

CIRCULAR Economy in the Food Sector.

Seminar on EU Packaging and Packaging Waste Regulation (PPWR)

13-14 July

CONTEXT

Why we are here



The regulation

The EU Packaging and Packaging Waste Regulation (PPWR) applies from 12 August 2026. It is binding on all packaging placed on the EU market, including imports.



The risk

For Sri Lankan food exporters, packaging that does not meet EU design, recyclability and recycled-content requirements becomes a direct market-access risk.



The response

Under the CIRCULAR project, Expertise France is running a two-day awareness seminar to move exporters from awareness to practical preparedness.

Global Gateway AGENDA Day 2



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- 09:00 – 09:15 am ● Recap and framing the day
- 09:15 – 10:30 am ● Packaging design for compliance
- 10:30 – 10:35 am ● Interactive Session - Mentimeter tool to assess the level of understanding of the participants
- 10:45 – 11:15 am ● *Coffee break*
- 11:15 – 12:30 am ● Supply chain and operational impacts
- 12:30 am – 13:15 pm ● *Lunch break*

Global Gateway AGENDA Day 2



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- 01:15 – 2:00 pm ● Audit, certification and reporting
- 02:00 – 02:45 pm ● Strategic roadmap and financial implications
- 02:45 – 03:00 pm ● *Coffee break*
- 03:00 – 03:30 pm ● Packaging compliance mapping workshop
- 03:30 – 04:00 pm ● Interactive Session - Mentimeter tool to assess understanding of audit, certification, reporting and financial implications

Day 2 Wrap-Up and Way forward



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Packaging design for compliance

Session Overview

01

Why Design is the Starting Point

Compliance cannot be retrofitted - it must be built in

02

Recyclability Grade System

Grades A/B/C and what they mean for your packaging portfolio

03

Material Compliance Matrix

Plastic types, PPWR outlook, food contact rules

04

Design-for-Recycling Rules

6 principles every exporter must know by 2028

05

Sri Lanka Export Audit

Tea bags, spice pouches, PET bottles, cinnamon tubes

06

Case Studies

Mars KIND bars (mono-PP switch), Amcor AmFiber (paper flexible)

Why Design is the Starting Point

PPWR compliance cannot be achieved through documentation alone - it starts with the physical packaging

Recyclability is designed in

The grade a package achieves (A/B/C) is determined by material choices and component design - not by labelling.

A multi-layer laminate cannot be 'labelled' into recyclability – the material structure must change

Recycled content requires reformulation

Switching to PCR-containing plastic requires testing for food safety under Regulation (EC) 1935/2004.

The physical packaging must be qualified with the new material before compliance can be claimed

Compostability is a material property

A tea bag is compostable only if the bag material, string, tag and adhesive all meet EN 13432.

You cannot retrofit compostability - the materials must be changed

Pillar 1 - Recyclability: The Grade System

All packaging placed on the EU market must be recyclable and assigned a grade based on design-for-recycling performance (recycled at scale thresholds apply from 2035 onwards)

A

>=95% Recyclable

Fully recyclable

Best in class - compliant through
2038 and beyond

B

>=80% Recyclable

Recyclable with minor issues

Compliant - allowed through 2038
and beyond

C

>=70% Recyclable

Recyclable with limitations

Compliant until Jan 2038 - Banned
from Jan 2038

Below Grade C (<70%) - BANNED from EU market: 1 January 2030

Grade C - BANNED from: 1 January 2038 - only Grades A and B remain compliant

Pillar 1 - Design for Recycling (D4R): What It Means

D4R criteria set technical requirements for how packaging must be designed to achieve each recyclability grade

PPWR Article 6 requires packaging to comply with D4R criteria | Delegated acts by 1 January 2028 | Enforcement from 1 January 2030

Material choice

Mono-materials or easily separable components preferred over multi-layer laminates

No problematic additives

Remove substances that hinder recycling - PFAS, black pigment, fluorescent dyes

Label compatibility

Labels must not contaminate the recycling stream - paper labels on plastic bottles are acceptable; PVC labels are not

Adhesive compatibility

Adhesives must not disrupt sorting or processing in recycling facilities

Colour and opacity

Dark or opaque pigments block near-infrared (NIR) sorting - switch to natural or clear

Component separability

Multi-component packs must be manually or mechanically separable before disposal

Pillar 2 - Recycled Content Targets (Article 7)

Minimum recycled content requirements for plastic packaging - 2030 and 2040 targets

Packaging Type	2030 Target	2040 Target
Contact-sensitive PET packaging (excl. beverage bottles)	30%	50%
Contact-sensitive other plastic (excl. beverage bottles)	10%	25%
Single-use plastic beverage bottles	30%	65%
Other plastic packaging (non-contact)	35%	65%

Key Conditions:

- Only post-consumer recyclate (PCR) qualifies - post-industrial recyclate (PIR) does NOT count
- EC to adopt recycled content methodology by 31 Dec 2026; minimum recycled content targets apply from 1 Jan 2030
- Food contact packaging: target waived if PCR inclusion would breach Reg. (EC) 1935/2004 food safety rules

Pillar 2 - What Counts as Recycled Content?

PPWR Article 7 is explicit: only post-consumer recyclate (PCR) counts toward recycled content targets

POST-CONSUMER RECYCLATE (PCR) - COUNTS

- Material collected from end-consumers after use
- Kerbside recycled plastic from households
- Post-consumer PET bottles reprocessed into rPET
- Must meet Regulation (EC) 1935/2004 for food contact
- Source: waste from households and similar final users

POST-INDUSTRIAL RECYCLATE (PIR) - DOES NOT COUNT

- Manufacturing off-cuts and scrap recycled within the factory
- In-process waste loops - e.g. film trim re-fed into extruder
- Closed-loop industrial waste that never reached a consumer
- Common in plastic film and flexible packaging production
- Does NOT qualify under PPWR recycled content targets

Implication for Sri Lanka: Most Sri Lankan exporters currently use virgin plastic. Switching to PCR-containing packaging requires supplier qualification and food safety testing.

