

The Packaging and Packaging Waste Regulation (PPWR) in Practice

Which packaging is legally yours and what must be true by 12 August 2026

Regulation (EU) 2025/40 applies from 12 August 2026, a regulation, with one text in every Member State with no transposition and no grace period for new stock. [1] Its obligations attach to roles held per packaging stream, not to companies. This note is written for organisations that buy, fill and hand over packaging rather than make it where the first compliance question is not “*what does the regulation require?*” but “*which of our packaging is legally ours?*”. A sorting exercise answers it, and the work programme follows from the answer.

Three things are live from 12 August 2026

1

The conformity chain. Every packaging type placed on the market must meet the regulation’s sustainability requirements (Articles 5–12), evidenced by technical documentation and a **Declaration of Conformity** to the Annex VIII model, retained for five years. A self-assessment and no notified body. The duty sits with the manufacturer. It moves to you where your name or brand is on the packaging, or where you import it. [2] [4]

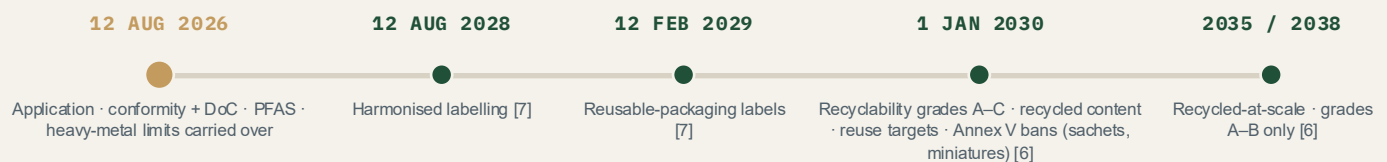
2

The PFAS restriction. Food-contact packaging above the thresholds (25 ppb any single non-polymeric PFAS, 250 ppb their sum, 50 ppm total organic fluorine) may not be placed on the market from 12 August 2026, whenever it was manufactured. Only packaging already in the distribution chain sells through. Anything not yet placed cannot be placed at all. [3]

3

The producer register. The regulation harmonises the producer definition and makes registration mandatory in each Member State where you hold the producer role. Registration and fee mechanics remain per-market. [5]

THE DATED OBLIGATIONS



THE SORT: THREE BUCKETS PER PACKAGING STREAM

PASS-ON	WHAT LANDS HERE Packaging that arrives on bought-in goods and leaves with what you sell or hand over i.e., branded products, supplier cartons, manufacturer wrap.	WHO HOLDS THE DUTIES The supplier. Your job is evidence, not conformity.
YOURS	WHAT LANDS HERE Own-brand packaging, packaging you fill for service, packaging you import, packaging you move across an EU border.	WHO HOLDS THE DUTIES You. Producer roles attach (see the full programme on page 2).
CONSUMED	WHAT LANDS HERE Packaging used up inside the operation and never placed on the market by you e.g., back-of-house, consumables, internal transfer	WHO HOLDS THE DUTIES The supplier placed it on the market where you are the end user. Document the call.



PPWR compliance is a sorting problem before it is a packaging problem. Sort every stream once, and the obligations attach themselves.

