



We pave the way.
Worldwide.

roedl.ee

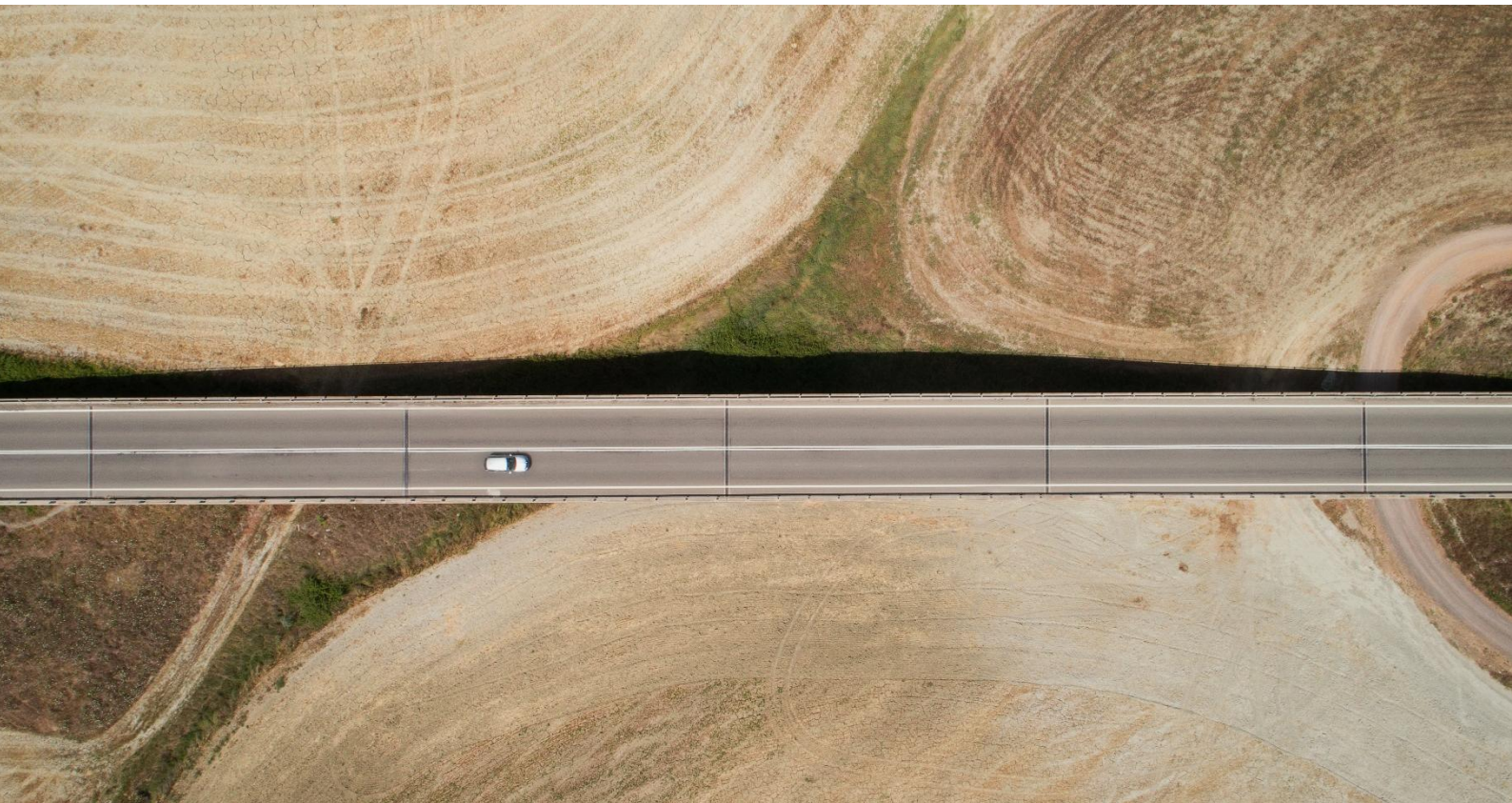
New European Union Packaging and Packaging Waste Regulation

June 2026

On 12 August 2026, the new European Union Packaging and Packaging Waste Regulation (PPWR – Packaging and Packaging Waste Regulation) will enter into force.

