



PPWR: Regulatory Overview

Requirements, impacts and action areas
for companies

From regulatory basics and roles to
conformity and PPWR readiness



PPWR: Regulatory Overview

What companies need to know about packaging, evidence and conformity from 2026 onwards.

The PPWR is the new EU Regulation on packaging and packaging waste. It replaces the previous Packaging Directive 94/62/EC with the directly applicable Regulation (EU) 2025/40. Its aim: more consistent packaging rules across the EU, less packaging waste, greater circularity and more resource-efficient packaging solutions.

Application Date

From **12 August 2026**, packaging and packaged goods placed on the EU market must comply with the PPWR requirements. This affects companies that develop, use, import, distribute or place packaging on the market. PPWR compliance will therefore become a prerequisite for market access in the EU.

Conformity Assessment

A conformity assessment is required for each packaging item or packaged product. Companies must assess the relevant requirements and provide evidence through technical documentation and an EU Declaration of Conformity. Data and documentation processes should therefore be established at an early stage.

Who does the PPWR apply to?

In principle, the PPWR applies to companies of all sizes that manufacture, fill, import, distribute or place packaging or packaged products on the EU market. This includes not only packaging manufacturers, but also companies using packaging for their own products or importing packaged goods and offering them on the EU market.

Key PPWR Action Areas



Material Requirements

Chemical safety, recycled content and restrictions.



Circular Design

Promoting recyclability & reusability.



Packaging Reduction

Reducing packaging & waste and conserving resources.