The programme each bucket triggers

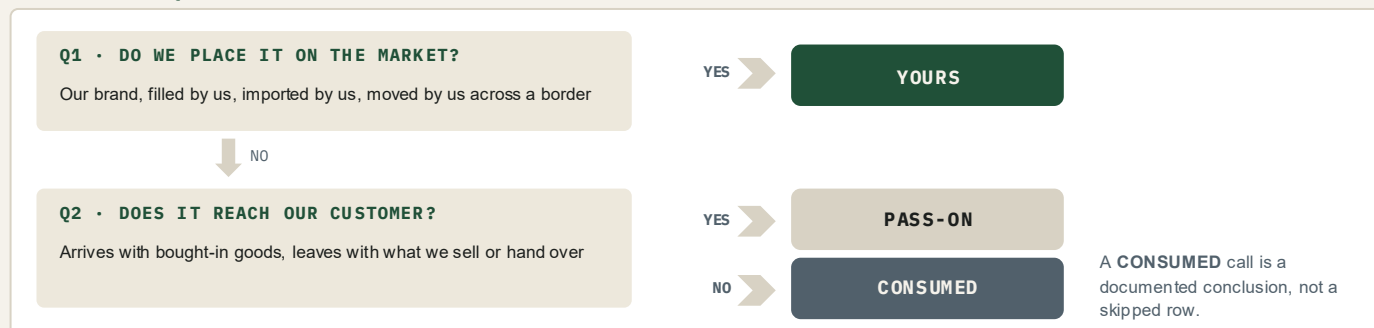
Step 1 — Inventory the streams

The first-pass inventory comes out of procurement, not out of site visits. Your categorised spend data should already hold the item list, suppliers, volumes and markets. Extract it, key it by packaging type and version, and survey only to close gaps. Chasing completeness by walking properties is the expensive way to build a list you mostly already own.

Output: the stream list per item, material, weight, format, supplier, markets, volume.

Step 2 — Sort each stream: two questions

THE TWO-QUESTION SORT



THE WORK PROGRAMME PER BUCKET

Bucket	Obtain	Produce	Register
PASS-ON	Supplier Declarations of Conformity (DoC) on request. PFAS confirmations on food-contact lines. Conformity flow-down clauses in supply terms.	An evidence file per supplier and stream, dated	No producer registration for these streams
YOURS	Technical documentation per packaging type. PFAS test results where food-contact. Supplier inputs where you brand or fill their packaging.	The Declaration of Conformity per Annex VIII, signed and retained five years. Labelling readiness plan against the 2028–29 dates ^{[2][7]}	Producer registration in each market where you place packaging. Authorised representative where selling in from outside ^{[4][5]}
CONSUMED	Normal supplier conformity, nothing beyond it	The recorded basis for the out-of-scope call	None

Two duties sit inside YOURS and they do not always land together: (1) The conformity chain (DoC, technical file) follows who manufactures, brands or imports the packaging. (2) The producer register follows who places it on the market for EPR purposes. Where you fill bought-in service packaging, the register duty can be yours while the DoC remains the manufacturer's. The register on each stream records both answers.

Step 3 — Build the register

One register, one line per packaging type, carrying every obligation:



DATA FIELDS TO CAPTURE: Packaging type and version, SKUs and markets, material, weight, format, duty holder per obligation, DoC status and reference, PFAS status (food-contact), recyclability data, recycled content, evidence reference, date checked, owner.

Every later obligation (the 2028 labels, the 2030 grades and content minima, EPR fee reporting) draws on these same fields. Built once in 2026, the register is the data infrastructure for the decade built per obligation.

Scope note: EPR registration, fees and deadlines remain per-market and vary; the UK operates a separate regime (packaging EPR, Plastic Packaging Tax) outside this note.

SOURCES

1 [Regulation \(EU\) 2025/40](#) of 19 December 2024 on packaging and packaging waste, OJ L, 22.1.2025; in force 11 February 2025; applies from 12 August 2026

2 Declaration of Conformity: [Annex VIII](#) model, confirming conformity with Articles 5–12; self-assessment; technical documentation retained five years [Art 39].

3 PFAS in food-contact packaging: [Article 5](#) — 25 ppb individual non-polymeric PFAS, 250 ppb sum, 50 ppm total organic fluorine; applies to packaging placed on the market from 12 August 2026 irrespective of manufacture date.

4 Importer bearing a name or trade mark on the packaging assumes manufacturer obligations: [Article 21](#). Authorised representative: [Article 22](#).

5 Producer definition harmonised; mandatory registration in each Member State of placing: [Article 44](#); registration and reporting format implementing act due 12 February 2026.

6 From 1 January 2030: recyclability grades A–C (Article 6); recycled content minima; reuse targets; [Annex V](#) format restrictions, incl. single-portion sachets and hotel toiletry miniatures.

7 Harmonised labelling from 12 August 2028 ([Articles 12–13](#)); reusable-packaging labels from 12 February 2029.