Your Webinar Questions Answered

PPWR Compliance Countdown: What Manufacturers and Their Supply Chains Must Do Now | July 29, 2026

Introduction

Thank you to everyone who participated in our webinar and submitted questions. We truly appreciate the high level of engagement and the thoughtful discussion throughout the session. It is always encouraging to see such active participation and genuine interest in understanding the practical implications of the PPWR and related compliance requirements.

To support participants after the webinar, we have compiled the most frequently asked questions together with our responses. We hope this document helps clarify key topics and provides useful guidance for your ongoing compliance activities.

Disclaimer: The information provided in this FAQ is for general informational and educational purposes only and reflects our understanding of the relevant legislation and guidance available at the time of publication. It does not constitute legal advice, regulatory advice, or a formal compliance assessment. Regulatory requirements may change, and the interpretation may vary depending on specific facts, circumstances, and national implementation or enforcement practices. Organizations should consult their legal counsel or other qualified advisors before making business or compliance decisions based on the information contained in this document.

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Registration and Deadlines

1. When exactly does packaging registration under EPR in the EU become required, and how does the PPWR differ from the old Packaging Directive (94/62/EC)?

Extended Producer Responsibility for packaging already existed under Directive 94/62/EC, and it continues to exist in the same institutional form after 12 August 2026. Registration remains national, not EU-wide. There is still no single EU packaging register, which means that each Member State continues to operate its own national producer register, such as BDO in Poland or the Zentrale Stelle Verpackungsregister in Germany, together with its own authorized Producer Responsibility Organization and fee structure. A company that is already correctly registered under the old Directive in a given country does not need to re-register there simply because the PPWR has entered into force; that existing registration continues.

What genuinely changes within the EPR mechanism itself is the following:

- First, because the PPWR is a Regulation rather than a Directive, the definition of who qualifies as a producer is now identical and directly binding across all 27 Member States, instead of being interpreted differently from country to country under the transposed Directive. This matters in practice because that definition is also broader than most national versions used to be. As a result, companies that pack goods in-house, sell under a private label, or import from outside the EU may now be captured as producers in a country where they were not covered before. In such cases, registration in that country would be new rather than renewal.
- Second, Article 45 introduces a separate new obligation to appoint, by written mandate, a local authorized representative for EPR in every Member State where the company has no legal establishment. Only a few countries required this before.
- Third, enforcement of existing EPR registrations becomes more active, because online marketplaces and fulfillment or logistics providers are now legally required to verify a seller's EPR registration number before allowing sales or handling goods. This was not a formal obligation under the old Directive.

Regarding the authorized representative requirement, the European Commission proposed in late 2025 to suspend that obligation until 2035 for EU-established producers. However, as of mid-2026, this has not been adopted, since negotiations in the Council stalled due to objections from a majority of Member States. The binding rule today is still the full Article 45 obligation from 12 August 2026.

2. Why must packaging be registered individually in each EU Member State instead of through one common EU database?

Because Extended Producer Responsibility is structurally a national waste-management competence. Each Member State operates its own producer register, its own PRO(s), and its own fee and eco-modulation system under Article 44. The PPWR harmonizes the rules producers must follow, but deliberately leaves the registration and collection infrastructure with the Member States.

3. Do country-specific EPR registrations need to be completed by 12 August 2026? If not, what is the actual deadline? Does reporting start in January 2027?

There is no general obligation for every company to complete a new country-specific EPR registration by 12 August 2026 simply because the PPWR becomes applicable on that date.

Packaging EPR already existed under Directive 94/62/EC. National producer registers, PRO memberships, reporting arrangements, and fee systems therefore do not disappear or restart on 12 August 2026. If a company is already correctly registered and compliant in a Member State under the existing national EPR system, it should normally continue using that registration. The PPWR does not create a new replacement EU registration process.

The practical significance of 12 August 2026 is different. From that date, the PPWR directly applies across the EU and introduces a harmonized definition of a producer for EPR purposes. A company should therefore reassess whether it falls within that definition in each country where it makes packaging or packaged products available. If it was not previously required to register in a particular Member State but becomes a producer under the PPWR definition, it should complete the relevant national EPR registration before placing packaging on that Member State's market. Likewise, if the company starts selling into a new country, registration is required in that country before the first relevant placement of packaging on the market.

For reporting, there is no single fixed date, such as January 2027, that applies uniformly across the EU. Packaging placed on the market from August 2026 onward will generally be captured in each Member State's existing annual reporting cycle. This means that the first reports covering that period would typically be submitted during 2027, once national systems close out the 2026 calendar year. This is governed by each country's current reporting calendar, not by a new PPWR-specific deadline. Separately, the PPWR provides for a fully harmonized EU-wide reporting and registration format under Article 56, but this will be phased in gradually through implementing acts rather than taking effect immediately in August 2026. Each Member State's national producer register must be updated to support this harmonized system by around August 2027, eighteen months after the relevant implementing act enters into force. One industry source indicates that producers will be required to report through the new harmonized format for the first time by 1 June 2029. In practice, this means that reporting will continue to look somewhat different from country to country

for the next few years, even though the underlying legal obligation is now the same PPWR text everywhere. Full harmonization of the reporting process itself is not expected before 2029.

4. What happens if a company is not ready for the 12 August 2026 deadline, especially if it uses only transport or tertiary packaging?

