

**2024
Edition**

**Factsheet 7:
EU Packaging & Packaging Waste
Directive & Provisional Regulation**

An Apparel Supplier's Guide 2.0

**Key Sustainability Legislation
in the EU, US, and UK**

EU Strategy for Sustainable and Circular Textiles
EU Corporate Sustainability Due Diligence Directive
EU Corporate Sustainability Reporting Directive
New York Fashion Act
EU Forced Labour Regulation & Guidance
US Uyghur Forced Labor Prevention Act
EU Ecodesign for Sustainable Products Regulation
EU Packaging & Packaging Waste Directive & Provisional Regulation
EU Microplastics Regulation
UK Plastic Packaging Tax
EU Product Environmental Footprint Guide
EU Textiles Regulation
EU Taxonomy
The German Due Diligence in the Supply Chain Act
Lessons for Fashion: How the agricultural sector is tackling commercial compliance through the EU Directive on unfair trading practices

Acknowledgements

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The Remedy Project is a social enterprise that works to improve access to justice and remedy for migrant workers in global supply chains. They work constructively with governments, civil society, law enforcement, and the private sector to translate the UN Guiding Principles on Business and Human Rights into practice. For more information please see www.remedyproject.co.

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Introduction

UPDATE

a. Objective

In July 2023 the first iteration of this guide covering, 12 pieces of legislation, was published. This document is an update to that guide and includes updates to the 12 factsheets issued last year as well as three additional factsheets covering new legislation not previously included.

This document is intended to enable suppliers in the apparel value chain that are established or headquartered outside of the Global North¹, or whose operations are based outside these jurisdictions or whose supply chains extend to the Global South, to better understand how sustainability-related legislation in the Global North could potentially impact them. While suppliers may not, in all cases, be directly subject to the obligations created by these Global North

laws, they may still experience knock-on effects as they form an integral part of the global apparel value chain and produce goods for multinational brands and retailers who have increasing compliance obligations as they adopt new practices in order to respond to the increased legislation. As such, this document aims to:

- Offer a public resource and roadmap for suppliers to proactively respond to and prepare for the requirements of these Global North laws.
- Provide a platform for dialogue and information exchange where suppliers and manufacturers can explore engagement (where possible) with policy makers in Global North jurisdictions.
- Support suppliers in delivering the fashion industry's social and environmental performance goals, and drive meaningful change for rights holders – whether workers, local communities, cotton farmers– globally.

b. Important legislative context to understand

As governments in the Global North embark on ambitious plans to transition towards climate neutrality, inclusive and sustainable growth, the body of sustainability legislation is expanding rapidly.

The European Union (EU) is at the forefront of these changes, introducing a plethora of legislative and non-legislative measures to implement priority policies such as the [European Green Deal](#). The European Green Deal is a cornerstone of the EU's industrial strategy, comprising a series of proposals to make the EU's climate, energy, transport, and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, and to secure the global competitiveness and resilience of European industry². There are also sector-specific initiatives such as the EU Strategy for Sustainable and Circular Textiles, which aim to implement the commitments made

¹ For the purposes of this document, "Global North" encompasses the European Union, United Kingdom, and the United States.

² European Commission, [A European Green Deal](#)

under the European Green Deal (see infographic on the next page “**Snapshot of the Legislative Landscape in the Global North**”), by setting out measures to address the design and consumption of textile products, and promote a greener and fairer value chain in the textiles industry. The legislations covered in this document such as the EU Ecodesign for Sustainable Products Regulation and Digital Product Passport, EU Corporate Sustainability Due Diligence Directive, EU Regulation on Prohibiting Products Made With Forced Labour on the Union Market (Forced Labour Regulation), are only some of the initiatives taken by the EU to execute on the European sustainability policy objectives³.

