March 2024

The European Parliament and EU Council of Ministers have reached an agreement to prohibit PFAS in food packaging under the European Commission's proposed packaging and packaging waste regulation (PPWR).

The provisional deal, struck on 4 March, will pave the way for the Commission to adopt the measure on the persistent substances at a time of [uncertainty](#) for the EU-wide PFAS restriction [proposal](#) under the REACH regulation.

Last month, the Council of Ministers' Belgian presidency [suggested](#) imposing the same PFAS limits in food packaging as those planned under the broader REACH restriction.

The presidency's proposal envisioned limiting the substance group in food packaging to:

- 25ppb for a single PFAS;
- 250ppb for a group of PFAS measured as a targeted sum; and
- 50ppm for all PFAS, including polymeric PFAS.

The limits would start 18 months after the PPWR enters into force.

It is not yet clear what the agreed-upon thresholds are or when the limits would apply, as Parliament and the Council have not yet published a consolidated PPWR text with the relevant amendments. The consolidated text will be ready by mid-March before a vote by the Parliament's environment committee (ENVI) expected on 19 March.

In its 4 March press release, the Council said that to avoid any overlap with other pieces of legislation, "the co-legislators tasked the Commission with assessing the need to amend that restriction within four years of the date of application of the regulation".

It follows the [approval](#) on 29 February by EU member states of a European Commission text proposing a REACH restriction on PFHxA in food packaging, clothing and other uses.

While the EU's revision of the food contact legislation may be [delayed](#), regulatory action on the products continues. Last month, the Commission [published](#) its draft regulation proposing a restriction on the use of bisphenol A (BPA) and other bisphenols in FCMs.

### Reception

[NGO](#) coalition Rethink Plastic welcomed the proposed prohibition and said a mandatory future report on the presence of substances of concern in packaging "will bring more clarity about the extent to which they negatively affect circularity, as well as chemical safety and impact on human and environmental health".

Parliamentary rapporteur Frédérique Ries from the Renew group said the ban on forever chemicals in food packaging "is a great victory for the health of European consumers".

## What can we expect from digital product passports?

Digital product passports have the potential to deliver safer products and help companies demonstrate sustainable chemicals management. Managing analyst, EMEA, Kimberley de Miguel reports

19 December 2023

Over the past few years there has been a significant surge in regulatory measures worldwide focusing on product traceability, chain of custody and data sharing requirements. This proliferation is notable in the EU, where an array of regulations are being introduced or proposed, which include reference to a digital product passport (DPP). This increase stems from the EU's digital transition plans that are designed to harmonise, and standardise, data access in alignment with the Green Deal.

The DPP is a linchpin of this transition, and aims to transform how products are traced, their lifecycles are assessed, and their environmental impacts are evaluated. The EU's approach involves a number of sectors that are under mounting pressure to adopt more sustainable business practices. These include textiles, construction, electronic waste, plastics, chemicals and automotive industries. Defining the precise data requirements for different product categories remains a work in progress. Achieving a DPP necessitates the cooperation of the entire supply chain to establish vital information that can mitigate product wastage.

### Who will digital passports benefit?

The introduction of digital passports will bring transparency to intricate supply chains for brands and manufacturers. Implementing them has the potential to prompt a re-evaluation of business practices and partnerships, offering environmental insights, expediting sustainability goals and allowing premium pricing for responsibly produced goods. In addition, they have the potential to bring the following benefits to value chain stakeholders:

- material suppliers will be acknowledged for transparent processes that prioritise environmental safety and worker welfare;
- repair professionals will have access to comprehensive repair

histories of products, aiding in the identification and resolution of new issues;

- recyclers will possess detailed information about component and material compositions, allowing for optimised take-back programmes and improved material recovery;
- governments and public authorities will gain a new set of standards and an easily accessible method to confirm compliance; and
- consumers and end users will be able to make well-informed purchasing decisions and foster sustainable behaviours, such as embracing repair and recycling.

### What are the ecodesign requirements?

The EU [Ecodesign for Sustainable Products Regulation](#) (ESPR) proposal which builds on the existing Ecodesign Directive 2009/125/EC encompasses performance and information requirements, both of which are integral to the DPP.

Performance requirements refer to the functional aspects, and overall efficiency, of a product during its lifecycle. They are typically related to energy use, resource efficiency, environmental impact and circularity. Performance requirements aim to regulate how well a product operates, consumes energy and uses resources, as well as its impact on the environment. Compliance with these requirements ensures that a product meets specific standards regarding its performance and sustainability throughout its lifecycle.

Information requirements are focused on the data, details and transparency surrounding a product's composition, environmental impact, and other crucial information. Information requirements are essential for the DPP, ensuring that comprehensive details about a product's contents, environmental performance, energy usage, recyclability and other relevant

factors are available and accessible. This information is critical for consumers, recyclers, policymakers and other stakeholders to make informed decisions and facilitate better product lifecycle management.

The DPP is specifically concerned with the information requirements within the broader framework of the ESPR. It functions as a means to provide detailed information about a product's compliance with the Ecodesign information requirements. This includes disclosing data about the product's energy use, water consumption, environmental footprint, recycled content, traceability in the supply chain and other essential aspects. The DPP ensures that this information is easily accessible and available to stakeholders, contributing to greater transparency and informed decision-making throughout the product's lifecycle.