Non-compliant packaging cannot legally be placed on the market after that date, and national market surveillance authorities are empowered to take corrective measures. However, stock already placed on the market before the deadline generally does not need to be withdrawn. Transport and tertiary packaging are fully in scope, and there is no blanket exemption for this packaging type from the general obligations, such as substances of concern minimization, labeling, and registration. Exemptions apply only to certain later-phase targets, such as some reuse-target derogations.

5. Do we need to appoint an authorized representative in other countries where we have no legal presence?

It depends. No, not in every case, but in many cases you do.

Article 45(3) of the PPWR states that a producer that is not established in a Member State must appoint, by written mandate, an authorized representative for EPR in each Member State where it first makes packaging or packaged products available on the market. In practice, this clearly covers non-EU companies and EU companies selling into countries where they have no legal presence.

For non-EU producers, the rule is straightforward: they must appoint an authorized representative in every EU country where their packaging reaches users from 12 August 2026 onward. For EU-based producers selling cross-border, the same Article 45(3) obligation currently applies. However, the Commission has proposed suspending the authorized representative requirement for EU-established companies until 2035. This proposal has not yet been adopted and is still under negotiation, so it cannot be relied on at this stage.

Separately, some Member States already require authorized representatives under their national laws, especially for foreign producers, and these national rules continue to apply regardless of what happens with the PPWR suspension proposal.

6. How do we determine the correct Producer Responsibility Organization (PRO) to register with in a given country?

In each country, you cannot freely invent a PRO. You must join one of the organizations that the Member State has officially approved for the relevant waste stream, such as packaging, WEEE or batteries. Some countries have only one PRO for packaging, so the choice is automatic; others, like Germany or Poland, have several

competing PROs, and producers can choose among them based on fees, services and contract terms.

The correct PRO therefore depends on three things:

- the country,
- the waste stream, and
- the national list of approved schemes.

The practical steps are always the same. First, check the national packaging EPR guidance or producer register for that country to see which PROs are authorized for packaging. Second, confirm that the PRO covers your specific material types and business model. Third, compare offers and join one approved PRO. Joining any non-approved scheme does not fulfill legal EPR obligations.
However, remember there are already packaging requirements in place prior to this implementation date, and even existing packaging may be subject to additional scrutiny during PPWR implementation. To be safe, you should ensure your packaging is compliant with the requirements in effect when the product is placed on the market.

7. Who checks or audits compliance with EPR registration: EU customers, customs authorities, or another body?

Compliance with EPR registration is checked mainly by national authorities, not by customers. Each Member State designates a competent authority or agency to operate the producer register and enforce packaging EPR rules. This authority may request documents, issue fines, or prevent non-compliant producers from placing packaging on the market. In addition, online marketplaces have a legal duty under Article 45 to verify that sellers are properly registered for EPR before allowing them to sell into a given Member State. They may suspend or block sellers that fail to provide valid registration numbers. Customs authorities are not the primary audit body for EPR and are not identified in the PPWR as the main enforcement route for packaging registration.

8. Do stored goods need to be relabeled to comply with the PPWR starting on 12 August 2026?

Packaging that has already been placed on the European Union market before the relevant PPWR requirements start to apply, including packaging already held in stock, does not need to meet the new sustainability and labeling requirements and does not need to be withdrawn or relabeled.

9. If a product is sold before August 2026, are we obligated to meet the PPWR requirements?

No. As noted above, packaging that has already been placed on the market before the relevant requirement’s date of application does not need to comply with that requirement.

Substances of Concern, PFAS, Heavy Metals

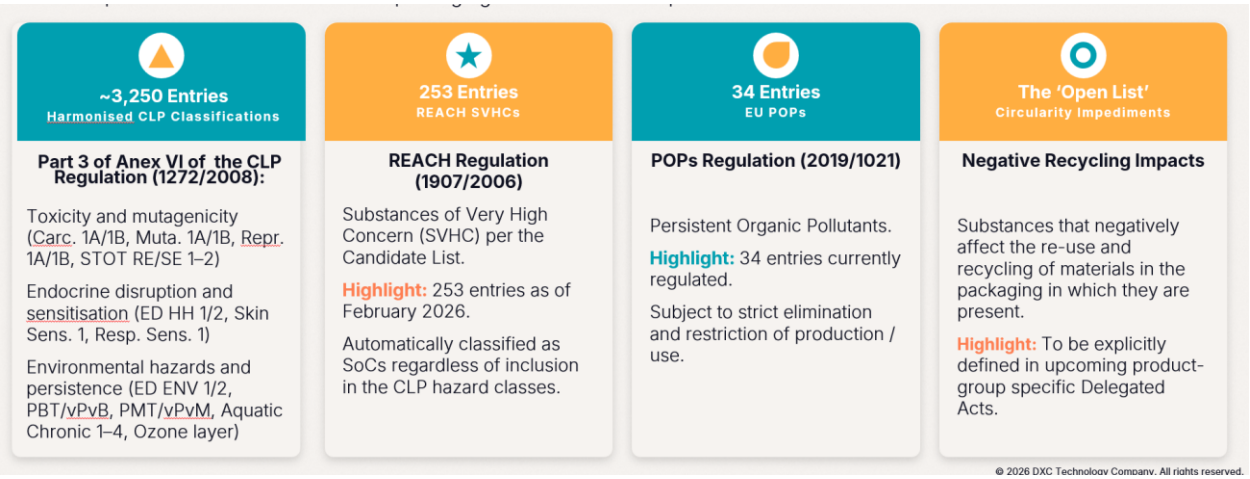
10. How can minimization of Substances of Concern (SoC) be proven? What threshold counts as minimal, given the absence of guidance or standards so far?