These legislations create legally binding obligations on companies to consider how they are managing their social and environmental impact. Many of these laws and regulations have global application and/or will impact apparel manufacturing and sourcing hubs outside of the Global North. As such, while these laws originate from the Global North such as the EU, United Kingdom, and United States, they will impact companies operating outside of these jurisdictions. It is therefore a prescient

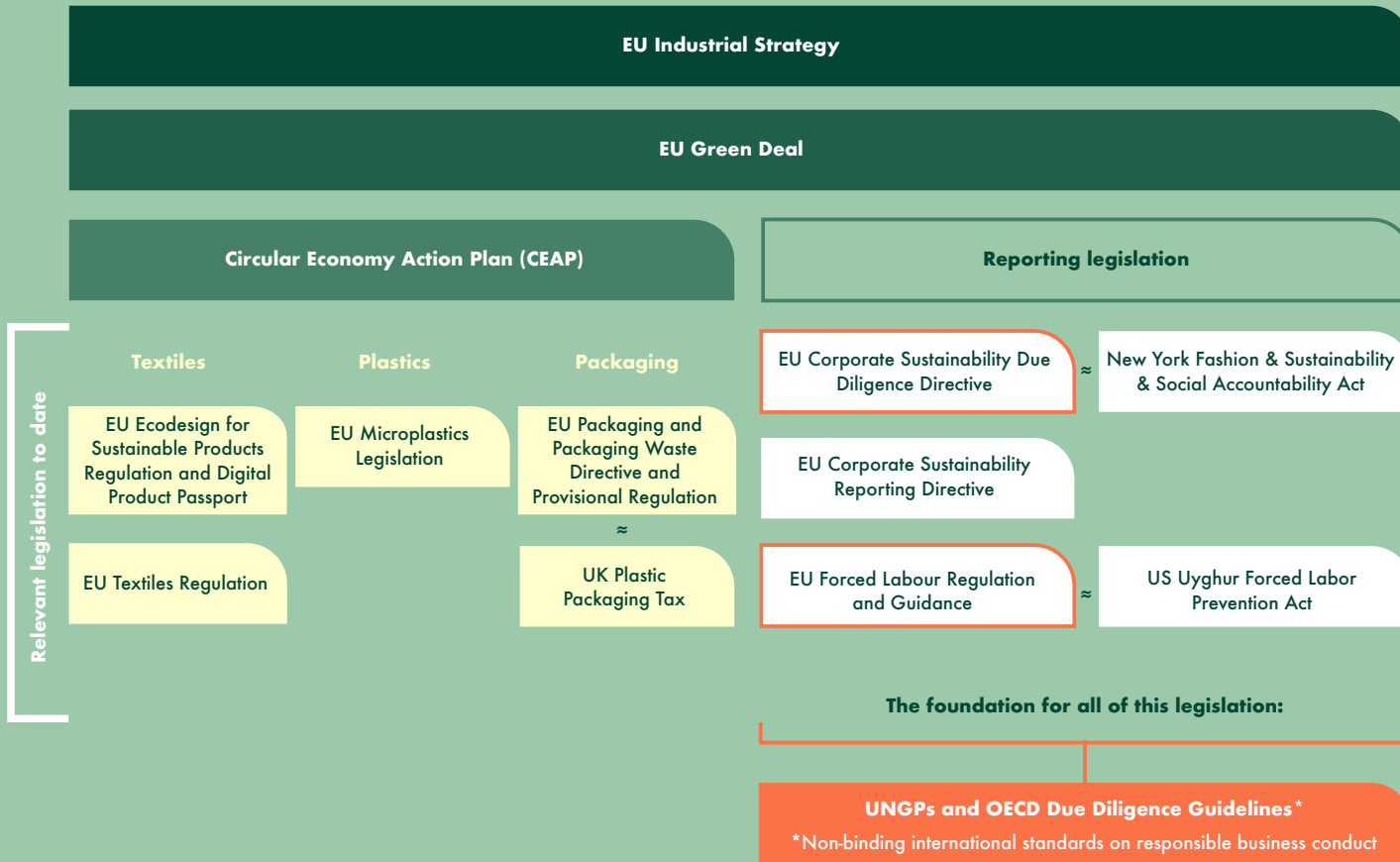
time for companies directly subject to these legislations, and for those who have business relationships with them, to align their sustainability policies and practices with these laws.

