

W H I T E P A P E R

Packaging Regulation Beyond the EU

How Switzerland and the United Kingdom Navigate the PPWR

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About This Paper

This white paper examines how Switzerland and the United Kingdom are responding to the EU's Packaging and Packaging Waste Regulation (Regulation EU 2025/40, or PPWR), which entered into force on 11 February 2025 and applies from 12 August 2026. Neither country is an EU member state, yet both face significant regulatory pressure — through trade dependencies and their own domestic reform agendas. This paper considers the practical implications for exporters, the state of domestic packaging legislation in each jurisdiction, and the degree to which that legislation converges with or diverges from the PPWR.

Executive Summary

The EU's Packaging and Packaging Waste Regulation (PPWR) is the most significant overhaul of European packaging law in three decades. By replacing the old Packaging Directive with a directly applicable regulation — one that requires no transposition into national law — the EU has effectively set a unified packaging standard across its 27 member states. For companies operating outside the EU, the regulation's reach does not end at the EU border.

Switzerland and the United Kingdom occupy different but equally instructive positions in relation to the PPWR. Switzerland is not in the EU or the EEA, yet its exporters face the full weight of PPWR compliance for goods entering the EU market. The UK, post-Brexit, has its own independent regulatory trajectory, building its own Extended Producer Responsibility system with an eye on EU alignment but without being legally bound to it.

The central finding of this paper is that the PPWR functions as a de facto standard for any business seeking EU market access — not merely an EU one. Any business seeking access to the European single market, wherever it is headquartered, must design and label packaging to PPWR specifications. This creates a powerful gravitational pull that is already reshaping domestic packaging legislation in both Switzerland and the UK, even without formal legal obligation.

Key Findings

- Switzerland has published a draft Packaging Ordinance (VerpV) due to take effect in January 2027. It broadly mirrors the PPWR in structure and intent but is deliberately less restrictive — notably omitting binding minimum recycled content quotas and outright bans on certain single-use plastics.
- Switzerland was, until recently, the only country in Western Europe without a comprehensive Extended Producer Responsibility regime. The VerpV closes this gap by extending EPR¹ to all packaging types and materials for the first time.
- Great Britain operates its own EPR system, launched under the Environment Act 2021, which shares some objectives with the PPWR but diverges on key details including reuse targets, recycled content mandates, and labelling requirements.
- UK businesses exporting to the EU are legally obliged to comply with the PPWR regardless of what domestic UK law requires. The same applies to Swiss exporters. Non-compliance risks goods being refused at EU borders from August 2026.

¹ Extended Producer Responsibility (EPR) is a policy principle that makes manufacturers, importers, and distributors financially and/or operationally responsible for the end-of-life management of the packaging they place on the market. In practice, EPR schemes require producers to register with a national authority, report the volume and type of packaging they use, and pay fees that fund the collection, sorting, and treatment of packaging waste — typically managed by local authorities or producer responsibility organisations. The underlying rationale is the “polluter pays” principle: those who benefit commercially from packaging bear the cost of its disposal rather than taxpayers.

1. The PPWR: What It Requires and Why It Matters Beyond the EU

Regulation (EU) 2025/40 entered into force on 11 February 2025 and applies in full from 12 August 2026, with certain provisions phased in through to 2040. It replaces Directive 94/62/EC, which had been in place for 30 years and suffered from inconsistent national implementation across member states. Unlike a directive, a regulation applies directly and uniformly — there is no room for member states to interpret or dilute requirements.

The PPWR's core requirements span the full packaging lifecycle. All packaging placed on the EU market must be recyclable by 2030 — meaning it must be designed for recycling, not that it must actually be recycled at that point. The distinction matters: by 2030 the obligation is one of design (packaging must meet “Designed for Recycling” criteria, graded A to C, with grade C to be phased out by 2038). A separate and more demanding standard — that packaging be “recycled at scale”, i.e. processed through real industrial recycling infrastructure across the EU — does not apply until 2035. In short, 2030 is about what packaging is capable of; 2035 is about what actually happens to it. Plastic packaging must meet minimum recycled content targets. Reuse and refill systems are mandated for certain sectors, with binding targets from 2030 onwards. A harmonised labelling system — including material composition information and consumer sorting guidance — will be required from 2028. PFAS restrictions on food contact packaging apply from mid-2026. Deposit Return Schemes for single-use plastic and metal beverage containers must be in operation by 2029. Extended Producer Responsibility obligations apply to all packaging producers.

WHY NON-EU COUNTRIES ARE AFFECTED

The PPWR defines its scope by market access, not geography. Any packaging placed on the EU market — whether manufactured in Frankfurt, Geneva, or Glasgow — must comply. This is the mechanism through which the regulation reaches well beyond EU borders, compelling non-member exporters to meet EU standards as a condition of trade.

