Navigating the EU Packaging and Packaging Waste

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Executive Summary

The Packaging and Packaging Waste Regulation (PPWR) (Regulation (EU) 2025/40) was adopted on 19 December 2024 and applies across the European Union (EU) from **12 August 2026**. It replaces existing Packaging and packaging waste directive (94/62/EC) with a single, directly applicable rulebook covering how packaging is designed, declared, placed on the market and recovered. For senior leadership the change is not only a design or procurement exercise - it is a **data problem**.

From the application date, the **EU Declaration of Conformity (DoC)** is a prerequisite for placing packaging on the market. Packaging may only be placed on the market where it is supported by a technical documentation file drawn up under **Annex VII** and a signed declaration following the model in **Annex VIII**. Where verified supplier data is missing, that file cannot be completed and the packaging cannot legally be placed on the market.

This whitepaper translates the Regulation into concrete obligations for manufacturers, importers, distributors and brand owners. Document cover key requirements, recyclability and reuse targets, ready-to-use DoC and technical documentation templates, and how the DXC **Compliance Data eXchange (CDX)** turns fragmented supplier information into the structured evidence base on which conformity now depends.

The Regulatory Shift: From Directive to Regulation (EU)

The move from **Directive 94/62/EC** to **Regulation (EU) 2025/40** is a change of legal instrument as much as of content. A directive is transposed into 27 national laws, each with its own requirements. Regulation on other hand applies simultaneously and identically in every Member State. The reform follows the Circular Economy Action Plan and a Commission review that found the earlier requirements too vague to enforce and inconsistently applied across the EU. The pressure was also quantitative: packaging waste had grown to roughly 36% of all municipal waste in the EU, and the directive had failed to reverse that trend.

Three shifts define the new regime:

- **Harmonization over fragmentation.** A single set of rules replaces divergent national requirements. One compliance standard now applies everywhere, with no room for local interpretation.
- **A wider scope.** The Regulation extends beyond consumer packaging to grouped, transport, industrial and e-commerce formats, placing obligations on every economic operator in the chain.
- **Lifecycle governance.** The focus shifts from managing waste after the fact to designing for recycling, mandatory recycled content, reuse and substance control. It requires visibility into the material and chemical composition of every component upstream.

Why the instrument matters. As a regulation, the PPWR has no national transposition period to soften its impact, and no room for local variation. The obligations below take effect on the stated dates, in identical form, for every company placing packaging on the EU market.

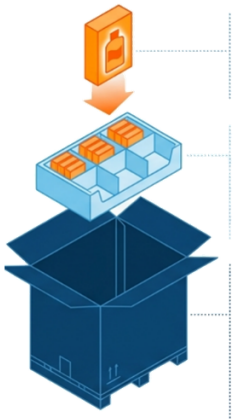
Know Your Packaging, Know Your Role

PPWR applies to all packaging placed on the EU market, but obligations differ depending on what type of packaging you have and which role you play in the supply chain. If you classify either one incorrectly, the technical file you build afterward will miss the right requirements from the start.

What Counts as Packaging

PPWR applies to all packaging placed on the EU market, but obligations differ depending on what type of packaging you have. Beyond the layers and use-based categories shown below, two distinctions matter throughout this whitepaper:

- **Contact-sensitive packaging** used for food, cosmetics, medicinal, veterinary, medical-device or infant nutrition products, where recycled-content and substance rules are stricter and,
- **Single use versus reusable packaging,** whether packaging is designed for one use or built to be used multiple times within a reuse system. This distinction matters throughout the Regulation, because different requirements apply depending on which category the packaging falls into.



How packaging is layered

- Sales Packaging (Primary)
  Direct contact with product; unit picked off shelf. Constitutes a sales unit to the end user at the point of sale.
- Grouped Packaging (Secondary)
  Groups multiple sales units; removable without affecting product. Used to facilitate shelf restocking or create a stock-keeping unit.
- Transport & E-commerce Packaging (Tertiary)
  Pallets, outer boxes, e-commerce mailers. Facilitates handling and transport; prevents damage; excludes shipping containers.

Specific Categories
Based on how packaging is used

Service Packaging
Filled at point of sale (bags, cups).

Take-away Packaging
For immediate consumption elsewhere. Filled at attended points of sale with beverages or ready-prepared food; no further preparation needed.

Packaging for Primary Production
For unprocessed farming products.

Who is responsible: supply chain roles

The Regulation distributes accountability across the value chain. Each role has its own legal duties, but all these roles need to work from the same set of facts about the packaging. the same material composition, the same substance data, the same recycled-content figures. If the supplier reports one number and the manufacturer's file shows another, that inconsistency itself becomes a compliance problem.

