In this issue:

EU Regulation on the prevention of losses of plastic granules to reduce microplastic pollution

The main aspects concern:

- ✓ **Prevention of losses of plastic granules throughout the supply chain** (production, transport, storage), with the aim of reducing microplastic releases into the environment to zero
- ✓ **Obligation to implement a risk management system**, including prevention, containment and cleaning measures, monitoring of losses and recording of quantities handled
- ✓ **Control and compliance mechanisms**, through reporting, inspections, certification/declarations and significant sanctions in case of non-compliance

The new EU Regulation on packaging and packaging waste

The main aspects concern:

- ✓ **Circular economy and sustainability of packaging –** the regulation requires all packaging to be recyclable, reusable or compostable, with progressive requirements until 2030–2035 for design, recycling at scale and recycled content
- ✓ **Waste reduction and packaging optimization -** strict rules are introduced to minimize packaging volume and weight, limit empty space (e.g. e-commerce) and reuse targets and reduce unnecessary packaging
- ✓ **Extended Responsibility and EU Harmonisation (EPR) -** it is clearly established who is responsible (producer) for the financing of waste management, with harmonised rules in the EU for labelling, collection, recycling and return systems (DRS)

The new EU Regulation on shipments of waste

The main aspects concern:

- ✓ **Strict control of waste shipments** – introduces tougher rules for exports (especially to non-OECD countries) and clear notification, authorisation and traceability procedures
- ✓ **Full digitalisation of the system** – all notifications and documents on waste shipments will be managed through an EU-wide electronic system
- ✓ **Environmental protection and circular economy** – limits the export of problematic waste (e.g. plastic) and encourages its treatment and recycling within the EU

1. REGULATION (EU) 2025/2365 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 12 November 2025 on the prevention of losses of plastic granules to reduce microplastic pollution

The European Union has recently introduced new regulations to reduce microplastic pollution, with a direct impact on several industries.

What does the new regulation provide?
It aims to prevent the loss of plastic granules and restricts the use of synthetic polymer microparticles in certain products.

Who is concerned?
The regulation applies to the entire plastics supply chain, including:

- plastic Manufacturers & Recyclers;
- polymer processing and processing companies;
- distributors and logistics operators who handle and transport such polymers;
- Ocean carriers and warehouses.

Restrictions on microplastics content also affect industries such as:

- cosmetics & personal care;
- detergents and cleaning products;
- agriculture and fertilizers;
- constructions and technical materials.

Why is it important?
Companies need to take measures to prevent grain losses, adapt their products, and comply with new reporting and reporting requirements.

What's next?
The implementation of legal obligations will be done in stages, and some sectors of activity benefit from transition periods. The closest deadline is 31.05.2026.

We recommend assessing the impact on your business and taking the necessary compliance measures in advance.

If you have any questions or would like support in interpreting the regulations, please do not hesitate to contact us.

2. REGULATION (EU) 2025/40 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904 and repealing Directive 94/62/EC

Regulation (EU) 2025/40 on packaging and packaging waste (PPWR) entered into force on 11 February 2025 and will become applicable from 12 August 2026.

Scope
It applies to all economic operators who produce, import or place on the market packaging or packaged products, setting harmonised requirements at EU level.

Main technical requirements:

- recyclability: all packaging must be recyclable (applicable from 2026; requirements detailed later);
- design for recycling: harmonised technical criteria from 2030 onwards;
- minimization: reducing the weight and volume of packaging to the minimum necessary;
- recycled content: binding targets for plastic packaging (with certain derogations);

- reuse: introduction of targets for reusable packaging (including transport and HORECA);
- labelling and compliance: requirements for user information and technical documentation.

Operators' responsibility:

- manufacturers (in the sense of PPWR) must finance waste management (EPR);
- manufacturers must ensure compliance of packaging before placing on the market;
- reporting, registration and traceability obligations at national level.

The main risks of non-compliance:

- blocking access to the EU market for non-compliant packaging;
- sanctions and penalties at national level (EPR, incorrect reporting);
- additional costs (higher EPR fees, urgent packaging redesign);
- contractual risk in the relationship with retailers and partners (sustainability requirements);
- reputational impact (ESG non-compliance / pressure from customers).

Indicative calendar:

- 2026 – general application
- 2030 – Design requirements for recycling and minimization
- 2035 – 'At scale' recycling requirements

Recommendation:
A technical analysis of the existing packaging (materials, design, supply chain) and preparation for progressive compliance is required.

3. REGULATION (EU) 2024/1157 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 April 2024 on shipments of waste, amending Regulations (EU) no. 1257/2013 and (EU) 2020/1056 and repealing Regulation (EC) no. 1013/2006

The new Regulation (EU) 2024/1157 on shipments of waste introduces major changes, applicable from **21 May 2026**, including the full digitalisation of procedures through the DIWASS system.

Key changes:

- electronic-only transmission of notifications and documents;
- extending EU control over illegal transfers;
- **mandatory audit** of installations in third countries (exports);
- new rules for plastic waste (EU3011, 6% threshold);
- the possibility **of an export ban** by the Commission.

Risks of non-compliance:

- rejection of border shipments or blocking of transfers;
- administrative sanctions and liability for illegal transfers;
- impossibility of exporting without a valid audit;
- IT non-compliance (lack of access/registration in DIWASS);
- operational delays during the transition period (dual regime 1013/2006 + 2024/1157).

Impact for operators:

- the obligation to register and use DIWASS (EU Login);
- revision of the classification of waste (especially plastic);
- adapting internal procedures and training staff;
- temporary maintenance of reporting in national systems (e.g. ROAFM).

Key Highlights:

- 21 May 2026 – application of the new regulation
- Nov. 2026 – ban on plastic exports to non-OECD
- Transition – parallel application for existing notifications

Recommendation:
Prepare in advance for digitalisation, audit the value chain and align internal procedures.

For more details, please feel free to contact us.

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