This market-access logic is sometimes called the “Brussels Effect”: the tendency for EU regulation to become a binding standard for any trading partner that wants access to the EU market. To be precise, this is not a global standard in the sense that the US, China, or other major economies are legally required to follow it — they are not. But for Switzerland and the UK, whose exporters depend heavily on EU market access, the PPWR functions as a de facto standard because the alternative — maintaining separate, non-compliant packaging for EU-bound goods — is commercially impractical. Businesses rarely maintain separate packaging lines for EU and non-EU markets — the economics favour harmonisation upward. The result is that PPWR requirements ripple outward into supply chains and regulatory agendas far beyond the EU's formal jurisdiction, at least among its close trading partners.

2. Switzerland: Complying to Export, Reforming at Home

2.1 The Export Compliance Obligation

Switzerland's relationship with the EU is governed by a complex web of bilateral agreements rather than EEA membership or an EU-Switzerland framework agreement. This means Switzerland does not automatically adopt EU regulations, and the PPWR has no direct legal force in Swiss domestic law. However, this matters little for Swiss companies that export to the EU — and many of them do.

Any Swiss manufacturer, brand owner, or distributor placing packaged goods on the EU market for the first time must comply with all applicable PPWR requirements. In practice, this means Swiss exporters need to ensure that their packaging is recyclable, appropriately labelled, free of PFAS in food contact applications, and registered under an Extended Producer Responsibility scheme in each EU member state where they first place products on the market. Article 45 of the PPWR requires producers established outside the EU to appoint an authorised representative for EPR purposes in each member state where they operate — a significant administrative undertaking for smaller Swiss businesses.

PRACTICAL IMPLICATION FOR SWISS EXPORTERS

From August 2026, a Swiss chocolate manufacturer selling into Germany and France will need to comply fully with PPWR requirements for those markets — recyclability standards, labelling specifications, EPR registration, and appointed representatives — regardless of what Swiss domestic law requires. The cost and complexity of dual compliance creates strong incentives for Swiss companies to simply design all their packaging to PPWR standards, even for domestic sales.

2.2 Domestic Reform: The New Packaging Ordinance (VerpV)

Switzerland's domestic packaging framework has, until recently, been conspicuously thin. The existing Packaging Ordinance (VGV) was last revised in 2000 and applied only to beverage containers. This made Switzerland the only country in Western Europe without a comprehensive Extended Producer Responsibility regime for packaging — a regulatory gap that had grown increasingly difficult to justify as neighbouring countries moved toward circular economy frameworks.

In June 2025, the Swiss Federal Council published a consultation draft for a new Federal Ordinance on Packaging (the 'd-PO' or VerpV), with a public consultation period that ran until October 2025. Subject to revisions following that consultation, the ordinance is expected to take effect in January 2027. It would extend EPR obligations to all types and materials of packaging for the first time — covering everything from consumer goods to industrial transport packaging.

Alignment with the PPWR

The VerpV is explicitly designed with the PPWR in mind, though it stops well short of full transposition. The Federal Council has opted for a framework that is broadly compatible with

EU objectives — sustainability, circularity, reduced waste — while maintaining Swiss regulatory discretion on specifics. The most significant divergences from the PPWR include the following.

- No binding minimum recycled content quotas. The PPWR sets mandatory minimum percentages of post-consumer recycled content for plastic packaging, phased in from 2030. The VerpV does not replicate these binding quotas, relying instead on industry incentives and market signals to drive recycled content uptake.
- No outright bans on single-use plastics. The PPWR restricts or phases out certain categories of single-use plastic packaging in conjunction with the Single Use Plastics Directive. The Swiss draft does not include equivalent prohibitions.
- More space for self-regulation. The VerpV is designed to accommodate privately organised plastic recycling schemes, giving industry greater latitude to develop compliance approaches rather than mandating specific infrastructure.
- EPR extended comprehensively. In this respect, the VerpV goes further than the existing Swiss framework — not because it exceeds the PPWR, but because Switzerland is starting from a lower base. The new ordinance brings Switzerland in line with what has long been standard across Western Europe.

The overall picture is of a Swiss regulator that recognises the direction of travel — and the commercial logic of aligning with the EU — while preserving national flexibility where the political economy permits. Swiss businesses should not assume that VerpV compliance automatically means PPWR compliance for export purposes. The two frameworks will overlap substantially but are not identical.

