ENVIRONMENT SEMINAR 2026 | SESSION REPORT

Europe: What happens next?

PPWR and the European foodservice market

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Eamonn Bates: Secretary General, 360° Foodservice

Eamonn Bates is Secretary General of 360° Foodservice, a European organisation representing the foodservice packaging sector. His Seminar presentation considered the new obligations and uncertainties created by the EU Packaging and Packaging Waste Regulation (PPWR) for businesses placing packaging on the EU market.

KEY FINDINGS

- PPWR creates distinct responsibilities for manufacturers and EPR producers.
- Own-brand arrangements and cross-border supply can change who carries an obligation.
- EU requirements will also have implications for Northern Ireland.
- Further implementing measures and guidance will determine practical details.

FULL SESSION REPORT

European packaging rules are creating new responsibilities for foodservice businesses and challenging the assumptions on which companies have traditionally organised their supply chains, Eamonn Bates told delegates at the FPA Environment Seminar. Presenting on the Packaging and Packaging Waste Regulation (PPWR), he examined how firms may need to reconsider their roles, obligations and approach to compliance.

One regulation, different responsibilities

Bates explained the significance of the PPWR distinction between a 'manufacturer' for product-compliance purposes and a 'producer' for extended producer responsibility. These terms do not simply map onto everyday trade descriptions. The organisation that converts a material into a cup or container may not be the same undertaking responsible for EPR registration and fees when packaging is placed on a market.

That distinction matters particularly for the foodservice packaging chain, with its combination of converters, importers, distributors, own-brand customers, hospitality businesses and cross-border suppliers. Businesses need to identify which products they place on the market, whose name or trademark they carry and the role each party plays under the relevant definitions.

The presentation examined scenarios where an importer, distributor or brand customer can take on obligations depending on the commercial arrangement. Bates also highlighted a narrowly defined microenterprise exception in the product-compliance provisions, cautioning that the conditions matter and should not be treated as a general exemption for smaller businesses.

Product compliance, traceability and labelling

Bates addressed the responsibilities linked to packaging design, conformity assessment, documentation, declarations of conformity and traceability information. Some of these requirements are already relevant; others will depend on phased dates and secondary measures. Businesses therefore need a timetable that distinguishes requirements that apply now from measures still under development.

He drew attention to the difference between the manufacturer identification information provisions and the EU's later harmonised labelling arrangements. These are separate obligations and should not be conflated when planning packaging artwork or compliance systems.

Restrictions and the role of guidance

The session also considered Annex V restrictions relevant to particular single-use packaging formats used in the hospitality and foodservice market from 2030. The European Commission's interpretation of the plastic-content threshold requires careful attention; being below the PPWR threshold does not, of itself, remove obligations under other legislation such as the Single-Use Plastics Directive.

Bates emphasised that businesses should monitor Commission guidance and implementing acts, particularly where the final practical detail remains unsettled. Decisions made prematurely could lock companies into artwork, product development or compliance arrangements that later need changing.

A UK business issue, not only an EU issue

The presentation also highlighted Northern Ireland, where relevant PPWR provisions apply under the Windsor Framework, and the implications for UK companies selling packaging into the EU. Businesses supplying multiple markets may need to manage separate compliance arrangements and changing labelling requirements.

His overarching message was that companies must first establish their correct legal role, understand the products and markets concerned and then build compliance processes around the detailed requirements, rather than assuming that existing UK EPR responsibilities translate directly into PPWR obligations.

SESSION PHOTOGRAPHY





PRESENTATION SLIDES

Download a PDF of the presentation slides here

Source and publication note

This session report is intended to be an overview and is not a verbatim transcript.