Pillar 2 - Food Contact Exemptions: When Targets Apply

Recycled content requirements may be waived for certain packaging categories

Packaging Exempt from Recycled Content

- Baby food and infant formula packaging
- Medical and pharmaceutical packaging
- Packaging for dangerous goods
- Compostable plastic packaging
- Plastic components <5% of total packaging weight
- Food contact packaging where PCR would breach Reg. (EC) 1935/2004

Practical Guidance for Food Exporters

- Step 1** Identify whether your packaging contacts food directly
- Step 2** Check if an approved PCR source exists for your material
- Step 3** Obtain food safety assessment under Reg. (EC) 1935/2004
- Step 4** If PCR fails safety test, document the waiver basis
- Step 5** Retain documentation for 5 years (or 10 for reusable)

Note: The exemption is not automatic - exporters must document and demonstrate why recycled content cannot be used.

PFAS Ban in Food Contact Packaging - Action Required Before August 2026

DEADLINE: 12 AUGUST 2026 - PFAS restrictions apply NOW

What the Ban Covers

- PFAS = per- and polyfluoroalkyl substances (thousands of compounds) used for grease and water resistance
- From 12 Aug 2026, food-contact packaging is non-compliant if it exceeds any one of the three limits
 - ≤25 ppb any individual PFAS (excl. polymeric)
 - ≤250 ppb sum of PFAS (excl. polymeric)
 - ≤50 mg/kg total PFAS, incl. polymeric
- Screen total fluorine first: under 50 mg/kg = presumed clear; over = run individual/sum PFAS testing
- Affects: grease-resistant paper bags, microwave popcorn bags, fast food wrappers, baking papers, some fluoropolymer-coated flexible pouches used for oily food products
- Sri Lanka relevance: spice pouches for oily products, coconut oil sachets, greaseproof wrappers

What to Do - Checklist

- ☒ Identify all food-contact packaging in your range
- ☒ Request supplier SDS (Safety Data Sheet) for each packaging material
- ☒ Ask for PFAS analytical test certificate or declaration of absence
- ☐ If PFAS present: switch material supplier or redesign pack
- ☐ Update Declaration of Conformity (DoC) to confirm PFAS-free
- ☐ Document in technical file - EU customs may request evidence
- ☐ Greaseproof/barrier papers: verify coatings are PFAS-free

Compostable Packaging - Which Sri Lankan Export Formats Are Affected

Mandatory compostable packaging for certain formats: required by 12 Feb 2028

Tea Bags - HIGH IMPACT

Current:

Nylon or polypropylene mesh bags with paper outer

PPWR Requirement:

Must be industrially compostable by 12 Feb 2028

Ceylon tea bags made from synthetic mesh will be banned. Switch to PLA (polylactic acid) or natural plant-fibre mesh. Critical for Sri Lanka tea exporters targeting EU.

Filter Coffee Pods - MEDIUM IMPACT

Current:

Plastic/aluminium pods with paper filter

PPWR Requirement:

Compostable certification required Q1 2028

Affects Sri Lanka specialty coffee exporters. Compostable pods certified under EN 13432. Less immediate than tea bags but worth monitoring.

PLU Stickers (Fresh Produce) - LOW IMPACT

Current:

Plastic adhesive stickers on fruit/veg

PPWR Requirement:

Compostable PLU stickers by Q1 2028

Small impact for Sri Lanka export - mainly fresh produce. Paper-based compostable stickers available as alternatives.

Mars / KIND Bars - Mono-Material Packaging Switch

BEFORE	AFTER
✗ Multi-layer laminated plastic wrapper	✓ Mono-material polypropylene (PP) wrapper
✗ PET + PE + metallised layers bonded together	✓ Single resin, no bonded layers
✗ Not recyclable in any EU stream	✓ Kerbside recyclable in Ireland
✗ Below Grade C/ non-recyclable	✓ recyclable mono-PP
✗ Common food bar packaging across industry	✓ Achieves Grade A/B recyclability

Key Lessons for Sri Lankan Exporters

- 1 Mono-material is the primary design fix. It achieves the highest recyclability grades (A/B) and works for most food applications.
- 2 Transition requires testing time. Mars completed this over multiple years - start early. Do not wait for 2030 deadline.
- 3 Barrier properties can be maintained in mono-PP with appropriate coating technology. Shelf-life need not be sacrificed.
- 4 Buyer preference: EU retailers increasingly demand recyclable packaging as a listing condition, independent of regulation.
- 5 Applicable to spice pouches, snack bags, curry paste pouches - the same laminated formats Sri Lanka commonly exports in.

Amcor AmFiber - Paper-Based Flexible Packaging for Food

AmFiber Product Facts

- Paper-based flexible refill pack for food applications
- Designed as a recyclable alternative to plastic laminate pouches
- Recyclable in the paper stream where paper-recyclability methods apply
- Kerbside/curbside recyclable in several European countries
- Compatible with dry food applications
- Part of Amcor's 96% recycle-ready flexible portfolio target

Relevance to Sri Lanka

Dry spices:

Paper-based pouch viable if product is not oily or high-moisture- good for dry spices and seasonings

Premium positioning:

Paper packaging appeals to EU consumers seeking sustainable products. Premium price point opportunity.

Certification path:

European paper-recyclability assessment (e.g. Aticelca method) is the benchmark, available to any brand using a certified paper-based flexible pack

Not suitable for:

High-moisture products, oils, sauces. Moisture barrier is lower than plastic laminates.