Note on reuse vs recycling — VerpV and UK EPR compared: The PPWR addresses both recycling (packaging must be designed to be recycled, with content quotas) and reuse (binding refill/reuse targets for certain sectors from 2030). The Swiss VerpV covers both dimensions in principle — the consultation draft explicitly prioritises “reuse and recycling over other waste treatment options” and raises recycling targets (including a 55% target for single-use plastic packaging). However, the VerpV does not include binding reuse rates equivalent to the PPWR’s sector-specific mandates; reuse is encouraged as a priority hierarchy rather than mandated through hard numerical targets. The UK EPR scheme, by contrast, addresses primarily recycling: it funds collection and waste treatment but contains no binding reuse or refill targets. The UK government has signalled it will consult on reusable packaging incentives, but binding reuse obligations are not currently planned in Great Britain. On recycling, both frameworks set targets and fund infrastructure — but neither matches the PPWR’s specificity or the binding force of its recycled content quotas.

3. The United Kingdom: A Divided Regulatory Landscape

3.1 Great Britain: Independent Path, EU Influence

Following its departure from the EU, Great Britain (England, Scotland, and Wales) developed its own packaging regulatory framework under the Environment Act 2021 and the subsequent UK Extended Producer Responsibility scheme. This regime shares the PPWR's broad objectives — reducing packaging waste, increasing recycling rates, improving recyclability — but is an independent legal instrument, not a derivative of EU law.

For UK businesses exporting to the EU, the position is the same as for Swiss exporters: PPWR compliance is a condition of market access, not a domestic legal obligation. Goods sold only within the UK need not meet PPWR requirements. In practice, however, many UK companies — particularly in food, beverages, and fast-moving consumer goods — sell into both the EU market and their own domestic UK market. For them, dual-system compliance is unavoidable, and the administrative overhead is considerable.

UK EPR and PPWR: Convergences and Gaps

The UK EPR scheme, which came into force in 2024, requires producers to register and pay fees based on the amount and type of packaging they place on the UK market. These fees fund the full net cost of managing household packaging waste — covering collection, sorting, recycling, and disposal by local authorities, not recycling alone. The scheme targets the same problem as the PPWR but differs in a number of important respects.

- No binding reuse targets. The UK EPR does not include the PPWR's mandatory reuse and refill targets for sectors such as food service and retail. The government has indicated it will consult on reusable packaging incentives, particularly for glass, but binding obligations are not currently planned.
- No minimum recycled content mandates. Unlike the PPWR, UK EPR does not set legally binding minimums for post-consumer recycled content in plastic packaging. The UK's approach relies more heavily on economic incentives within the EPR fee structure.
- Labelling in flux. UK EPR labelling requirements were temporarily suspended pending a review of potential alignment with the EU's forthcoming harmonised label system (due from August 2028 under the PPWR). The government has stated that simplifying requirements for businesses operating across both markets is a priority objective.
- Deposit Return Scheme. England is implementing a Deposit Return Scheme for single-use plastic and metal beverage containers, currently targeted for 2027 — broadly similar in design to what the PPWR requires of member states by 2029.

REGULATORY DIVERGENCE RISK

The gap between UK EPR and PPWR requirements is manageable today but could widen as the PPWR's more demanding second-phase requirements (2030–2040) come into force. UK businesses investing in packaging redesign now should build PPWR compliance into their specifications, even for domestic-only products, to avoid costly redesigns as regulatory alignment becomes commercially necessary.

4. Comparative Overview

The table below summarises the current and anticipated position across the three relevant jurisdictions. It reflects the state of regulations and published draft legislation as of May 2026. A number of implementing acts under the PPWR remain to be adopted, and both the UK and Switzerland may revise their frameworks in response.

Requirement	EU PPWR	Switzerland (VerpV)	Great Britain
Legally binding domestically	Yes	From 2027 (partial)	No
EPR obligations	Full (2025–26)	Full (2027)	Yes (2024)
Recyclability targets	All packaging by 2030	Encouraged, no mandate	Developing
Min. recycled content	Binding quotas	No quotas (as yet)	Under development
Reuse / refill targets	Binding from 2030	Not included	Not included
Harmonised labelling	From Aug 2028	Broadly aligned	Under review
PFAS restrictions	From mid-2026	To be determined	Separate regime
Deposit Return Scheme	Mandatory by 2029	Existing VPbV scheme	England DRS (2027)

Reading across this table, the direction of travel is clear: all four jurisdictions are moving toward broadly similar packaging sustainability requirements, but at different speeds and with different levels of legal compulsion. The PPWR sets the ceiling and, effectively, the reference point against which all others are calibrated.