Role	Primary legal obligations
Manufacturer (Art. 15) Any entity that designs, produces or commissions packaging and markets it under its own name or trademark	Runs the conformity assessment, draws up the technical documentation and the Declaration of Conformity, applies markings and retains records (5 years single-use, 10 years reusable).
Supplier (Art. 16)	Provides the manufacturer with all material and documentary information needed to

Role	Primary legal obligations
Any entity supplying materials, components or packaging to the manufacturer	demonstrate conformity - a direct legal duty, not a commercial courtesy.
Authorized representative (Art. 17) An EU-based entity mandated in writing by a non-EU manufacturer to act on its behalf	Acts on the manufacturer's written mandate, keeping the declaration and technical file available to authorities.
Importer (Art. 18) Any entity that places packaging from outside the EU onto the EU market	Verifies that the assessment and file are complete, that labelling is correct, and that the operator is identifiable before placing packaging on the market.
Distributor (Art. 19) Any entity in the supply chain, other than the manufacturer or importer, that makes packaging available on the market	Exercises due care by checking required labels and ensuring storage and transport do not compromise conformity.
Fulfilment provider (Art. 20) A third-party offering warehousing, packing, addressing or dispatching services without owning the packaging	Ensures handling conditions do not risk compliance with the packaging it warehouses or ships.

There is only one manufacturer per packaging unit. Even when a separate supplier physically produces it. Under Article 21, an importer or distributor can also become the manufacturer, and inherit all its obligations, if it places packaging on the market under its own brand, or modifies packaging already on the market in a way that affects conformity.

Five Strategic Reasons This Cannot Wait

1. Market access depends on the technical file

The technical documentation and the Declaration of Conformity (DoC) are preconditions for placing packaging on the market, not post-market formalities. Without a complete file and a valid declaration, packaging can be refused market access and become subject to enforcement at the border.

2. Compliance requires upstream data, not best efforts

Recycled content, heavy metal limits and PFAS thresholds can only be demonstrated with data held by suppliers. Article 16 places a direct duty on suppliers to provide that information to the manufacturer. Securing it in a structured, verifiable form is the practical bottleneck for most organizations.

3. The technical file is your liability shield

Every sustainability claim, every substance calculation and every minimization decision must be evidenced in the file. A well-maintained dossier is the difference between a defensible position and an unsupported assertion when a market surveillance authority asks for proof. Platforms like the CDX address this directly, turning fragmented supplier inputs into a structured record.

4. EPR fees become a controllable cost

Extended Producer Responsibility contributions will be modulated against recyclability performance grades and recycled-content levels. Evidence of high-grade, recyclable, high-recycled-content packaging is no longer just a compliance output — it is a lever on operating cost.

5. Enforcement is coordinated and dissuasive

The Regulation harmonizes market surveillance and links it to customs controls on packaging entering the EU. Member States must set penalties that are effective, proportionate and dissuasive by 12 February 2027, with administrative fines applying specifically to packaging-format and reuse obligations.

Key Obligations: An article-by-article

The following provisions form the technical core of the Regulation. Thresholds and dates are drawn directly from Regulation (EU) 2025/40; several are supplemented by Commission implementing or delegated acts due before they take effect.

Article	Requirement	Thresholds / critical dates
Art. 5(4)	Heavy-metal limit	Sum of lead, cadmium, mercury and hexavalent chromium **below 100 mg/kg**.
Art. 5(5)	PFAS in food-contact packaging	**Prohibited from 12 Aug 2026** above 25 ppb (single PFAS), 250 ppb (sum) or 50 ppm (incl. polymeric).
Art. 6	Recyclable packaging & grades	Design-for-recycling and Grades A-C from **2030**; recyclable *at scale* from **2035**; **Grades A-B only from 2038**.

