

# PPWR Packaging Compliance Checklist

Six readiness steps for exporters, brands, importers and converters whose packaging is placed on the European Union market, under the Packaging and Packaging Waste Regulation (EU) 2025/40, which applies from 12 August 2026.

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## The six readiness steps

A component-by-component check of which formats a business places on the EU market, and in what role, is the first step of every PPWR readiness review. Each 2030 duty is the calendar date or a fixed period after the supporting Commission act, whichever is later.

### 01 Inventory the packaging

List every packaging format placed on the EU market by material and weight, and flag the food-contact items. The PPWR covers all packaging regardless of material or origin from 12 August 2026, so grouped, transport and e-commerce packaging, rigid bottles and containers, flexible pouches and films, and service and beverage cups all enter the inventory.

BY MATERIAL AND WEIGHT

### 02 Check the PFAS and substance limits

From 12 August 2026 food-contact packaging may not be placed on the EU market with PFAS at or above 25 ppb per substance, 250 ppb for the sum of PFAS or 50 ppm including polymeric PFAS, and the sum of lead, cadmium, mercury and hexavalent chromium must not exceed 100 mg/kg.

PFAS 25 / 250 PPB · 50 PPM

### 03 **Grade for recyclability**

From 1 January 2030 packaging must be recyclable within grades A, B or C, where grade A is at least 95 percent, grade B at least 80 percent and grade C at least 70 percent of the unit weight recyclable. From 1 January 2038 only grades A or B remain, so a redesign toward mono-material construction is planned early.

GRADE A 95 / B 80 / C 70

### 04 **Plan the recycled content**

From 1 January 2030 each plastic part carries a minimum recycled content from post-consumer waste: 30 percent for contact-sensitive PET, 10 percent for contact-sensitive other plastic, 30 percent for single-use plastic beverage bottles and 35 percent for other plastic packaging, averaged per plant and year, rising to 50, 25, 65 and 65 percent from 2040.

30 / 10 / 30 / 35 PERCENT

### 05 **Prepare the harmonised label**

From 12 August 2028, or 24 months after the implementing acts if later, packaging must bear a harmonised, pictogram-based label of its material composition so consumers can sort it correctly. Harmonised-label-ready artwork is best prepared ahead of the date rather than at it.

HARMONISED LABEL FROM 2028

### 06 **Build the conformity file**

Before packaging is placed on the EU market, carry out the conformity assessment under the internal production control procedure of Annex VII, draw up the technical documentation, and issue an EU Declaration of Conformity to the Annex VIII model under Article 39, kept available for the authorities, all from 12 August 2026.

ANNEX VII · ANNEX VIII

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A readiness review applies these steps to a specific business. The EU PPWR solutions page at [greensutra.in/services/eu-ppwr-solutions/](https://greensutra.in/services/eu-ppwr-solutions/) sets out the engagement, and the full reference sits at [greensutra.in/eu-ppwr-guide/](https://greensutra.in/eu-ppwr-guide/).

Primary sources: Regulation (EU) 2025/40 (PPWR), European Commission, Packaging waste. This checklist is informational and is not legal advice.