There is currently no general numeric threshold for SoC minimization as a whole. Article 5 imposes a qualitative obligation to minimize SoC so that unacceptable adverse effects on health or the environment are avoided. At this stage, compliance is demonstrated by identifying known SoC, based on ESPR, CLP, and REACH criteria, and documenting their absence or minimization in technical documentation. No harmonized standard currently provides a presumption of conformity. Numeric limits exist only for the four heavy metals, with a combined limit of 100 ppm, and for PFAS in food-contact packaging.

11. Is there an official definition or list of Substances of Concern (SoC)?

The definition refers to Article 2(27) of the ESPR, and it is sufficient for only one of the four listed conditions to be met. A list is expected from the ongoing Commission/ECHA study under Article 52. In the meantime, sources such as ECHA's Candidate List of Substances of Very High Concern and Annex VI of Regulation (EC) No. 1272/2008 (CLP) can be consulted.

Based on this definition, there is currently no single official SoC list published specifically for packaging.



(27) 'substance of concern' means a substance that:

(a) meets the criteria laid down in Article 57 of Regulation (EC) No 1907/2006 and is identified in accordance with Article 59(1) of that Regulation;

(b) is classified in Part 3 of Annex VI to Regulation (EC) No 1272/2008 in one of the following hazard classes or hazard categories:

(i) carcinogenicity categories 1 and 2;

(ii) germ cell mutagenicity categories 1 and 2;

(iii) reproductive toxicity categories 1 and 2;

(iv) endocrine disruption for human health categories 1 and 2;

(v) endocrine disruption for the environment categories 1 and 2;

(vi) persistent, mobile and toxic or very persistent, very mobile properties;

(vii) persistent, bioaccumulative and toxic or very persistent, very bioaccumulative properties;

(viii) respiratory sensitisation category 1;

(ix) skin sensitisation category 1;

(x) hazardous to the aquatic environment — categories chronic 1 to 4;

(xi) hazardous to the ozone layer;

(xii) specific target organ toxicity — repeated exposure categories 1 and 2;

(xiii) specific target organ toxicity — single exposure categories 1 and 2;

(c) is regulated under Regulation (EU) 2019/1021; or

(d) negatively affects the reuse and recycling of materials in the product in which it is present;

12. Is PFAS restricted under PPWR for all packaging, or only for food contact packaging?

Only food-contact packaging. The PFAS limits under Article 55 apply exclusively to food-contact materials.

13. Do heavy metal and PFAS/BPA requirements for food-contact packaging apply to all three packaging types: primary, secondary, and tertiary?

The heavy metals limit and the general SoC minimization obligation apply to all packaging placed on the market, regardless of type. PFAS limits apply based on whether the packaging is food-contact packaging, not on whether it is classified as primary, secondary, or tertiary packaging.

14. What is the heavy metals limit (100 ppm was mentioned), and is this a binding standard?

Yes. The PPWR keeps the existing legal limit of 100 ppm by weight for the sum of lead, cadmium, mercury, and hexavalent chromium in packaging. This is a binding legal standard, not a guideline. A specific derogation applies to glass packaging: the 100 ppm limit may be exceeded only where the excess is solely due to the use of recycled glass and there is no intentional addition of these heavy metals during manufacturing.

15. Are desiccants covered under PPWR?

By definition, the PPWR applies to packaging and its components that are intended for the containment, protection, handling, delivery, or presentation of products. However, it explicitly excludes items that are integral parts of a product and remain with it throughout its life cycle. Desiccant sachets sit in a gray area: they are placed inside packaging and protect the product from moisture, but they are not packaging in the traditional sense, and there is currently no dedicated recycling or labeling stream for them. Levosil, a desiccant producer, has formally asked the Commission for clarification.

Packaging Definitions and Labels

16. How does the concept of sales packaging apply to industrial goods, for example rolled goods or raw material in a simple PE bag with a label, several of which are placed in a carton on a pallet? Would a bag that never reaches a shelf but goes directly to the customer count as sales packaging because it contacts the product? Are there official examples for industrial users?

For PPWR purposes, sales packaging is not limited to retail shelves. It covers any packaging that directly contains the product and is intended to be handed over to another economic operator or to the end user, regardless of whether the recipient is a consumer or an industrial customer.

In your example, a simple PE bag that directly contains raw material and is passed to the customer would normally qualify as sales packaging, even if it never appears on a store shelf. Several such bags placed together in a carton on a pallet could be treated as grouped packaging or transport packaging, depending on how they are used in the supply chain. There are no dedicated official examples aimed only at industrial users in the PPWR or its FAQ. However, the general rule is clear: if an item is designed and intended to be filled and used to deliver or protect the product, it is packaging, and the fact that it is B2B rather than retail does not change its status.

17. Do labels applied directly to products (an instruction label on a coffee maker, an energy label on a washing machine, a marketing sticker on a TV, or a label on a fridge or car part) fall under PPWR? Is technical documentation and DoC data required for them?

