

PPWR Checklist for Procurement & Packaging Technology

From 12 August 2026, only packaging with complete, verifiable documentation may be placed on the EU market. This checklist shows what you need for that.

Only a few weeks left until the deadline: from 12th August 2026, every packaging type needs a Declaration of Conformity (DoC) together with technical documentation (TeDo) – otherwise you risk restricted market access, with no option to sell off your current stock.

The real hurdle here is rarely the material – it is the proof. What matters is whether you can demonstrate conformity for each item across your entire portfolio.

Use the following points to check where you stand – and how much of it you can realistically achieve by the deadline without a digital data-management tool.

1. Capture your packaging portfolio & technical master data in full

Question	Yes	No
Is it clear for which packaging your company qualifies as the “manufacturer” under the PPWR? What matters is whose name or trademark appears on the packaging; for unbranded imported goods, the EU importer takes on the manufacturer role.	☐	☐
Are all packaging items – including transport packaging (e.g. pallets, stretch film, edge protectors) and B2B packaging – captured centrally and completely in digital form, with material grades, weights and layer structure?	☐	☐
Is there, for each packaging item, a technical datasheet/material specification together with a technical drawing or annotated schematic (component and layer plan)?	☐	☐

2. Demonstrate substance limits (Art. 5)

Question	Yes	No
Is compliance with the heavy-metal limit (≤ 100 mg/kg as the sum of lead, cadmium, mercury and hexavalent chromium) documented and verifiable for each packaging item?	☐	☐
For food-contact packaging, is PFAS compliance (25 ppb per individual substance, 250 ppb in total, 50 ppm total fluorine as a screening threshold) evidenced and documented through laboratory test reports?	☐	☐

3. Document substances of concern & minimisation (Art. 5 & 10)

Question	Yes	No
Are substances of concern (including SVHCs, CMR 1A/1B) recorded for each packaging item, and is their minimisation evidenced in the technical documentation?	☐	☐
Is a qualitative minimisation assessment available for each packaging item?	☐	☐

4. Assess recyclability & reuse (Art. 6 & 11)

Question	Yes	No
Has the basic recyclability of each packaging item been assessed (interim verification per EN 13430)?	☐	☐
For reusable packaging, is a qualitative reusability assessment (reference method EN 13429) documented?	☐	☐

5. Build up the technical documentation (TeDo) (Art. 38 / Annex VII)

Question	Yes	No
Is complete technical documentation (TeDo) available for each packaging item (master data, drawings, substance and conformity evidence)?	☐	☐
Is a process for versioned, audit-proof retention in place (5 years for single-use, 10 years for reusable)?	☐	☐

6. Issue the Declaration of Conformity (DoC) (Art. 39 / Annex VIII)

Question	Yes	No
Is a Declaration of Conformity issued for each packaging type that initially demonstrates conformity with Art. 5 and can be extended to further articles as they come into force?	☐	☐
Does the DoC contain all mandatory information per Annex VIII (including unique identification number, manufacturer, statement of responsibility, etc.)?	☐	☐

Your PPWR Readiness Score

Every “No” is an open evidence gap – and therefore a risk to your market access. Count your “No” answers across blocks 1–6:

Number of “No”	What this means for you
7 – 13	Critical. This many open items can hardly be closed manually before the deadline. Without a central, automated data foundation, providing DoC and TeDo evidence on time becomes a real market-access risk.
3 – 6	The foundation is there. But the remaining gaps are typically the most demanding ones: substance evidence, minimisation, TeDo, DoC. These are exactly the points that cost the most time manually and are the most error-prone.
0 – 2	Well positioned. But the PPWR does not end on 12 August 2026: every product change, every new item and every further stage (see outlook) must remain verifiable. A system maintains this state permanently – manual upkeep rarely does.

What is coming after 2026

Question	Yes	No
Do you have on your radar that, from 2030, graded recyclability verification and binding minimum recycled-content quotas (PCR) will apply?	☐	☐
Are you prepared for the harmonised EU labelling required from 2028 and – phased in from 2027 – digital information via QR code / Digital Product Passport?	☐	☐
Have you already taken into account the quantitative minimisation limits binding from 1 January 2030, as well as the minimum reuse-cycle numbers to be set by Commission implementing act?	☐	☐

Disclaimer

This checklist serves solely as an initial orientation for dealing with the EU Packaging and Packaging Waste Regulation (PPWR) and makes no claim to completeness. It does not replace individual legal, regulatory or technical advice. The stated limits, standards (e.g. EN 13428/13429/13430) and article/annex references reflect the status as of entry into application on 12 August 2026 according to current interpretation. Specific requirements may vary depending on industry, company structure, country-specific legislation and product portfolio. Delegated acts and interpretations of the PPWR are published on an ongoing basis and may affect assessment and implementation.

Reach audit-readiness with Packa

PPWR conformity is above all a matter of evidence and data: most packaging already meets the requirements. What is decisive is whether you document your entire portfolio's data in a **structured, properly formatted and digitised way**. Packa supports you **across the entire process** and gets you to **audit-readiness simply and efficiently**.

In a short [demo](#), we will gladly show you your path to PPWR conformity.

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