

PPWR Action list for Distributors (1/3)

Immediate, by 12 August 2026

☐ **Determine your PPWR role:**

- Carefully study the PPWR regulations.
- Confirm that you are acting as a distributor and not as a manufacturer.
- Verify that products are sold under the original Go!Paint brand and packaging.
- Ensure you do not modify packaging or relabel products under your own brand. If you do, you may become a manufacturer under PPWR.

☐ **Collect compliance documentation from your suppliers**

Request and keep access to:

- PPWR compliance statement
- Declaration of Conformity (or access to it)
- Packaging composition information
- Recyclability information
- Substances of Concern declarations
- Recycled-content information where applicable

☐ **Establish a document retention system**

Maintain:

- Supplier compliance documentation
- Product and packaging specifications
- Version control for updated declarations and statements

Store records in a location accessible for regulatory inspections.

☐ **Implement incoming-product checks**

Verify before placing products on the market that:

- Required labels are present
- Packaging appears compliant
- Compliance documentation is available
- No obvious non-conformities exist

PPWR Action list for Producers (2/3)

2027

☐ **Review supplier information annually**

Confirm that:

- DoCs remain valid
- Packaging specifications have not changed
- New PPWR requirements have been addressed by your suppliers

Maintain documented evidence of these reviews.

☐ **Prepare for market surveillance requests**

Create an internal process for responding to requests from authorities:

- Identify responsible employees
- Define response timelines
- Ensure documentation can be provided quickly

2028 - 2030

☐ **Monitor packaging changes**

Whenever Go!Paint changes:

- Packaging materials
- Labels
- Container design
- Packaging suppliers

request updated compliance information and archive previous versions.

☐ **Verify recyclability-related updates**

As PPWR recyclability requirements become more detailed, obtain updated declarations from Go!Paint confirming continued compliance

☐ **Review online sales responsibilities**

If selling directly into other EU Member States:

- Assess whether EPR registration obligations apply.
- Confirm whether local producer obligations are triggered.

Producer responsibilities for EPR can differ from distributor responsibilities under PPWR product compliance rules.

PPWR Action list for Producers (3/3)

Ongoing Responsibilities

- ☐ Sell products only from compliant suppliers.
- ☐ Keep compliance documentation available.
- ☐ Cooperate with market surveillance authorities.
- ☐ Stop supplying products if you become aware of a compliance issue.
- ☐ Request updated compliance information when packaging changes.
- ☐ Monitor PPWR guidance and implementing acts as they become available.

(1) Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC. Available at <https://eur-lex.europa.eu/eli/reg/2025/40/oj/eng>

(2) Source <https://www.steelforpackagingeurope.eu>

DISCLAIMER

This Q and A document is intended for informational purposes only and represents our interpretation of the PPWR at the time of writing. Regulatory requirements and official guidance may evolve over time. This document does not constitute legal advice, and companies should seek their own legal and regulatory assessment to determine compliance with applicable legislation. In all cases, the official text of the PPWR and related legislation takes precedence.