foodcortex

COMPLIANCE BRIEF

# Packaging and Environmental Labelling Requirements in the UK and EU

Practical regulatory guidance for Great Britain, with Northern Ireland, Ireland and European Union considerations.

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# At a glance

Packaging obligations are separate from the mandatory food information required for a food supplement. They may arise from packaging composition and food-contact use, **extended producer responsibility (EPR)**, environmental information supplied to consumers, and EU-wide sustainability and labelling measures. Although Regulation (EU) 2025/40 is intended to harmonise important aspects of the EU packaging framework, it introduces obligations on different dates and does not mean that every national packaging-information requirement ceased on 12 August 2026.

- Separate **food information** requirements from **packaging/environmental** obligations.
- Check the EU Packaging and Packaging Waste Regulation **(EU) 2025/40 (PPWR)**, which began applying on **12 August 2026**, but has later implementation dates for specific measures.
- Check UK packaging extended producer responsibility (EPR) by the responsible entity, market, producer thresholds and data duties.
- Do not assume that a familiar recycling logo meets national sorting-information rules.
- Examine the national sorting and marking provisions applicable to **France, Italy and Spain**, as illustrative examples of country-specific requirements; these examples do not constitute an exhaustive EU country review.
- Resolve packaging requirements **before** printing multilingual artwork.

## How to use this brief

Use this brief in packaging specification, environmental-labelling review and pre-print artwork approval. The selected national examples show how consumer sorting information differs within the European market, alongside the PPWR and UK EPR requirements.

# 1. Two separate layers of compliance

## 1.1 The food label

Regulation (EU) No 1169/2011 and the applicable food supplement laws require product information such as ingredient particulars, allergens, operator details and supplement-specific statements. These must remain legible and be presented appropriately in the intended market. [1]

## 1.2 The packaging itself

Environmental obligations may arise from the packaging's materials, weight, purpose, marketing route, producer status and country of supply. The relevant obligations can concern recyclability, substances of concern, reporting, fees and markings, even if the food wording is unchanged.

An authorised nutrient claim or a legally accurate ingredient list does not address packaging EPR or sorting information. Conversely, a recycling statement does not establish that a food supplement label is compliant.

# 2. EU PPWR: what is in force now?

Regulation (EU) **2025/40** entered into force in February 2025 and generally began to apply from **12 August 2026**. The European Commission's June 2026 guidance and August 2026 implementation announcement confirm that this is an **operative EU instrument**, not merely a future proposal. [2,3]

The PPWR is an operative Regulation, but **its individual requirements must be read with their own application dates and transitional provisions**. In particular, Article 12(1) establishes the harmonised material-composition label from **12 August 2028, or 24 months after the entry into force of the relevant implementing acts, whichever is later**. Consequently the PPWR cannot be interpreted as requiring every package marketed in October 2026 already to carry the future harmonised symbol. Operators should monitor the implementing measures and the scope and exemptions of the relevant Article. [2,3]

PPWR provisions include requirements covering packaging design, minimisation, recyclability, hazardous substances and EPR. Which particular rule applies on a given date depends on its operative article and transition provision. The fact that a regulation "applies" does not mean every future deadline within it has passed.

## 3. Food-contact packaging

Where bottles, closures, liners, sachets or other components contact the supplement, consider the EU food-contact material framework and corresponding UK requirements. Material suitability depends on the intended food, conditions of contact, duration and relevant migration or compositional restrictions. [4]

The PPWR also establishes restrictions on certain substances in food-contact packaging, including PFAS-related requirements. Check the exact thresholds, application date, exemptions and official guidance rather than making broad claims that “all PFAS packaging is banned”. [2,3]

Request packaging specifications and relevant declarations from suppliers. Environmental design decisions should never compromise food safety, stability or moisture protection.

## 4. UK packaging extended producer responsibility

The UK has an operational packaging EPR framework with registration, data-reporting and, for relevant producers, financial obligations. Producer duties and deadlines depend on the statutory criteria and whether the business is classed as a **small or large producer**, as well as packaging and producer activities. Official PackUK/Defra guidance was updated in October 2026. [5]

For obligated large producers, relevant requirements include reporting packaging data, recyclability assessments under the appropriate **reporting-year** methodology, waste disposal fees where applicable, and other compliance steps. Smaller obligated producers have different duties. Do not apply a large-producer fee or reporting rule to every start-up automatically. [5,6]

EPR liability is distinct from an assumed universal rule requiring a specific on-pack UK recycling symbol for all food supplement packages. Any applicable current on-pack labelling measures must be checked separately.

## 5. Recyclability assessment: version control

The UK’s Recyclability Assessment Methodology (RAM) changes by reporting year. PackUK confirms that the **2026** reporting year uses the appropriate existing RAM version, while separate **RAM 2027** materials concern the 2027 reporting year. [6]

A packaging team should therefore maintain a materials breakdown (for example plastic jar, cap, label, seal, carton), evidence of material identification and a traceable assessment result. Avoid using an outdated methodology or confusing recycling **reporting** with consumer-facing sorting **labelling**.