At a high level, these laws (especially those relating to mandatory human rights due diligence) can be collectively understood as a legal framework that translates elements of the United Nations Guiding Principles on Business and Human Rights (UNGPs) into binding legal obligations. The UNGPs represent the authoritative framework on how businesses should operationalize their commitments to human rights. As businesses are increasingly required to comply with different (and sometimes overlapping) laws in this area, it is The Remedy Project’s view that businesses that are able to operate in accordance with the UNGPs and other international frameworks such as the OECD Due Diligence Guidance for Responsible Business Conduct will be more successful in making this transition. Complying with the highest international standards could help future-proof business against future legislative changes and may also be more efficient from a process perspective. Furthermore, the Remedy Project sees a trend of many

brands upgrading their internal compliance and value chain requirements based on the UNGPs and international frameworks. Thus, complying with these international standards could help businesses position themselves to align with brands’ expectations and easily and effectively adapt to future legislative requirements, as well as satisfy the requirement of other business partners and customers. Instead of having to operate in accordance with different standards of compliance for each jurisdiction and each counterparty, the business can adopt a less fragmented, and thus less burdensome, approach to compliance. Of course, even if suppliers align with established international frameworks, different brands will continue to set varying detailed procedural requirements on their supply chain partners, particularly in the near future. We therefore continue to recommend that suppliers proactively work with brands and retailers on implementation to reduce the risk of multiple interpretations.

³ See for example the summaries of EU legislation on environment and climate change.

Snapshot of the Legislative Landscape in the Global North



Note * The legislations, regulations and directives in this diagram are not the complete set laid out under the umbrella strategies. Head to the [European Commission](https://ec.europa.eu/commission/presscorner/detail/en/ip_22_1111) website to learn more.

c. General implications for companies supplying apparel & beyond

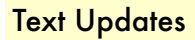
These legislative developments make clear that businesses will need to re-think the way they approach sustainability. This new era of legislation moves sustainability from “nice to have” to “must-have” and requires companies to implement human rights and environmental risk management practices. With this transition, we expect to see more cross-functional efforts to embed considerations of human rights and environmental impacts into business’ day-to-day operations and overall strategy. In this new landscape, in-house legal teams must work closely with procurement and sourcing, operations, product teams, and in-house sustainability experts to achieve compliance. There must also be executive and management level buy-in, and attention given to sustainability issues.

How to Use ● This Document

This document comprises a series of factsheets. For each legislation, the factsheet will cover the following topics on the right.

Updates to Factsheets will be identified by these indicators:

UPDATE 

 Text Updates

1. Key Changes

A summary of key changes to the legislation since August 2023.

2. Overview

A summary of the key aspects of the legislation.

3. Context

A description of the political context and policy objectives that the legislation seeks to address or achieve.

4. Status

Whether the legislation is in effect and if not, the current stage of the legislative procedure. If known, the expected timeline for implementation is also provided. For proposed EU legislation, users may find it helpful to refer to the [European Parliament's infographic](#) for information on the different stages of the EU legislative procedure.

5. Scope

This section sets out the types of companies or products that fall within the scope of the legislation. This may include, for example, an explanation of the thresholds that a certain company must meet for the legislation to apply. Our suggestion to suppliers is to start by identifying whether they are directly in-scope and, if so, review the obligations and compliance recommendations for companies in-scope (Sections 5 & 6). If a supplier has established that they are not directly in-scope, it is our suggestion that those suppliers review whether the brands for which they produce are in scope. If a supplier's customer is within scope, our suggestion is to review the potential implications for suppliers to companies in-scope (see Section 7).

6. Obligations for companies in-scope

A description of the duties and responsibilities that must be undertaken by the companies that are directly subject to the legislation.

7. Compliance recommendations for companies in-scope

Suggested recommendations for companies to prepare for compliance with the legislation (where the legislation is not yet in effect), or considerations for companies seeking to improve their compliance (where the legislation is already in effect). For the avoidance of doubt, these compliance recommendations do not constitute legal advice or opinion; companies should seek legal advice from attorneys concerning any specific situation or legal question they may have. Moreover, as the text of the laws in many cases remains subject to change, companies should refer to the most updated version of the legislation in developing their compliance strategy. The enforcement actions undertaken by the relevant regulator (once the law is in effect) will also determine the scope of compliance obligations.

