

## PPWR DEADLINE APPROACHING: IS YOUR PACKAGING COMPLIANT?

Our earlier articles looked at how the Packaging and Packaging Waste Regulation (*PPWR*) *will affect packaging over time* and *how to stay competitive under PPWR*. This follow-up focuses on the first wave of compliance actions that companies need to have under control by 12 August 2026, the general application date of the PPWR and outlines a practical pathway to get there (including access to supporting tools).

From 12 August 2026, packaging that does not meet the applicable PPWR requirements can no longer be placed on the EU market, which can disrupt supply chains and markets if preparation is late.

### WHO IS IN SCOPE?

The 2026 PPWR obligations apply across the entire packaging value chain and to all economic operators placing packaging or packaged products on the EU market, including manufacturers, suppliers, importers and distributors. They cover all packaging levels: primary, secondary, tertiary and service packaging.

In practice, this means that any packaging placed on the EU market (except exemptions) must be supported by compliant documentation and proof, regardless of packaging type or use.

### THE FIRST REQUIREMENTS (12 AUGUST 2026)

Most PPWR requirements phase in later, but the first compliance wave is driven by a set of obligations that are already concrete and enforceable, amongst others:

#### 1) EU Declaration of Conformity (DoC) and technical documentation

Each packaging type must be supported by a signed EU Declaration of Conformity and corresponding technical documentation. This documentation must be available per packaging type when requested by authorities and may also be requested by different roles in the value chain as part of their due diligence.

Operationally, this requires clear packaging identification, version control, and a technical file that links the DoC to the relevant evidence, such as specifications, supplier declarations, test reports, and should be updated when packaging changes.

#### 2) Strict heavy metal limits

PPWR maintains the combined maximum concentration limit of 100 mg/kg for lead, cadmium, mercury, and hexavalent chromium in packaging and packaging components. Compliance must be tested or otherwise verified and documented for the packaging configuration placed on the market.

#### 3) PFAS restrictions (for food contact packaging)

Food contact packaging must meet strict PFAS concentration limits from the 12<sup>th</sup> August 2026 (application date PPWR). For many companies, this requires identifying potential PFAS sources such as coatings or barrier layers and ensuring appropriate test results and supplier evidence are in place within the technical file.

#### 4) Additional short-term PPWR requirements

Organizations should also address keep in mind the requirements related to environmental claims, packaging traceability (Identifier + manufacturer information), and reusable packaging. These requirements focus on substantiating sustainability claims, ensuring required identification information is available on packaging.

## ROLES AND RESPONSIBILITIES: WHO PAYS IS NOT THE SAME AS WHO PROVES

Companies must clearly distinguish between who is accountable for compliance and who has financial responsibility under Extended Producer Responsibility (EPR).

Two questions help structure this:

- Who is responsible for conformity when placing compliant packaging on the EU market and issuing the EU Declaration of Conformity (DoC), supported by technical documentation? (*Manufacturer*)
- Who bears financial responsibility for packaging waste management, including EPR registration, reporting and fee payment? (*Producer*)

*Those responsible for conformity*, in practice **manufacturers**, are responsible for ensuring compliant design and for issuing the DoC, while other economic operators like importers and distributors must verify that required documentation exists and is compliant before placing packaging on the market and must be able to provide it to authorities upon request.

*Financial responsibility* under EPR follows a different legal logic and is assigned to the “**producers**” as defined per Member State (typically the making packaging available on the market). This aspect, including producer identification, registration and reporting obligations, should be addressed separate to reflect its distinct regulatory framework.

## HOW EY'S PPWR TOOL SUPPORTS SHORT-TERM COMPLIANCE

EY brings a practical pathway to move away from complex regulatory text to a repeatable process that produces evidence and documents.

EY's PPWR tools are designed as a workflow based on three steps:

### Step 1: Determine your role

The first step is to determine which role(s) the organization performs under PPWR, such as manufacturer, importer, distributor, supplier, which may differ per packaging.

EY's Role Identifier is a decision-based tool that maps company activities (e.g. manufacturing, importing, selling cross-border) to PPWR roles and responsibilities. A short questionnaire and possibility to record answers per Packaging ID ensures clarity on:

- which obligations apply and
- who is responsible for compliance and documentation

This step is essential, as many organizations fulfil multiple roles simultaneously depending on their supply chain setup.

### Step 2: Assess applicable obligations and gather technical documentation

Once roles are identified, the focus shifts to assessing applicable PPWR requirements and gathering the necessary data and documentation. This also includes to tailor supplier questionnaires, gap and risk assessments and collection of technical documentation. The objective is to create a clear and auditable compliance record for each packaging type.

### Step 3: Generate DoC and link to technical documentation

The final step is to translate the collected evidence into compliant documentation. EY's Technical Documentation and DoC Creation Tool helps link packaging data, technical evidence, and compliance assessments into a structured Declaration of Conformity (DoC).

## CLOSING POINT

From 12 August 2026, the question will often be:

“Show the DoC and the evidence behind it for this packaging type.”

That is why the short-term work on conformity responsibility is mainly about documentation, traceability, and ownership across the value chain.

To support organisations in taking these steps, EY offers a complimentary 30-minute intake session to discuss your PPWR scope, roles and **access to EY's PPWR Role Identifier tool**, enabling a structured and practical starting point to determine responsibilities and next actions.

## AND MORE...

The Role Identifier can also be extended with an additional module covering producer identification and financial responsibility under EPR, allowing organizations to clearly identify if they bear financial obligations.