

PPWR Q&A – Webinar June 17th 2026

Q: We have received DOC (Declaration of Conformity) from other suppliers regarding PPWR.

Will we receive this from BOXON were you confirm that you are PPWR compliant towards us as a customer based on our acquired products from Boxon?

Yes. The Declaration of Conformity is an essential document under the PPWR and must be prepared before packaging is placed on the EU market. Boxon will provide the relevant PPWR documentation for the packaging supplied to customers. In practice, the DoC will normally be prepared by packaging type or packaging family, not necessarily per individual SKU. Ideally as discussed in the webinar, in order to create updated and complete information this is better to do under a request from a national authority.

Q: Thanks for the presentation. Concerning requirements August 12 2026, should we also declare compliance to REACH SVHC, beside PFAS and heavy metals?

REACH SVHC compliance is already part of existing chemical compliance obligations and continues to apply. The new PPWR-related focus from August 2026 concerns, among other things, PFAS and heavy metals in packaging. Customers will continue to receive the usual packaging compliance documentation where applicable, with additional information related to PFAS and heavy metals.

Q: Are these statements (heavy metals and PFAS) also valid for non-standard products/articles?

Yes, for all packaging. For non-standard products, the relevant supplier documentation and material information will still be used to confirm whether substances of concern, such as heavy metals and PFAS, are present. The purpose is to maintain traceability at product level in a practical and consistent way.

Q: Will statements of substance of concern be present on a customized product from Boxon?

Yes, where the customization does not change the material composition in a way that affects compliance. Statements on substances of concern can be provided for customized products based on the relevant material and supplier documentation.

Q: The customer is considered manufacturer for customized articles, but our requests are more related to the dimensions, loops or logos...nothing related to materials to be used ...will we be kept responsible for sending statements on substances of concerns?

Where Boxon supplies the packaging and the customization only concerns dimensions, loops, logos or similar features, the substance-related documentation provided by Boxon should normally be transferable to your own customers. In our interpretation, you would not need to create new substance statements if the material composition has not been changed.

Q: Prohibited to placing packaging on the EU market from August 2026 without DoC?

The obligation to draw up the DoC depends on the role of the economic operator placing the packaging on the EU market. Where the customer is responsible for its own DoC, it should be based on its own conformity assessment and relevant supplier information. Full technical documentation does not necessarily need to be shared automatically between commercial parties; it can be managed through a controlled documentation process using supplier statements, material declarations, PPWR declarations and product specifications. The formal DoC and supporting technical documentation must be available to competent authorities where legally required.

We interpret PPWR legislation in relation to DoC's as a "behind the scene validation". With this we mean as described in the webinar that in order for the DoC to be updated and correct the best approach is to request the DoC when needed from a formal authority (referring to article 15 paragraph 10 from PPWR). Our assurance for this process to work in practice goes in hand with our statements, PPWR declaration and conformity assessments.

Q: What delegated / implementing acts are missing?

Area	Type	PPWR reference	Expected date	What is still missing
Harmonised packaging and waste receptacle labels	Implementing act	Arts. 12(6), 13(2)	12 Aug 2026	Labels for sorting, reusable packaging, DRS, recycled content, and waste receptacles. The Commission says it is currently preparing this act.
Digital labelling / material composition identification	Implementing act	Art. 12(7)	12 Aug 2026	Digital marking method for identifying packaging material composition.
Recycled content calculation and verification	Implementing act	Art. 7(8)	31 Dec 2026	Methodology for calculating and verifying recycled content in plastic packaging.
Sustainability criteria for plastic recycling technologies	Delegated act	Art. 7(9)	31 Dec 2026	Criteria for recycling technologies used to generate recycled plastic content.
Equivalence rules for third-country recycled content	Implementing act	Art. 7(10)	31 Dec 2026	Methodology for assessing whether recycled content rules outside the EU are equivalent. (Green Forum)
Reusable packaging rotations	Delegated act	Art. 11(2)	12 Feb 2027	Minimum number of rotations for reusable packaging formats. (eur-lex.europa.eu)
Reporting to the Commission	Implementing act	Art. 56(7)	12 Feb 2027	Reporting rules and formats for Member State reporting. (Green Forum)

Reuse target calculation rules	Implementing act	Art. 30(4)	30 Jun 2027	Methodology for calculating compliance with reuse targets. (Green Forum)
Design-for-recycling criteria	Delegated acts	Art. 6(4)	1 Jan 2028	Detailed design-for-recycling criteria and recyclability performance grades. This is one of the most important missing pieces for packaging design decisions. (Green Forum)
Empty-space ratio methodology	Implementing act	Art. 24(2)	12 Feb 2028	Methodology for calculating empty-space ratio, relevant for e-commerce, transport and grouped packaging. (Green Forum)
Recycled-at-scale methodology	Implementing act	Art. 6(5)	1 Jan 2030	Methodology for assessing whether packaging is recycled at scale. (Green Forum)
Green public procurement requirements	Implementing acts	Art. 63	By Feb 2030	Minimum mandatory requirements for public contracts involving packaging or packaged products. (Green Forum)

Q: Thank you for great presentation but one summary question if i understand it correctly: DoC will be issued by Manufacturer (i.e. Boxon) as per your company in general statement OR DoC on article level (stating all articles you deliver to your customer)?

The DoC will not be a general company statement, and it will not necessarily be issued per individual article or SKU. Our approach is to prepare the DoC by packaging type or packaging family, such as corrugated, PP, PE or PET packaging. This allows the DoC to cover several products within the same packaging category, supported by the relevant technical documentation.

Q: From your perspective, what are the departments - in a company - responsible for PPWR? in under Environment or Supply Chain?

PPWR compliance is usually cross-functional. Based on our experience, the most relevant departments are Sustainability or Environment, Procurement, Supply Chain, Sales, Master Data and Finance, especially where EPR obligations are involved.

Q: Where can we get the templates?

The template samples will be made available together with the webinar recording and the supporting webinar materials.

Q: Could you please explain briefly about possible penalties in case a manufacturer is not compliant or partially not compliant?

Penalties will depend on how each EU Member State implements enforcement. In general, market surveillance authorities may request documentation, require corrective actions, restrict products from being placed on the market, or apply financial penalties. Our expectation is that authorities will first focus on documentation, traceability and corrective action, but non-compliance may lead to penalties if the issue is not resolved.

Q: If I am a supplier of your packaging material: do I need to register somewhere?

For the PPWR roles of manufacturer, importer or distributor, there is no general registration simply to define your role in the supply chain. These roles are determined by how the packaging is placed on the market. However, Extended Producer Responsibility (EPR) obligations are separate. If you are considered a producer under national EPR rules, you may need to register in the relevant Member State.

Q: Are there concerns for packed Raw Materials used in production which are coming out of EU. We heard that the costumer (so we) are then the manufacturer.

If packed raw materials are imported from outside the EU, the company bringing them into the EU may have specific responsibilities as an economic operator, such as importer or, in some cases, manufacturer. The exact role depends on the supply chain and how the product is placed on the market. In practice, you should request complete packaging documentation from your non-EU suppliers to ensure traceability before the packaging enters the EU market.

Q: Is a label = Packaging

A label is normally considered a packaging component. Like other packaging components, it should be included in the relevant packaging documentation and traceability information.

Q: Is it possible that the PPWR will be postponed because still topics are not clear -- similar to EUDR?

At this stage, we cannot assume that the PPWR will be postponed. Our approach is to prepare based on the current legal timeline and continue monitoring any updates from the European Commission. Several technical details are still being developed, but companies should continue preparing for the requirements that are already confirmed.