8. Potential implications for suppliers to companies in-scope

In some instances, suppliers in the apparel value chain who are not directly subject to the concerned legislation, may still be impacted by the legislation as they supply to companies in-scope (i.e., a fashion brand or fashion retailer in-scope). These may include requirements around transparency and traceability, or obligations to undergo audits or obtain certifications. This section sets out the potential implications of the legislation for suppliers. For the avoidance of doubt, companies in-scope will approach compliance differently and many of the legislations covered in this document are in nascent stages of development. Moreover, the enforcement actions undertaken by the relevant regulator will also affect how companies in-scope respond to the legislation. As such, the guidance provided herein is only intended to represent our best estimates of the knock-on effects of the concerned legislation and is for informational purposes only.

9. Penalties for non-compliance

Where applicable or known, the penalties for companies in-scope that fail to comply with the legislation are set out.

10. Form of Enforcement

A description of the key forms of enforcement action that may be taken by the relevant authorities.

11. Reporting/disclosure for companies in-scope

An overview of the key information disclosure obligations (if any) for companies in-scope.

12. Access to remedy mechanisms and litigation risk

This section notes where the relevant legislation provides a right for legal action to be taken against a company for alleged non-compliance.

13. Opportunity to participate and engage in legislative development

Where applicable, opportunities to participate in public consultation.

14. Useful resources to support compliance

Links to third-party resources and guidance are provided for further detail on how companies in-scope may approach compliance and how suppliers or business partners to companies in-scope may prepare for cascaded compliance requirements.

Glossary

A glossary of key terms used in this document is set out below.

Brands: For the purposes of this document, this refers to a multinational company that is engaged in the business of offering branded apparel products.

Companies in-scope: Companies that are directly subject to the obligations set out in the relevant legislation.

Due Diligence: A process that businesses should carry out to identify, prevent, mitigate, and account for how they address the actual and potential adverse human rights or environmental impacts in their operations, their value chain and other business relationships.

EU Decision: A “decision” is binding on those to whom it is addressed (e.g., an EU country or an individual company) and is directly applicable.⁴

EU Delegated Act: A delegated act is an EU legislative mechanism to ensure that EU

laws that are passed can be implemented properly or reflect developments in a particular sector.

EU Directive: A directive is a legislative act that sets out a goal that all EU countries must achieve. However, it is up to the individual countries to devise their own laws on how to reach these goals⁵.

EU Regulation: A regulation is a binding legislative act. It must be applied in its entirety across the EU⁶.

EU negotiation position: A particular stance taken by a European Institution in a negotiation where it outlines the preferred result.

EU provisional agreement: When after negotiations, an informal agreement is reached on the text of a legislative proposal that then needs to be formally approved by the European Parliament and the Council of the European Union during the legislative procedure.

Adopted: When a law is officially approved at the end of the legislative procedure.

Approved: Used as a synonym for adopted or used in cases of approval of draft versions of the law.

Derogated: Not included or not applied.

European Commission: The European Commission is the EU’s politically independent executive arm. It is responsible for drawing up proposals for new European legislation, and it implements the decisions of the European Parliament and the Council of the EU.

European Council: The European Council is the EU institution that defines the general political direction and priorities of the European Union.

European Parliament: The European Parliament is the EU’s law-making body that is directly elected by EU voters every 5 years.

Grievance Mechanism: Any routinized, State-based, or non-State-based, judicial or non-judicial process through which grievances concerning business-related human rights abuse can be raised and remedy can be sought⁷.

^{4,5,6} European Union, Types of legislation

⁷ UNGPs Principle 25 and commentary

Types of EU legislation

- **Directive:**
A legislative act that sets out a goal for EU countries who then have to devise their own laws on how to reach these goals.
- **Regulation:**
A binding legislative act which must be applied in its entirety across the EU.
- **Decision:**
A binding law only on those to whom it is addressed (e.g. an EU country or an individual company) and is directly applicable (it does not have to be implemented by the recipient).
- **Delegated and Implementing Acts:**
Non-legislative acts adopted by the European Commission aimed at supplementing elements of a legislative act for uniform implementation.