Amcor Flexible Portfolio

96%

of flexible packaging portfolio recycle-ready

**Mono
PE/PP**

Primary recommendation for pouches and sachets

**NOT
Recyclable**

PET flexible films

Sri Lanka Export Packaging Audit: Tea Bags

RISK LEVEL: CRITICAL - Mandatory compostable format required by Q1 2028

Current Packaging

- Mesh tea bag: nylon (polyamide) or polypropylene
- Paper outer envelope or individual foil/paper/PE wrapper
- Cardboard retail box (recyclable element)
- Some premium formats: heat-sealed silk/nylon pyramid bags
- Printed ink on outer: various ink types
- Standard format for most Ceylon tea exported to EU

PPWR Risk + Required Action

CRITICAL	Tea bag mesh MUST be industrially compostable by 12 Feb 2028. Nylon/PP mesh banned for EU market.
HIGH	Paper outer/foil wrapper: check PFAS content if grease-resistant coating used. Deadline Aug 2026.
LOW	Outer cardboard box: Highly recyclable, keep free of plastic coatings from 2030
MEDIUM	Pyramid/silk bags: must also be compostable if sold in EU. PLA (polylactic acid) mesh available.

Sri Lanka Export Packaging Audit: Spice Pouches and Laminates

RISK LEVEL: HIGH - Multi-layer laminates typically are below Grade C – face a ban from January 2030

Current Packaging

- Stand-up pouches: PET/PE or PET/Al/PE laminates
- Flexible sachets: OPP/CPP or BOPP/PE structures
- Barrier pouches for oily products: PVDC or Al-foil layers
- Zipper closures: often different resin to pouch body
- Printed labels: multicolour gravure print directly on film
- Spices: chilli, pepper, curry mixes, cinnamon powder

PPWR Risk + Required Action

HIGH

PET/PE or PET/Al/PE laminates: Grade C or below. Must redesign to mono-PP/PE by 2030.

HIGH

OPP/CPP: Same risk. Evaluate transition to mono-PP pouch. Mars KIND approach applicable.

MEDIUM

Zipper closures: must be compatible resin or mechanically separable. Check with supplier.

MEDIUM

Inks: verify no SoC. EC/ECHA SoC report due Dec 2026 may restrict specific ink types.

LOW

Outer cardboard: Highly recyclable, keep free of plastic coatings/liners. Current content documentation needed.

Sri Lanka Export Packaging Audit: PET and HDPE Bottles

RISK LEVEL: MEDIUM - Good recyclability but recycled content targets apply from 2030

Current Packaging

- PET jars/bottles: sauces, chutneys, coconut oil (clear)
- HDPE bottles: coconut oil, flavoured oils
- PP lids/closures: typically different resin to bottle
- Sleeve labels or paper labels with adhesive
- Tamper-evident seal: sometimes foil/PE laminate
- Export volumes: sauces, chutneys, flavoured coconut products

PPWR Risk + Required Action

LOW

PET bottles Grade A recyclability. Biggest asset for compliance. Continue using.

MEDIUM

Recycled content: 30% PCR PET required by 2030. Must source food-grade PCR PET. Verify under EC 1935/2004.

MEDIUM

PP/PE closures: check if mechanically separable. Must not degrade recycle quality.

LOW

Sleeve labels: switch to paper labels or remove-wash sleeve. Glued-on sleeves may affect grade.

LOW

HDPE bottles: Grade A recyclability. Same PCR rules as PET - 10% recycled content (other plastics) by 2030.

Sri Lanka Export Packaging Audit: Glass jars

RISK LEVEL: LOW – Glass is Grade A recyclable under PPWR with no recycled content mandate; most compliant format for SL food exporters

Current Packaging

- Glass jar or bottle body (clear or amber)
- Metal twist-off lid (tinplate/aluminium) with sealing compound
- Paper or plastic label adhered to glass body
- Used for: sauces, syrups, condiments and preserved foods
- Also used for: dry spices, powders and seasonings

PPWR Risk + Required Action

LOW

Glass jar/bottle body – grade A recyclable, no recycled content target for glass under PPWR. Confirm no added coatings or functional barriers that could affect recyclability grade

LOW

Metal twist-off lid – grade A recyclable. No recycled content targets set for metal; tinplate & aluminium already recycle at high rates. Verify sealing compound is PFAS-free

LOW

Label – low impact on glass when label can be removed; glass recycling tolerates both paper & film labels. Wash-off adhesives and non-bleeding inks are good practice to avoid recyclability penalties.

LOW

Outer cardboard shipper box – grade A recyclable. PPWR sets no recycled content target for fibre. Ensure free from plastic coatings and liners

LOW

Overall compliance path – glass jar format is the most PPWR-compatible packaging. Priority action to audit lid seals for PFAS-free and switch to recycling compatible labels so the full pack stays grade A.

Reuse Design - What "Reusable" Means Under PPWR and When It Applies

Reuse criteria: packaging must withstand multiple use cycles while maintaining food safety and function

PPWR Reuse Definition

- Must withstand minimum number of rotation cycles (delegated act to specify exact number)
- Must maintain food safety and product function across all cycles
- Quality/safety controls must be in place at each reuse point
- Reuse systems: deposit-refund, return-and-refill, shared packaging pools
- End-of-life: must still be recyclable when no longer suitable for reuse

When Does It Apply?

Catering/HoReCa:

Reusable food service packaging mandatory for certain formats. Hotels, restaurants using Sri Lanka-origin foods.

B2B transport:

Reuse targets for pallet wrap, shipping containers, industrial transit packaging.

Retail formats:

Refill stations - EU retailers may introduce these. Brand owner must design for it.

NOT typically required:

Standard consumer food pouches and bottles are not covered by mandatory reuse requirements under current PPWR text.

