29 October 2026

Questions and Answers on Packaging Regulations

Swiss Packaging Ordinance (VerpV) and EU Packaging and Packaging Waste Regulation (PPWR): Key Questions and Answers for the Medtech Industry

Purpose	Member information and guidance
Background	The new Swiss Packaging Ordinance (VerpV) and the European Packaging and Packaging Waste Regulation (PPWR) introduce new requirements for packaging. For medtech companies, packaging design, recyclability, documentation, labelling, reporting and take-back obligations are particularly relevant. This Q&A summarises the main questions raised during the Swiss Medtech webinar on 18 August 2026 and the subsequent responses from the Swiss Federal Office for the Environment (FOEN). The requirements of the two regulations are compared by topic to highlight similarities and differences.
Contact	Barbara Mettler, Sustainability Expert, Swiss Medtech, prepared in collaboration with Nila-Pia Rähle, Samanea Innovation

Key messages

- The VerpV and PPWR generally also apply to medical device packaging; exemptions must be assessed specifically.
- Product safety and sterility take priority.
- Companies should establish early on whether packaging data are available and responsibilities are clearly assigned.

Scope and deadlines

Question	Answer
Question 1: What are the main requirements of the VerpV and the PPWR?	Both regulations aim to make packaging more resource-efficient and recyclable and to promote the circular economy. The main requirements include: ▪ Reducing packaging weight and volume ▪ Improving recyclability ▪ Using recycled content where required ▪ Reporting and take-back obligations ▪ Documentation and labelling requirements **Switzerland:** The Ordinance relies on self-assessment for packaging requirements and provides for subsidiary take-back obligations and reporting requirements.

<table>
<tr><td></td><td>EU: The PPWR additionally establishes harmonised requirements for conformity assessment, technical documentation and labelling, as well as Extended Producer Responsibility (EPR).</td></tr>
<tr><td>Question 2: When do the requirements apply?</td><td>The VerpV and the PPWR are being implemented in stages. The following dates are particularly relevant for companies:
<table>
<tr><th></th><th>Switzerland</th><th>EU</th></tr>
<tr><td>12 August 2026</td><td>–</td><td>General application date, including requirements for packaging identification and manufacturer information</td></tr>
<tr><td>1 January 2027</td><td>Entry into force of the VerpV</td><td>–</td></tr>
<tr><td>1 January 2030</td><td>Packaging design requirements</td><td>Packaging minimisation requirements; further requirements concerning recyclability and recycled content are phased in</td></tr>
<tr><td>1 January 2031</td><td>Reporting obligations and subsidiary take-back obligations</td><td>–</td></tr>
</table>
EU: Not all PPWR requirements have applied since August 2026. Some provisions have later application dates.

Switzerland: The VerpV is generally independent of the PPWR. Whether Switzerland would adjust its deadlines following postponements in the EU is currently unknown. The recycling targets under Art. 7 VerpV apply from 1 January 2032 (55% for the relevant single-use plastic packaging and 70% for beverage cartons). The first report under Art. 22 VerpV, covering the 2031 reporting year, must be submitted by the end of February 2032.</td></tr>
<tr><td>Question 3: Which companies and packaging are affected? Are there exemptions for SMEs?</td><td>In principle, companies placing packaging or packaged products on the respective market are affected. Neither Switzerland nor the EU provides a general exemption for SMEs or for the medtech industry.

In Switzerland, thresholds apply to certain obligations. The conditions for reporting under Art. 22 VerpV are explained in Question 14.

In the EU, micro-enterprises are also generally subject to Extended Producer Responsibility (EPR). Simplified reporting requirements apply to companies making less than ten tonnes of packaging available annually in a Member State. Under</td></tr>
</table>

	certain conditions, responsibility may shift to the packaging supplier.

