



Sustainable packaging: navigating policy, risk and implementation

How to navigate the evolving packaging regulatory landscape

NOVEMBER 2025



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In a time when the future of packaging is being reshaped, organisations must navigate an increasingly complex regulatory landscape and rising stakeholder expectations.

This document offers **strategic insights** and **practical guidance** to help decision-makers and teams **understand evolving requirements**, **manage compliance risks**, and **embed sustainability into packaging strategies**.

Readers will find actionable steps and perspectives that support resilient, responsible, and forward-thinking approaches to packaging in today's dynamic environment.

Who should be addressing packaging sustainability

Packaging sustainability has evolved from a niche concern to a central, strategic issue that permeates every function of an organisation. No longer the exclusive remit of environmental teams, it now demands active engagement from procurement, design, logistics, marketing, compliance, and finance. Any company placing packaged products on the market in a B2C or B2B context - whether as a manufacturer, brand owner, importer, or retailer, must now consider not only the environmental footprint of its packaging, but also its regulatory obligations and end-of-life management.

This shift is driven by mounting regulatory pressure, growing client expectations, and the increasing recognition that sustainable packaging is both a compliance requirement and a lever for value creation.



For example, **client experience demonstrates that addressing packaging sustainability is essential for maintaining market access, managing risk, and responding to stakeholder and regulatory demands across global markets.**

Regulatory Context

The packaging regulatory environment is undergoing one of the most significant transformations in decades. What was once a domain focused primarily on waste management now extends to encompass design, material sourcing, traceability, durability, reuse, and more.

A. Evolving regulatory landscape

Packaging regulations are being reshaped worldwide, with each jurisdiction introducing its own specific requirements. For multinational companies, this means navigating a complex and often fragmented regulatory landscape. The European Union's Packaging and Packaging Waste Regulation (PPWR) and the wave of Extended Producer Responsibility (EPR) laws in the United States are at the forefront of these changes. In practice, this requires companies to understand and comply with a patchwork of obligations, from recyclability and recycled content mandates to labelling and reporting requirements.

B. Fragmented requirements

Despite the emergence of overarching frameworks like the PPWR, requirements remain highly fragmented. Countries and even regions within countries develop their own EPR systems, reduction and reuse targets, recyclability frameworks, reporting formats, fee structures, and eco-modulation criteria. This creates significant operational complexity, particularly for multinational organisations that must comply with multiple, sometimes conflicting, obligations simultaneously.

A clear example of this fragmentation is seen in EPR requirements for grouping and transport packaging, which vary widely between jurisdictions (with countries where two separate EPR schemes are established and countries where one scheme covers all packaging types). To manage this complexity, compliance strategies must be modular and adaptive, capable of aligning with diverse systems while maintaining consistent internal governance and data management.

C. Beyond the usual scope

Packaging sustainability is no longer limited to waste or recyclability. New regulations now extend to issues such as deforestation (e.g., the EU Deforestation Regulation, which may capture packaging materials derived from paper, cardboard, or rubber), chemicals (REACH, RoHS), food contact safety, and corporate sustainability reporting (CSRD, ESPR). This broadening of scope means that packaging must comply with a growing array of environmental, health, and safety standards, as well as new due diligence and transparency requirements.



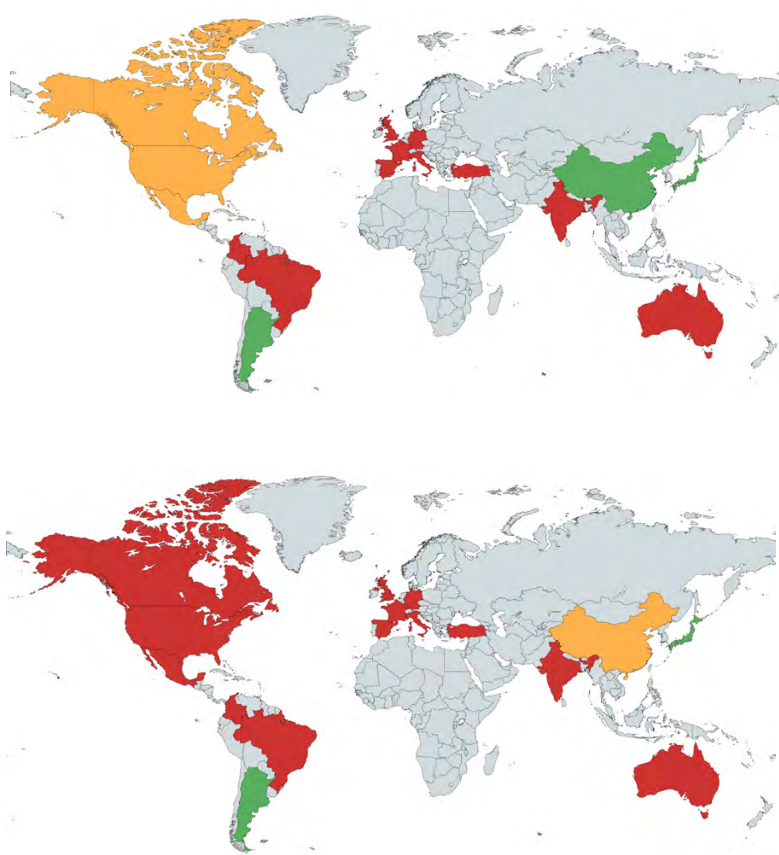
Current risk landscape: Regional overview