Labels applied directly to products fall under the PPWR only if they perform a packaging function. The PPWR definition explicitly includes ancillary elements that are hung directly on, or attached to, the product and that perform a packaging function, such as clothing hang tags used for product presentation and sold or discarded together with the product. These are treated as packaging and must be covered by technical documentation and the Declaration of Conformity.

By contrast, labels or leaflets whose main purpose is to provide permanent user instructions, technical information, or mandatory energy information, and which are intended to remain with the product throughout its life cycle, are generally considered product documentation rather than packaging under Commission guidance. Instruction manuals are specifically mentioned as excluded from the packaging definition.

In practice, wraparound sleeves, hang tags, and short-term promotional labels that support product presentation and are discarded with the packaging are likely to be packaging and should be included in the DoC and technical file. Fixed instruction labels on a coffee maker or energy labels required by separate energy-labeling rules are more likely to be treated as non-packaging product labels governed by other legislation. As far as we know, there is no official worked example for each of the specific products listed, so this remains an interpretation based on the legal definition and current guidance rather than a definitive ruling in every individual case.

18. Does labeling, marking, or taping on a carton qualify as tertiary packaging?

No. The tertiary packaging in this example is the carton itself; labeling, printing, and taping are components or features of that transport packaging, not separate tertiary packaging units in their own right. These elements therefore follow the same PPWR rules that apply to the carton, such as traceability and identification marking under Article 15, as well as substance and recyclability requirements. However, they do not create an additional, distinct layer of tertiary packaging that would be classified and declared separately.

19. Which part number should appear on the packaging: the one belonging to the product inside or a separate number for the packaging itself?

The PPWR does not specify which product part number must appear on the packaging. It only requires that the packaging itself can be uniquely identified.

Under Article 15(5), each packaging unit must bear a type, batch, or serial number, or another mark that allows the packaging to be identified for traceability and conformity purposes. This is a packaging identifier, not the product's internal part number. You can therefore:

- use a dedicated packaging code or batch number to meet PPWR requirements, and
- optionally add the product part number or serial number if required by other legislation, such as the Batteries Regulation, MDR, energy-labeling rules, or CE marking rules, or for your own logistics.

In short, the PPWR is concerned with an identifier for the packaging, while other EU product regulations may require additional product-specific numbers or labels that can also be placed on the same box.

Supply Chain Responsibility: Who Is Obligated

20. An EU company imports components from outside the EU, stores them, and exports them to customers in other EU countries without touching the goods or packaging. In which country should packaging waste be reported: ours or the customer's?

In this scenario, what matters is where the packaging is first made available to an end user or commercial customer on that Member State's territory, not where it is temporarily stored. The PPWR ties EPR obligations to "making available on the territory of a Member State," and the Commission FAQ clarifies that logistics companies performing handling and storage are not considered end users and do not, by themselves, trigger end-of-chain EPR obligations.

So, if an EU company:

- imports components from outside the EU into Country A
- stores them in Country A
- and then sells and ships them to customers in Country B without repacking or relabeling

then, for EPR and packaging waste reporting purposes, the relevant country is Country B, where the packaging is first supplied for use or consumption by the customer. In practice, the EU company is the "producer" for Country B and must register and report packaging there. Storage in Country A alone normally does not create a separate EPR reporting obligation in Country A if the packaging does not end up with end users there.

One important note is that if the company changes the packaging in Country A, for example by rebranding, repacking, or relabeling it under its own name, or if a customer in Country A also receives those goods, then it can become a producer in Country A as well. The exact obligation always follows who first places the packaged

product on the market under its own name in each Member State, not just where the goods happen to be warehoused.

21. Does PPWR apply only to packaging manufacturers, or also to packaging users?

It applies to a broad set of “economic operators” defined in Article 3: manufacturers, suppliers, importers, distributors, authorized representatives, final distributors, and fulfillment service providers all have distinct obligations under the Regulation. A pure “packaging user” that does not fall into any of these roles, for example because it does not import, distribute, or rebrand packaging, generally relies on upstream compliance. However, if it imports packaged goods from outside the EU or places packaging on the market under its own name, it becomes an importer or manufacturer by definition and takes on full obligations.

22. If we are only a packaging user and not the manufacturer, is the key compliance point to collect compliance or technical documentation, or a Certificate of Conformity (CoC), from our packaging suppliers?

The PPWR does not recognize a separate role called “packaging user.” It assigns obligations based on what you actually do with the packaging. Under Article 3, the manufacturer is the company that has packaging designed or manufactured under its own name or trademark and places it on the market. Article 21 also clarifies that an importer or distributor that places packaging on the market under its own brand, or modifies existing packaging in a way that affects conformity, is deemed to be the manufacturer and must take on all manufacturer obligations, including the Declaration of Conformity and technical documentation.

If your company’s name or logo appears on the packaging, or if you import unbranded packaging or packaged products from outside the EU and sell them in the EU, you are not “only a user”; you are the manufacturer under the PPWR, even if another company physically produced the packaging. In that case, you must draw up your own DoC, keep technical documentation, and ensure full compliance.

If you truly only use packaging supplied by another company, without importing it, without placing your brand on it, and without modifying it in a way that could affect compliance, your main obligation is to obtain and retain adequate declarations and technical information from your packaging suppliers. Article 16 requires suppliers to provide manufacturers with all documentation needed to demonstrate conformity. However, the first step is always to check whether the PPWR treats you as a manufacturer or importer for that packaging, rather than assuming that you are “just a user.”