Responsibilities

Question	Answer
Question 4: What obligations apply to the different economic operators?	Responsibilities depend on the company's role in the supply chain. The VerpV and PPWR must be distinguished. **Switzerland** Obligations primarily apply to manufacturers or operators placing packaging on the market. ▪ **Manufacturers and companies placing packaging on the market:** Responsible for complying with applicable packaging requirements and reporting and take-back obligations. ▪ **Importers:** When importing packaging, they are generally treated as manufacturers under the VerpV. ▪ **Foreign direct suppliers:** Where they supply private consumers in Switzerland directly, they are considered manufacturers subject to reporting obligations. ▪ **Transport service providers:** Pure transport companies, such as Swiss Post or DHL, are not considered operators placing packaging on the market. **EU** The PPWR distinguishes between several economic operators with different responsibilities: **Economic operator** / **Main responsibilities** **Manufacturer** — Ensure packaging conformity; prepare Technical Documentation (TD), conduct the Conformity Assessment (CA) and draw up the Declaration of Conformity (DoC) **Importer** — Verify that the applicable conformity requirements have been met before placing packaging from third countries on the EU market. **Distributor** — Verify applicable requirements and fulfil due diligence obligations **Producer (for EPR purposes)** — Register, report packaging quantities and participate in EPR systems **Important for medtech companies:** Being the legal manufacturer of a medical device under the MDR does not automatically mean being the manufacturer or producer of

	packaging under the PPWR. A company may fulfil several roles at the same time. For contract manufacturing organisations (CMOs), private-label products and packaging service providers, responsibilities must be determined based on the actual business relationship and the relevant regulatory definitions. In particular, it matters who places the packaging on the market or makes it available under their own name or trademark. A pure transport service provider does not automatically assume the obligations of an operator placing packaging on the market.

Medtech-specific exemptions

Question	Answer
Question 5: Is medical device packaging exempt from the requirements?	No. Neither the VerpV nor the PPWR provides a blanket exemption for all medical device packaging. **Switzerland:** The exemption under Art. 5 para. 1 let. b VerpV concerns only the subsidiary take-back obligation. According to FOEN, this exemption must be interpreted narrowly. It concerns packaging that is or has been used directly for medical purposes, particularly where recycling is unsuitable or specific regulations require a different form of disposal, for example due to contamination. The decisive factor is therefore how the packaging is used, not merely the classification of the medical device it contains. The exemption does not provide a blanket waiver of design or reporting obligations. **EU:** The PPWR provides specific exemptions or special provisions for certain contact-sensitive packaging, including packaging for medical devices and in vitro diagnostic devices. These relate in particular to recyclability and recycled content in plastic packaging, but not to the PPWR as a whole. Whether an exemption applies depends on the packaging and the specific provision concerned.
Question 6: Do the exemptions also apply to secondary and transport packaging?	**Switzerland:** Generally not. According to FOEN, secondary and transport packaging is not exempt from take-back obligations unless it presents particular risks and must therefore be disposed of as special waste. Clean plastic outer packaging, shrink wrap and transport packaging are therefore generally covered. **EU:** The PPWR distinguishes between different packaging categories and includes specific provisions for contact-sensitive packaging. Whether these exemptions also apply to

	secondary and transport packaging depends on the relevant provision and the function of the packaging. Their exact scope, particularly where multiple packaging levels are involved, has not yet been conclusively clarified. An exemption under Swiss law cannot automatically be applied to the PPWR.
Question 7: How is packaging distinguished from an integral part of a product?	This distinction is particularly relevant for containers and components needed for a medical device to function, such as solution bags, desiccants, oxygen absorbers or Instructions for Use (IFU). According to FOEN, the packaging definition in the Swiss VerpV has been drafted so as not to conflict with the PPWR. Companies may therefore refer to the PPWR and the relevant European guidance when classifying these components. The function and use of the component are decisive. However, individual components cannot be classified across the board and must be assessed case by case.

Packaging design and materials

Question	Answer
Question 8: What requirements apply to weight, volume and recyclability?	Both regulations establish packaging design requirements, particularly to reduce unnecessary packaging material and improve recyclability. **Switzerland:** Weight and volume must be limited to the minimum necessary. Recyclability and the use of recycled content must be assessed in light of the state of the art and technical and economic feasibility. According to FOEN, the state of the art includes solutions that have been successfully tested, can be transferred technically and are economically viable for a medium-sized, financially sound business in the relevant industry. According to FOEN, no separate obligation to provide evidence is envisaged. The principle of self-assessment applies. **EU:** The Regulation contains specific requirements for packaging minimisation, recyclability and recycled content, with corresponding implementation deadlines. When developing new packaging, companies are advised to consider the requirements of both markets at an early stage. **Reusable packaging in the EU:** The PPWR contains additional requirements for reusable packaging and reuse systems, as well as phased reuse targets for certain packaging types, particularly transport packaging. Whether these