### Which product categories will need a DPP?

Batteries will be the first product segment required to comply with the DPP by 2026. Apparel and consumer electronics will follow soon after.

### Which new regulations require a DPP?

The European Commission highlights electrical and electronic equipment (EEE) as a fast-growing source of waste, posing environmental and health risks. Circular solutions are pivotal for resource recovery, reducing waste and decreasing dependence on expensive imports of rare-earth elements.

While the ESPR excludes the food sector, the proposed legislative framework for sustainable food systems aims to transition to sustainable food systems, strengthen policy coherence and reduce food waste. Similarly, the Packaging and Packaging Waste Directive focuses on achieving reusable or recyclable packaging across the EU market by 2030. Member countries must establish producer responsibility schemes by 2024 and aim for high collection rates, particularly for PET bottles. The European Commission aims to enhance the directive by focusing on design improvements, high-quality recycling and stronger enforcement. Leveraging digital tools like a digital packaging platform can aid waste management and sustainability goals among professionals.

Regulation	Compliance date	Key aspects
Ecodesign for sustainable products regulation (ESPR)	Draft proposal published in March 2022, with initial adoption expected in 2024	Aims to make consumer products more durable, reusable, repairable, recyclable and energy efficient. The updated initiative will likely identify additional product categories requiring DPPs, aligning with the Circular Economy Action Plan
<a href="#">EU battery regulation</a>	Ongoing prototype development with an implementation target set for 2024	Introduces a battery passport, setting forth stringent data requirements for batteries. This includes specifications on material sourcing, carbon footprint, percentages of recycled materials used, battery durability and guidelines for repurposing and recycling
<a href="#">EU toys safety legislation</a>	Revision of legislation ongoing	Focuses on enhancing the safety standards for toys available on the market. It ensures stringent safety measures, material specifications and compliance standards for toys, especially those intended for children. The specifics regarding the incorporation of <a href="#">digital product passport requirements</a> for toys are under review
EU sustainable and circular textiles regulation	Ongoing prototype development with an implementation goal set for 2024	Focuses on enhancing textile durability, repairability and recyclability. The regulation mandates a digital product passport for textiles based on mandatory circularity and other key environmental aspects
Revised regulation on detergents	Currently under consideration and subject to the approval of the European Parliament and Council	Simplifies market rules, introduces voluntary digital labelling for prepackaged and refill products and sets safety requirements for detergents with micro-organisms. It promotes sustainability by regulating refilled detergents similarly to prepackaged ones and mandates a product passport for enforcement
EU construction products regulation	The regulation was signed in 2022, and the implementation date is yet to be determined	Intends to enforce greener and safer construction products, highlighting the need for improved digital product information accessible to citizens and businesses. The regulation's requirements correlate with those of the digital product passport, suggesting a potential overlap in implementation strategies
Corporate sustainability reporting directive	Adoption by Parliament and Council of Ministers in 2022, implementation in 2024	Requires detailed company-wide reporting in accordance with EU sustainability reporting standards. It may involve digitally 'tagging' reported information to be machine-readable and incorporated into the envisioned European single access point under the capital markets union action plan

These regulations collectively underscore the EU's concerted effort to standardise, and digitise, data related to product lifecycles, traceability and environmental impact, across various sectors and fostering a more sustainable and transparent market ecosystem.

With regards to other products, an announcement is expected in 2024, subject to the finalisation of the ESPR. It is difficult to predict when and which products will be affected by new and revised regulations, yet we can conclude that the following areas are of utmost importance:

- product-specific requirements — the EU battery regulation focuses exclusively on batteries, introducing a battery passport with specific data requirements targeting materials, recycling and carbon footprint, unique to battery products;
- reporting and compliance — the corporate sustainability reporting directive introduces detailed company-wide reporting, intending to align with EU sustainability standards and potentially digitise reported information for regulatory compliance;
- product information accessibility — the construction products regulation intersects with the DPP's objectives by seeking enhanced digital product information accessible to various stakeholders involved in the construction industry; and
- environmental focus — the sustainable and circular textiles regulation and the ESPR prioritise environmental sustainability by emphasising product durability, repairability, recyclability and energy efficiency.

### Missing: specific information requirements

Companies currently lack definitive access to the specific information requirements for DPPs. There are challenges particularly for smaller entities dealing with complex value chains. Overcoming the hurdles will require concerted efforts, leveraging technological solutions and fostering collaboration throughout the supply chain. The balancing act between disclosing information and protecting confidential business data remains a critical challenge.

As regulations advocating DPPs evolve, companies will find themselves in a transformative phase regarding compliance. Some larger corporations might have initiated the process by actively engaging in stakeholder consultations or aligning with industry groups involved in the policymaking process. However, numerous small and medium-sized enterprises (SMEs) might lack clarity or comprehensive guidance on the specific data elements needed to comply with these evolving regulations.