23. If we use packaging for our products but do not manufacture it, are we liable for the packaging DoC?

Generally, the manufacturer is liable for the DoC. This is the entity that designs or produces the packaging, or that places it on the market under its own name or trademark. A company that simply buys and uses finished, compliant packaging is not automatically liable for the DoC unless it becomes the manufacturer itself by branding or importing that packaging.

Example 1: Company X buys standard, unbranded cartons from a packaging supplier and uses them only for internal or B2B transport, without altering them. Here, the packaging supplier is the manufacturer and must hold the DoC; Company X only needs to collect and keep that documentation.

Example 2: Company X orders the same cartons, but printed with its own logo and brand name. At that point, Company X becomes the manufacturer of that packaging under Article 21 of PPWR, even though another company physically produced it, and Company X must issue its own DoC.

Example 3: Company X imports already-packaged products from China, with no branding on the packaging, and sells them in the EU. In this case, Company X is the importer under Article 18 of the PPWR, but that does not mean it must create the Declaration of Conformity itself. Under Article 18, importers are required to verify that the manufacturer has carried out the conformity assessment, drawn up the technical documentation, and issued the DoC. They must also keep a copy of that DoC available for market surveillance authorities. The DoC is still issued by the non-EU manufacturer; the importer's responsibility is to make sure the DoC exists, is correct, and is retained, and to refuse to place packaging on the market if those conditions are not met.

The key question is not whether you are "only a user," but whether your brand appears on the packaging, whether you import it, or whether you modify it. That determines whether you must hold the DoC yourself or can rely on documentation from your supplier.

24. If we are a distributor and the packaging carries our brand, but we sell to customers who resell the product, who is obligated to make the declaration, us or our customer?

The party placing packaging on the market under its own name or trademark is treated as the manufacturer for compliance purposes. If you are a distributor branding otherwise third-party packaging and selling to a reseller who then sells to the end user, you, as the brand owner, are still the party that first placed it on the market and would be expected to hold the DoC. The reseller further down the chain typically does not re-declare unless it materially alters the packaging.

25. Should a company also be responsible for managing and ensuring the compliance of packaging received with purchased parts or components from suppliers?

Yes. In practice, Article 16 places the documentation burden on suppliers to inform manufacturers. Manufacturers must incorporate this information into their own technical documentation and DoC covering the full packaging unit, including third-party-supplied components.

26. We produce automotive relays packed in cartons with plastic trays and a plastic bag purchased from a packaging manufacturer. What is our position in this chain?

Because you assemble the final packaged product and place it on the market under your own name, you are the manufacturer of the packaging under the PPWR and are responsible for the Declaration of Conformity and technical documentation for the complete packaging unit, including the carton, trays, bag, and any labels. Your packaging supplier is a supplier in the PPWR sense and must, under Article 16, provide you with all information and documentation needed to demonstrate conformity of each component, such as material specifications and data on Substances of Concern, PFAS, and heavy metals. You then combine this supplier information into your own technical file and DoC for the full packaging unit. You do not have to run your own material tests if the supplier documentation is complete and reliable, but you remain responsible for the overall compliance of the packaging you place on the market.

27. We distribute thermoplastic resins to molders. Does the PPWR apply only to packaging for finished end-user products, or also to B2B packaging like this?

The PPWR applies to B2B packaging as well. Its scope is not limited to consumer end use; Article 2 covers all packaging placed on the EU market, regardless of who the recipient is. B2B-only exemptions exist for narrow, specific provisions, such as the plastic carrier bag ban, which explicitly excludes B2B situations. General sustainability, SoC, and labeling obligations apply regardless of whether the packaging is used in a B2B or B2C context.

28. We are a B2B metal distributor. We purchase metal, cut it to customer specifications, and dispatch it using packaging we buy, plus packaging received with incoming materials that we reuse. What is our role in the packaging supply chain, and what documentation should we obtain from packaging

suppliers and from material suppliers whose packaging we reuse?

Your role depends on what you do with the packaging when you send goods to your own customers. If you ship metal in packaging that bears your own name or brand, or if you modify or reconfigure the packaging in a way that affects its conformity, the PPWR will treat you as the manufacturer of that packaging for those shipments, even if you did not physically produce the materials. You then take on manufacturer obligations for the Declaration of Conformity and technical documentation. If you simply pass on intact, unbranded packaging exactly as received and do not place it on the market under your own name or brand, you act more as a distributor. As a distributor, your primary obligation is to ensure that the packaging you place on the market already complies and is backed by a valid DoC from the upstream manufacturer.

For packaging that you purchase specifically for your own outbound shipments, you should obtain and retain supplier documentation under Article 16, including material specifications and evidence on Substances of Concern, PFAS, and heavy metals. You should use this information to support the DoC for any packaging you place on the market under your name. For reused packaging that comes with incoming materials and that you use for your own shipments, you should retain the original manufacturer's DoC or technical documentation for that packaging as proof of compliance and keep it on file for as long as that packaging format remains in use in your outbound supply chain.

29. We fill purchased containers or barrels, which are our primary packaging, with chemical products that are not necessarily hazardous. We do not manufacture this packaging and have no DoC for the empty primary packaging currently in stock. Will we need to perform chemical analyses of the empty packaging in order to declare conformity after 12 August 2026? Can we continue selling filled products without a DoC until the existing stock of empty primary packaging runs out?