	requirements apply depends on the packaging type and the exemptions provided.
Question 9: How are sterility, product safety and regulatory requirements taken into account?	Product safety takes priority. According to FOEN, packaging only needs to be reduced in size if its primary functions remain assured. These include in particular: ▪ Sterility and product protection ▪ Transport stability ▪ Shelf life ▪ Legally required labelling FOEN confirms that companies may also refer to the PPWR requirements in their assessment. These requirements are particularly important in medical device packaging development and validation.
Question 10: What requirements apply to glass packaging and other packaging materials?	**Switzerland:** Glass packaging for medical purposes is subject to Art. 3 VerpV and, where the relevant conditions are met, the reporting requirements under Art. 22 VerpV. The advance disposal fee for glass packaging under Art. 8 VerpV applies to food and cosmetic products, but not to medical glass packaging. FOEN considers that glass packaging can generally meet the relevant requirements because glass is fundamentally recyclable. Where appropriate, companies should assess whether the quantity of packaging used can be reduced without compromising product safety. **EU:** The Regulation includes material-specific requirements, which must be considered according to the packaging material and intended use. The specific PFAS limits under Art. 5(5) PPWR apply to food-contact packaging. Pharmaceutical vials and glass bottles containing medicines are not considered food-contact packaging solely because they are in contact with a medicinal product. The general requirements for substances in packaging under Art. 5 PPWR continue to apply.

Documentation and labelling

Question	Answer
Question 11: What evidence of conformity is required?	This is a key difference between the two regulations. **Switzerland:** The Ordinance does not require a separate conformity assessment or declaration of conformity. The principle of self-assessment applies to the requirements under Art. 3. **EU:** The PPWR requires a conformity assessment, technical documentation and an EU Declaration of Conformity (DoC). The responsible packaging manufacturer must demonstrate compliance with the applicable requirements. The technical documentation covers, in particular, the packaging system, materials used and relevant packaging characteristics. The DoC is not batch-specific and does not need to accompany each delivery. The technical documentation and DoC must be retained for five years for single-use packaging and ten years for reusable packaging. Compliance with the PPWR is monitored by the competent market surveillance authorities of EU Member States. These authorities may review the Technical Documentation and the Declaration of Conformity.
Question 12: What information must packaging suppliers provide?	To assess packaging requirements, companies need information in particular on packaging materials, weights and relevant packaging characteristics. **Switzerland:** The Ordinance does not require a separate Declaration of Conformity for Art. 3. Responsibility for self-assessment remains. **EU:** The technical information and evidence required for the Conformity Assessment must be provided. These include, in particular, material and packaging specifications, information on material composition and relevant substances, and evidence needed to assess compliance with the applicable PPWR requirements. In practice, companies report difficulties obtaining complete information and test reports from packaging suppliers. Existing supplier declarations may provide a basis for the Technical Documentation. Whether they constitute sufficient evidence depends on the applicable requirements and the information available.
Question 13: What labelling requirements apply to packaging?	**Switzerland:** The VerpV does not introduce a general new material labelling requirement for all medical device packaging. Art. 17 VerpV concerns the labelling of beverage packaging.

	EU: The PPWR distinguishes between information identifying the packaging and its Manufacturer, and harmonised material labelling. Identification information under Art. 15 PPWR includes, in particular, a type, batch or serial number, as well as the Manufacturer's name and contact details. Harmonised material labelling becomes applicable at a later date. Specific exemptions or simplified requirements apply to certain packaging, particularly in the medical sector. The practical implementation for transport packaging, shrink wrap or very small packaging components must be assessed against the relevant applicable provisions.

Reporting and take-back obligations

Question	Answer
Question 14: What reporting obligations apply to companies?	**Switzerland:** Companies exceeding the relevant thresholds must report the quantities of single-use packaging placed on the market, broken down by packaging material. The reporting obligation under Art. 22 VerpV applies where, in each of two consecutive financial years, a company has both generated turnover of more than CHF 1 million and placed more than 500 kg of the relevant packaging materials on the market. Reporting covers the different relevant packaging materials, not only plastics. Composite packaging must also be included. This requires reliable data on materials, weights and quantities. Companies should already be checking whether and where these data are available. **EU:** Under Extended Producer Responsibility (EPR), registration and reporting obligations apply in EU Member States. Implementation takes place through national systems and may therefore involve different administrative procedures. Registration takes place in the respective national producer registers. The PPWR harmonises registration and reporting requirements, but practical implementation remains the responsibility of Member States. Companies should therefore check the availability of the relevant registers and the applicable national requirements.
Question 15: What take-back obligations apply, and how can they be fulfilled?	**Switzerland:** The VerpV provides for a subsidiary take-back obligation for single-use plastic packaging and beverage

