

# EU Packaging & Packaging Waste Regulation (PPWR)

Q&A -/ 2026 Requirements

Effective Date of Application: 12 August 2026 | Reference: Regulation (EU) 2025/40

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## About this Document

This Q&A has been prepared to help navigate the 2026 compliance requirements of the EU Packaging and Packaging Waste Regulation (PPWR), officially Regulation (EU) 2025/40.

### Important Disclaimer: Scope of this Document

This FAQ is provided for general guidance and informational purposes only. It focuses on requirements expected to apply from 12 August 2026 and does not constitute legal advice or a formal compliance assessment.

The PPWR establishes a staggered compliance timeline, with additional obligations expected in subsequent years, including requirements related to recycled content, labelling, reuse, and deposit return systems. Some future requirements remain subject to further implementing acts, delegated acts, and Member State-level measures.

Readers should seek their own legal or regulatory advice where needed and continue to monitor official EU and national guidance as the regulatory framework develops.

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## Section 1. Understanding The Regulation

### *Q. What is PPWR and when does it apply to your business?*

The Packaging and Packaging Waste Regulation (PPWR), officially Regulation (EU) 2025/40, is a directly applicable EU law replacing the previous Packaging Directive 94/62/EC. It entered into force on 11 February 2025 and will be fully enforceable from 12 August 2026. Unlike a directive, it applies uniformly in all EU Member States without requiring national transposition – meaning the same rules apply across the entire EU market. Any company that manufactures, imports, distributes, or places packaged goods on the EU market is within its scope, regardless of company size.

This Regulation applies to all packaging, regardless of the material used, and to all packaging waste, whether such packaging is used in or such packaging waste originates from industry, other manufacturing, retail or distribution, offices, services or households.

### *Q. What are the main roles inside PPWR*

PPWR offers three important main roles, and these are: Manufacturer, importer, and distributor. Depending on your role you will have different responsibilities and priorities regarding the regulation

**Important Note:** These Requirements differ whether your role is that of a Manufacturer, importer, or distributor. In the following question, we will cover this in more detail.

*Q. What are the requirements of this regulation starting August 12 - 2026?*

General Compliance Obligations Begin	Manufacturer ID on Packaging and Supporting Documents	No Misleading Green Claims	PFAS and Heavy Metal Limitations
All packaging placed on the EU market must comply with the PPWR. Manufacturers must complete a conformity assessment and draw up an EU Declaration of Conformity (DoC) under their sole responsibility.	Packaging must be accompanied by documentation with the manufacturer's name, trade name or trademark and a postal address (or equivalent via QR code/data carrier). A batch, type or serial number for traceability is also required.	Environmental claims on packaging are only valid if they relate to properties that genuinely exceed the minimum PPWR requirements, and must specify whether they apply to the unit, part, or all products.	No food-contact packaging may be placed on the market if it contains PFAS above: <b>25 ppb</b> for any individual PFAS <b>250 ppb</b> for total PFAS <b>50 ppm</b> total fluorine (incl. polymeric PFAS). The sum of the concentrations of lead, cadmium, mercury and hexavalent chromium shall not exceed <b>100 mg/kg</b> .

**Section 2. Understanding your Role**

*Q. How do you know if you are a manufacturer, importer, or distributor of a packaging product?*

Think of yourself in a very simple story: Who makes it? Who brings it in? Who passes it on?

- You are a Manufacturer if: You physically produce the packaging OR the packaging is made under your name or trademark (even if someone else makes it for you).
  - Rule of thumb: "If your name is on the box, you probably own it."
- You are an Importer if: You bring packaging (or packaged goods) into the EU from outside.
  - Rule of thumb: "If it crosses a border because of you, it's on you."
- You are a Distributor if: You buy and resell packaging within the EU, that is if you didn't make it and didn't import it.
  - Rule of thumb: "If you didn't make it or import it, but you sold it—you're distributing it."

**Important Note:** You need to identify which role you will be fulfilling (Manufacturer Importer, or, Distributor). Based on this identification in the next question we will cover each of your responsibilities.

*Q. What are the concrete requirements for each role / scenario?*

Requirements for a **Manufacturer:**

- Ask your suppliers to provide you with the technical data for each packaging type. This will be part of the documentation you need to show to the authorities. In practice, this technical data should include: PFAS & Heavy-metal statements, and technical specifications per packaging type (Corrugated, PE, PP, PET, etc)
- Using the technical data provided by your suppliers, you will compile a document called conformity assessment ([see Annex VII of the EU Packaging and Packaging Waste Regulation](#)). In practice, this means create a "digital folder" and store documentation of your packaging as proof towards the authorities. As the manufacturer, you are

responsible for this step because packaging is often made up of components from multiple suppliers—for example, cardboard from one, plastic from another, and labels from a third. Once these parts are combined into a final packaging product, you are the only one with the full overview. That is why the responsibility to complete the conformity assessment sits with you.

- After creating the conformity assessment which will be the combination of the documentation of the different suppliers into a single one, you will be ready to create and sign your own DoC or Declaration of Conformity ([see Annex VIII of the EU Packaging and Packaging Waste Regulation](#)). This will give you the “GO” to safely put your products in the EU Market. In practice this means to legally declare in a document that you are following the PPWR.
- If you are required to send your packaging’s supporting documentation to your customers, make sure that it contains your company’s name and address. In practice this means that documents going towards your customers should be identifiable with your brand and your address.