5. Practical Implications for Businesses

5.1 Swiss Companies

Swiss businesses that export to the EU face the most immediate and concrete compliance obligation. PPWR requirements apply to their EU-market packaging from August 2026, regardless of the state of Swiss domestic law. Priorities should include assessing the recyclability of all packaging formats against PPWR criteria, registering for EPR in relevant EU member states, and appointing authorised EPR representatives where required.

For domestic packaging, the VerpV framework coming into force in January 2027 will introduce EPR obligations and broader sustainability requirements for the first time. Companies that align domestic packaging to PPWR standards now — rather than waiting for VerpV implementation — will be better placed to manage both frameworks efficiently and will avoid the cost of parallel compliance paths.

5.2 UK Companies Exporting to the EU

UK exporters must comply fully with PPWR requirements for packaging placed on the EU market. This is a market-access requirement with real enforcement consequences: non-compliant goods risk refusal at EU borders. The August 2026 application date leaves limited time for companies that have not yet begun their PPWR compliance assessment.

5.3 Does PPWR Compliance Cover Domestic Law? The Key Question for Swiss and UK Businesses

The short answer is: no, not in full — and the direction of the gap matters. PPWR compliance means you satisfy the requirements for placing packaging on the EU market. It does not automatically mean you satisfy the domestic legal requirements in Switzerland or the UK for packaging sold in those markets. The two frameworks overlap substantially but are not identical, and the differences run in both directions.

For Switzerland specifically: PPWR compliance gets you a long way, but there are domestic obligations the PPWR does not cover. The VerpV will require EPR registration and fee payment with Swiss authorities — separate from EU EPR registration — and will impose take-back obligations for certain packaging categories. Crucially, the PPWR's PFAS restrictions and recycled content quotas do not currently exist in Swiss domestic law; a company that designs packaging to PPWR standards for its EU exports will often be exceeding what Swiss law requires on those specific points, but it will still need to register separately for Swiss EPR and comply with Swiss-specific take-back timelines (some obligations begin January 2028, reporting from 2029). Conversely, if the PPWR's design and substance standards become stricter than what the VerpV requires — which is likely in certain areas — PPWR compliance will automatically satisfy Swiss requirements on those dimensions.

For the UK specifically: PPWR compliance does not satisfy UK domestic law, and UK EPR compliance does not satisfy the PPWR. They are independent legal obligations. A company placing packaging on both the EU and UK markets must comply with both separately —

different EPR registrations, different fee schemes, different labelling requirements (the UK's are currently suspended pending review, but will return), and different recyclability assessment methodologies. The UK's Recyclability Assessment Methodology (RAM) uses a red/amber/green rating system that is not the same as the PPWR's A/B/C grade system. A packaging format that achieves a "green" rating under UK RAM is not automatically a PPWR "grade A" and vice versa. There is also one area where UK law goes further than the PPWR in its current form: the UK EPR fee structure is modulated by recyclability from April 2026, creating a financial incentive for recyclable design ahead of the PPWR's equivalent mechanism.

The practical recommendation is therefore not "comply with PPWR and you're covered domestically" — it is closer to the reverse: use PPWR as the design standard for your packaging (recyclability, substance restrictions, minimisation, labelling architecture), since it is the most demanding and specific of the relevant frameworks. Then layer the domestic EPR registration, fee payment, and reporting obligations of Switzerland or the UK on top as separate administrative compliance steps. PPWR compliance will reduce the engineering and design work needed for domestic compliance, but it will not replace the domestic compliance process itself. Businesses investing in packaging redesign now should also factor in likely future convergence: as both Switzerland and the UK tighten their domestic frameworks toward PPWR-equivalent standards over the coming years, the residual gap will narrow — but it will not disappear entirely, and the administrative separation of two distinct EPR systems will remain.

6. Conclusions

The PPWR is not merely an EU regulation. Through trade dependencies and the logic of market access, it functions as a binding standard for Switzerland and the UK — any business wishing to participate in the European single market must meet its requirements, regardless of where the business is established. Switzerland and the United Kingdom are not EU members, but neither is effectively insulated from the PPWR's requirements.

Switzerland has responded by initiating a domestic packaging reform — the VerpV — that takes the PPWR as its primary reference point while exercising national discretion on the most demanding requirements. The result will be a framework that is broadly compatible with EU sustainability objectives but less prescriptive on specifics such as recycled content quotas and single-use plastic restrictions.

The United Kingdom's response is more considered. Great Britain is developing its own EPR system that converges with the PPWR in many respects but diverges on others — particularly reuse targets, recycled content mandates, and labelling.

For businesses on both sides of these borders, the practical message is consistent: design to PPWR standards, plan for convergence, and do not treat the absence of direct domestic legal obligation as a reason to delay. The market has already moved; the regulation is catching up.

References and Further Reading

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