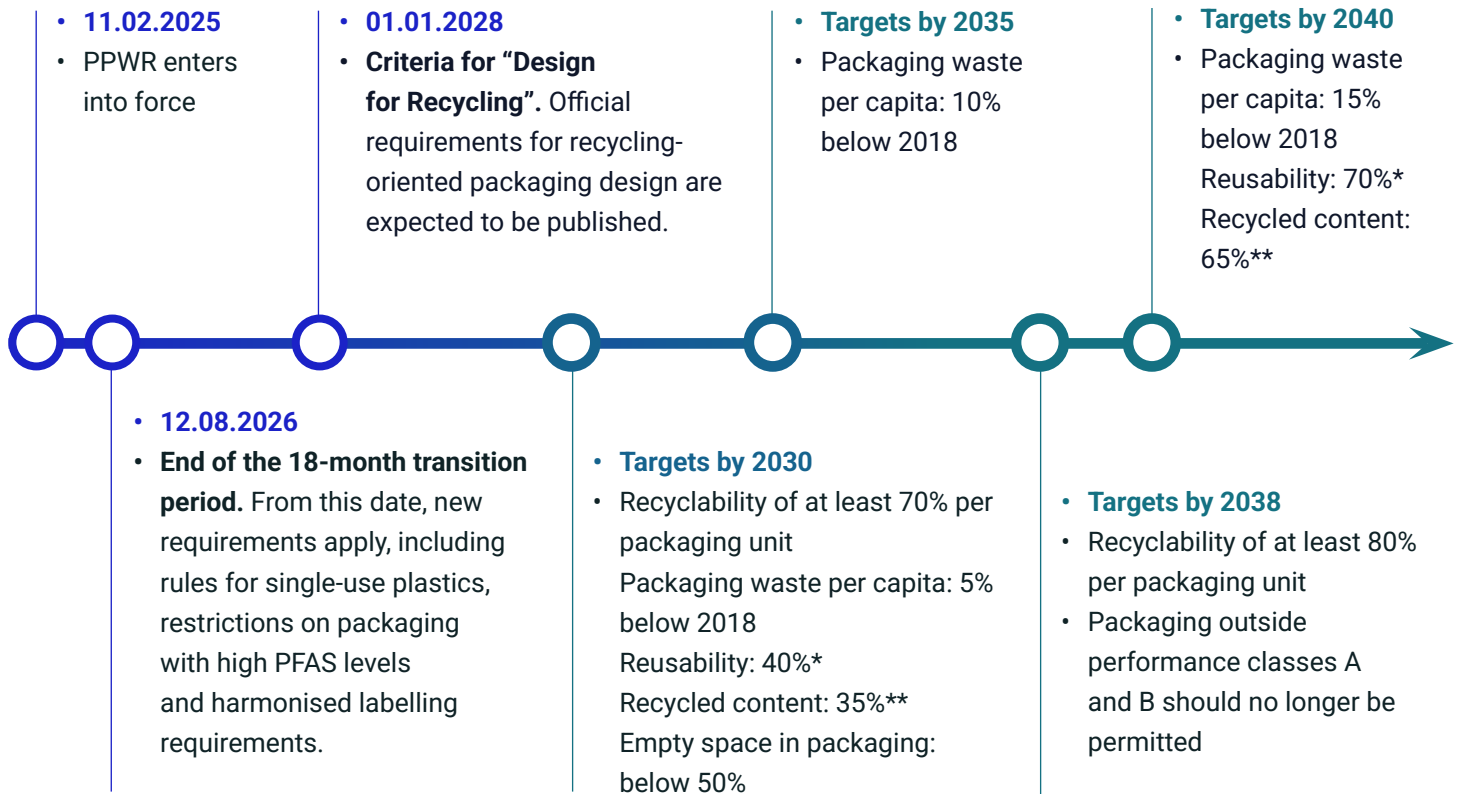


Labelling & Transparency

Clear labelling & transparent information.

PPWR: Key Deadlines

Key dates and requirements at a glance



* Reuse targets apply to transport packaging; grouped and beverage packaging are excluded.

** Recycled-content requirements apply to certain plastic categories; contact-sensitive packaging, PET packaging and plastic beverage bottles are not included.

PPWR: Risks of Non-Compliance

Market Access & Sales Restrictions

Non-compliant products may be stopped at the border, recalled from the market or excluded from further distribution.

Fines & Administrative Penalties

Violations may result in sanctions and fines. The specific level and form of penalties are determined nationally.

Recall, Disposal & Logistics Costs

Non-compliant packaging may lead to recalls, disposal, corrective action and additional storage costs borne by the company.

Affected Product Groups

All packaging and packaged products on the EU market

From 12.08.2026, goods not compliant with the PPWR may no longer be placed on the market.

Exceptions & Special Rules



Packaging for dangerous goods



Packaging for medical devices



Food-contact packaging



Innovative packaging

PPWR: Economic Operators and Information Duties

The PPWR distinguishes between different economic operators along the supply chain and assigns specific information and due-diligence obligations to them.

The PPWR does not only affect the producer of packaging. It defines different economic operators across the supply chain – from suppliers and manufacturers to importers, distributors and fulfilment service providers. Going forward, it will be essential for relevant packaging information to be available completely, traceably and on time.



Supplier

Any natural or legal person supplying packaging or packaging material to a manufacturer.



Manufacturer*

Any natural or legal person manufacturing packaging or a packaged product. Also applies where products are placed on the market under their own name or trademark.



Distributor*

Any natural or legal person in the supply chain making packaging available on the market, other than the manufacturer or importer.



Producer

Responsible for manufacturing and first making available transport, service and primary production packaging.



Importer*

Any natural or legal person established in the Union that places packaging from a third country on the market.

* If the economic operator is also a producer, extended producer responsibility may apply.



Supplier

- Provide information for technical documentation & conformity assessment

Provide



Manufacturer

- Collect supplier information & conduct conformity assessment
- Prepare & retain technical documentation
- Ensure packaging labelling and identification
- Conduct EU conformity assessment
- Initiate corrective action where required

Collect

Disclose

Disclose

Disclose

Verify



Importer

- Verify the conduct of the conformity assessment
- Collect and store EU conformity assessment documentation
- Verify labeling and manufacturer information
- Initiate corrective actions as needed

Collect

Collect

Verify

Verify



Distributor

- Verify producer registration
- Check labelling and manufacturer/importer information
- Stop supply in case of non-conformity & initiate corrective action
- Provide declaration of conformity & documentation upon authority request

Verify

Verify

Verify

Collect



Producer

- Register in the producer register
- Fulfil extended producer responsibility
- Report packaging quantities and relevant data

Provide

Provide

Provide



Depending on product origin and distribution model, a company may assume different roles under the PPWR and therefore be subject to different information obligations.