Supplier: For the purposes of this document, unless otherwise specified, this refers to a supplier in the apparel value chain. While the information provided herein is applicable across the entire value chain, it is primarily intended for Tier 1 suppliers and sub-contractors who produced finished goods for fashion brands and retailers, and Tier 2 suppliers and sub-contractors who provide services and goods, such as knitting, weaving, washing, dyeing, finishing, printing for finished goods, and components (e.g., buttons, zippers, soles, down and fusible) and materials for finished goods.

Value Chain: A value chain encompasses all activities related to the production of goods or the provision of services by a company, including the development of the product or the service and the use and disposal of the product as well as the related activities of upstream and downstream business relationships of the company.

Intentionally added: Deliberately utilized in the formulation of a material or component where its continued presence is desired in the final product to provide a specific characteristic, appearance or quality.



EU Packaging and Packaging Waste Directive and Provisional Regulation

Directive 94/62/EC on Packaging and Packaging Waste and Provisional Regulation

UPDATE

1. Key Updates

On March 4, 2024, the Council of the EU and the EU Parliament's representatives reached a provisional political agreement on the Proposal for a regulation on packaging and packaging waste (PPWR). The PPWR has provided more clarity on the main requirements of PPWR, as detailed below. The main changes relate to Section 1, 3, 4, 5, and 6.

2. Overview

UPDATE

The directive 94/62/EC on packaging and packaging waste (**Directive**) is part of a set of the EU rules on packaging and packaging waste, including design and waste management. The Directive was last amended in 2018 as part of the Circular Economy Package.¹ An ambitious revision is currently under legislative procedure. On November 30, 2022 the European Commission put forward a proposal² for amending Regulation EU 2019/1020³ and Directive (EU) 2019/904⁴, and repealing the Directive (the **Proposal**). The European Union's Council and Parliament then adopted its position on the Proposal in November and December 2023 respectively. On March 4, 2024, the Council of the EU and the EU Parliament's representatives reached a provisional political agreement on the Proposal for a regulation on packaging and packaging waste (PPWR). PPWR considers the full life-cycle of packaging and establishes requirements to ensure that packaging is safe and sustainable by requiring that all packaging is recyclable and that the presence of substances of concern is minimised. The provisional agreement will now be submitted to the

member states' representatives within the EU Council and to the EU Parliament's environment committee for endorsement. If approved, the text will then need to be formally adopted by both institutions before it can be published in the EU's Official Journal and enter into force. The regulation will be applied from 18 months after the date of entry into force.⁵

This factsheet will discuss both the requirements of the current Directive and expected changes under the Proposal.

The Directive sets Essential Requirements (as defined in Section 5 below) and targets for EU countries regarding the recovery and recycling of packaging waste. It vastly covers

- i. the substances in packaging;
- ii. the recyclability of packaging;
- iii. the management of waste packaging; and
- iv. the labelling of packaging.

¹ The First Circular Economy Action Plan was published in 2018. For a summary of its implementation see Implementation of the first Circular Economy Action Plan, link. The second Circular Economy Package was published on 30 November 2022, link.

² European Commission, Proposal for a revision of EU legislation on Packaging and Packaging Waste, 30 November 2022, link.

³ Regulation (EU) 2019/1020 of the European Parliament and of the Council of 20 June 2019 on market surveillance and compliance of products.

⁴ Directive (EU) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment.

⁵ Packaging: Council and Parliament strike a deal to make packaging more sustainable and reduce packaging waste in the EU, 4 March 2024, link.