#### Requirements for an **Importer**

- Ensure the packaging you import has a Declaration of Conformity (DoC) so you can sell it without any issues.
- Verify that technical documentation exists and that a conformity assessment has been carried out as specified in the manufacturer section of this Q&A. ([Also see Annex VII of the EU Packaging and Packaging Waste Regulation](#)).
- Ensure the correct information is passed downstream
- Be ready to act if something is non-compliant

#### Requirements for a **Distributor**

- Check 3 things before selling: The producer is registered (EPR), The packaging has the correct labels, and the manufacturer/importer has done their compliance work with the Declaration of Conformity.
- Don’t misuse supplier information. Only use it to check compliance, not for commercial advantage.
- Cooperate with authorities: Share documents and help resolve any issues when asked.

### **Section 3. Documentation & Compliance**

#### *Q. What documents you should receive or ask for?*

##### **If you are the manufacturer:**

- PFAS statement
- Heavy metals statement
- Other substance-related declarations where applicable
- Test reports / Lab Analysis – Primary food contact packaging only. **Secondary or tertiary food contact packaging is not part of the packaging unit will not need these tests.**

These documents are intended to support your conformity assessment as a manufacturer. They do not replace your responsibility to ensure full compliance and to issue a Declaration of Conformity where required. You will fully rely on your suppliers for these documents unless you physically produce the packaging.

**If you are not the manufacturer:**

- You will receive a signed Declaration of Conformity (DoC). This will be the proof that a conformity assessment has been carried out.

*Q. What is the difference between a Declaration of Conformity and supporting documentation for the conformity Assessment?*

A Declaration of Conformity (DoC) is the final statement that confirms packaging complies with the PPWR. It is a formal, legal document issued by the manufacturer, and it represents the conclusion of the conformity assessment process. In simple terms, it is the “yes, this packaging complies” statement.

Supporting documentation, on the other hand, is everything that sits behind that statement. This includes material data, substance information such as PFAS or heavy metals, test reports where applicable, and technical specifications. These documents do not confirm compliance on their own, but they provide the evidence needed to demonstrate it.

*Q. How should you use documentation in a conformity assessment?*

Documentation should be used as input to your conformity assessment, not as a replacement for it. Information such as material specifications, PFAS and heavy metal statements, and packaging composition data, is intended to support your evaluation of whether the packaging meets PPWR requirements.

As the manufacturer, you are responsible for reviewing this information, combining it with your own knowledge of the product and its use, and determining whether all applicable requirements are fulfilled. Based on that assessment, you then issue the Declaration of Conformity.

In practice, this means using suppliers documentation as reliable building blocks. It helps you understand what the packaging is made of, verify that key substance limits are respected, and ensure transparency in your assessment, while the final responsibility for compliance and the DoC remains with you.

**Section 4. PPWR in Practice and What Does it Mean**

*Q. What has changed compared to the previous rules?*

Under the previous Packaging Directive, many requirements were handled at a national level, which meant rules could vary from country to country. With the EU Packaging and Packaging Waste Regulation, this changes. The rules are now the same across the EU and apply directly to all companies.

In practice, this means a shift from general principles to clearer, enforceable obligations. If you place packaging on the market under your name, you now need to:

- Collect technical data from your suppliers (e.g. PFAS, heavy metals, materials)
- Combine that information into a conformity assessment
- Issue a Declaration of Conformity (DoC) confirming compliance

This level of documentation and formal responsibility was not as explicit before. There are also stricter and more specific requirements, such as:

- Defined limits for substances like PFAS and heavy metals
- Mandatory identification of the manufacturer on the packaging (name, address, traceability)
- Stronger rules around environmental claims (no vague or misleading statements)

In short, what used to be more flexible and interpreted locally is now more structured, documented, and consistent across the EU.

#### *Q. Why should you care now?*

Because from 12 August 2026, these are no longer future requirements—they apply to any packaging you place on the EU market. What this means for you depends on your role, but in most cases the impact is practical: First, you need to understand your role (manufacturer, importer, or distributor), because this determines your responsibilities. [\(See section 2\)](#)

The key point is that compliance is no longer something handled only by suppliers. You are expected to understand your role, have access to the right documentation, and be able to demonstrate compliance if requested.

Starting now gives you time to align with your suppliers, identify any missing data, set up a simple internal process, etc.

Waiting until 2026 increases the risk of delays, missing documentation, or being unable to place products on the market.

## **Section 5. PPWR Timeline**

### **2026**

<b>Category</b>	<b>Key Requirement</b>	<b>Timeline</b>
<b>Substances of Concern</b>	Lead, mercury, hexavalent chromium, cadmium ≤ 100 mg/kg + PFAS limits (food contact packaging)	Aug 2026
<b>Sharing of Information</b>	Technical documentation must be maintained to demonstrate compliance. Declaration of Conformity required	Aug 2026

**2028**

<b>Labelling</b>	Harmonized label required to facilitate sorting. QR code may be used	2028 (estimated Aug)
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**2030 - Onwards**

<b>Packaging Minimization</b>	Packaging must be minimized in weight and volume and evaluated against performance criteria	2030
<b>Recycled Content</b>	Plastic packaging must contain minimum levels of recycled content	2030: 35% / 2035: 65%
<b>Excessive Packaging</b>	Transport packaging must not exceed 50% empty space unless technically unavoidable	2030
<b>Re-use Targets</b>	Transport packaging must meet reusability targets depending on use	2030: 40% reusability / 2030: 100% between sites / 2040: 70%
<b>Recyclability</b>	All packaging must be recyclable and graded A-C	2030: 70% recyclable / Recyclable at scale 2035