

FAX MESSAGE
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To	1. Secretary/Ministry of Trade, Commerce, Food Security, Cooperative Development 2. Secretary/Ministry of Industry & Entrepreneurship Development 3. Director General/ Department of Commerce 4. Chairman/Sri Lanka Export Development Board 5. Chairman/Board of Investment of Sri Lanka <i>Msg. No. SL-92</i>
Copy	Secretary/Ministry of Foreign Affairs, Foreign Employment & Tourism Attn: Additional Secretary/Economic Affairs, MFA Additional Secretary/ Europe and North America, MFA DG/ Economic Affairs (Bilateral), MFA <i>Msg. No. 335</i>
From	Chandana Weerasena Ambassador
Signature	
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Msg.

Implementation of European Union Packaging and Packaging Waste Regulation

1. This is Further to this Mission's previous communications on new EU regulations, information on webinars etc., which we shared with relevant Sri Lankan stakeholders time to time in past years.
2. **The European Union Packaging and Packaging Waste Regulation 2025/40 (PPWR)** entered into force on 11 February 2025 and **will generally apply from 12 August 2026.**
https://environment.ec.europa.eu/topics/waste-and-recycling/packaging-waste_en
3. The EU PPWR:
 - covers all packaging and packaging waste, regardless of material or origin;
 - sets requirements for manufacturing, composition, and reusable or recoverable nature of all packaging placed on the EU market;
 - includes packaging waste management and prevention measures.
4. Please refer the European Commission website on EU Packaging & Packaging Waste Regulation (PPWR) implementation for more details:
https://green-forum.ec.europa.eu/packaging-and-packaging-waste-regulation-implementation_en

The PPWR -EU 2025/40 is enclosed for easy reference.

- a) **Guidelines on the implementation of the Regulation for economic actors and Member States (March 2026)** could be reviewed at

https://environment.ec.europa.eu/publications/guidance-document-packaging-and-packaging-waste-regulation-ppwr_en

- b) **Frequently Asked Questions (March 2026) addressing practical issues raised by stakeholders since the adoption of the PPWR is also enclosed.**

Updates on Overview of the Regulation:

- 5. The new EU Packaging and Packaging Waste Regulation (PPWR) aims to:**

- avoid and reduce packaging waste, and stimulate reuse;
- make all packaging on the EU market recyclable in an economically viable way;
- increase the recycling of packaging materials, especially plastic, and their reuse.

- 6. The new rules set stricter sustainability, labelling, and conformity requirements on all food packaging, which will also apply to suppliers of packaged food to the EU market who are based outside the EU.**

- 7. The PPWR establishes rules for all packaging and packaging waste made of any material,**

including the following (Article 3 of the new Regulation):

- primary production packaging: packaging for unprocessed products;
- sales packaging: packaging of goods sold to the final consumer;
- grouped packaging: packaging that groups a number of products (for convenience) at the point of sale;
- transport packaging: packaging that facilitates the handling and transport of products, including e-commerce packaging, but not including road, rail, ship, or air containers;
- disposable tea, coffee, or other beverage bags or single-serve units.

- 8. The PPWR also establishes comprehensive rules on waste management at the level of EU**

Member States, prevention of packaging waste, and promotion of reusable packaging on a global scale.

- 9. Some key requirements are as follows:**

- **All packaging must be recyclable by 2030.** Plastic packaging must contain minimum amounts of recycled plastic, packaging must be minimised (by weight and volume), and contaminants must be reduced. **Producers of recycled plastic in non-EU countries must produce it in a way that is equivalent to EU standards for the collection of plastic and environmental emissions.**
- **There will be new limits on concentrations of substances of concern in packaging, including per- and polyfluorinated alkyl substances (PFAS).**
- **Certain packaging materials will be banned, including single use plastic packaging for quantities of certain fresh fruit and vegetables <1.5 kg. All sticky**

labels attached to fruit and vegetables, and single use tea and coffee bags, will have to be (at least) industrially compostable.

- Documentation demonstrating compliance with new requirements must be passed along the supply chain.