Article	Requirement	Thresholds / critical dates
Art. 7	Minimum recycled content (plastic)	**2030:** 30% PET (contact-sensitive), 10% other contact-sensitive, 30% single-use bottles, 35% other. **2040:** 50 / 25 / 65 / 65%.
Art. 9	Compostable packaging	**Narrow set of formats (tea/coffee bags, single-serve units, fruit stickers) must be compostable from 12 Feb 2028**
Art. 10	Packaging minimization	Weight and volume reduced to the minimum required for function, safety and acceptability.
Art. 12	Harmonized labelling	Material-composition labels (pictograms) mandatory from **12 Aug 2028**; optional QR / digital data carrier.
Art. 24	Excessive packaging	Empty-space ratio **max 50%** for grouped, transport and e-commerce packaging from **2030**; sales packaging minimized from **12 Feb 2028**.
Art. 25	Restricted formats	Formats listed in **Annex V** prohibited from **1 Jan 2030**.
Art. 29	Reuse targets	Reusable-packaging quotas for transport, grouped and beverage packaging from **2030**, rising in **2040**.
Art. 39	Declaration of Conformity	Manufacturer's binding statement of conformity with Articles 5–12, per Annex VIII model, required from 12 Aug 2026
Art. 43	Waste prevention	Per-capita packaging waste cut vs 2018 by **5% (2030), 10% (2035), 15% (2040)**.
Art. 45-46	Extended Producer Responsibility	Producer registration and EPR fees **modulated** by recyclability grade and recycled content.
Art. 50	Deposit & return systems	**90% separate collection** of single-use plastic and metal beverage containers (<=3 L) by **1 Jan 2029**.
Art. 52	Recycling targets	**65%** of all packaging waste by end-2025, rising to **70%** by end-2030, with material-specific rates.
Art. 68	Penalties	Member States set effective, proportionate and **dissuasive** penalties by 12 Feb 2027.

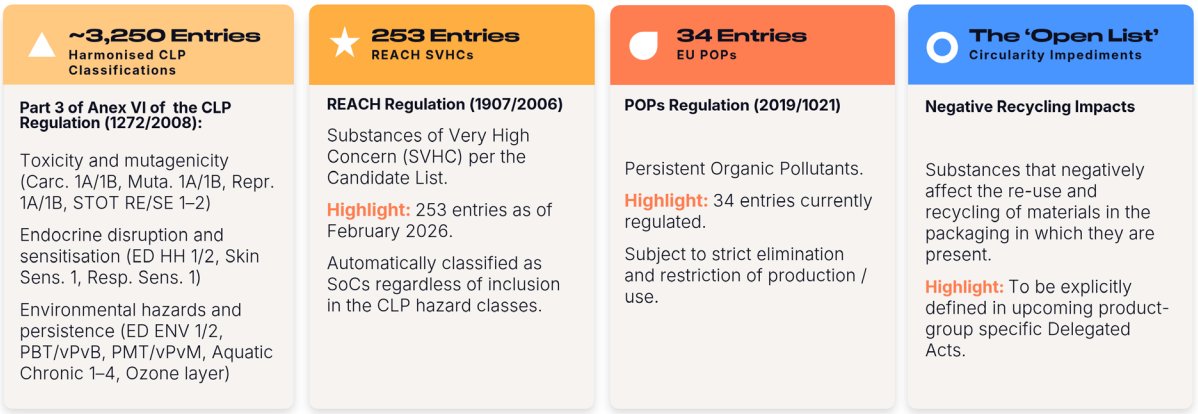
Deep Dives: Six Core Obligations

Among all the requirements covered above, six deserve particular attention, because they require the most upstream data and carry the highest compliance risk. The sections below explain each one in full: substance restrictions, recyclability grading, recycled content, and the rules that push packaging away from single-use formats.

Substances of Concern (Article 5)

Article 5 does two things at once. First, it carries over the long-standing heavy-metal limit: the combined concentration of lead, cadmium, mercury and hexavalent chromium must stay below 100 mg/kg. Second, it adds a broader, forward-looking duty in order to minimize substances of concern (SoC) across all packaging materials and components.

The numeric limits are covered in the obligations table above. What matters here is the scope of "SoC," because it's wider than most teams expect. PPWR doesn't create its own list. Instead, it adopts the definition of substance of concern from Article 2(27) of the Ecodesign for Sustainable Products Regulation (ESPR), which draws on four distinct sources, shown in the chart above.



The four sources feed the PPWR definition of substances of concern.

The practical consequence: a substance of very high concern (SVHC) under REACH is only one of four inputs. The SoC universe also includes harmonized CLP hazard classes, persistent organic pollutants, and once delegated acts arrive substances that impair recyclability. Demonstrating minimization therefore requires substance-level visibility across every component, not a single SVHC screen.

Food-contact packaging: BPA and PFAS

Food-contact packaging carries two further restrictions. PFAS above the thresholds in the obligations table are prohibited from 12 August 2026:

- ≤ 25 ppb - any single PFAS (non-polymeric)
- ≤ 250 ppb - sum of targeted PFAS (non-polymeric + precursors)
- ≤ 50 ppm - total fluorine from PFAS (including polymeric)

These limits apply whether the PFAS is intentionally added or present as background contamination, and PFAS itself is defined broadly to cover any substance with at least one fully fluorinated methyl or methylene carbon atom, subject to specific structural exceptions.