	cartons. It applies where the relevant packaging is not already covered by suitable take-back systems. According to FOEN, the exemption for packaging used directly for medical purposes must be interpreted narrowly. It concerns, in particular, packaging that is unsuitable for recycling or must be disposed of differently under specific regulations, such as contaminated packaging. A collective industry solution could help organise take-back efficiently. **EU:** The Regulation contains provisions on Extended Producer Responsibility (EPR). Practical implementation takes place through the relevant systems in Member States.

Interaction between the VerpV and PPWR

Question	Answer
Question 16: Is PPWR-compliant packaging recognised in Switzerland?	Yes. FOEN expressly confirms that packaging complying with the EU provisions under the PPWR also meets the requirements of Art. 3 VerpV. No additional Swiss Conformity Assessment or Declaration of Conformity is required. However, compliance with the PPWR does not automatically fulfil all Swiss reporting and take-back obligations.
Question 17: Are there conflicting requirements between the Swiss VerpV and the PPWR?	The Swiss VerpV was designed to avoid technical barriers to trade with the EU as far as possible. According to the FOEN responses available, there are no apparent conflicts between the two regulatory frameworks regarding the basic packaging requirements. This is illustrated by two points: ▪ According to FOEN, the packaging definition in the VerpV does not conflict with that in the PPWR. ▪ PPWR-compliant packaging also meets the requirements of Art. 3 VerpV. Differences exist in particular in documentation obligations, take-back systems, reporting obligations and implementation deadlines. Companies supplying both markets must therefore comply with the respective additional obligations.

Practical implementation

Question	Answer
Question 18: What should medtech companies do now?	**Clarify responsibilities:** What role does the company have under the VerpV and the PPWR? **Map the packaging portfolio:** Document materials, weights, quantities and packaging levels. **Check data availability:** Ensure that the required information on packaging materials, weights and quantities can be recorded in existing IT and ERP systems and extracted for reporting purposes. **Engage suppliers:** Collect available material information and evidence of conformity. **Review packaging design:** Consider regulatory requirements early in new developments and assess potential adjustments to existing packaging. Product safety, sterility and any necessary validation must be taken into account. **Prepare for EU compliance:** Review requirements for Technical Documentation (TD), Declaration of Conformity (DoC) and EPR registrations. **Prepare for take-back and reporting:** Identify affected packaging streams and assess possible collective solutions.

Sources and context

1. Direct written responses from the Swiss Federal Office for the Environment (FOEN) to ten questions submitted by Swiss Medtech concerning the VerpV (in particular medical exemptions, imports, state of the art, recognition of the PPWR, glass and deadlines). These were given priority for medtech-specific interpretation.
2. Swiss Packaging Ordinance (VerpV) of 24 June 2026, official ordinance text (Fedlex), particularly Arts. 2–8, 17, 20, 22–24 and 29. Legally binding source.
3. FOEN, explanatory report on the VerpV of 24 June 2026. Supplementary explanations, particularly on exemptions, thresholds and reporting obligations.
4. European Commission, Directorate-General for Environment, Packaging and Packaging Waste Regulation (PPWR): Frequently Asked Questions, second edition, August 2026. Non-binding interpretative guidance.
5. Swiss Medtech webinar of 18 August 2026: icotec, «PPWR Implementation»; Milani Design & Consulting, «Designing future-proof packaging»; Samanea Innovation, «Advancing Circularity in Healthcare – PPWR & VerpV».
6. Swiss Medtech, Working Group Packaging, meeting of 29 September 2026: practical challenges and next steps relating to packaging design, data collection and take-back systems.

Note on sources: Legal statements are based on the VerpV, the explanatory report, written FOEN responses and the European Commission FAQ provided. Examples and recommendations from the three webinar presentations and the Working Group Packaging are presented as practical contributions. Open questions of interpretation are not resolved independently.