Timeline for Implementation:

10. EU Regulation 2025/40 applies from 12 August 2026. However, the rules apply from different dates (see Table 1, Table 2 & Table 3 below):

Table 1		
Dates when PPWR requirements enter into force ^[1]		
Category	Requirements	From
Substances of concern	Food-contact packaging must not contain concentrations of PFAS ^[2] higher than the levels shown in Table 2	12 Aug 2026
Compostable packaging	Single use tea, coffee, and related beverage bags, and sticky labels attached to fruit and vegetables, must be compostable	12 Feb 2028
Labelling	Packaging must be marked with a harmonised label (pictogram) to inform about the composition of packaging material and help consumers to sort recyclable materials	12 Aug 2028
	Reusable packaging must be marked with a label showing its reusability	12 Feb 2029
Prohibited packaging	Single use plastic packaging cannot be used for quantities of fresh fruit and vegetables <1.5 kg	1 Jan 2030
Packaging minimisation	Packaging must be reduced to the minimum volume/weight needed to ensure its functionality	
Minimum recycled content	Plastic packaging must contain at least the minimum percentage of recycled plastic per unit of packaging (see Table 3)	
	Packaging must be designed for recycling	
Recycling packaging	Packaging with less than 70% recyclability cannot be put on the market	1 Jan 2038
	Packaging will have to meet Grade A or B to be placed on the market	

[1] PPWR: Packaging and Packaging Waste Regulation 2025/40.

[2] PFAS: polyfluorinated alkyl substances.



www.agrininfo.eu

Source: AGRINFO based on EU Regulation 2025/40

Table 2
Limits on concentrations of PFAS in packaging

Type of polyfluorinated alkyl substances (PFAS)	Limit
Any PFAS as measured with target PFAS analysis (polymeric PFAS excluded)	25 parts per billion (ppb)
Sum of PFAS measured as sum of targeted PFAS analysis	250 parts per billion (ppb)
PFAS (polymeric PFAS included) ^[1]	50 parts per million (ppm)
[1] If total fluorine (F) exceeds 50 mg F/kg, the manufacturer, importer, or downstream user of packaging must, if requested, demonstrate proof that the fluorine is measured as content of either PFAS or non-PFAS.  AGRINFO www.agrininfo.eu	

Source: AGRINFO based on EU Regulation 2025/40

Table 3
Minimum percentage of recycled plastic per unit of packaging

Type of packaging ^[1]	Minimum percentage recycled content	
	By 2030	By 2040
Contact-sensitive packaging ^[2] (except single use beverage bottles) with polyethylene terephthalate (PET)	30	50
Contact-sensitive packaging ^[2] (except single use beverage bottles) made from plastic materials other than PET	10	25
Single use plastic beverage bottles	30	65
Plastic packaging other than the above	35	65
[1] Certain sorts of packaging (e.g. certain medical packaging) do not have to fulfil these criteria. [2] Contact-sensitive packaging includes packaging that comes into direct contact with food.  AGRINFO www.agrininfo.eu		

Source: AGRINFO based on EU Regulation 2025/40

- Within EU, forbids single use plastic packaging from **1 January 2030**
- Within EU, all packaging must be recyclable **by 2030**.

- **From 12 February 2028**, single use bags for tea, coffee, and related beverages, and sticky labels attached to fruit and vegetables must be industrially compostable.
- Reduce the size of all types of packaging **from 1 January 2030**.
- Labelling and information requirements **from 12 August 2028**.

Affected Products:

- **All packaging types:** Plastic, Paper/cardboard, Glass, Metal, Composite packaging
- **Primary production packaging:** packaging for unprocessed products
- **Sales packaging:** packaging of goods sold to the final consumer
- **Grouped packaging:** packaging that groups several products (for convenience) at the point of sale
- **Transport packaging:** packaging that facilitates the handling and transport of products, including e-commerce packaging, but not including road, rail, ship, or air containers
- **Disposable tea, coffee, or other beverage bags or single-serve units.**
- **New limits on concentrations of substances of concern in packaging.**
- **Certain packaging materials will be banned**, including single use plastic packaging.
- **Documentation demonstrating compliance with new requirements** must be passed along the supply chain.