Design for Reuse Tips

- ✓ Robust wall thickness for rigid containers
- ✓ Closure that reseals cleanly after multiple uses
- ✓ Smooth interior - no crevices that harbour bacteria
- ✓ Dishwasher / cleaning cycle compatible materials
- ✓ Labelling that survives multiple wash cycles or is easily replaced

On-pack labelling and data carrier – Design implications

What PPWR Article 12 means for packaging artwork and data readiness

Article 12 introduces a harmonised EU label plus an optional QR or digital data carrier. Designers must reserve on-pack space and ensure the underlying material data is ready

ON-PACK DESIGN REQUIREMENTS

- Reserve space for the harmonised label and optional QR / data carrier
- High-contrast background for print and scanner legibility
- Data carrier must survive the pack lifecycle (moisture, heat)
- Position visible to the consumer at point of disposal
- Encode material composition at component level

TIMELINE AND NEXT STEPS

- Harmonised label + format: Commission implementing act by 12 Aug 2026
- EPR-participation QR option available from 12 Feb 2027
- Harmonised label mandatory from 12 Aug 2028 (or 24 months after the act)
- Start now: document material composition per component
- Packaging is not yet in ESPR Digital Product Passport scope - build the data anyway to future-proof

Empty Space Rules - 50% Maximum from 2030

50%

Maximum empty
space from 2030

Applies to:

- E-commerce packaging
- Grouped packaging
- Transport packaging

What the Rule Means

From 2030, the ratio of empty (unused) space to total package volume must not exceed 50% for grouped, e-commerce and transport packaging. This means a box cannot be more than half empty. Measured as: empty volume / total inner volume of packaging unit.

Implications for Sri Lankan Food Exporters

- Export cartons/master cases: review fill ratios. Padded-out boxes must be redesigned.
- Gift sets / presentation boxes: decorative space counts. Structural inserts are measured.
- E-commerce fulfillment: if fulfilling direct to EU consumer, packaging must be right-sized.
- Documentation: demonstrate compliance - packaging specifications must show volume calculations.

Engaging EU Buyers - Packaging Specs They Will Ask for from 2026

EU importers and retailers will increasingly require documented packaging compliance evidence from their suppliers.

1. Material Declaration

Full material composition: resin type, layer structure, additives, inks/coatings. Required for recyclability assessment.

2. Recyclability Certificate

Third-party design for recycling assessment. Plastics - EN 18120. Grade (A/B/C) per Annex II once the delegated Act applies

3. Recycled Content Evidence

Certificate from material supplier confirming PCR %. Food-safe PCR needs EC 1935/2004 compliance doc.

4. PFAS Declaration

Accredited-lab CoA (supplier declaration alone insufficient): =<25 ppb individual PFAS; =<250 ppb sum of targeted PFAS; =<50 ppm total PFAS incl. polymeric

5. DoC and Technical File

Declaration of Conformity referencing PPWR requirements met. Technical file supporting the declaration.

6. Structured Packaging Data

Structured data for the Art 12 data carrier: material, recycled content, recyclability grade, manufacturer info.

Decision Framework - Redesign Now vs Wait for Delegated Acts?

Wait for Delegated Acts

Risk

Delegated acts finalise requirements - leaving less time to redesign, test, certify

Risk

EU buyers may require compliance evidence before regulatory deadlines as a commercial condition

Risk

Material suppliers will face demand surge in 2027-2029 - prices and lead times will increase

Risk

Packaging redesign triggers technical file re-assessment - this takes 6-18 months

Benefit

Delegated acts provide final certainty - no risk of designing to wrong specification

Redesign Now

Benefit

CEN harmonised D4R standards (EN 18120 (plastics D4R) published early 2026 - clear enough basis to act now for most formats

Benefit

PFAS ban applies 12 Aug 2026 - must act immediately regardless of delegated act timing

Benefit

Mono-material principle is firm - core of PPWR regardless of delegated act details