### What challenges are facing companies?

- Data availability and standardisation: the foremost challenge for companies is the lack of standardised information templates or clear guidelines regarding the data required for DPPs. Accessing, compiling and standardising data across complex supply chains poses significant hurdles, especially for SMEs with limited resources and disparate data management systems.
- Interoperability and technical adaptability: ensuring interoperability between existing enterprise resource planning (ERP) systems and new digital passport requirements remains a significant obstacle. Integrating diverse data formats, legacy systems and technologies into a unified digital passport system

might necessitate substantial technological investments and adaptations, affecting operational efficiency.

- Resource constraints and compliance costs: SMEs might encounter resource limitations, both in terms of financial capabilities and expertise. Acquiring the necessary technological infrastructure, data management tools, and expertise to meet compliance standards could pose financial burdens, especially for smaller entities.

### How can companies overcome these challenges?

- Collaborative industry efforts: collaboration across industry sectors, consortia or trade associations could provide a platform for sharing best practices, developing standardised templates and collectively addressing challenges. Joint initiatives can streamline data gathering and ensure uniformity in compliance strategies.
- Government support and guidance: government bodies or regulatory authorities can play a crucial role in supporting companies by providing clearer guidelines, facilitating training programmes and offering financial incentives or grants for compliance efforts, particularly for SMEs.
- Adoption of digital solutions: investing in specialised software solutions or traceability platforms designed for digital product passports could assist companies in organising, standardising and managing the required data. Using modern technology can streamline data collection, enhance transparency and improve compliance readiness.
- Capacity building and education: offering educational programmes, workshops or training sessions to SMEs can build capacity and awareness regarding compliance requirements. Such initiatives can empower smaller businesses to navigate the complexities of data collection and management for DPPs.

While larger corporations may have started navigating the landscape of digital product passports, numerous challenges persist for SMEs in terms of access to information, technical adaptation and resource limitations. Collaborative efforts, government support, technological adoption and educational initiatives can collectively aid companies in overcoming these challenges, fostering a more inclusive and prepared business ecosystem for compliance with evolving regulations.

### Key takeaways

Gaining transparency within the value chain is crucial for eliminating toxic chemicals. The DPP has potential to drive market shifts toward safer products, aiding companies in demonstrating sustainable chemicals management. Challenges persist, especially for smaller businesses navigating complex value chains and data requirements. However, the benefits may outweigh these obstacles in the long run, considering potential litigation or costs associated with chemical impacts.

The emergence of DPPs signals a significant paradigm shift towards sustainability and transparency, offering both challenges and opportunities for businesses in the EU market. This evolving regulatory landscape requires businesses to adapt, ensuring compliance while strategically leveraging these changes to foster innovation and sustainable practices.

## Packaging compliance

Learn more about the EU's Packaging and Packaging Waste Regulation as well as insights on packaging regulations around the globe.

Click to play video ►



This video was recorded on 10 March 2025.

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10 April 2025 | Brussels + Virtual, Belgium

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Conference

## PFAS Global 2025

24 April 2025 | Virtual

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watch live or on demand



Conference

# Food Contact Materials Practical Training Series

21 May 2025-6 June 2025 | Virtual

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# Sustainable Food Contact Materials Europe 2025

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# Packaging EPR Global Regulatory Comparison

Keep track of packaging EPR requirements worldwide

Combined with focused expert analyst support as part of Focused Compliance Solution, this solution helps your team quickly identify where regulations exist, what they say, pending deadlines, and similarities and differences across jurisdictions.

With our tool, you'll get an overview of the relevant regulation plus detailed coverage of packaging definitions, labelling elements, registration and notification requirements, end-of-life management and packaging materials.

## What's included?

EPR for Packaging Global Regulatory Comparison gives your team a bird's eye view of the regulatory requirements across key jurisdictions.

## This solution:

- Gives you a complete list of the relevant regulations, all in one place
- Categorises and sorts the regulation, making it easily digestible for your team
- Identifies all the obligations and makes it simple to compare across jurisdictions

- Highlights sustainability targets and gives specific focus to relevant labelling elements
- Provides a 'product agnostic' view that is broadly applicable across product types
- Initial two-hour exploratory meeting plus four quarterly updates.
- 10 hours Analyst Helpdesk time

## How do I get access?

This data tool is part of our Focused Compliance Solution, available to purchase along with existing Enhesa Product Intelligence core member services including Chemical Watch News & Insight, Regulatory Database and Professional Development. Focused Compliance Solution is not available as a standalone service.


## Contact us

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[product.sales@enhesa.com](mailto:product.sales@enhesa.com)

*Act today and prepare for tomorrow to create a more sustainable future with 360° intelligence for your operations, products, and chemicals management across the globe.*



## **About Enhesa**

At Enhesa we empower the world's largest businesses to achieve compliance, manage risk, and drive sustainability with clear, actionable insights.

We combine the knowledge of our global team of experts with regulatory data and market-leading AI to transform complex regulatory landscapes into timely intelligence and foresight. This means we can support our customers to become industry leaders in environment, health, safety, and sustainability.

Discover more: [enhesa.com](https://enhesa.com)

Achieve **compliance**, manage **risk**, and drive **sustainability**.