

Conformity Requirements

Regulation (EU) 2025/40 · PPWR

PPWR Article	Requirements for the EU Declaration of Conformity (Appendix VIII)	Requirements for the Technical Documentation (Appendix VII)
Article 5 Substances in Packaging (Limit values & PFAS prohibition from 12 August 2026)	From 12.08.2026: <ul style="list-style-type: none"> · Statement of the unique identification number of the packaging · Declaration of sole manufacturer responsibility · Confirmation of compliance with heavy metal limit values (sum of Pb, Cd, Hg, Cr VI < 100 mg/kg) · Confirmation of compliance with PFAS limit values (25 ppb targeted analysis / 250 ppb sum / 50 ppm total PFAS) 	<ul style="list-style-type: none"> · General description of the packaging and design/ manufacturing drawings · Detailed test reports, chemical analyses and material declarations from suppliers · Evidence of limit value compliance for all packaging components · List of applied harmonised standards or common specifications
Article 6 Recyclability	From 12.08.2026: <ul style="list-style-type: none"> · Confirmation of conformity with Design for Recycling criteria · Reference to harmonised standards or, in their absence, applied common specifications From 01.01.2030*: <ul style="list-style-type: none"> · Statement of the achieved performance grade (A, B or C) 	<ul style="list-style-type: none"> · General description and design drawings · Documentation of assessment results against DfR criteria · Sorting efficiency calculations · From 2035: Evidence of "recycling at scale" including technical documentation of sorting and recycling plants
Article 7 Recycled Content in Plastic Packaging	From 01.01.2030*: <ul style="list-style-type: none"> · Confirmation of the average post-consumer recycled plastic content per manufacturing site and calendar year (e.g. 30 % for PET, 10 % for other contact-sensitive plastics) · Statement of identification number and manufacturer responsibility 	<ul style="list-style-type: none"> · Documentation of the specific calculation method pursuant to the EU implementing act · Third-party audits verifying the recycled content · Evidence of material origin · For imports: evidence that the third-country recycling facility meets equivalent environmental standards
Article 8 Bio-based Plastics (Sustainability requirements)	From 12.08.2029*: <ul style="list-style-type: none"> · Declaration of compliance with the (future) sustainability requirements for bio-based raw materials · Reference to the criteria pursuant to Directive (EU) 2018/2001 	<ul style="list-style-type: none"> · General description of the packaging · Evidence of the bio-based share (methodology/ certification) · Documentation of compliance with sustainability criteria for raw material sourcing
Article 9 Compostable Packaging	From 12.02.2028*: <ul style="list-style-type: none"> · Confirmation of conformity with industrial compostability requirements (e.g. for tea bags, coffee capsules, fruit stickers) · Reference to the (updated) harmonised standards or common specifications 	<ul style="list-style-type: none"> · Designs and general description · Laboratory test reports on biodegradability, disintegration and impact on the composting process · Verification of compliance with microplastics limit values
Article 10 Packaging Minimisation (Weight, volume & empty space ratio)	From 01.01.2030*: <ul style="list-style-type: none"> · Confirmation that weight and volume have been reduced to the minimum necessary for functionality · Confirmation of compliance with the prohibition of double walls and false bottoms 	<ul style="list-style-type: none"> · Evidence of assessment against performance criteria pursuant to Annex IV (or EN 13428) · Documentation of the empty space ratio (max. 50 %) · Justification for volume overruns due to trade mark or design protection (only permissible where protection existed before 11 February 2025)
Article 11 Reusable Packaging (Reuse systems)	From 01.01.2030*: <ul style="list-style-type: none"> · Confirmation of compliance with requirements for reusable packaging · Confirmation of integration into a functioning system (open/closed loop) 	<ul style="list-style-type: none"> · Documentation of the minimum number of rotation cycles · Description of the reconditioning process (cleaning, inspection) · Evidence of the existence, accessibility and monitoring of the reuse system
Article 12 Labelling and Information (Material identification & digital data carrier)	From 12.02.2028*: <ul style="list-style-type: none"> · Declaration of correct application of harmonised material composition symbols, waste sorting symbols, and digital data carriers 	<ul style="list-style-type: none"> · Graphic representations of the symbols used · Technical specifications of the digital data carrier (QR code) · Where applicable: reference to integration into the digital product passport pursuant to Regulation (EU) 2024/1781