

PPWR COMPLIANCE CHECKLIST FOR PACKAGING BUYERS

Status as of October 2026. Regulation (EU) 2025/40 (PPWR) and Commission guidance C(2026) 3702, non-binding.

CompanyItem code or range

Your role(s) manufacturer / importer / distributor / final distributor / EPR producer

MarketsCompleted byDate

SECTION 1. ALREADY APPLYING (from 12 August 2026)

Done	Item	Article	Applies from	Who	Evidence to hold
☐	Work out your PPWR role for each printed item (manufacturer, importer, distributor, EPR producer)	Art 3(1), point 13	12 Aug 2026	All	Role register by item code and country; open questions on branded or micro-enterprise status noted for the competent authority
☐	Food-contact packaging: no more than 25 ppb for any single PFAS and 250 ppb for the sum (targeted analysis), and 50 ppm for all PFAS including polymeric PFAS. If total fluorine is above 50 mg/kg, get proof of the fluorine source	Art 5(5)	12 Aug 2026 (no sell-off period)	Manufacturer ensures; importer checks; distributor must not supply non-compliant packaging; material supplier gives fluorine proof on request	Targeted-analysis or total fluorine test report per material; supplier proof of PFAS versus non-PFAS fluorine where required
☐	Sum of lead, cadmium, mercury and hexavalent chromium in packaging: 100 mg/kg maximum	Art 5(4)	12 Aug 2026 (general application)	Manufacturer	Supplier statement or test report
☐	Collect information from packaging and material suppliers needed to show conformity	Art 16	12 Aug 2026	Manufacturer requests; supplier provides	Bill of materials with component weights, coatings, inks, adhesives, windows; change-notification commitment
☐	Draw up and keep technical documentation, and re-assess it when design, materials or referenced standards change	Art 15, Annex VII	12 Aug 2026	Manufacturer	One technical file per item code and version, with test reports and a change log
☐	Draw up and sign the EU Declaration of Conformity in the language(s) of each Member State of supply	Art 39, Annex VIII	12 Aug 2026	Manufacturer	Signed declaration per item code and version, in the required language(s)
☐	Keep the declaration and technical documentation for 5 years (single-use) or 10 years (reusable) after placing on the market	Art 15(3), Annex VII point 4	12 Aug 2026	Manufacturer; importer keeps a copy of the declaration	Archive of superseded versions linked to item codes
☐	Put manufacturer name and postal address, and a type, batch or serial number, on the packaging (or data carrier or accompanying document)	Art 15(5) and 15(6)	12 Aug 2026	Manufacturer	Artwork showing the details, or the data-carrier or document reference
☐	Before placing imported packaging on the market: check the manufacturer's assessment, documentation and labelling, add importer name and address, supply documents to authorities within 10 days of a reasoned request	Art 18, incl. Art 18(3)	12 Aug 2026	Importer	Checklist record per consignment; copy of declaration; importer details on pack or document
☐	Verify documentation and labelling before making packaging available, and do not supply packaging known to be non-compliant	Distributor duties (article not cited in our guides)	12 Aug 2026	Distributor	Supplier documents on file; records of what was checked

Done	Item	Article	Applies from	Who	Evidence to hold
☐	Importer or distributor that sells under its own name or modifies packaging in a way that could affect compliance takes on the manufacturer role	Art 21	12 Aug 2026	Importer, distributor	Decision note on role; full manufacturer file if the role changes
☐	Non-established producers appoint an EPR authorised representative; a written mandate can also cover keeping documentation	Authorised representative provisions (article not cited in our guides)	12 Aug 2026 (general application)	Producer without establishment in the Member State	Signed mandate; representative's contact details
☐	General recyclability principle applies now; until the design-for-recycling delegated acts exist, the old Packaging Directive requirements and standards such as EN 13430 remain the reference	Art 6(1)	12 Aug 2026	Manufacturer	Short recyclability note per item; mill or laboratory statement where available
☐	Register, report and pay EPR fees under each country's scheme (for example LUCID and a dual system in Germany under VerpackDG)	National law	Varies by country; VerpackDG applies from 12 Aug 2026	Producer	Registration numbers and licensing confirmations per country
☐	Check printed environmental claims: generic claims such as eco-friendly or biodegradable without recognised excellent performance are banned. Related rule, not part of the PPWR	Directive (EU) 2024/825	27 Sep 2026	Brand owner	Claim evidence file or removal of the claim from artwork
☐	PE-lined paper beverage cups: keep the printed Plastic in product marking in the local language. Related rule, not part of the PPWR	Implementing Regulation (EU) 2020/2151	In force	Brand owner, manufacturer	Approved artwork showing the marking per market