In this newsletter:

- Key changes



Dear reader,

We would like to inform you that on **12 August 2026**, the new European Union Packaging and Packaging Waste Regulation (PPWR – Packaging and Packaging Waste Regulation) will enter into force. The new regulation largely repeals the currently valid Packaging Directive and introduces significant changes to companies' obligations, reporting requirements, and financial planning.

Since the new regulation applies directly and simultaneously in all EU Member States, it will have a direct impact both on companies operating in Estonia and on those selling or shipping their products to foreign markets.

Key changes:

- **Packaging classification and recyclability:**

All packaging placed on the market must meet strict reuse and recycling requirements. A new, harmonised classification system will be introduced, based on the actual recyclability of packaging. Non-recyclable packaging will be subject to high additional fees or may be fully prohibited.

- **Expanded definition of “producer”:**

The definition of “producer” will be significantly broadened. Under the new regulation, a “producer” is considered any entity that first places a packaged product on a national market – whether a local manufacturer, importer, or an online seller delivering directly to the end consumer via e-commerce platforms. This means that many small businesses that previously fell below thresholds will now be subject to direct reporting obligations.

- **Tightening of Extended Producer Responsibility (EPR):**

Membership in producer responsibility organisations (PROs) and the submission of data to them will become more detailed. Financial contributions (so-called packaging fees) will depend on the environmental footprint of the packaging – the more difficult it is to recycle a material, the higher the fee.

- **Increased administrative and reporting burden:**

In the future, companies will need to keep records not only of packaging material type (e.g. plastic, paper) and weight, but also declare the percentage of recycled content and the exact packaging design category. This will require changes to warehouse management systems and product databases.

- **Removal of minimum thresholds and exemptions:**

Unlike previous national regulations, many existing de minimis exemptions for small-scale activity will be removed. Most reporting obligations will apply to all market participants regardless of company size.

- **Obligation to register in target countries:**

The regulation requires companies to fulfil producer responsibility obligations in every EU Member State where their product reaches consumers. If the company does not have a legal entity in the target country, an Authorized Representative must be appointed there.

- **Unified labelling:**

From 12 August 2028, all packaging placed on the market must carry standardised labelling to help consumers with separate waste collection. The Commission will adopt an implementing act no later than 12 August 2026, specifying the labelling requirements in detail. The label must also be applied to reusable packaging.

If you require any assistance or consultation regarding this regulation, please do not hesitate to contact us.

Contact person

Tiina Mirka

Head of Accounting Services

T +372 (6) 805 - 629

tiina.mirka@roedl.com



Imprint

Publisher:

RÖDL Estonia

Maakri 23 A 10145 Tallinn

info@roedl.ee

www.roedl.ee

Responsible for the content:

Tiina Mirka

tiina.mirka@roedl.com

Layout/Type:

Liisa Maide

liisa.maide@roedl.com

This Newsletter offers non-binding information and is intended for general information purposes only. It is not intended as legal, tax or business administration advice and cannot be relied upon as individual advice. When compiling this Newsletter and the information included herein, RÖDL used every endeavour to observe due diligence as best as possible, nevertheless RÖDL cannot be held liable for the correctness, up-to-date content or completeness of the presented information. The information included herein does not relate to any specific case of an individual or a legal entity, therefore, it is advised that professional advice on individual cases is always sought. RÖDL assumes no responsibility for decisions made by the reader based on this Newsletter. Should you have further questions please contact RÖDL contact persons. The entire content of the newsletter and the technical information on the Internet is the intellectual property of RÖDL and is protected by copyright. Users may load, print or copy the contents of the newsletter only for their own use. Any changes, duplication, distribution or public reproduction of the content or parts thereof, whether online or offline, require the prior written consent of RÖDL.