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European Commission Issues Guidance on E.U. Packaging Rules Before 2026 Deadline

The notice clarifies how refillable cups, beer kegs and branded packaging will be classified under the bloc’s new law.

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The European Commission has published new guidance on the European Union’s packaging and packaging waste regulation, offering companies and national authorities a clearer reading of rules that will begin to apply on Aug. 12, 2026, including provisions that matter for bars, restaurants and beverage suppliers using refillable containers such as beer kegs.

The notice, published Wednesday in the Official Journal of the European Union, is meant to explain selected parts of Regulation (EU) 2025/40, known as the PPWR. The Commission said it issued the document after receiving many questions from member states and businesses about how to interpret the law. It said the goal is to support timely implementation and more uniform application across the bloc.

The guidance does not change the law and does not create new obligations. The Commission said only the regulation itself is legally binding, and final interpretation remains with the Court of Justice of the European Union. Still, the document gives businesses an early indication of how Brussels expects key definitions and compliance duties to work in practice as companies prepare packaging designs, labeling systems and logistics plans ahead of next year’s start date.

For beverage producers, importers and hospitality operators, that matters because the regulation reaches far beyond consumer-facing bottles and cans. It affects how packaging is classified, who is treated as the manufacturer for compliance purposes, and how reuse systems may be counted. Those points can shape investment decisions in refillable formats, transport packaging and back-of-house handling across the beer trade and other drinks categories.

The Commission said the PPWR entered into force on Feb. 11, 2025, and will apply from Aug. 12, 2026. It added that more detail will still come through implementing acts, delegated acts, standardization requests and further guidelines over the next two to three years. At the same time, it said it does not intend to prioritize an implementing act on a methodology for identifying material composition of packaging by digital labeling.

A central part of the guidance deals with what counts as packaging under the regulation. The law defines packaging broadly as an item used by an economic operator for containing, protecting, handling, delivering or presenting products to another operator or to an end user. The Commission stressed that classification depends on function and intended use, not only on whether an item appears in Annex I, an indicative list of examples.

That distinction can affect beverage service directly. The guidance says that if a beverage cup is sold empty in a supermarket for private use by consumers, it is not considered packaging. But if a supermarket fills that same type of cup with a product such as coffee at a refill station, it becomes packaging, specifically service packaging. The example shows how identical objects can fall inside or outside the rules depending on how they are used in commerce.

The document also addresses who counts as the “manufacturer” under the regulation, another issue with practical consequences for packaged drinks sold across borders or under private labels. The Commission said a manufacturer is not necessarily the company that physically produces the packaging material. In many cases for sales packaging and grouped packaging, it will normally be the filler that performs final processing steps and places the packaged product on the EU market. That means beverage companies that fill bottles, cans or multipacks under their own brand will often carry primary responsibility even if converters or suppliers made the packaging itself.

For transport packaging and service packaging in final form, the manufacturer will normally be the company that makes that packaging unless it is clearly branded by its user. Under certain conditions, importers and distributors can also be treated as manufacturers if they place packaging on the market under their own name or trademark or modify it in ways that could affect compliance.

Although the excerpt published by the Commission ranges across many sectors, including horticulture, textiles and medical products, its relevance for drinks lies in how it clarifies reuse and classification questions in food service and business-to-business supply chains. The monitor summary tied to the notice points in particular to clarification around reuse in HORECA — hotels, restaurants and catering — and to beer kegs supplied in reusable systems between businesses.

That point could be significant for brewers because reusable beer kegs are a core format in draft distribution across Europe. Clarification on whether those B2B keg movements count toward reuse targets may influence how breweries measure compliance and report performance under the new regime. It may also affect decisions

on fleet management, washing capacity, reverse logistics and whether companies favor one package type over another in on-trade channels.

The broader regulation is also expected to shape recyclability requirements from Aug. 12, 2026. For beverage companies, that creates pressure to review materials used in bottles, closures, labels, sleeves, secondary packs and transport units so they align with future EU standards. Even where this week’s notice does not settle every technical question, it signals how closely regulators are looking at functional design choices rather than relying only on product category labels.

The Commission said its guidance should be read together with the regulation and related legislation rather than as a stand-alone reference. It also said both this document and accompanying frequently asked questions may be updated as more stakeholder input arrives and as practical experience develops once the rules begin to apply.

For breweries and other drinks businesses operating in Europe, that leaves a short runway to prepare. Companies selling into supermarkets face one set of issues around sales packaging and branding responsibility. Those supplying bars and restaurants face another around reusable service systems and transport formats such as kegs. In both cases, the new guidance suggests regulators want consistent treatment across member states before enforcement begins next summer.

The notice was published as a Commission communication in the Official Journal under reference C/2026/3084. Its release gives companies their clearest official reading so far of several contested parts of one of the EU’s most consequential packaging laws for consumer goods industries, including beer and other beverages sold through retail and hospitality channels.