3. Context

The Directive regulates what kind of packaging can be placed on the EU market, and how packaging waste should be both managed and prevented. However, despite the implementation of the Directive, the European Commission has observed that packaging and packaging waste continue to have an increasingly serious impact on the environment. As such, the European Commission considers that the current Directive has failed to manage and reduce the negative environmental impacts of packaging. It has identified three groups of interlinked problems to solve:

1. Increase of packaging waste due to more single-use packaging, high level of avoidable packaging, and higher share of plastics in packaging;
2. Systemic issues with packaging circularity due to commonly used design features that inhibit recycling, and unclear packaging labelling; and
3. Systemic issues in EU's ability to reduce the use of virgin materials in new packaging.⁶

4. Status

The Current Directive

The Directive was first adopted on December 20, 1994. It has been amended several times to account for changes in packaging technology and consumption. The latest amendment to the Directive entered into force on July 4, 2018. The EU countries were required to transpose the Directive into national law by July 5, 2020.



⁶ European Commission, Executive summary of the impact assessment report accompanying the document Proposal for a Regulation of the European Parliament and the Council on packaging and packaging waste, 30 November 2022, [link](#).

5. Scope

The Directive covers all packaging placed on the European market and all packaging waste, whether it is used or released at industrial, commercial, office, shop, service, household, or any other level, regardless of the material used.⁷

Packaging means all products made of any materials of any nature to be used for the containment, protection, handling, delivery, and presentation of goods, from raw materials to processed goods, from the producer to the user or the consumer. 'Non-returnable' items used for the same purposes shall also be considered to constitute packaging.⁸ It includes all sales packaging or primary packaging, grouped packaging or secondary packaging, and transport packaging or tertiary packaging. Packaging used for textiles falls under the scope of the Directive.

6. Obligations for companies in-scope

Under the current Directive:

The Directive does not apply to companies directly, but instead creates obligations for EU countries to implement measures at national level to prevent the production of packaging waste, and to promote reuse of packaging, recycling, and recovery of packaging waste. EU countries are therefore required to ensure that packaging placed on the EU market meet the following essential requirements.

1. Essential Requirements

All packaging placed on the EU market to comply with three essential categories of requirements (the Essential Requirements):⁹

- **Manufacturing and composition of packaging:** packaging must be designed and manufactured adequately to (i) reduce its volume and weight to the minimum, (ii) permit its re-use or recovery including recycling, and (iii) limit the presence of noxious or hazardous substances and materials.

⁷ Article 2, Directive

⁸ Article 3, Directive

⁹ See Annex II – Essential requirements on the composition and the reusable and recoverable, including recyclable, nature of packaging

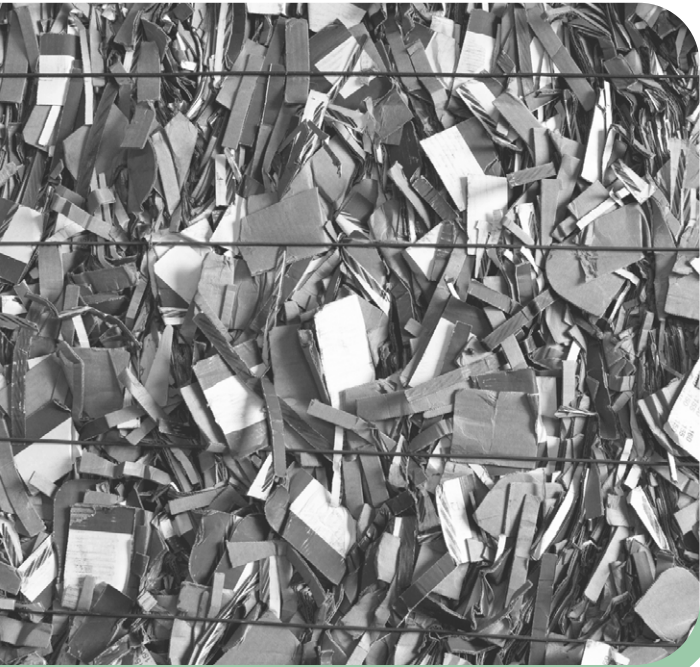
- **Re-usable nature of packaging:** packaging must be designed and manufactured adequately to (i) allow for multiple use/trips/rotations, (ii) allow for safe reuse processes, and (iii) be recoverable once the packaging is no longer re-used.
- **Recoverable nature of packaging:** packaging must be designed and manufactured adequately to allow for (i) its recovery in the form of material recycling, (ii) its recovery in the form of energy recovery, (iii) its recovery in the form of composting, and (iv) its biodegradability to be complete if advertised as biodegradable packaging.

