



ANNEX - Reuse requirements for takeaway packaging under the Packaging and Packaging Waste Regulation (PPWR)

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This Annex is part of the Blueprint for harmonising the implementation of takeaway food and drinks packaging systems for reuse in Europe

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Reuse systems in the EU legal framework

The Packaging and Packaging Waste Regulation

At the EU level, reuse systems are increasingly supported under regulatory frameworks. Most notably, **EU Regulation 2025/40** - the [Packaging and Packaging Waste Regulation](#) (PPWR) - was adopted in **January 2025 in order to regulate** all packaging placed on the EU single market. It introduces **legally binding targets, definitions, and requirements** to transition from single-use to reusable packaging.

For what matters most for the good interpretation of the Blueprint, which focuses on reusable takeaway packaging, under the PPWR:

- **Reuse** is explicitly recognised as a **mechanism to meet EU-wide packaging waste reduction targets (Art. 43)**:
 - **5% reduction by 2030.**
 - **10% by 2035.**

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- **15% by 2040.**

(All compared to 2018 levels)

- **Market restrictions (bans) apply to certain types of single-use packaging by 2030**, mostly plastic, including single-use plastic grouped packaging, single-use plastic packaging of fruits and vegetables, **single-use plastic packaging consumed in the premises of the HORECA sector**, single-use plastic condiments portions (condiments, preserves, sauces, sugar, coffee creamer), packaging used in the accommodation sector (i.e. toiletries) as well as very lightweight plastic carrier bags (Art. 25, Annex V).
- **Reuse targets** are mandated for three packaging sectors (Art. 29):
 - Transport and sales packaging (including e-commerce): 40% by 2030 and 70% by 2040.
 - Transport packaging between sites of the same enterprise or partner enterprises: 100% by 2030.
 - Grouped packaging: 10% by 2030 and 25% by 2040.
 - Beverage packaging (alcoholic and non-alcoholic): 10% by 2030 and 40% by 2040.
- The regulation introduces an **obligation to offer takeaway food and drinks in packaging within a system for reuse by February 2028**, with the aim to achieve **10% of items sold in reusable systems by 2030** (Art. 33).
- Ambitious **Member States and local governments are allowed to go beyond EU requirements**, accelerating the shift toward reuse at scale to achieve positive environmental outcomes.¹

This evolving regulatory landscape underscores the need for a **coherent implementation strategy** - and the annexed blueprint aims to offer exactly that.

¹ PPWR Implementation guide for national and local governments. Rethink Plastic Alliance et al. 2025, pp. 8-9. Available at: rethinkplasticalliance.eu/wp-content/uploads/2025/03/PPWR-implementation-guide-for-national-and-local-governments.pdf

PPWR key definitions

To design effective, scalable systems for reusable takeaway packaging, all stakeholders must operate from a shared understanding of the legal terms that define what reuse systems are - and, thus, understand what they are not at the same time.

Below are the **key definitions outlined in the PPWR**, which now frame the scope and requirements for reuse systems across Europe from January 2025.

- **'Re-use'** means any operation by which reusable packaging is used again multiple times for the same purpose *for which it was conceived [art 3 (27)]*
- **'Re-use system'** means the organisational, technical or financial arrangements, together with incentives, that allow re-use either in a closed loop or open loop system, such as a deposit and return system that ensures that packaging is collected for re-use; [art3 (31)]
- **'Reusable packaging'** are those inserted in a re-use system that fulfils all of the following requirements [article 11 (1)]:
 - A. It has been conceived, designed and placed on the market with the objective to be re-used multiple times;
 - B. It has been conceived and designed to accomplish as many rotations as possible under normally predictable conditions of use;
 - C. It fulfils applicable requirements regarding consumer health, safety, and hygiene;
 - D. It can be emptied or unloaded without being damaged in a way that would prevent its further function and re-use.

