



Annel

PPWR

REGULATORY CHANGES  
FOR COSMETIC PACKAGING

A STEP-BY-STEP SURVIVAL GUIDE FOR COSMETIC  
BRANDS, MANUFACTURERS AND IMPORTERS

# WHY PPWR MATTERS FOR COSMETICS?

PPWR changes the role of packaging in cosmetic compliance.

Packaging will no longer be only a branding or marketing element. It will also need to meet specific legal requirements before a product can remain on the EU market.

This applies to:

- jars
- bottles
- tubes
- pumps
- caps and closures
- labels and sleeves
- cartons
- inserts
- transport packaging
- e-commerce packaging

# KEY PPWR TIMELINE:

**11 February 2025**

PPWR enters into force.

**12 August 2026**

Most general PPWR rules start to apply.

**2028 / 2029**

Harmonised labelling requirements are expected to apply, depending on the adoption of technical acts.

**1 January 2030**

Key market-facing obligations begin: packaging minimisation, recyclability requirements and recycled content targets.

**2035**

Recyclability will also need to be assessed at scale.

**2040**

Higher recycled content targets will apply.

# STEP 1: CREATE A PACKAGING INVENTORY

The first step is to map every packaging component used for each SKU.

This should include:

- primary packaging
- caps and closures
- pumps and applicators
- labels and sleeves
- cartons and inserts
- protective films
- grouped packaging
- transport packaging
- e-commerce packaging

For each component, the company should identify the material, weight, function, supplier and any available technical documentation.

# STEP 2: COLLECT SUPPLIER DATA

Cosmetic companies will need reliable data from packaging suppliers.

Supplier documentation should cover:

- material composition
- plastic type or polymer
- recycled content
- coatings and barriers
- inks, labels and adhesives
- heavy metals
- substances of concern
- recyclability information

Without supplier data, it will be difficult to prove PPWR compliance.

# STEP 3: CHECK SUBSTANCE RESTRICTIONS

PPWR requires packaging to be manufactured in a way that minimises the presence of substances of concern.

For cosmetic packaging, companies should review supplier declarations and material specifications.

Particular attention should be paid to:

- heavy metals
- coatings
- adhesives
- inks
- barriers
- fluorinated substances, where relevant

PFAS restrictions under PPWR apply to food-contact packaging.

For cosmetics, this should be treated as a packaging material risk signal, not as a direct automatic ban on all cosmetic packaging.

# STEP 4: REDUCE UNNECESSARY PACKAGING

From 2030, packaging must be designed so that its weight and volume are limited to the minimum necessary.

This means that packaging should not be larger, heavier or more complex than needed for:

- product protection
- hygiene
- safety
- transport
- storage
- functionality

Marketing, premium appearance or perceived product size should not be used to justify unnecessary packaging volume.

# PACKAGING MINIMISATION: COSMETIC RISK EXAMPLES

High-risk examples in cosmetics include:

- luxury jars with double walls
- false bottoms
- oversized cartons
- decorative inserts with no protective function
- excessive empty space in e-commerce parcels
- unnecessary sleeves or secondary packaging
- heavy packaging used mainly for premium visual effect

These formats should be reviewed before 2030.

# STEP 5: ASSESS RECYCLABILITY

From 2030, packaging must be designed for recycling.  
Packaging will be assessed using recyclability performance

grades:

Grade A

At least 95% recyclable

Grade B

At least 80% recyclable

Grade C

At least 70% recyclable

From 2030, packaging must achieve at least Grade C.  
From 2038, packaging will need to achieve at least Grade B.

# RECYCLABILITY: COSMETIC PACKAGING RISKS

Some cosmetic packaging formats may be more difficult to recycle.

High-risk examples include:

- multi-material pumps
- trigger sprays
- multi-layer tubes
- sachets
- metallised labels
- decorative coatings
- complex closures
- small detachable components
- black or hard-to-sort plastics

These formats may require redesign or alternative suppliers.

# STEP 6: PREPARE FOR HARMONISED LABELLING

PPWR will introduce harmonised labelling for packaging composition and waste sorting.

Cosmetic companies should prepare for future artwork changes across:

- labels
- cartons
- sleeves
- multi-language packaging
- e-commerce packaging
- consumer instructions

Artwork and marketing teams should avoid creating new market-specific sorting icons before the EU harmonised requirements are finalised.

# STEP 7: BUILD TECHNICAL DOCUMENTATION

PPWR compliance will need to be supported by technical documentation.

The file should include:

- packaging specifications
- material composition
- supplier declarations
- recycled content evidence
- recyclability assessment
- packaging minimisation justification
- labelling information
- component-level documentation

The company should be able to show why each packaging format is compliant.

# STEP 8: IDENTIFY PACKAGING THAT NEEDS REDESIGN

After the packaging review, each format should be classified by risk level.

## **Low risk**

Simple mono-material packaging with clear supplier documentation.

## **Medium risk**

Packaging with labels, coatings, closures or mixed components that require further assessment.

## **High risk**

Multi-material, oversized, poorly documented or difficult-to-recycle packaging.

High-risk packaging should be prioritised for redesign before 2030.

# ACTION PLAN FOR COSMETIC COMPANIES

Now

Create a full packaging inventory by SKU.

2026

Collect supplier declarations and technical data.

2027-2028

Assess high-risk formats and start redesign work.

2028-2029

Prepare artwork teams for harmonised labelling updates.

2030

Ensure packaging meets minimisation, recyclability and recycled content requirements.



# KEY PPWR REQUIREMENTS FOR COSMETICS

## PACKAGING MINIMISATION

(Articles 10 & 24)

Deadline: 01.01.2030

- Empty Space Ratio: For grouped, transport, and e-commerce packaging, the empty space cannot exceed 50%.
- Weight & Volume Reduction: Packaging must be reduced to the minimum necessary to ensure functionality, safety, and hygiene.
- Cosmetic Examples:
  - Elimination of Double Walls: Jars (e.g., for luxury creams) with double walls or false bottoms designed solely to increase perceived volume are prohibited.
  - Right-sizing: Outer cardboard boxes must fit the primary product closely to avoid unnecessary volume



## **RECYCLABILITY (Article 6)**

Deadline: 01.01.2030

- Design for Recycling (DfR): All packaging must comply with strict criteria to ensure it can be collected, sorted, and recycled at scale.
- Composite Materials: If a secondary material (like a coating) exceeds 5% of the total weight, it is considered composite and faces stricter recycling hurdles.
- Cosmetic Examples: Multi-layer sachets or complex pump mechanisms must be redesigned to ensure materials can be separated or processed together



## **RECYCLED CONTENT (Article 7)**

Deadline: 01.01.2030

- Mandatory PCR: Plastic packaging must contain a minimum percentage of post-consumer recycled (PCR) content.
- Targets: For example, contact-sensitive plastic packaging (excluding PET) requires 10% recycled content, while other plastic packaging requires 35% .
- Cosmetic Examples: Plastic bottles for lotions or caps for tubes must incorporate certified recycled plastics.



## **HARMONIZED LABELLING (Article 12)**

Deadline: 12.08.2028 (Estimated)

- Sorting Instructions: Packaging must bear standardized pictograms to show consumers how to sort waste.
- EPR Information: Physical labels for Extended Producer Responsibility (EPR) are banned; this information must be provided digitally.

# KEY MESSAGE FOR COSMETIC BRANDS

PPWR makes packaging a market-access issue.

Cosmetic brands should not wait until 2030 to react.

Packaging decisions made today may affect whether products can remain compliant on the EU market in the coming years. The safest approach is to review packaging now, identify high-risk formats and work with suppliers before redesign becomes urgent.