Separately, under Regulation (EU) 2024/3190 rather than the PPWR itself, bisphenol A (BPA) is banned in food-contact materials from 20 July 2026, with limited transitional arrangements for certain reusable food-contact materials (until July 2027) and select categories (until January 2028). Both restrictions must be substantiated with supplier data in the technical file.

Recyclability Performance Grades Explained

From 2030, all packaging must be recyclable and assigned a recyclability performance grade. The grade is calculated per packaging unit using Annex II design-for-recycling parameters, including material composition, colours, barriers, coatings, inks, adhesives, ease of emptying and dismantling. The Commission will define the exact weighting and thresholds in implementing acts, but the 2030 obligation date is already fixed.

Responsibility sits with the producer that first places the packaging on a Member State market, because its EPR fees are modulated against the grade achieved.

Recyclability performance grades under Article 6 and Annex II.

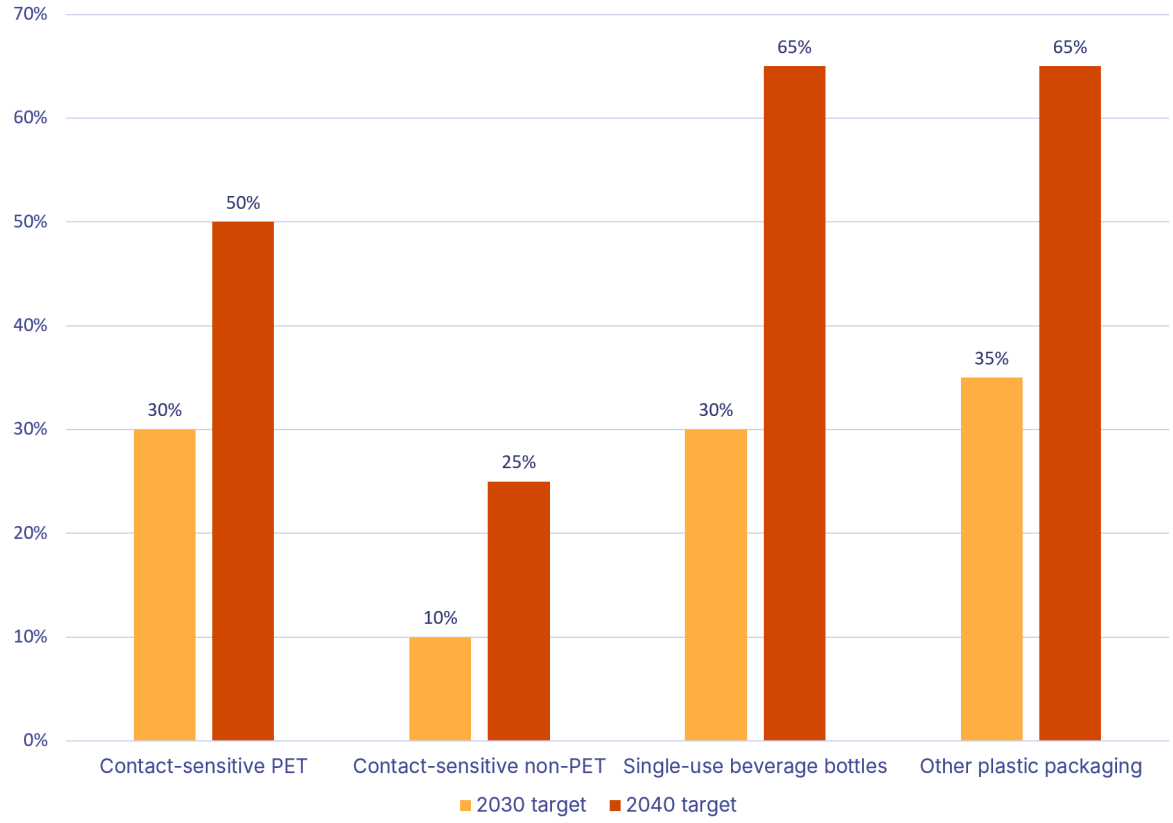
Three dates determine how the grading regime tightens:

- **From 2030,** grading follows design-for-recycling criteria; packaging below Grade C (70%) is non-recyclable and cannot be placed on the market.
- **From 2035,** a recycled-at-scale factor is added, so design alone is no longer sufficient.
- **From 2038,** only Grades A and B remain marketable; Grade C packaging must be redesigned or withdrawn.