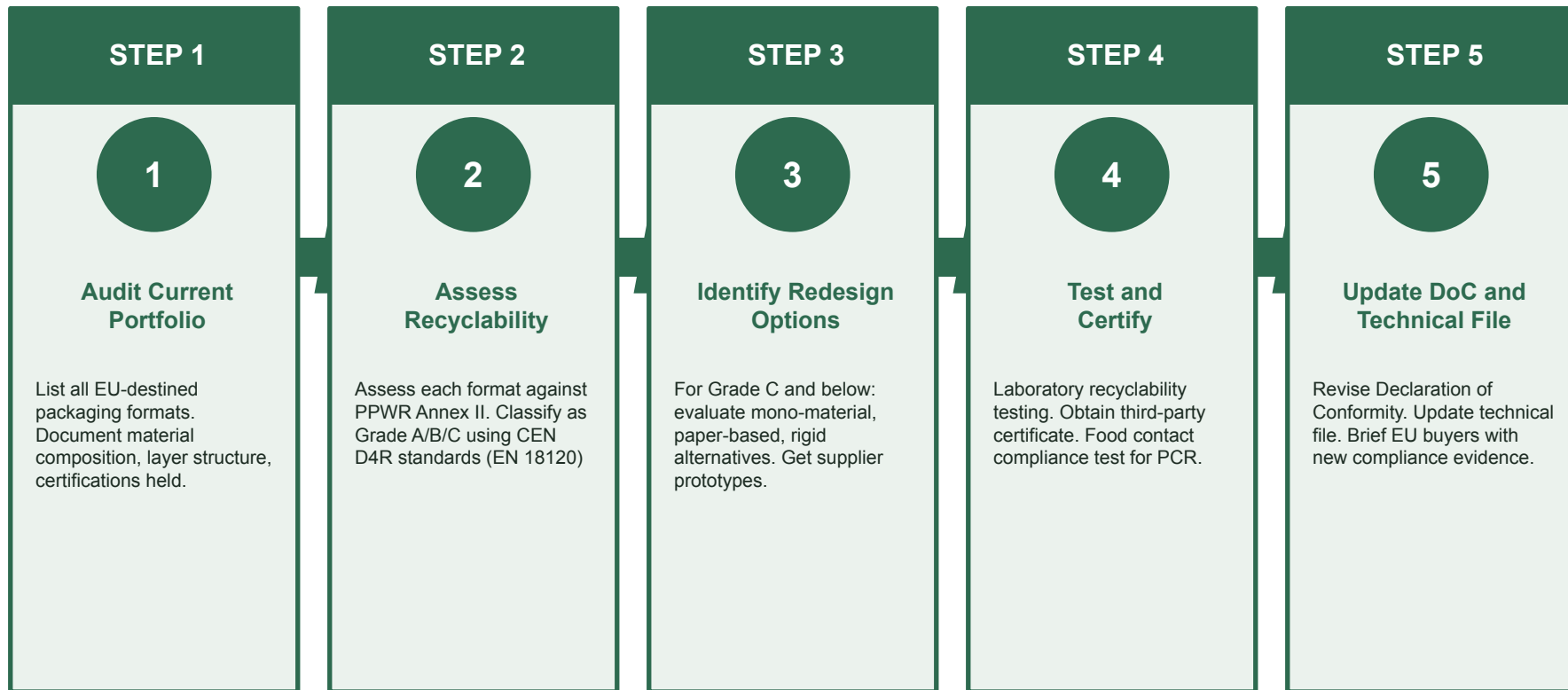
Benefit

Early movers win: EU buyers reward proactive compliance with continued/preferred listings

Caution

Some specific thresholds (grade % cutoffs for some formats) may change in delegated acts

Packaging Redesign Process - 5 Steps to Compliance



Tea Bag Formats - PPWR Compliance Comparison

Sri Lankan exporters use both formats - compliance outlook is very different

TRIPLE LAMINATE TEA BAG

PET/PP/PE or foil-based multi-layer

- NOT compostable - fails EN 13432
- BANNED from EU market from 12 Feb 2028
- Material switch MANDATORY - no exemption
- Action required: switch material NOW
- Lead time: 12-18 months for qualification
- String, tag and adhesive must also switch

PAPER / COTTON TEA BAG

Natural fibre filter paper or cotton muslin

- Likely EN 13432 compliant - verify with supplier
- Compliant pathway to Q1 2028 deadline
- Verify: string, tag and adhesive also certified
- Paper bleaching: confirm PFAS-free process
- Action: obtain EN 13432 certificate NOW
- EU buyers already asking about this in 2026

Source: PPWR Article 9 (Regulation EU 2025/40) | EN 13432 - Industrial compostability standard

Action Checklist for Sri Lankan Exporters - Priority Actions

URGENT (Before Aug 2026)

- Check all food-contact packaging for PFAS content
- Request PFAS analytical test certificate from packaging supplier
- If PFAS detected: initiate supplier switch or material change immediately
- Check tea bag mesh material – must be compostable-grade PLA if nylon/PP
- Update Declaration of Conformity for any affected formats

MEDIUM TERM (2026-2028)

- Complete packaging audit for all EU-destined formats
- Classify each pack against PPWR recyclability grades A/B/C
- For laminated pouches: initiate mono-PP/PE redesign project
- Ensure tea bags certified industrially compostable by 12 Feb 2028
- Reserve space in label artwork for EU harmonised recyclability mark
- Prepare Art. 12 data carrier/structured packaging data

LONGER TERM (2028-2030)

- Source food-grade PCR PET for bottles (30% by 2030)
- Source food-grade PCR for other plastic formats (10% by 2030)
- Verify fibre packaging meets recyclability grade
- Ensure empty space <50% in export cartons and transport packaging
- Complete technical file updates and DoC revisions
- Engage EU buyers with updated compliance documentation package

Key Takeaways

- ✓ Design is the starting point - compliance cannot be retrofitted after production
- ✓ Multi-layer laminates typically fall below Grade C – banned from 2030
- ✓ Mono-material PP/PE is the primary fix for flexible food packaging
- ✓ Tea bags must be compostable by 12 Feb 2028 - critical for SL tea exporters
- ✓ PFAS ban is NOW - 12 August 2026 deadline requires immediate supplier review
- ✓ Case studies confirm the path: Mars KIND (mono-PP) and Amcor AmFiber (paper flexible)



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Supply chain and operational impacts

Session Overview

01

Supply chain roles

Who is responsible for what under PPWR

02

Importer obligations

Special focus for Sri Lankan exporters

03

Documentation & traceability

Technical files, DoC, recycled content chain

04

Operational checklist

Procurement, production, labelling, reporting

05

Compliance roadmap

Immediate, short-term, and medium-term actions

How PPWR Reshapes the Packaging Supply Chain

Roles, obligations, and the flow of compliance



* When you place the packaging on the EU market yourself

Key principle: Obligations follow the role, not the geography. As a Sri Lankan exporter placing packaging on the EU market, you take on Importer AND Producer obligations.



Who is Responsible for What

PPWR Article 3 definitions; obligations per Articles 15-19, 38

Actor	Conformity assessment	Technical file	Declaration of Conformity	EPR registration	Document retention
Manufacturer	✓	✓	✓	Partial	✓
Supplier	Partial	Partial	✗	✗	Partial
Importer	Partial	✗	✓	✓	✓
Distributor	✗	✗	✗	✓	✗

Except for packaging under its own name or trademark, in this case the distributor is the manufacturer

✓ = Primary responsibility ✗ = Not responsible Partial = Contributes data/verification only

Roles Deep-Dive: Manufacturer

PPWR Article 15 and Annex VII obligations

1

Conformity Assessment (Art. 38)

Carry out conformity assessment before placing packaging on market. Self-declare against PPWR essential requirements.

2

Technical File (Annex VII)

Draw up and maintain a full technical file documenting material composition, weight, recyclability, PCR content, SoC declaration for each packaging unit.

