IMBALLAGGI SPECIALI

Mezzago, li 04/06/2026

Subject: EU Regulation 40/2025

Dear,
We would like to make focus to the **new European Regulation on Packaging and Packaging Waste**,(EU) 40/2025 (**PPWR**–"Packaging and Packaging Waste Regulation ").
The new regulation is part of the European Union's circular economy policies.
The PPWR introduces a **new set of obligations that affect all types of packaging** (sales or primary, grouped and/or transport packaging), irrespective of the materials from which it is made.
The regulation was published in the EUOJ on 22 January 2025 and **will apply from 12 August 2026.**
According to the PPWR rules, **all industrial and commercial supply chains** , States and therefore Citizens, are involved in profound **redesign and reorganization activities, related processes and packaging products**.
The "Manufacturer", having detailed knowledge of the design and production process, is best placed to carry out the conformity assessment provided for under this Regulation. Conformity assessment under this Regulation should therefore remain solely the obligation of the "Manufacturer". It's important to clarify that the PPWR **defines the "Manufacturer" as the person who essentially designs the packaging system**, meaning is able to influence the sustainability requirements prescribed by the Regulation.
The Manufacturer will therefore have **the obligation to ensure, in accordance with the requirements defined by the harmonised standards, the following** aspects where applicable:

- ensure the provisions for the **minimization of substances** contained in packaging and dangerous for the environment and health
- ensure the **prescribed requirements for the recyclability of packaging**
- ensure compliance with the **minimum recycled content in plastic packaging**
- comply where applicable with the relevant requirements for **bio-based raw materials** in plastic packaging
- ensure compliance with the requirement of **compostable packaging** where applicable
- ensure the **reduction of weight and volume** of packaging, while respecting design and "empty space" requirements
- ensure compliance of **reusable packaging** where applicable
- ensure **correct labelling of the packaging**

VIA DELLE INDUSTRIE 9/2 - 20883 MEZZAGO (MB)
CAP. SOCIALE Euro 500.000,00 i.v. C.F. e P.I. 02313160968 REA MB-1419428
Tel. 039 62082.1 r.a. E-mail: info@imballaggispeciali.it www.imballaggispeciali.it

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according to a specific conformity assessment procedure and **holding a specific technical file of the packaging/packaging systems**.
The Manufacturer must also **ensure a control system finalized to guarantee that packaging must be alwais compliant, that its traceability is assured and finally** that a specific **EU Environmental Declaration of Conformity of the packaging is ensured**.
Some categories of packaging will subject to **reuse obligations** (e.g. transport packaging).
Some **new rules will enter into force immediately** with the implementation of the PPWR, i.e. from next August 2026; **others are expected to enter into force gradually**, in 2028, 2030, 2038 and following specific delegated acts of the European Commission.

All things considered, **IS Imballaggi Speciali Srl is therefore committed to fully satisfying the European requirements applicable to its packaging products and related packaging systems**, which prevail over those currently present at the level of individual Countries and/or obviously at Companies level.
We remain at your disposal for any further information.

Best regards.

I.S. Imballaggi speciali srl

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