Because EPR fees follow the recyclability grade, the grade is both a market-access and cost driver. It must be kept in the technical file and updated when materials or components change.

Minimum Recycled Content (Art. 7)

Article 7 sets binding minimum recycled-content percentages for plastic packaging, rising in two steps: 2030 and 2040. The obligation applies per packaging type, not as a portfolio average, so each format must meet its own threshold.



Minimum recycled content in plastic packaging under Article 7 - 2030 and 2040 targets by category.

Recycled content must come from post-consumer plastic waste processed through an approved recycling process. The calculation method will be specified by Commission implementing acts. Three exceptions narrow the scope:

- Compostable plastic packaging is exempt.
- The 5%-part rule excludes plastic components below 5% of the packaging unit weight.
- Certain contact-sensitive, medical-device and food-contact formats benefit from safety-related derogations.

Compliance requires traceable evidence of recycled material origin and proportion, kept in the technical file and supported by supplier certification. Recycled-content performance also affects EPR fees through eco-modulation.

Reuse, Refill and Restricted Formats

Beyond recyclability, the Regulation pushes packaging away from single-use models in three ways: mandatory reuse quotas, refill obligations, and outright bans on specific formats.

Reuse targets (Article 29)

Packaging in scope	2030 target	2040 target*
Transport and sales packaging used for transport (pallets, boxes, crates, trays and similar)	**40%** reusable within a re-use system	**70%**
Grouped packaging in the form of boxes (excluding cardboard) used to create a stockkeeping or distribution unit	**10%** reusable	**25%**
Alcoholic and non-alcoholic beverages in sales packaging offered to consumers	**10%** in reusable packaging	**40%**

* Note: the 2040 figures are aspirational targets, not binding obligations. The 2030 figures, by contrast, are mandatory minimums. Member States retain the right to set stricter national targets for individual sectors.

Reuse obligations fall on "economic operators" as defined in Article 3(12): producers, packaging suppliers, importers, distributors, authorized representatives, final distributors and fulfilment service providers. Consumers and industrial or commercial end-users are excluded. Operators using reusable packaging must also participate in a compliant reuse system meeting the governance, tracking and reporting requirements of Annex VI.

Refill obligations (Articles 28-29) and takeaway-sector rules (Articles 32-33) run in parallel, requiring distributors to offer refill options and reusable containers for food and drink. Micro-enterprises and certain product categories benefit from defined derogations.

Restricted formats (Annex V), from 1 January 2030

Format	What is restricted	Illustrative examples
Single-use plastic grouped packaging	Convenience packaging that groups goods at point of sale to encourage multi-buys (not handling packaging).	Collation films, shrink wrap
Single-use plastic for fresh produce	Packaging for pre-packed fresh fruit and vegetables under 1.5 kg, subject to defined exemptions.	Nets, bags, trays, containers
Single-use plastic in the HORECA sector	Packaging for food and drink filled and consumed on the premises.	Trays, disposable plates and cups, boxes
Single-use plastic condiment portions (HORECA)	Individual portions of condiments, sauces, sugar, creamer and seasoning, with limited exceptions.	Sachets, tubs, single-serve trays
Single-use accommodation-sector packaging	Cosmetic and toiletry miniatures provided per individual booking.	Miniature shampoo and lotion bottles
Very lightweight plastic carrier bags	Very thin carrier bags, except where needed for hygiene or to prevent food waste.	Very thin bags for bulk groceries

Compostable Packaging (Article 9)

By 12 February 2028, only a few formats must be compostable: permeable tea and coffee bags, soft single-serve units, and fruit and vegetable stickers. These must meet the industrial composting standard in bio-waste treatment facilities and the home-composting standard where a Member State requires it. Everything else, including biodegradable plastics, must instead be designed for recycling under Article 6. Compliance is shown in the technical file.