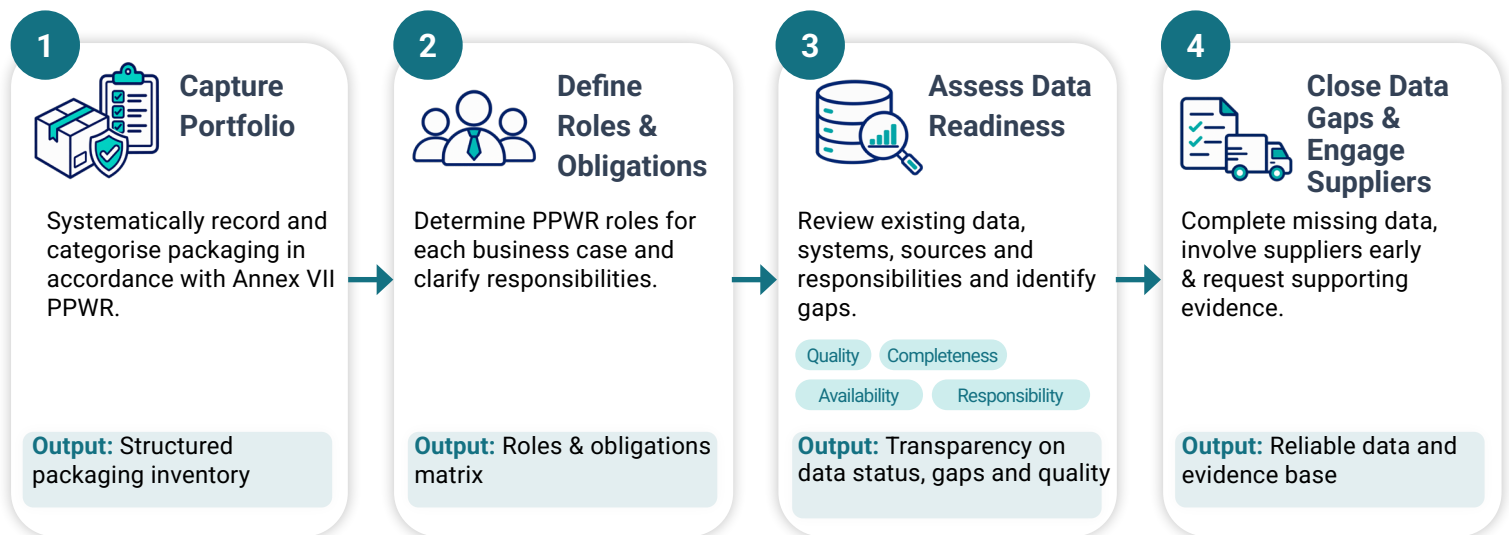
Basis for the EU Declaration of Conformity

Technical documentation forms the basis for demonstrating PPWR conformity. It contains the relevant technical information and evidence required to meet the applicable requirements. On this basis, the conformity assessment determines whether the packaging complies with the applicable requirements. Once conformity has been demonstrated, the EU Declaration of Conformity is issued as formal confirmation.