The global risk landscape for packaging compliance is rapidly evolving, with significant regional variation in regulatory maturity, enforcement, and future direction. For organisations with a global reach, understanding these differences is critical for effective risk management and strategic planning.

The global risk landscape for packaging compliance is highly dynamic, with significant differences across regions:

- In **Europe**, compliance risk is at its peak: EPR for packaging is already in force or imminent across most countries, with strict requirements on recyclability, reuse, and recycled content. Enforcement is robust, and non-compliance can lead to heavy fines or even exclusion from the market.
- **North America** is rapidly intensifying its regulatory stance. The US and Canada are rolling out EPR for packaging, but the landscape is fragmented, with states like California, Colorado, Maine, Minnesota, and Oregon leading on early implementation. The risk of penalties and market access loss is rising, making proactive compliance a necessity.
- Across **Latin America**, risk is steadily increasing. Colombia and Brazil have established EPR and reporting obligations, while Mexico is moving towards comprehensive EPR, though details are still emerging. Argentina remains low risk for now, but specific rules – such as those for wood packaging – still apply.
- In **Asia Pacific**, the risk profile is highly variable but changing fast. Australia and India have enforced EPR and set ambitious recycling and recycled content targets, while China and Japan are not yet regulating B2B EPR but are showing clear signs of regulatory movement.

Example of risk evolution in a few selected regions over 12 months



Risk level	Definition
High	An EPR or key regulation is in force or is impending enforcement and requirements targeting key packaging materials used within a B2B context
Medium	An EPR regulation is not yet in force, however, significant legislative movement is being observed requiring active monitoring in case of any upcoming changes that could affect packaging materials used within a B2B context.
Low	No EPR regulations and sparse legislative evolution related to packaging in the jurisdiction in scope.

- **This risk for China increases from low to moderate:** While there are no current EPR requirements, fees, or eco-modulations for B2B packaging in China currently, discussions around the development of EPR systems, with a particular focus on the packaging industry, suggest a potential for moderate risk in the future.
- **The risk for North America (Us & Canada) increases from moderate to high:** EPR requirements are expected to extend to B2B in British Columbia and in Quebec through the Environment Quality Act (by 2030), as well as US states including Oregon.
- **The risk for Mexico increases from moderate to high:** EPR requirements for all packaging have been proposed in October 2024, with further details on precise compliance requirements awaited. Enforcement would likely require setting up reporting processes and payment of fees for packaging waste management.

Steps Towards Compliance

To navigate this evolving landscape, organisations should adopt a systematic, risk-based approach to compliance, structured around the following steps:

A. Knowledge

- Internal: Identify and qualify all packaging placed on the market, gathering comprehensive data on material composition, weight, recycled content, and the presence of banned substances. For most companies, this means improving transparency on material breakdown and ensuring data is available for all packaging types.
- External: Continuously monitor regulatory developments in all relevant jurisdictions, using both desk research and engagement with regulatory bodies and industry associations.

B. Identify Applicable Regulations

- Map out which regulations apply to each packaging type and market, considering both current and upcoming requirements. This includes tracking deadlines for EPR registration, reporting, and fee payments in each jurisdiction.

C. Compliance Gaps and Risk Mapping

- Assess current packaging against regulatory requirements, identifying gaps and prioritising them by risk level—considering client pressure, market access, and the cost of inaction. For example, failure to register for EPR or incorporate recycled content can result in significant fines or even market bans.

D. Implementation

- Take concrete steps to achieve compliance: register as a producer, join or set up a Producer Responsibility Organisation (PRO), pay recycling fees, appoint an authorised representative where required, and redesign packaging for recyclability and compliance with hazardous substance restrictions.

E. Monitoring and Continuous Improvement

- Establish internal tracking mechanisms and assign clear responsibilities for compliance timelines and data submission. Regularly re-evaluate compliance status, stay informed about regulatory changes, and provide ongoing training to staff.

Conclusion

Sustainable packaging is now a core business imperative, requiring coordinated action across the organisation and a proactive, risk-based approach to compliance.

By systematically identifying regulatory requirements, closing compliance gaps, and embedding sustainability into packaging design and operations, companies can not only mitigate risk but also seize opportunities for differentiation and value creation in a rapidly evolving global landscape.

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