Key Obligations for Packaged Food from Non-EU countries, including Sri Lanka:

11. Under the PPWR (Article 18), packaging and packaged food exported from non-EU countries to the EU must:
 - comply with the sustainability requirements set out in Articles 5–11;
 - be correctly labelled;
 - be accompanied by the correct documentation;
 - be correctly identified;
 - have undergone a conformity assessment.
12. Under the new rules, non-EU exporters of packaged foods to the EU market must ensure by the end of 2025 that:
 - any packaging has undergone an appropriate conformity assessment procedure;
 - the relevant technical documentation has been drawn up by the packaging manufacturer;
 - the manufacturer has provided a written declaration of conformity for the packaging type.
13. **Suppliers exporting packaged foods should engage early with packaging manufacturers to review testing, monitoring, and documentation processes.** Packaging manufacturers must be able to provide the information and documentation necessary for the exporter manufacturer to demonstrate compliance with this Regulation.
14. **Exporters will need long-term strategies for sourcing packaging that can meet new recyclability criteria and, in the case of plastic packaging, for ensuring that recycled plastic is produced in a manner equivalent to EU standards.**

- 15. Suppliers exporting packaged products who are considered as producers** *(because they sell products directly to an EU consumer or business for distribution, consumption, or use in an unchanged form)* **should monitor the national law of each EU country** to verify if they must appoint an authorised representative for extended producer responsibility (EPR) in that country.
- 16. Suppliers of fruit and vegetables should closely monitor exemptions to the ban on use of single use plastic packaging for quantities of fresh fruit and vegetables below 1.5 kg.** This includes the non-exhaustive list of exemptions to be published by the European Commission by February 2027, and additional exemptions set by EU countries from January 2030.
- 17. Suppliers of fruit and vegetables should also explore sources of industrially compostable sticky labels, and potentially home compostable ones** *(if required by EU countries)*.
- 18. For more details, the Embassy recommends referring the document enclosed herewith which has been prepared by the EU-funded AGRINFO, for more details.**

Impact of EU PPWR on non-EU Companies, including Sri Lankan Companies:

- Packaging sold into EU must comply PPWR (applies to suppliers who are based outside the EU);
- Comply with the sustainability requirements;
- Correctly labelled;
- Accompany by the correct documentation;
- Correctly identified;
- Undergo a conformity assessment;
- Use Recyclable packaging;
- Use Compostable packaging;
- Potential redesign of global packaging lines;
- Comply with the PPWR obligations during the production of packaging until the packaged products are exported to the EU and their obligations are transferred to the EU importer;
- Suppliers exporting packaged foods should engage early with packaging manufacturers to review testing, monitoring, & documentation processes.

Embassy's Observations and Recommendations:

- 19. It is important to note that all countries are expected to comply with the EU PPWR and respect objectives of PPWR when supplying relevant products to the EU market w.e.f different timelines as set out in the Regulation.**
- 20. Therefore, this Mission recommends all private and public sector stakeholders/institutions and private-sector companies/manufacturers/exporters in Sri Lanka who currently export to the EU market and who intends to export to the EU market in the future, to continue all work related to the compliance of EU PPWR requirements.**

21. Please take necessary actions to disseminate this information among relevant stakeholders in Sri Lanka.
22. If any stakeholder (public/private sector) in Sri Lanka needs support regarding training needs, capacity building etc., on EU PPWR, may please contact the EU Delegation in Colombo directly and/or inform this Mission in Belgium to make necessary arrangements together with relevant EU institutions/stakeholders in this side.
23. Further, we believe Sri Lankan producers/exporters are well aware of challenges they will face in the case of non-compliance of EU PPWR when they supply products to the EU market in the future and therefore, **we strongly recommend relevant Sri Lankan stakeholders to expedite processes and take necessary steps/actions as early as possible to comply with EU PPWR requirements to avoid any negative consequences on Sri Lanka's exports to the EU market in the future.**

Opportunities for Countries like Sri Lanka:

24. Finally, these regulations are set as progressive steps to the world. Therefore, there could be opportunities for new industries and develop innovative products in this sector.
25. A country like Sri Lanka may invent and develop environmentally friendly, recyclable packaging products to the world markets including Europe. It would be also prudent to explore opportunities within the already signed FTAs with countries like India, Pakistan, Thailand and Singapore to promote and develop this industry targeting world markets including the EU region.
26. It is very important to note that while implementing these new Regulations, the EU region works towards achieving a low-carbon, circular, sustainable, resilient and competitive economy. In this background, we strongly suggest Sri Lankan companies to take necessary steps to comply with these new environmentally friendly new regulations to sustain in the EU market and at the same time consider these new Regulations as opportunities to enter the EU market with more innovative, environmentally friendly and recyclable packaging products as demand for this sector will gradually increase in the EU market in years to come (ENDS)