3

Declaration of Conformity (DoC)

Prepare EU Declaration of Conformity. Make available to importers, distributors, and authorities on request.

4

Post-Market Obligations

If non-compliance found after market: take corrective action without delay (including recall/withdrawal); notify relevant market surveillance authority.

5

Document Retention

5 years for single-use packaging; 10 years for reusable packaging. Provide documentation to authorities within 10 days of a reasoned request.

6

Packaging Changes

Material changes, new suppliers, or specification updates require a full reassessment of conformity - a new technical file and DoC.

Roles Deep-Dive: Supplier

What packaging suppliers must provide under PPWR

What Suppliers Must Provide

- ✓ Material composition data (type, weight, % of each material)
- ✓ Recycled content percentage and certification
- ✓ Recyclability grade information
- ✓ Substance of Concern (SoC) declaration
- ✓ Technical data for Annex VII technical file
- ✓ Design for Recycling compliance data
- ✓ Updated data when any material or specification changes

Supplier Limits of Responsibility

- ❖ NOT responsible for the full conformity assessment
- ❖ NOT required to draw up the DoC themselves
- ❖ NOT required to register for EPR
- ❖ Responsibility lies with the Manufacturer / Importer

SUPPLIER IN PRACTICE: AMCOR

Amcor develops recycle-ready specifications and provides customers with the compliance data they need for their technical files.

Roles Deep-Dive: Importer

Most relevant for Sri Lankan exporters placing packaging on the EU market

Placing packaging on the EU market brings importer-type obligations – verifying & holding conformity evidence. Who carries them depends on how you sell:

- **Sell B2B to an EU buyer – EU buyer is the importer and carries these duties**
- **Place product yourself/own brand – these duties are yours, plus manufacturer**

1. Verify conformity assessment completed

Confirm the Sri Lankan manufacturer has completed the PPWR conformity assessment before you place the packaging on the EU market.

2. Verify DoC prepared

Check the EU Declaration of Conformity has been drawn up and is valid. You must keep a copy.

3. Verify labelling compliance

Ensure the packaging bears PPWR-required labels including harmonised EU pictogram (mandatory from August 2028).

4. Verify manufacturer ID and contact

Manufacturer name and contact details must be present on the packaging or documentation.

5. Retain DoC copies

Keep copies of the Declaration of Conformity for 5 years (single-use packaging) or 10 years (reusable packaging).

6. Provide own identification on packaging

Add your own name/trademark and contact address to the packaging.

7. Ensure storage and transport conditions

Ensure storage/transport conditions do not jeopardise compliance with PPWR essential requirements.

8. Register for EPR as Producer

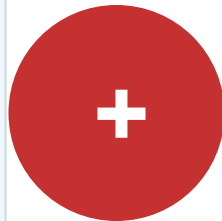
Register in the Article 44 producer register in each EU Member State where packaging is placed on market.

Sri Lankan Exporter: Dual Obligations

Importer + Producer - two sets of responsibilities in every EU Member State

AS IMPORTER

- ✓ Verify DoC from SL manufacturer
- ✓ Verify conformity assessment completed
- ✓ Verify labelling is PPWR-compliant
- ✓ Verify manufacturer ID on packaging
- ✓ Add own name/contact to packaging
- ✓ Retain DoC copy 5 or 10 years
- ✓ Ensure safe transport conditions



AS PRODUCER (EPR)

- ✓ Register in Article 44 producer register
- ✓ Register in EVERY Member State you sell into
- ✓ Track packaging volumes placed on market
- ✓ Track by material type and packaging category
- ✓ Report annually per Member State
- ✓ Pay EPR fees to fund collection/recycling
- ✓ Keep records for audit and compliance review

Supplier Tiering and PPWR Risk Assessment

Prioritise supplier engagement based on compliance risk and volume impact

Not all packaging suppliers carry equal PPWR risk. Use a tiered approach to focus resources on the suppliers whose materials pose the greatest compliance exposure.

TIER 1 - HIGH RISK

Immediate engagement required

- Multi-layer laminate suppliers (foil/PET/PE)
- Paper suppliers with potential PFAS coatings
- Tea bag material suppliers (nylon/PET mesh)

ACTION:

Request PFAS certificates + D4R assessment within 30 days

TIER 2 - MEDIUM RISK

Engage within 6 months

- Mono-material flexible film suppliers
- Rigid plastic tray and pot suppliers
- Ink and adhesive suppliers (D4R ink criteria)

ACTION:

Request material datasheets + recycled content options

TIER 3 - LOWER RISK

Monitor annually

- Paper and board carton suppliers (PFAS-free confirmed)
- Glass jar and bottle suppliers
- Aluminium can suppliers (non-laminated)

ACTION:

Annual confirmation of PFAS-free status and grade retention

Supplier Compliance: Documentation to Request

Embed these requirements in every packaging purchase order

EU Declaration of Conformity (DoC)

Full DoC signed by manufacturer. Must reference PPWR and identify the packaging. Request with every PO and on every update.

Recycled Content Certification

Post-consumer recycled (PCR) content % with chain of custody. Must trace to EU-compliant recycling installation or equivalent.

Annex VII Technical File Data

Material composition, weight, recyclability grade, PCR % and certification, SoC declaration. Minimum dataset required for your own technical file.

Substance of Concern Declaration

Written confirmation that packaging is free from restricted substances at or above threshold levels per PPWR Art. 5.