2. Targets

The Directive sets multiple targets for the EU countries to achieve the above-mentioned objectives, notably:

- 3 years after the entry into force of the Directive, all packaging placed on the market shall comply with Essential Requirements;
- No later than 5 years after the implementation of the Directive in national laws, at least 50% of all packaging should be recovered, at least 15% of which by weight per packaging material being recycled¹⁰;
 - By December 31, 2025, at least 65% by weight of all packaging waste should be recycled. The recycling targets per material were set at: 50% of plastic, 25% of wood, 70% of ferrous metals, 50% of aluminum, 70% of glass, and 75% of paper and cardboard.
 - By December 31, 2030, at least 70% by weight of all packaging waste should be recycled. The recycling targets per material were set at: 55% of plastic, 30% of wood, 80% of ferrous metals, 60% of aluminum, 75% of glass and 85% of paper and cardboard.

¹⁰ Article 6.





- The concentration levels of heavy metals present in packaging should not exceed 600 ppm by weight no later than 2 years after the implementation of the Directive in national laws, should not exceed 250 ppm by 3 years after the implementation, and not exceed 100 ppm by weight 5 years after implementation.

3. Producer Responsibility

The EU countries must also establish responsibility schemes to encourage the design of environmentally friendly packaging by making sure that producers bear the financial and/or organizational responsibility for the waste management of their packaging.¹¹

Under the PPWR:

If enacted, PPWR would change the rules from being a directive to a regulation. It would create direct obligations on companies in-scope. For example, manufacturers that place packaging on the EU market would need to ensure that the packaging is designed and manufactured in accordance with the requirements set out in the regulation around substances used in packaging, minimum recycled content, recyclable and compostable packaging, reusable packaging, and packaging minimization. Any supplier of packaging or packaging materials will also be required to provide the manufacturer with all the information and documentation necessary for the manufacturer to demonstrate that the packaging conforms with the requirements of the Proposal.

Notably, if enacted EU manufacturers and importers into the EU will need to comply with PPWR. PPWR therefore does not differentiate between companies incorporated in the EU, and those incorporated outside the EU.

¹¹ Article 12 of the Directive

UPDATE

The main requirements of PPWR are to:

- reduce unnecessary packaging and promoting reusable and/or refillable packaging solutions –(i) introduces a restriction on placing on the market of food contact packaging containing per- and polyfluorinated alkyl substances (PFASs) above certain thresholds, (ii) includes 2030 and 2040 headline targets for minimum recycled content in plastic packaging (but exempts compostable plastic packaging and packaging whose plastic component represents less than 5% of the packaging total weight from such targets) and (iii) sets a maximum empty space ratio of 50% in grouped transport and e-commerce packaging and manufacturers are to reduce packaging unless the packaging is already protected when PPWR is enacted.
- set new binding re-use targets for 2030 and indicative target for 2040—(i) the targets vary based on the type of packaging used; micro-enterprises are exempt and economic operators are given the option to form pools of up to five final distributors to meet re-use targets for beverage packaging; (ii) includes a 5 year renewable five-year of exemption in specific cases and (iii) includes an obligation for take-away businesses to offer possibility of bringing own containers at no additional charge and by 2030 take-away activities should aim to get 10% of products in packaging which is suitable for re-use.
- set up deposit return systems to ensure the separate collection of at least 90% per annum of single-use plastic bottles and metal beverage containers by 2029—member states would be exempt from requirement to introduce a DRS if they reach a separate collection rate of above 80% in 2026 and they submit an implementation for achieving 90% target.
- restrict certain packaging formats (including single-use plastic packaging for fruit and vegetables, condiments, sauces within the HORECA sector, for small cosmetic and toiletry products, and for very lightweight plastic bags).¹²

¹² Packaging: Council and Parliament strike a deal to make packaging more sustainable and reduce packaging waste in the EU, 4 March 2024.