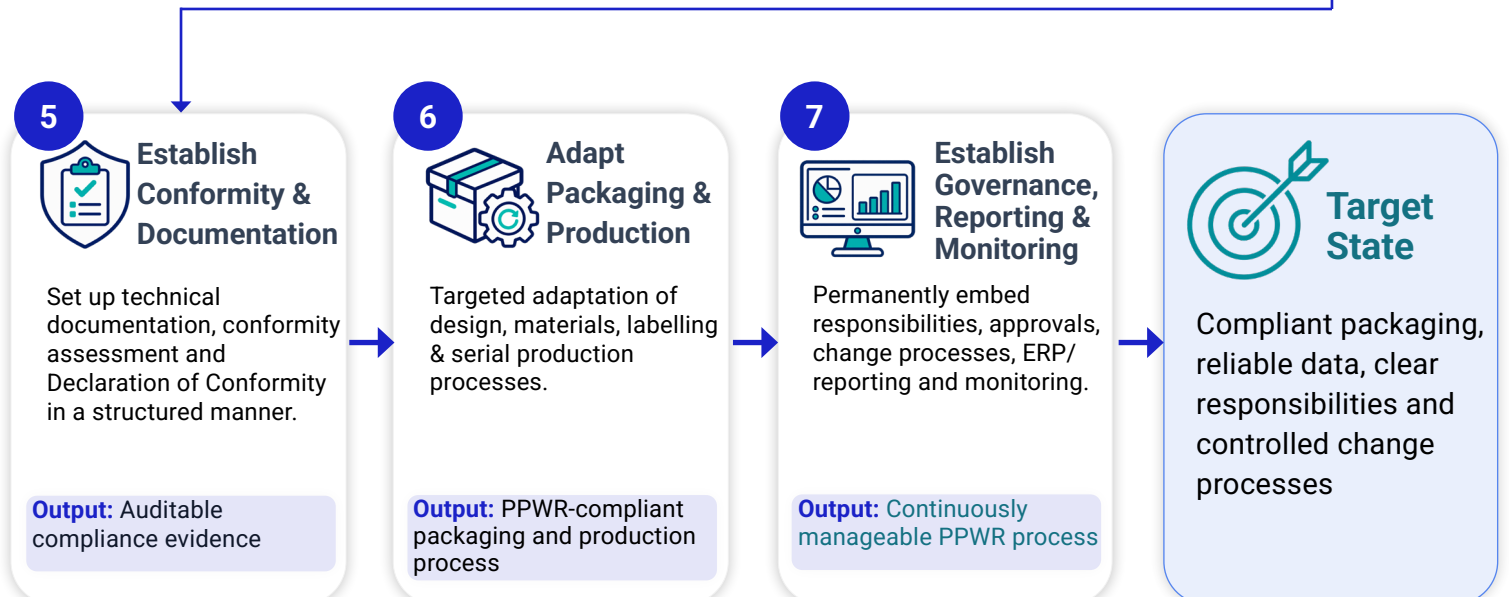
Next Steps towards PPWR Readiness

From initial assessment to a robust compliance structure

1. CREATE TRANSPARENCY



2. BUILD & EMBED COMPLIANCE



PPWR Readiness Checklist

How well prepared are we for the requirements?

01 – Packaging Portfolio & Scope

Do we know what is affected?

- ☐ Have all relevant packaging items and packaging levels been captured?
- ☐ Is packaging clearly linked to products / product groups?
- ☐ Are material, weight and intended use generally known?
- ☐ Are relevant markets, sales channels and entities assigned?

Goal: Full transparency across the packaging portfolio

02 – Roles, Obligations & EPR

Do we know what we are responsible for?

- ☐ Is our PPWR role known for each business case?
- ☐ Have potential multiple roles been considered?
- ☐ Have the resulting obligations been broadly assigned?
- ☐ Are existing EPR registrations, markets and reporting processes known?

Goal: Clear roles and obligations matrix

03 – Data Readiness & Suppliers

Do we have the information we need?

- ☐ Is it defined which packaging data we require?
- ☐ Do we know which data already exists and where it is stored?
- ☐ Are completeness, quality, currency and data sources traceable?
- ☐ Are suppliers involved and missing evidence identified?

Goal: Reliable data and evidence base

04 – Conformity & Documentation

Can we demonstrate conformity transparently?

- ☐ Is the technical documentation structured?
- ☐ Is relevant supplier, material, test and performance evidence available?
- ☐ Is the process for conformity assessment and the EU Declaration of Conformity defined?
- ☐ Are documents clearly linked to packaging, product and version?

Goal: Auditable and verifiable packaging

05 – Packaging Requirements

Have relevant PPWR topics already been assessed?

- ☐ Are material composition and relevant substance issues known?
- ☐ Have recyclability and recycled content been broadly assessed?
- ☐ Have reuse and packaging minimisation been assessed for relevance?
- ☐ Are labelling requirements and future changes considered?

Goal: Transparency on current and future compliance gaps

06 – Governance & Processes

Is PPWR permanently embedded in the company?

- ☐ Are responsibilities for data, suppliers, documentation, EPR and compliance defined?
- ☐ Is there an approval and change process for packaging changes?
- ☐ Is there a process for gaps, non-conformities and corrective actions?
- ☐ Are regulatory changes and open actions regularly monitored?

Goal: Continuously manageable PPWR process

PPWR READINESS – 5 KEY QUESTIONS

- ☐ **Scope** – Do we know which packaging is affected?
- ☐ **Responsibility** – Do we know our roles and obligations?
- ☐ **Data** – Do we have reliable data and supplier evidence?
- ☐ **Evidence** – Can we document conformity transparently?
- ☐ **Control** – Can we manage changes and gaps over time?



pakera

Rethink packing.

Version 2.0

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