Recyclability Grade Certificate

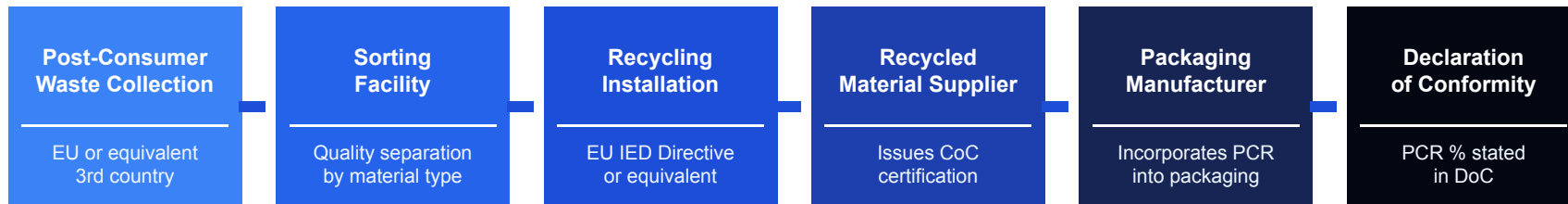
Confirmation of recyclability grade under Design for Recycling delegated act (expected 2028). Critical for labelling and DoC.

Change Notification Protocol

Agreement from supplier to notify you of any material, specification, or process change that triggers conformity reassessment.

Traceability: Mapping Recycled Content Origin

PCR chain of custody - every link must be documented



Recycled content must be traceable back to this point

PCR must come from:

- Post-consumer waste collected in the EU, OR
- A third country with equivalent waste collection and sorting standards
- Recycled in EU-compliant installations under the IED Directive, OR equivalent third-country facility

Key timeline:

- EC to adopt recycled content methodology: 31 December 2026
- Operators comply with recycled content requirements: from 1 January 2030
- Digital Product Passport will carry recycled content % field

Case Study: Amcor - Compliant Supplier in Action

Source: Amcor FY25 Sustainability Report

AMCOR | Global Packaging Supplier | FY25 Sustainability Report

01 CEN Working Group Participation

Amcor is actively engaged in the PPWR and CEN Design-for-Recycling process. Amcor develops recycle-ready specifications (96% of its flexible packaging portfolio, FY25), positioning it to give customers compliant recyclability and PCR data ahead of the regulation.

02 Recycle-Ready Specifications

Amcor proactively develops recycle-ready packaging specifications for customers. Rather than waiting for PPWR delegated acts, Amcor builds packaging to Design for Recycling guidelines now, enabling customers to receive correct recyclability grade data when required.

03 Customer Compliance Data

Amcor provides customers with the material composition, recyclability, and PCR data needed for the Annex VII technical file and DoC. This shows what a good packaging supplier relationship looks like under PPWR - data flows with the packaging.

Lesson for importers: Ask your packaging supplier if they are doing what Amcor does. If they cannot provide recyclability grade data and a DoC dataset, you face a compliance gap.

Case Study: Nestle - Supply Chain Data at Scale

Source: nestle.com

NESTLE | Global Food and Beverage | Annual Packaging Sustainability Report

89.5%

Designed to be recyclable, reusable or compostable

packaging globally

20.6%

Recycled Content in Plastic Packaging

globally across all SKUs

Annual

Reporting Cycle

Ellen MacArthur Foundation framework

What Nestle tracks across thousands of suppliers and SKUs:

- Material type and weight per packaging unit
- Recyclability grade per material component
- Recycled content % per material type
- Data aggregated across all geographies annually
- Reported per Ellen MacArthur Foundation framework

What this means for PPWR compliance:

Nestle is already doing the data collection that PPWR will mandate for every EU importer. Under PPWR, Sri Lankan exporters will need a similar system - tracking material composition, recyclability, and PCR content across every SKU, per Member State, for annual EPR reporting. The scale may be smaller, but the data model is the same.

Documentation Flows: Who Holds What, for How Long

Technical file, DoC and EPR registration - chain of custody

Technical File

(Annex VII)

Held by

Manufacturer

Retention

5 years (single-use)

10 years (reusable)

Contents

- Material composition
- Weight data
- Recyclability grade
- PCR content %
- SoC declaration
- Test results

Declaration of Conformity

Held by

Manufacturer + copy with Importer

Retention

5 years (single-use)

10 years (reusable)

Contents

- Reference to PPWR
- Packaging ID
- Manufacturer details
- Conformity statement
- Date and signature

EPR Registration

(Art. 44)

Held by

Importer / Producer in each MS

Retention

Annual renewal; records kept 5-10 yrs

Contents

- Register in each MS
- Volume placed per MS
- Material type breakdown
- Annual report
- EPR fee payment

All documentation must be provided to market surveillance authorities within 10 days of a reasoned request

Data and Reporting Systems

What data to capture, when, and how to structure it

Per SKU Data

- 1 Packaging material type (primary, secondary, transport)
- 2 Weight per component (grams)
- 3 Recyclability grade (A/B/C when delegated act adopts)
- 4 Recycled content % and certification reference
- 5 Substance of Concern status
- 6 DoC reference number and date

Per Market Data

- 1 Volume of packaging placed on market (kg)
- 2 Breakdown by material type
- 3 Breakdown by packaging function
- 4 Member State-level volumes for EPR reporting
- 5 Annual EPR report submission date per MS
- 6 EPR registration number per MS

System Requirements

- 1 Link SKU-level spec data to volume tracking
- 2 ERP or dedicated compliance platform
- 3 Retain records for 5-10 years per SKU
- 4 Support audit trail for market surveillance
- 5 Update data on every specification change
- 6 Export functionality for EPR registrars

Managing Packaging Changes

5 triggers that require conformity reassessment

Any of these 5 triggers = new technical file + new Declaration of Conformity required

1

Material Change

Any change to packaging material type or composition - including switching from virgin to recycled content, or changing polymer type.

Impact: Recyclability grade, PCR %, and SoC declaration all need recalculation

2

New Packaging Supplier

Switching to a new packaging manufacturer or supplier - even if the specification appears identical. New supplier = new conformity chain.

Impact: Request new Annex VII data and DoC from new supplier immediately

3

Specification Update

Changes to packaging weight, dimensions, or component design that affect material weight, volume, or recyclability properties.