7. Compliance recommendations for companies in-scope

The Directive does not, by itself, create any specific obligations for companies. The obligations under the Directive largely fall upon the EU countries themselves to meet recycling targets for packaging waste, and to introduce measures to promote the use of reusable packaging, such as deposit-return schemes, economic incentives, and requirements relating to the minimum percentages of reusable packaging placed on the market for each type of packaging.

However, companies that produce and use packaging should refer to the relevant EU country's regulations on packaging and packaging waste, and if enacted the PPWR, and ensure that any packaging produced or sourced for use is compliant with national laws and measures and the PPWR. If enacted, PPWR will be applied from 18 months after the date of entry into force.¹³

¹³ Packaging: Council and Parliament strike a deal to make packaging more sustainable and reduce packaging waste in the EU, 4 March 2024, link.

8. Potential implications for suppliers

Suppliers to companies which are subject to national law requirements or measures to promote the use of reusable packaging and/or reduce packaging waste or the PPWR will likely face pressure to source packaging that use biobased, biodegradable, and compostable plastics as alternatives to conventional plastics. They are likely to face pressure to reduce the quantity of packaging used, and to use reusable and refillable packaging solutions, or otherwise ensure that packaging is recyclable or compostable.

9. Penalties for non-compliance

Not applicable as the Directive does not prescribe penalties for non-compliance for companies in-scope. To be defined under the PPWR.

10. Form of enforcement

Not applicable under the Directive.

To be defined under the PPWR.

¹³ Packaging: Council and Parliament strike a deal to make packaging more sustainable and reduce packaging waste in the EU, 4 March 2024, [link](#).

¹⁴ Ibid.

¹⁵ 2005/270/EC: Commission Decision of 22 March 2005 establishing the formats relating to the database system pursuant to Directive 94/62/EC of the European Parliament and of the Council on packaging and packaging waste, [link](#).
¹⁶ Commission Implementing Decision (EU) 2019/665 of 17 April 2019 amending Decision 2005/270/EC establishing the formats relating to the database system pursuant to European Parliament and Council Directive 94/62/EC on packaging and packaging waste, [link](#).

11. Reporting/ disclosure requirements for companies in-scope

There are no reporting obligations on companies. However, there are reporting requirements for the EU countries. Specifically, the EU countries must create and/or enable databases on packaging and packaging waste to facilitate the monitoring of the Directive's implementation.¹⁴ A European Commission decision¹⁵ decided on the format and rules regarding the calculation, verification, and reporting of data through the databases. A second European Commission decision¹⁶ later introduced new rules to improve the quality of reporting received. European Commission decisions are binding, meaning that addressees of the decisions (in this case, the EU countries) must comply with the decision. To be defined, if any, under the PPWR.

12. Access to remedy mechanisms and litigation risk

Not applicable under the Directive. To be defined, if any, under the PPWR.



13. Opportunity to participate and engage in legislative developments

Not applicable with respect to the Directive. In regards to the Proposal, the European Commission opened a feedback period from 1 December 2022 to 24 April 2023 to collect feedback on the Proposal which it will summarize and present to the European Parliament and Council to help with the legislative debate.

14. Useful resources to support compliance

Consolidated text: European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste

European Commission, Proposal for a revision of EU legislation on Packaging and Packaging Waste

European Commission, Packaging waste

Discover Other Factsheets from An Apparel Supplier's Guide 2.0

0

EU Strategy for Sustainable and Circular Textiles

1

EU Corporate Sustainability Reporting Directive

2

EU Corporate Sustainability Due Diligence Directive

3

New York Fashion Act

4

EU Forced Labour Regulation and Guidance

5

US Uyghur Forced Labor Prevention Act

6

EU Ecodesign for Sustainable Products Regulation

7

EU Packaging and Packaging Waste Directive and Provisional Regulation

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EU Microplastics Regulation

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UK Plastic Packaging Tax

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EU Product Environmental Footprint Guide

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EU Textiles Regulation

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EU Taxonomy

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German Supply Chain Due Diligence Act

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Lessons for fashion: How the agricultural sector is tackling commercial compliance through the EU Directive on unfair trading practices