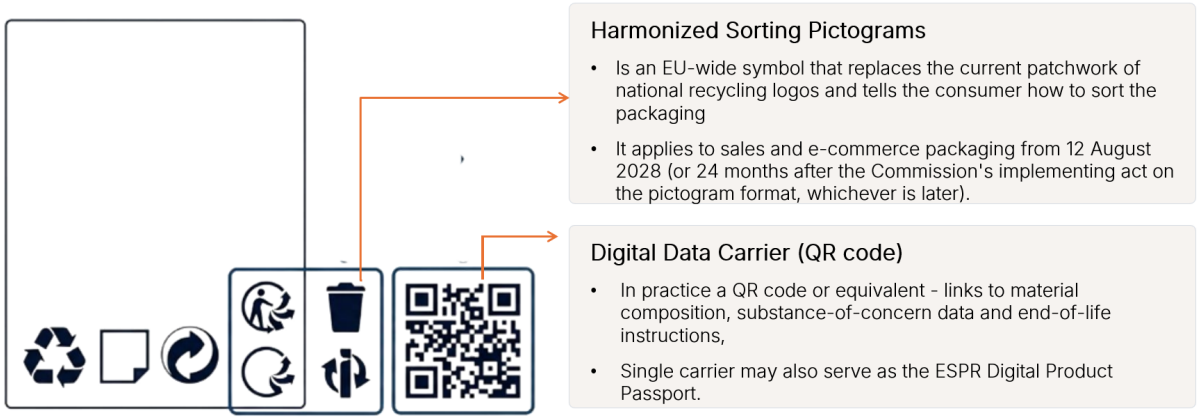
Annex III sets four conditions before compostable packaging can be mandated or permitted. The format must:

- Have no reasonable reusable design alternative, with the product unable to be sold unpackaged.
- Be designed to decompose into carbon dioxide (or methane), water, biomass and mineral salts.
- Meaningfully, boost organic waste collection and reduce compost contamination.
- Avoid adding contamination to the non-compostable waste stream.

On-Pack Labelling and Its Exemptions (Article 12)

Article 12 requires two elements on packaging:

- Harmonized sorting pictogram,
- Digital data carrier (QR Code)



Transport and industrial B2B packaging is exempt from the consumer sorting label, but not automatically. The exemption must be assessed and documented in the Annex VII file. E-commerce packaging is explicitly not exempt: even where it functions as transport packaging, delivering a product to a consumer through an online channel triggers the labelling requirement.

Conformity: The Declaration and the Technical File

Two documents anchor conformity under the PPWR: the Declaration of Conformity (DoC) and the technical documentation file that supports it. Together, they are the evidence base a manufacturer must hold before packaging can legally reach the market. Both documents follow the same core rules.

Both the DoC and the technical file share the same core rules: one per packaging type, issued under the manufacturer's sole responsibility, and kept for 5 years after single-use packaging (or 10 years for reusable packaging) is placed on the market.

- **Language:** drawn up in, or translated into, the language(s) required by the Member State of placement
- **Single declaration**: where multiple acts require a DoC, one dossier may cover all of them, listing each act and reference
- **Enforcement:** authorities check a risk-based sample annually and can withdraw non-compliant packaging from the market
- **No CE marking:** the PPWR uses the DoC instead, since CE marking applies to the product, not the packaging around it
- **Traceability:** packaging must carry a type, batch or serial number linking it to compliance records

Declaration of Conformity - working template (Annex VIII)

The structure below reproduces the model in Annex VIII. It can be adopted directly as a per-packaging-type template. By signing, the manufacturer assumes responsibility for conformity with Articles 5 to 12.

EU DECLARATION OF CONFORMITY

Regulation (EU) 2025/40 - Annex VIII

1. Declaration number / unique identification of the packaging:

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2. Name and address of the manufacturer (and Authorized representative, if any):

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3. This **declaration of conformity is issued under the sole responsibility of the manufacturer.**

4. Object of the declaration - description of the packaging allowing traceability:

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5. Conformity with relevant EU harmonization legislation (reference to other EU acts applied):

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6. References to harmonized standards, common specifications or other technical specifications applied:
7. Notified body (name, address, number), intervention performed and certificate(s), where applicable:
8. Additional information:
Signed for and on behalf of:
Place and date of issue:
Name, function and signature:

Technical Documentation File (Annex VII)

Conformity is assessed through the Module A — internal production control — procedure. The manufacturer establishes the technical documentation, ensures the manufacturing process delivers packaging that matches it, and must be able to demonstrate an analysis and assessment of the risks of non-conformity. At minimum, the file must contain:

- **(a)** A general description of the packaging and its intended use.
- **(b)** Conceptual design, manufacturing drawings and the materials of components.
- **(c)** Descriptions and explanations needed to understand the drawings and the operation of the packaging.
- **(d)** A list of the harmonized standards and common specifications applied (in full or in part), any other technical specifications used, and - where standards are not applied - a description of the solutions adopted to meet the requirements.
- **(e)** A qualitative description of how the assessments under Article 6 (recyclability), Article 10 (minimization) and Article 11 (reuse) were carried out.
- **(f)** Test reports.

Manufacturing control (Annex VII, point 3) requires the manufacturer to take all measures necessary so that the manufacturing process and its monitoring keep production aligned with the technical documentation. An authorized representative may hold the documentation where the manufacturer's mandate provides for it.