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- **‘Take-away packaging’** means service packaging filled at attended points of sale with beverages or ready-prepared food that are packaged for transportation and immediate consumption at another location without the need for any further preparation and are typically consumed from the packaging; [art 3 (3)].
 - **‘Deposit’** means a defined sum of money, not being part of the price of a packaged or filled product that is collected from the end user when purchasing such packaged or filled product, covered by a deposit and return system in a given Member State and redeemable when the end user or any other person returns the deposit bearing packaging to a collection point established for that purpose; [art 3 (61)].
 - **‘Deposit and return system’** means a system in which a deposit is charged to the end user when purchasing a packaged or filled product covered by that system, and redeemed when the deposit bearing packaging is returned through one of the collection channels that are authorised for that purpose by the national authorities [art 3 (62)].
 - **‘Rotation’** means the cycle that reusable packaging accomplishes from the moment it is placed on the market together with the product it is intended to contain, protect, handle, deliver or present, to the moment it is ready to be reused within a re-use system with a view to it being supplied again to end users together with another product; [art 3 (29)].
 - **‘Trip’** means the transfer of packaging, from filling or loading to emptying or unloading, as part of a rotation or on its own; [art 3 (30)].
 - **‘Closed loop system’** means a re-use system in which reusable packaging is circulated by a system operator or a co-operating group of system participants without the change of the ownership of packaging; [ANNEX VI (b)].
 - **‘Open loop system’** means a re-use system in which reusable packaging circulates amongst an unspecified number of system participants, and the ownership of the packaging changes at one or more points in the re-use process; [ANNEX VI (c)].
 - **‘System operator’** means any natural or legal person who is a system participant and manages a reuse system; [ANNEX VI (d)].

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- **‘System participant’** shall mean any natural or legal person who participates in a reuse system and performs at least one of the following actions: collects the packaging either from end users or from other system participants, reconditions it, distributes it among system participants, transports it, fills it with products, packs it or offers it to end users; a re-use system can comprise one or more system participants. Businesses or other economic operators that make use of reusable packaging may appoint a third party to be responsible for one or more mutualised reuse systems.[ANNEX VI (e)].
 - **‘End user’** means any natural or legal person that resides or is established in the Union to whom a product has been made available either as a consumer or as a professional end user in the course of its industrial or professional activities, and that does not make that product further available on the market in the form supplied to it [art 3 (23)].
 - **‘Final distributor’** means the natural or legal person in the supply chain that delivers packaged products, including through re-use, or products that can be purchased through refill to the end user [art 3 (21)].
 - **‘Consumer’** means any natural person who is acting for purposes which are outside their trade, business or profession [art 3 (22)].
 - **‘HORECA sector’** means Accommodation and Food Service Activities according to NACE Rev. 2 – Statistical classification of economic activities [art 3 (35)].

PPWR key deadlines

To complement the regulatory definitions outlined above, the following section clarifies the progressive **implementation timeline** that applies to reuse systems in Europe — and highlights key milestones for takeaway packaging.

According to Art 33 of EU Regulation 2025/40, by February 2028, businesses in the HORECA sector selling hot or cold beverages or ready-prepared food in takeaway packaging **must give consumers the option of obtaining the products in reusable packaging within a system for reuse.**

It is important to note that this obligation applies to any establishment offering food and beverages for immediate consumption, meaning it is not limited to strictly HORECA-type establishments. Therefore, **the retail sector selling ready-prepared food for takeaway (e.g. salad bars) should equally abide by this obligation.**

EU Regulation 2025/40 indicates that such businesses should aim to achieve **10% of their products sold in reusable packaging by 2030.**

Reusable packaging options should be made **clear to consumers** through **visible and legible information** boards or signs and **provided at no higher cost** and under **no less favourable conditions than single-use** packaging.

TABLE 1: PPWR Implementation timeline (of some of the key measures relevant to the Blueprint)

YEAR		MEASURE	DETAILS	APPLIES TO	ARTICLE
2025	12 February 2025	PPWR entry into force	20 days after publication in the OJ (22 January 2025)		
2026	12 August 2026	PFAS ban	18 months after adoption/publication in the OJ	Businesses	Article 5 (5)
	12 August 2026	Mandatory report on the presence of substances of concern in packaging and packaging components	18 months after adoption/publication in the OJ	Commission	
2028	12 February 2028	Reuse obligation for HORECA (takeaway)	Micro companies are exempted	HORECA	Article 33

YEAR	MEASURE	DETAILS	APPLIES TO	ARTICLE
2030	1st Jan	BANS: Restriction of certain packaging formats <ul style="list-style-type: none"> Single-use plastic for: <ul style="list-style-type: none"> - Fruits & veggies - Grouped packaging (bottles, cans, etc.) - HORECA in-house consumption - Single-servings (sugar, cream, ketchup, etc.) - Very lightweight carrier bags - Miniature hotel toiletries - Shrink wrap for suitcases in airports - EPS & XPS food and beverage containers 	Businesses	Article 25 (1)
		Reuse targets:		Article 29
	1st Jan	40% transport packaging	Includes e-commerce, but excludes cardboard boxes	Businesses
	1st Jan	10% grouped packaging	Excludes cardboard boxes	Businesses
	1st Jan	10% beverage packaging	Alcoholic & non-alcoholic, excludes: <ul style="list-style-type: none"> - Milk & Dairy - Wine and spirits <ul style="list-style-type: none"> - Those with a sales area smaller than 100 m² - Those in island with a population of less than 2000 inhabitants - Those in a municipality with a population density less than 54 persons/km² 	Businesses

