

PPWR Action list for Producers (1/2)

Immediate, by 12 August 2026

- ☐ Identify all packaging types in your product portfolio (sales, grouped, transport)
- ☐ Determine your role for each product line: manufacturer, importer, or distributor
- ☐ Compile material composition data for all packaging components (substrate, coatings, inks, adhesives, seals, labels)
- ☐ Obtain heavy metal declarations (Pb, Cd, Hg, Cr(VI) ≤ 100 mg/kg) from all material suppliers
- ☐ Assess PFAS presence in coatings/liners (even if not food-contact, document findings)
- ☐ Conformity assessment under Module A (internal production control) for each packaging type
- ☐ Compile Annex VII technical documentation dossier for each packaging type
- ☐ Draw up EU Declaration of Conformity (Annex VIII model) for each packaging type
- ☐ Ensure manufacturer/importer identification (name, address) on packaging or accompanying documents
- ☐ Ensure packaging bears type, batch, serial number, or other identification element
- ☐ Implement document retention system (5 years single-use / 10 years reusable)
- ☐ Verify EPR registration of suppliers (if distributor) or register yourself (if producer)
- ☐ Establish 10-day response capability for authority requests

Near term, by 12 August 2028

- ☐ Monitor Commission implementing acts on harmonised label specifications (due 12 Aug 2026)
- ☐ Prepare for harmonised material composition labels (pictogram-based)
- ☐ Plan label artwork updates to accommodate new labelling requirements
- ☐ Ensure online product listings include required compliance information before purchase
- ☐ Review e-commerce packaging for empty-space ratio compliance (50% max, from 2030)

PPWR Action list for Producers (2/2)

Medium-term, by 1 January 2030

- ☐ Conduct design-for-recycling assessments for all packaging types
- ☐ Identify packaging formats at risk of falling below Grade C (70%) threshold
- ☐ Begin redesign of non-recyclable or poorly recyclable packaging formats
- ☐ Plan for minimum recycled content in plastic packaging (35% for other plastic packaging)
- ☐ Assess packaging minimisation against Annex IV criteria
- ☐ Document technical justification for wall thickness, headspace, and structural design
- ☐ Review and update technical documentation with recyclability assessment results

Long-term (2035 - 2038)

- ☐ Ensure packaging meets recycled-at-scale requirements (from 2035)
- ☐ Plan for Grade C phase-out: only Grades A and B permitted from 2038
- ☐ Review and increase recycled content to 2040 targets (65% for other plastic packaging)

(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

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