Extended Producer Responsibility (Articles 44-46)

Conformity rules decide whether packaging can enter the market, EPR decides who pays for it once it becomes waste. PPWR replaces 27 separates national EPR schemes with one EU-wide framework, and defines "producer" broadly: the manufacturer, importer or distributor that first places a packaged product on the market of a given Member State. This covers B2B and industrial packaging, not just consumer packaging, and only one producer is designated per packaging unit

Core producer obligations

- **Register** in the national producer register of every Member State where packaging is placed on the market.
- **Report annually, by 1 June,** the volumes placed on the market by material, together with recovery and recycling performance and consumer-sorting information.
- **Pay** a share of the collection, sorting and recycling costs for that packaging

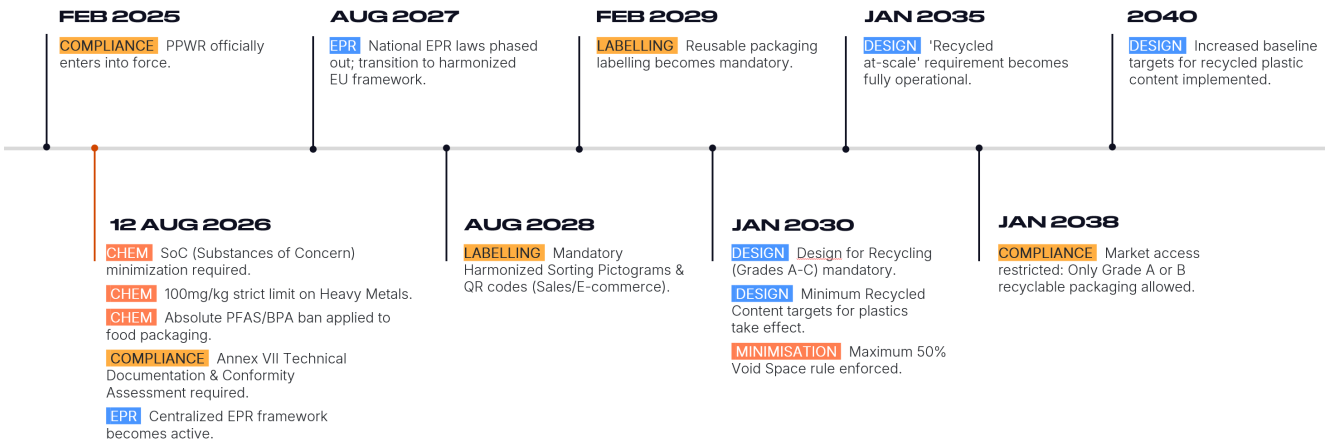
Eco-modulation and transition

EPR fees are not flat, they scale with a packaging's recyclability grade and recycled-content level, so better-designed packaging costs less each year. Harmonized eco-modulation criteria will be set by future delegated acts, and Member States may offer reduced administrative fees to producers placing under 10 tons per year.

Transition. The PPWR takes over from the old EU packaging directive on 12 August 2026. From that date, producers must already follow the PPWR's rules. What is not ready yet is the paperwork side: national registers and reporting formats. Member States need until 12 August 2027 to build the new harmonized registers. Until then, producers keep using the existing national registration process.

Compliance Roadmap: 2025-2040

Compliance is not a one-time filing in 2026. The Regulation rolls out obligations over the next fifteen years, and each new deadline builds on data you should have already collected for the one before it.



Key application dates under Regulation (EU) 2025/40 (not exhaustive)

What Data PPWR Requires You to Collect

PPWR compliance starts with data, not design. Every requirement in Articles 5 to 12 comes down to specific data points you must collect, document and keep. These points fall into three groups, and all of them feed into the same two documents — the Annex VII technical file and the Annex VIII Declaration of Conformity. The companies that struggle with the PPWR won't be the ones with imperfect packaging. They'll be the ones that can't gather this data in time. When the information isn't available internally, it must come from suppliers, which is the topic of the next section.

Substance Data

Required for: Annex VII technical file, Declaration of Conformity

- Identity and concentration of all substances in packaging materials
- Heavy metals content per component
- PFAS content and BPA status (food contact packaging)

Packaging Design & Performance Data

Required for: Annex VII technical file, Declaration of Conformity

- Material composition per packaging layer (type, weight %)
- Recyclability grade (A / B / C)
- Recycled content % per packaging type per year
- Packaging weight and volume, including void space ratio)

Documentation & Identification Data

Required for: Annex VII technical file, Declaration of Conformity, market surveillance

- Unique identifier per packaging unit
- Technical file: design, materials, manufacturing, applied standards
- Retention period: 5 years (single-use) / 10 years (reusable)

The three data streams the Regulation demands, and where they are used (not exhaustive).