SECTION 2. 2027 AND 2028

Done	Item	Article	Applies from	Who	Evidence to hold
☐	Takeaway outlets must let customers use their own containers at no higher price	Art 32	12 Feb 2027	Final distributor (HORECA takeaway)	Written procedure for staff; price check against single-use
☐	Takeaway outlets must offer a reusable packaging option at no higher price (micro-enterprises exempt)	Art 33	12 Feb 2028	Final distributor (HORECA takeaway)	Reusable-offer plan: format, supplier, washing or return route
☐	Watch: Commission due to adopt design-for-recycling criteria and grades per packaging category	Art 6(4)	By 1 Jan 2028	Commission; manufacturers monitor	Estimated grade noted per item, marked as an estimate
☐	Harmonised material sorting label, including e-commerce packaging. Applies on the later of 12 Aug 2028 or 24 months after the implementing act; the act was not adopted as of October 2026	Art 12(1)	Not before 12 Aug 2028	Manufacturer; importer checks	Reserved label zone and regulatory artwork layer; component-level bill of materials
☐	Packaging manufactured or imported before the label deadline may be made available for up to three years after it takes effect	Art 12(12)	From the label date	Manufacturer, importer	Stock list with production dates, used for reprint timing

SECTION 3. 2029 TO 2038

Done	Item	Article	Applies from	Who	Evidence to hold
☐	Reusable packaging label with QR code or open data carrier (later of 12 Feb 2029 or 30 months after its implementing act)	Art 12(2)	Not before 12 Feb 2029	Manufacturer of reusable packaging	Durable mark and code that survive washing cycles

Done	Item	Article	Applies from	Who	Evidence to hold
☐	Packaging must reach grade A, B or C (70 % or more); below 70 % is technically non-recyclable	Art 6(3)	1 Jan 2030, or 24 months after the delegated acts if later	Manufacturer	Grade assessment per item against the adopted criteria
☐	Minimum recycled content in plastic packaging: contact-sensitive PET 30 %, contact-sensitive non-PET 10 %, other plastic 35 % (50, 25 and 65 % from 2040)	Art 7	1 Jan 2030 at the earliest	Manufacturer of plastic packaging	Recycled-content declaration for plastic components such as bags, pouches and lids
☐	Restrictions on single-use plastic packaging for food and drink consumed on HORECA premises, plastic condiment portions (except with takeaway) and very lightweight plastic carrier bags (with exceptions). Commission guidance treats paper-based packaging with 5 % or more plastic as covered	Annex V; guidance C(2026) 3702 (non-binding)	1 Jan 2030	Final distributor and manufacturer	Plastic share by weight per item; dine-in versus takeaway use list
☐	Maximum 50 % empty space in grouped, transport and e-commerce packaging	Art 24	1 Jan 2030, or 3 years after the methodology act if later	Operator who fills the packaging	Pack-out ratio per shipper size
☐	Packaging minimisation: weight and volume reduced to the minimum needed for function	Art 10	2030	Manufacturer	Rationale per item (strength, grease or heat resistance, print area)
☐	Takeaway outlets endeavour to offer 10 % of products in reusable packaging	Art 33	2030	Final distributor (HORECA takeaway)	Share of reusable servings tracked
☐	Recycled at scale (2035, or 5 years after its implementing acts if later); only grades A or B (2038)	Art 6(2) (b) and Art 6(3)	1 Jan 2035; 1 Jan 2038	Manufacturer	Updated grade assessment; supplier roadmap for the item

ROLE KEY

Manufacturer = manufactures packaging or has it designed or manufactured under its own name or trademark.

Importer = EU operator placing third-country packaging on the EU market.

Distributor = other operator making packaging available.

Final distributor = hands packaging to the end customer (for example a takeaway outlet).

Producer (EPR) = for service packaging, the operator first making it available in that Member State.

NOTES

(1) Rows marked "article not cited in our guides" are deliberately left without an article number.

(2) Dates marked "or later" depend on Commission acts that had not been adopted as of October 2026.

(3) The two non-PPWR rows are included because they affect printed artwork and claims.