## 6. National sorting-information rules pending fuller harmonisation

### 6.1 Why selected countries have additional requirements

The PPWR pursues greater EU harmonisation of packaging design and information; nevertheless **national approaches had developed before its application**, particularly for consumer sorting information and packaging material identification. Those systems do not necessarily impose identical obligations, and their interaction with the PPWR must be assessed by reference to the scope, transitional provisions and EU free-movement rules. France, Italy and Spain illustrate three different national approaches to consumer packaging information.

A business supplying other EU markets must establish separately whether local EPR registration, consumer information, deposit-return marking or other packaging provisions apply. The existence of the future Article 12 harmonised label is not a basis for ignoring currently applicable national measures; equally, a historical national requirement should not be assumed to survive unchanged where EU harmonisation or domestic amendment affects it. [2,3]

### 6.2 France: Triman and sorting information

French environmental law includes consumer sorting-signage obligations for relevant household-market products and packaging, with the **Triman** concept and associated sorting information commonly described as **Info-tri**. The current applicable rules, product category, packaging scope and any exemptions should be checked against official French texts and guidance. [7]

The precise form of an approved sorting instruction is governed by French arrangements and evolving EU harmonisation. Do not paste a symbol from a competing product and assume it covers all French packaging components. Check whether each separate component requires distinct sorting information.

### 6.3 Italy: packaging environmental labelling

Italy has national environmental packaging labelling requirements introduced through Legislative Decree No. 116/2020 and associated implementing provisions. Businesses should check the current obligations for material identification, consumer information, packaging types and the relevant official guidance for the Italian market. [8]

Material identification codes and sorting instructions serve different functions and should not be conflated. The correct wording and feasibility of any digital provision, exemption or transition require an exact current legal check rather than reliance on historical industry graphics.

### 6.4 Spain: household-packaging disposal information

Spain provides a further example of national consumer information which differs from both the French and Italian approaches. Article 13 of **Royal Decree 1055/2022** requires household packaging to indicate the **waste fraction or collection container** in which it should be deposited. For packaging comprising readily separable materials, the instructions must address the respective fractions or containers. Where materials are not readily separable or packaging is composite, the relevant rule generally refers to the predominant material by weight, subject to the stated exception. The new marking obligations under Article 13 applied from **1 January 2025**. [9]

The Spanish provision distinguishes this disposal information from material identification codes under Decision 97/129/EC, which Article 13(1) generally treats as voluntary pending EU requirements. A generic material code or an unsubstantiated recycling symbol should therefore not be assumed to satisfy Spain's requirement to communicate where household packaging should be deposited. The actual packaging configuration, national interpretation and interaction with PPWR must be checked before final artwork approval. [2,9]

## 7. Northern Ireland and other EU Member States

Northern Ireland has specific status under the Windsor Framework, including EU goods requirements where applicable, while UK-wide packaging EPR may impose producer obligations under the relevant national arrangements. These are different questions that must be checked independently. [2,5]

For Ireland and other EU Member States, establish the applicable EPR registrations, national packaging-waste arrangements, any deposit-return system and presently applicable information duties. Where a national rule overlaps with the PPWR, assess its continuing operation rather than

treating harmonisation as an immediate blanket repeal. The examples in Section 6 should be used as a model for the questions to ask, not as substitutes for country-by-country due diligence.

## 8. Artwork and procurement control

1. Create a packaging bill of materials identifying every component and material.
2. Identify the entity placing the packaging on each market and any EPR scheme responsibilities.
3. Verify food-contact compliance and packaging safety evidence.
4. Check the current law **and individual application dates** for the relevant destination.
5. Approve national and EU-relevant sorting information before artwork sign-off.
6. Retain the approved text, graphics, supplier declarations, weight data and justification.
7. Reassess whenever materials, labels, destination markets or environmental claims change.

## 9. Pre-print packaging checklist

- All material components and weights are recorded.
- Relevant food-contact declarations are available and appropriate for use.
- UK EPR entity, producer class and reporting-year methodology are documented.
- PPWR current and future-dated requirements are individually distinguished.
- French, Italian and Spanish national marking obligations have been checked for relevant destination markets.
- Symbol use is legally grounded and verified against current official rules.
- NI and EU market issues are separated from GB assumptions.
- Food regulatory copy and packaging graphics have both passed review.
- Evidence, artwork versions and change triggers are retained.

## 10. Primary legislation and official guidance

The following legislation and official authority materials explain the applicable framework and country examples.

1. Regulation (EU) No 1169/2011 on food information
2. Regulation (EU) 2025/40 on packaging and packaging waste
3. European Commission: 2026 PPWR interpretation and guidance
4. Regulation (EC) No 1935/2004 on food-contact materials
5. UK Government: Extended producer responsibility for packaging
6. UK Government: Recyclability Assessment Methodology, RAM 2027
7. France: Code de l'environnement, Article L541-9-3
8. Italy: Legislative Decree 116/2020, official Gazette
9. Spain: Royal Decree 1055/2022, consolidated text, Article 13

## Conclusion

Packaging compliance cannot be established by selecting one recycling or sorting symbol for all markets. The correct approach combines **material-by-material evidence**, assessment of the responsible producer, and market-specific review of rules and their effective dates before artwork is finalised.