The CDX Solution: Turn PPWR into a structured process

CDX centralizes, validates and structures your packaging compliance data from supplier substance declarations to documentation management in one system.

Manual approach

- Substance data collected manually from individual suppliers, no central visibility on gaps
- No way to check substances against SoC, SVHC or REACH candidate lists
- Compliance evidence scattered across email inboxes and shared drives
- Supplier engagement through email threads, no audit trail, low response rates
- Compliance data siloed separately for PPWR, REACH, SCIP and RoHS

The CDX approach

- Supplier declarations stored in one workspace, with visibility into what's missing
- Automated substance check against SoC, SVHC and REACH lists on material declarations
- Compliance documents attached directly to packaging items and supplier records
- Structured supplier requests and reminders with response tracking
- Single dataset reused across PPWR, REACH, RoHS and other regulations

The gap between the two columns is not about effort, it’s about whether your compliance claims can survive an audit. Manual processes work until a regulator, customer or auditor asks for evidence behind a specific claim. CDX is built so that evidence is already there, linked and ready.

Start building your Annex VII technical file today.

The 12 August 2026 deadline is not a document deadline — it is the date when packaging must already be supported by evidence.

For many companies, the critical work is not writing the declaration itself. It is creating a repeatable evidence process: identifying which packaging types are in scope, asking suppliers for the right information, validating responses, and keeping records current as materials, components and suppliers change.

That is why the next step is practical rather than theoretical. The checklist below separates actions that can start now from items that should be monitored until the Commission finalizes the remaining methodologies and guidance.

A Practical Compliance Checklist

The following sequence turns the Regulation into a work programme, but not every step can be taken today. Some depend on data that is already required; others depend on implementing acts the Commission has not yet finalized.

Start now — requirements are already defined

- ✓ **Map the portfolio.** Classify every packaging unit against the Annex II categories and identify contact-sensitive and food-contact items.
- ✓ **Collect upstream data.** Gather multi-tier supplier disclosures for heavy metals and PFAS, both mandatory from 12 August 2026. CDX gives you one structured channel to request, track and store this data instead of chasing spreadsheets and email threads.
- ✓ **Check minimization and empty space.** Verify weight, volume and the empty-space ratio against Articles 10 and 24, applicable from January 2030 but based on stable, current criteria.
- ✓ **Assemble the technical file.** Compile the Annex VII elements per packaging type, including test reports, ahead of the 12 August 2026 deadline. CDX attaches this evidence directly to each packaging item, so the file builds itself as data comes in.
- ✓ **Issue the declaration.** Draw up and sign the Annex VIII Declaration of Conformity from 12 August 2026 and set the retention clock (5 or 10 years).
- ✓ **Register for EPR.** Complete producer registration from 12 August 2026, ahead of the harmonized framework becoming fully operational.

Not yet actionable - guidance is still missing

- **Assess recyclability.** The Grade A/B/C methodology depends on delegated act, which is not yet finalized. Track your material composition now so you're ready to run the assessment once criteria are confirmed, rather than asking suppliers for a grade that doesn't yet have a defined method.
- **Screen formats and reuse.** Annex V restricted formats apply from 2030; Article 29 reuse targets phase in from 2030 and rise through 2040. Monitor upcoming guidance rather than finalizing supplier requests today.
- **Keep it live.** Once the above requirements stabilize, establish a process to update the declaration and technical file whenever a material, component or supplier changes. CDX maintains this as a living record, so nothing has to be rebuilt from scratch at the next deadline.

From Complexity to Control

PPWR compliance is not a one-time submission, it's a condition of continued market access that has to be maintained as products, suppliers and criteria change. CDX turns that ongoing burden into a structured, defensible process: one system where evidence is always current, market access is protected, and compliance costs less to maintain.

See CDX in action

The clearest way to understand the value of CDX is to see it apply to your own packaging portfolio. In a personalized demonstration, our ESG information architects will show you how to:

- Collect and reconcile material data across every tier of your supply chain
- Generate audit-ready technical files and Declarations of Conformity from the data
- Track PFAS, heavy metals, recycled content and recycability grades against Article thresholds
- Use recyclability evidence to lower modulated EPR contributions
- Maintain a scalable, future-ready compliance process through 2040

Book your demo now

Learn more at **cdxsystem.com**

DXC Technology

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About DXC Technology

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