Under the PPWR, a company that fills packaging and places the filled product on the EU market under its own name is treated as the manufacturer of that packaging for conformity purposes, even if it did not physically make the containers. You are therefore responsible for having a Declaration of Conformity and technical documentation for those primary containers from 12 August 2026 onward.

You do not automatically have to test every container yourself. The Regulation expects you to build your technical documentation from supplier evidence first. For low-risk packaging with strong, specific supplier documentation, that may be sufficient. For higher-risk or poorly documented packaging, chemical testing is recommended and may be necessary to provide defensible proof of compliance.

The critical point is that from 12 August 2026, you cannot rely on “no DoC, but we are using up old stock” as a compliance strategy. The PPWR applies to any packaging placed on the market from that date, regardless of when the empty containers were produced. If you continue filling and selling products in primary packaging for which you have neither a DoC nor adequate technical documentation, you have a real compliance gap.

30. We purchase die-cut corrugated cardboard and fold it into cartons for our products. What information must be printed on the cartons? Are we considered responsible for the packaging, and do we need to register?

Because you convert the die-cut board into finished cartons and place those cartons on the market with your products under your own name, you are the manufacturer of the packaging under the PPWR and are responsible for its conformity, Declaration of Conformity, and technical documentation. From 12 August 2026, you must ensure that each carton:

- carries an identification mark, such as a type, batch, or serial number, or another code that allows the packaging to be traced; and
- shows your name, registered trade name or trademark, and postal address, with electronic contact information if available; alternatively, this information may be accessible through a QR code or another digital carrier.

The harmonized sorting label with pictograms for material composition under Article 12 does not become mandatory in 2026. It starts from 12 August 2028 at the earliest, once the Commission’s implementing acts defining the pictograms are in force. You should plan to add that sorting label later, but for now the focus is on traceability and manufacturer identification.

31. Is EPR registration also required for companies that apply their own logo on purchased packaging?

Yes. Applying your own name or trademark to otherwise third-party packaging generally makes you the “producer” or manufacturer for that packaging under the PPWR framework, triggering both registration and DoC obligations.

32. If our packaging is already subject to another regulation such as MDR, do we still need to comply with PPWR?

Yes. The PPWR applies to almost all packaging placed on the EU market, including packaging for medical devices and IVDs. There is no general exclusion simply because the packaging is already regulated under the MDR or IVDR. The MDR and

IVDR govern the safety and performance of the device itself, while the PPWR adds a separate layer of rules on substances, sustainability, recyclability, labeling, and EPR for the packaging. For certain contact-sensitive health care packaging, there are targeted exemptions or delayed obligations for recyclability and recycled content. However, core PPWR duties, such as substance restrictions, minimization, conformity assessment, technical documentation, DoC, registration, and EPR, still apply in full.

33. If we supply EXW, are we considered to place the product on the market in the country where we are based?

Yes, normally you are. The PPWR uses the general EU “placing on the market” concept, which is independent of Incoterms. A product is placed on the market when it is first made available for distribution, consumption, or use on the territory of a Member State, whether for payment or free of charge, by a manufacturer or importer. Under EXW, you make the goods and their packaging available at your premises in your country. The buyer then organizes transport and export, but that does not change the fact that you are the economic operator that first makes the packaged product available there.

In practice, this means that when you sell EXW from Country A, you are placing the packaged product on the market in Country A, and you are treated as the manufacturer or producer there for PPWR and EPR purposes. The buyer may become the importer and producer in the destination country if it brings the goods into another Member State under its own name, but EXW does not remove your obligations in the country where you are based and where the goods are first made available.

Declaration of Conformity & Technical Documentation

34. Is a Declaration of Conformity (DoC) alone sufficient to demonstrate compliance, or is full technical documentation (drawings, material composition) also required?

Both are required together. The DoC, based on the Annex VIII model, is the formal signed statement, but it must be supported by complete technical documentation under Annex VII. Technical documentation substantiates the claims made in the DoC. One without the other is not compliant.

35. Should all PPWR articles already be reflected in the documentation (DoC) by August 2026?

No. Only obligations that are effective from 12 August 2026, such as SoC minimization, heavy metals and PFAS limits, DoC, and traceability marking, need to be

reflected by that date. Later-phased requirements, such as recycled content and recyclability grades from 2030 and compostability from 2028, are not yet applicable and do not need to be included in the documentation until their own application dates arrive.

36. Is there a single, universally adopted DoC or technical documentation template across the EU? Could a template be shared?

Yes. Annex VIII of Regulation (EU) 2025/40 provides the standard EU Declaration of Conformity model to be used across all Member States.

eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202500040

37. Must a declaration be made separately for every individual packaging component? For example, for a wooden pallet, cardboard box(es), an inner PE sack closed with a zip tie, a cardboard lid on top, and a whole unit secured with stretch film or a strapping band, does each component need its own declaration?

No. Based on the FAQ document, the declaration is made per “packaging unit” or packaging batch or series, not per individual material component. The document explicitly frames this in the recyclability assessment context, confirming that a single DoC can cover the packaging unit as a whole, such as a bottle, lid, and label together, instead of requiring a separate DoC for each component. For a shipment such as a pallet, carton, PE sack, zip tie, lid, and stretch film, if these together constitute a single packaging unit or a grouped or transport packaging arrangement, a single combined declaration covering the whole unit is the expected approach. Separate declarations for small individual components, such as the zip tie alone, would not be proportionate or consistent with the structure of the Regulation.