YEAR		MEASURE	DETAILS	APPLIES TO	ARTICLE
			Micro companies are exempted		
	1st Jan	10% non-binding reusable packaging at the HORECA (takeaway)	Micro companies are exempted	HORECA	
	1st Jan	Waste reduction target: 5%	Baseline year: 2018	Member States	Article 43
	1st Jan	Recycled content targets: 30% PET and all plastic beverage bottles 10% contact-sensitive 35% other plastic		Businesses	Article 7
2035	1st Jan	Waste reduction target: 10%	Baseline year: 2018	Member States	Article 43
2040		Reuse targets:			Article 29
	1st Jan	70% transport packaging	Includes e-commerce, but excludes cardboard boxes	Businesses	
	1st Jan	25% grouped packaging	Excludes cardboard boxes	Businesses	
	1st Jan	40% beverage packaging	Alcoholic & non-alcoholic, excludes: - Milk & Dairy - Wine and spirits - Sales area smaller than 100 m ² - Island with a population of less than 2000 inhabitants	Businesses	

YEAR	MEASURE	DETAILS	APPLIES TO	ARTICLE
		- Municipality with a population density less than 54 persons/km ²		
	1st Jan	Waste reduction target: 15% Recycled content targets: 65% PET 25% contact-sensitive 65% other plastic	Baseline year: 2018	Member States
	1st Jan		Businesses	Article 7
				Article 43

EU requirements on the governance of reuse systems

Beyond dates and definitions, Annex VI of the **PPWR** also lays out detailed governance requirements for the **structure, accountability, and performance of reuse systems**. These apply to all economic operators using reusable packaging, with limited exceptions for certain open-loop systems.

General requirements (apply to all reuse systems):

They must:

- Have a system operator that controls the proper functioning of the system and verifies whether re-use is properly enabled, including:
 - reporting rules with transparent data on the number of re-uses, collection rate, sales, calculation, number of units of packaging that have been handled by the end-of-life plan; etc.

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- Have clear governance/structure guidelines defining their functioning, including requirements for packaging use, that are accepted by all system participants and which specifies:
 - The types and design of packaging allowed to circulate in the system;
 - The products intended to be used, filled or transported through the system;
 - The terms and conditions for proper handling and packaging use;
 - Detailed requirements for packaging reconditioning;
 - The requirements for packaging collection; storage; filling or uploading;
 - The rules to ensure the effective and efficient collection of reusable packaging, including by providing for incentives for end users to return the packaging to the collection points or grouped collection system;
 - The rules to ensure equal and fair access to the re-use system, including for vulnerable consumers
 - The rules to ensure a fair distribution of costs and benefits for all system participants
 - The rules to ensure the implementation of the extended producer responsibility obligations for reusable packaging used in the system and that has become waste
 - Performance:
 - Ensure that the re-use targets and any other objectives of the system can be met;
 - Ensure the reusable packaging meets the minimum intended number of rotations (to be defined in a EU Regulation 2025/40 delegated act);
 - Ensure that the design of the packaging is laid down in accordance with mutually agreed specifications or standards by the system participants;
 - Accessibility: equal access and fair conditions of all economic operators wishing to become a part of the system; as well as equal access and fair conditions for all end users;

In addition to these general requirements, Annex VI of the PPWR, also lays down specific requirements for closed and open re-use loop systems, as summarised below:

Closed loop specifics (in addition to the general requirements):

- The system has reverse logistics facilitating transfer of the packaging from the end users back to the system participants;
- The system ensures the collection, reconditioning and redistribution of packaging;
- System participants are obliged to take the packaging back from the collection point if it has been used, collected and stored in accordance with the system rules.

Open loop specifics (in addition to the general requirements):

- After packaging is used, the system participant decides whether to re-use the packaging or to pass it to another system participant for re-use;
- The system ensures that the collection, reconditioning and redistribution of packaging are in place and are generally available;
- Reconditioning meeting the requirements under Part B, Annex VI, is part of the system.