Xpol
Where demand and supply synchronise

Packaging & the New EU Rules

What the PPWR means for XPOL

A practical guide to the Packaging and Packaging Waste Regulation (PPWR), the roles XPOL may have in different product flows, and the packaging choices Sales should prioritise.

What is PPWR?

Regulation (EU) 2025/40 sets common EU rules for packaging throughout its life cycle. It aims to prevent unnecessary packaging, improve recyclability, increase recycled content and support reuse.

Main themes

- ✓ Packaging minimisation and design
- ✓ Recyclability and recycled content
- ✓ Reuse and refill systems
- ✓ Labelling, data and conformity
- ✓ Extended Producer Responsibility (EPR)

Who may be affected?

Any company that manufactures, imports, fills, distributes or places packaging on the EU market may have responsibilities under the PPWR.

- Manufacturers and brand owners
- Importers and distributors
- Packers, fillers and repackers
- Retailers and market placers

PPWR timeline: key milestones

11 Feb 2025
Enters into force
The Regulation became EU law.

12 Aug 2026
Generally applies
Most PPWR provisions start to apply.

2028
Labels expected
Harmonised sorting labels are expected.

2030
Major targets
Recyclability, recycled content and reuse requirements strengthen.

Packaging is no longer only a commercial choice; it is also a compliance topic.

Sources: Regulation (EU) 2025/40 and European Commission PPWR guidance.

How the PPWR affects our process

Understanding our role, our responsibilities and the information we need.

1 Our product flow

1 Import → 2 Store / distribute → 3 Repack / sleeve / relabel → 4 Sell → 5 Place on market

2 Typical XPOL roles by chain

Packed at source outside the EU (e.g. Kenya)	**XPOL acts as importer** and may also be the party placing the packaged product on the market, depending on the sales flow and EPR rules.
Packed at source inside the EU	**XPOL often acts as distributor / trader** Check who first makes the packaging available in the destination country and whose brand appears on it.
Bought unpacked or as raw material; packed by XPOL in NL	**XPOL acts as packer / filler** and may be the producer or manufacturer for the packaging, depending on branding and national rules.
XPOL repacks, sleeves, bouquets, relabels or combines products	**XPOL may take on extra responsibilities** Review conformity, technical documentation and EPR obligations before sale.

3 Quick role check for Sales

1	Is the product already packed when XPOL buys it?	**Yes / No**
2	If yes, was it packed outside or inside the EU?	**Outside / Inside EU**
3	Will XPOL repack, relabel, sleeve, bouquet or combine products?	**Yes / No**
4	In which country is the packaged product first sold?	**Country**

These answers help define whether XPOL is acting mainly as importer, distributor, packer / repacker, or the party placing packaging on the market.

4 What changes in practice?

Check suppliers
Confirm compliance information and packaging suitability.

Build an approved packaging list
Use only formats and materials that have been reviewed.

Keep records
Maintain accurate information, evidence and declarations.

Review country-specific obligations
Understand and apply local EPR and reporting requirements.

5 What data do we need?

- ✓ Packaging type and code
- ✓ Material and components
- ✓ Weight of each component
- ✓ Supplier / manufacturer
- ✓ Country of origin
- ✓ Recycled content
- ✓ Recyclability information
- ✓ Declaration of conformity / evidence
- ✓ Brand or trademark shown on packaging
- ✓ Countries where sold

Main takeaway Before offering or using packaging, define the product flow, XPOL role, required evidence and country obligations.

Role descriptions are practical guidance; final legal responsibility can depend on branding, contracts, destination and national EPR rules.

What should Sales offer?

Practical guidance for discussing packaging materials with customers.

1 Key numbers to know



Minimum recycled content
From 2030 for many "other plastic packaging" applications, subject to category rules and exemptions.



Reuse target
From 2030 for specified transport packaging used within the EU, subject to scope and exemptions.

2 Sales guidance

Prefer	Check first	Avoid
Simple mono-material packaging	Mixed materials	Over-packaging
Right-sized packaging	Labels, tapes, adhesives and coatings	Vague green claims without proof
Verified recycled content	Country-specific obligations	Complex hard-to-recycle combinations
Reusable transport solutions where possible	Supplier documentation availability	Long-term use of non-approved materials
Packaging already on the approved list	TM New materials or marketing claims	Decorative solutions that add waste without clear value

3 How to speak about packaging with customers

Start the conversation
Ask about goals, constraints and the destination market.

Offer approved options
Balance flower protection, cost, sustainability and compliance.

Support with facts
Use verified material data and supplier documentation.

Partner for progress
Explain when a new option needs review before confirmation.

Example customer message

"We recommend this packaging option because it uses less material, is easier to document and is better aligned with the upcoming EU rules, while still protecting flower quality."

Recommend a solution. Back it up with proof.

Key takeaway

Use less. Keep it simple. Ask for proof. Choose reusable options where practical.

Before confirming packaging

- ✓ Approved option
- ✓ Data and proof available
- ✓ Destination obligations checked
- ✓ Flower quality protected

Important nuance

The 35% and 40% figures do not apply to every format. Targets depend on the packaging category, product flow and exemptions.

Sources: Regulation (EU) 2025/40, Articles 7 and 29; European Commission PPWR guidance.