38. Since we only ship components using transport (tertiary) packaging, can we generate a DoC for each item (carton, pallet, etc.) instead of one single combined DoC?

Either approach can work, as long as the documentation clearly maps to defined packaging units or batches. The Regulation does not prescribe one DoC per shipment versus one DoC per item type. The key point is that each declared unit or batch must be properly identified in line with Annex VIII’s requirement for “unique identification of the packaging,” such as a type, batch, or serial number.

39. Is one DoC needed for all packaging combined, or a separate DoC for each individual package?

The same logic applies. The DoC attaches to an identifiable packaging unit or batch, identified by type, batch, or serial number, not to each single physical package. Multiple physical packages produced in the same batch or format and from the same manufacturing plant can share one DoC.

40. Since a declaration must be made per country and per material type, would there be one declaration per material, for example wood? When a customer requests proof, should we provide the general declaration we filed rather than a customer-specific one, even though the same material type applies across different customers? How is this handled in practice?

Under the PPWR, the EU Declaration of Conformity is issued per packaging type or family of packaging with the same material and functional properties, not per customer and not simply per raw material such as "wood" in the abstract. In practice, you prepare one declaration for each distinct packaging design or group of designs that share the same composition and performance, for example, a specific carton format, a standard wooden pallet type, or a defined plastic tray family. That declaration remains valid across all customers and markets where that packaging type is placed on the EU market.

When a customer asks for proof, you normally provide the general declaration and technical documentation for that packaging type, not a customer-specific version. The same DoC applies wherever that packaging is used, as long as its design and materials remain unchanged. You only need a new or updated declaration when you change the packaging in a way that affects its properties, for example, a different material grade, a new coating, a different adhesive, or a design change relevant to recyclability or substance content.

41. Could packaging suppliers create and publish a Packaging Material Data Sheet covering several part numbers to avoid multiple separate reports, as a best practice, provided the data sheet covers variants with the same material composition and compliance characteristics?

Yes, with several conditions, a packaging manufacturer could absolutely create and use a packaging MDS that addresses multiple products. As with other product types, this packaging "family" may involve an assembly / complex object made up of several different parts (e.g. a tray inside a box with an overwrap) or might be a single part/article (e.g. a molded single-material tray).

- If it is an assembly, each package set must weigh the same amount, have the same weight for each component, and have the same ratios for regulatory-relevant and non-regulatory-relevant substances. (This is possible, but probably not common.)
- If the package is a single part, it may be common for a family of products to share the same compliance characteristics. For example, packaging designed to hold hand tools (screwdrivers, pliers, wrenches) could all have the same weight and composition, even though the indent moldings are of different shapes.

42. Could a company with IMDS data for packaging link that information directly to a declaration as a way to demonstrate compliance?

An IMDS Packaging declaration could be linked to CDX and demonstrate PPWR compliance in this fashion, but both an IMDS-Connect license and a CDX license are necessary to use this functionality.

43. What happens if packaging data is not entered into IMDS due to insufficient time before deliveries or lack of awareness of the requirements?

Today, packaging is not a general reporting requirement in IMDS. If a specific client or clients require your company to report packaging in IMDS, that is a business-to-business matter between your company and those clients, and we recommend you address packaging compliance directly with those clients.

44. Will the material be rejected, or will it result in a noncompliance

Rejections are always a business-to-business matter between your company and your clients. However, if your packaging contains Substances of Concern within the scope of the PPWR, this should at least trigger a conversation between you and your client about mitigation or migration plans. This is especially true if your product is imported into or produced within the EU where it is non-compliant, yet many customers recognize that a substance known to be a problem in one region will likely become an issue in other regions, and so may invoke conditional or contractual restrictions beyond what is regulated.

45. Does IMDS have the same packaging features as CDX, or will those features be added?

IMDS does not currently address the PPWR, and we are unaware of any Steering Committee plans to do so in the near term. Today, packaging is not a general reporting requirement in IMDS. If a specific client or clients require your company to report packaging in IMDS, that is a business-to-business matter between your company and those clients, and we recommend you address packaging compliance directly with those clients. Even though IMDS does not provide the same packaging features, many

OEMs and Tier-1s employ in-house systems that perform additional checks beyond those built into IMDS, and in those cases the CDX PPWR functionality may be advantageous for your organization.

46. Given an existing CDX license for CDX submissions, is a separate license needed for PPWR?

A CDX MDS license supports all CDX "What substances does my supply chain introduce into my product?" regulations, including Packaging and the PPWR. No separate CDX license is needed for PPWR other than a suitably sized CDX MDS license.

Recycling and Recycled Content

47. When does the minimum recycled content requirement come into effect: immediately, or in 2030? How will this be reflected in the DoC?

From 1 January 2030 at the earliest, or three years after the relevant implementing act, whichever is later. Confirmed targets include 30% recycled content for contact-sensitive PET packaging, 10% for other contact-sensitive plastic packaging, 35% for non-contact-sensitive plastic packaging, and 30% for single-use plastic beverage bottles.

48. How is the recyclability rate of a given packaging assessed?

There are two related but distinct mechanisms:

(1) Design for Recycling grading: each packaging unit receives a recyclability performance grade from A through C, with anything below C considered non-recyclable, based on the criteria in Annex II, Table 3. From 2030, only packaging rated A through C may be placed on the market.

(2) Separately, recyclability at scale is assessed against an EU-wide actual recycling rate benchmark of 55%, or 30% for wood, for each packaging category listed in Annex II, Table 2.

49. What counts as recycled content? Does chemically recycled plastic count? Are certified mass balance schemes allowed?

Under the PPWR, "recycled content" will be defined and verified according to a detailed methodology to be adopted by the European Commission in a future implementing act under Article 78, which is not yet in force. This means it is still uncertain to what extent chemically recycled plastics and certified mass-balance schemes will qualify as recycled content for PPWR targets and labeling purposes. Companies should monitor the Commission's implementing measures and guidance once they are published.

50. Is the requirement that packaging must be recyclable, rather than made from recycled material? Is that the correct understanding?

Correct. These are two separate obligations: recyclability by 2030 under Article 6 is distinct from minimum recycled content targets for plastic packaging, which also apply from 2030 under Article 7.

Scope and Sector-Specific Questions

51. Will the PPWR apply to all industries?

The scope is comprehensive: the PPWR applies to all packaging placed on the EU market, whether empty or filled, regardless of material and regardless of whether it is produced in the EU or imported.

52. Is environmental labeling applicable to industrial packaging?

Under the PPWR, the harmonized labeling requirements in Article 12 apply to "packaging placed on the market" as defined in the Regulation, which includes transport and industrial packaging formats as long as they qualify as packaging. There is no general carve-out for B2B or industrial packaging in Article 12. Specific labeling details and any differentiated treatment for certain formats will be specified in future implementing acts. Companies using industrial packaging should therefore assume that harmonized environmental labeling will be required and should monitor the Commission's implementing measures for precise design and application rules.

53. We sell only B2B using neutral packaging without disclosing the contents. To what extent must we follow the PPWR?

The PPWR applies to all packaging placed on the EU market, including neutral industrial and transport packaging used exclusively in B2B channels. There is no general B2B exemption from the core sustainability, substances of concern, and labeling obligations, so such packaging must comply with the same requirements as consumer packaging. The Commission's FAQ mentions a B2B exclusion only for the specific ban on certain plastic carrier bags; other PPWR provisions remain applicable.

54. We are a label supplier. Are all labels subject to the PPWR? For example, what about a label placed directly on the product, not on the packaging, such as on a refrigerator or car part?

As discussed above, this depends on whether the label performs a packaging function. A hang tag or wrap that has a containment, protection, or presentation role is likely to qualify. A purely informational or safety-compliance label, such as a

regulatory plate on a refrigerator or an automotive part identification label, is less likely to qualify because it does not function as containment, protection, handling, or delivery. However, there is no document-confirmed ruling on these exact product examples, so this should be treated as an informed interpretation rather than certainty.

55. What does the term “marketplace” mean? Does it refer to the manufacturer (MAN) and distributor, or only to the manufacturer?

“Marketplace,” meaning an online platform provider, is a separate category from a manufacturer or distributor. Under Article 45(4)–(6), online marketplaces must check producers’ EPR registration before allowing sales to EU consumers and must remove non-compliant sellers.

56. What about Articles 8 and 9 of the PPWR? How do they apply?

Article 8 concerns bio-based feedstock in plastic packaging, which is a distinct sustainability requirement from recycled content. Article 9 concerns compostable packaging and requires specific formats, such as permeable tea and coffee bags and sticky fruit and vegetable labels, to meet industrial composting standards, and home composting standards where required, from 12 February 2028. Even compostable or biodegradable packaging must still be designed for material recycling under Article 6 without compromising other waste streams.

57. Does water remain in the cured product, as shown in the example, or was that only an illustrative example for the webinar?

The product was just an illustrative example for the webinar, but the small amount of water (3.3 grams in a 10.705 kg material, or 0.03%) could remain in the cured form of this particular packaging material, where the pigmented water is in trapped “bubbles” in the thermoplastic carrier.

58. Could information on Battery Pack PPWR compliance be shared?

Batteries are governed by their own dedicated legal instrument, the EU Batteries Regulation (EU) 2023/1542, which has separate EPR obligations in force from 18 August 2025 rather than under the PPWR. We do not have confirmation of any specific cross-reference or exemption clause linking battery packaging to the PPWR within these two documents. If battery packaging also functions as product packaging, such as an outer box, that outer packaging would likely fall under the PPWR separately from the battery cells themselves, but this distinction should be confirmed case by case.

Suggested Best Practices Raised by Participants

59. Are the following recommended as a systematic approach to supply chain compliance: building a packaging material database, reducing mixed-material packaging, increasing the use of recyclable and recycled-content materials, developing returnable transport packaging, collecting supplier declarations and certificates, aligning with OEM packaging engineering teams, and digitizing packaging compliance records?

Yes. Those actions represent a sound, systematic approach to PPWR-aligned supply chain compliance. In practice, companies will need structured packaging data, fewer mixed-material formats, more recyclable and recycled-content materials, returnable transport solutions, robust supplier declarations and certificates, close alignment with OEM packaging engineering, and digitized compliance records to support EU Declarations of Conformity and audits.