Impact: Recalculate empty space compliance (50% max empty space from 2030) and recyclability grade

4

Substance of Concern Update

If EU restricts a new substance that is present in your packaging, your SoC declaration must be updated and DoC revised.

Impact: Monitor PPWR Art 5 substance list updates from EC

5

Delegated Act Updates

When EC adopts new delegated acts (recyclability grades, PCR methodology, DPP data fields), all affected packaging must be reassessed.

Impact: Key dates: recycled content methodology Dec 2026; recyclability grades expected 2026-2027

Operational Checklist

Four domains - action items for PPWR compliance readiness

Procurement

- ✓ Qualify only PPWR-compliant packaging suppliers
- ✓ Request DoC and Annex VII data with every purchase order
- ✓ Add PPWR compliance clauses to supplier contracts
- ✓ Establish change notification protocol with each supplier

Labelling

- ✓ Update production lines for harmonised EU pictogram (Aug 2028)
- ✓ Plan for digital data carrier (QR code) for DPP (from 2030)
- ✓ Ensure manufacturer and importer ID on all packaging
- ✓ Review current labels against PPWR requirements now

Production

- ✓ Document material composition for every packaging SKU
- ✓ Track recycled content % and certification per SKU
- ✓ Verify Substance of Concern status for all materials
- ✓ Maintain Annex VII technical file per packaging unit

Documentation and reporting

- ✓ Packaging with substances of concern description
- ✓ Recycled content calculation
- ✓ Accredited laboratory tests report
- ✓ EU declaration of conformity and EPR declaration

Sri Lanka Exporter Scenario: Non-Compliance Gaps Today

Typical supply chain walkthrough - where the gaps are



Current compliance gap analysis for a typical Sri Lankan spice/tea exporter:

Gap	Severity	Recommended Action
No DoC from SL packaging manufacturer	Critical	Engage manufacturer immediately; use contract clause to mandate DoC provision
No Annex VII technical file data from supplier	Critical	Request material data sheet per SKU; escalate if supplier cannot provide
EPR not registered in EU Member States	Critical	Identify all EU markets; begin registration process in each - can take several weeks, varies by country
Labelling not yet updated for harmonised pictogram	Medium	Plan label artwork changes; mandatory from August 2028
No document management system for 5-10 year retention	Medium	Implement cloud-based document system; file by SKU and year

Key Takeaways

- ✓ Selling into the EU brings importer-type duties (verify and hold DoC); placing product yourself or under your own brand also makes you the manufacturer and Producer (EPR) in every Member State
- ✓ The conformity chain starts with your packaging manufacturer – no DoC from them = no compliant supply chain
- ✓ EPR registration is mandatory in every EU country you sell into - begin mapping your markets now
- ✓ Documentation (DoC, technical files) must be retained for 5-10 years and available to authorities within 10 days



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Audit, certification and reporting

Session Overview: The Compliance Proof Ecosystem

01

Conformity Assessment

Step-by-step process before market entry

02

Technical File (Annex VII)

What documents must be compiled and retained

03

Recyclability Verification

CEN standards, RecyClass, D4R criteria

04

Market Surveillance

Audit readiness

05

Preparation Timeline

Aug 2026, Jan 2028, Jan 2030 milestones

Audit, certification and reporting

Legal requirements

Manufacturer obligations

Step1: Who is the manufacturer?

Definition:

'manufacturer' means any natural or legal person that manufactures packaging or a packaged product;

Specificities

- **Trademarks:** Where the packaging or a packaged product is designed or manufactured under its own name or trademark, the manufacturer is the natural or legal person
- **SMEs:** where the micro-enterprise designs/manufactures under its own name/trademark and is supplied within the same Member State, the supplier is considered the manufacturer.

Audit, certification and reporting

Legal requirements

Manufacturer obligations

Step 2: Verify the rules

Manufacturers shall only place on the market packaging which is in conformity with the requirements laid down in or pursuant to Articles 5 to 12.

→ Compliance with the sustainability requirements

Step 3: Conformity tests

- Before placing packaging on the market, manufacturers shall carry out the **conformity assessment procedure** referred to in **Article 38** or have it carried out on their behalf.
- They shall draw up the **technical documentation (TDs)** referred to in **Annex VII**.
- They will **keep the TDs for a number of years** and present to market surveillance authorities when requested

Note: Chapter VII of PPWR provides the requirements applicable to packaging conformity.

Audit, certification and reporting

Manufacturer obligations - Annex VII Conformity assessment procedure

Legal requirements

General Obligation

It is the procedure whereby the manufacturer fulfils the obligations, ensures and declares on his sole responsibility that the packaging concerned satisfies the requirements of Articles 5 to 12 of this Regulation.

Technical Documentation

The manufacturer shall establish the **technical documentation (TD)** assessing the conformity of the packaging and includes an adequate analysis and assessment of the risks of non-conformity.

The TD shall specify the applicable requirements and shall cover at least the design, manufacture and operation of the packaging.

Required Elements for the TD

- A general description of the packaging and its intended use
- Conceptual design, manufacturing drawings, and components materials
- Descriptions/explanations for understanding drawings and operation
- List of harmonized standards applied, or common technical specifications
- Qualitative description of assessments under Articles 6, 10, and 11
- Test reports

Scope of Assessment: The assessment of conformity shall be carried out for the entire packaging unit. The assessment should include all integrated and separate components. It shall also demonstrate why the packaging falls under exemptions (eg. Article 6)

Audit, certification and reporting

Legal requirements

Role of the supplier

Provision of Information

General Obligation

Suppliers shall provide the manufacturer with all the information and documentation necessary to demonstrate the conformity of the packaging and packaging materials with this Regulation.

- **Scope:** Includes technical documentation (Annex VII) and requirements under Articles 5 to 11.
- **Language:** Must be in one or more languages easily understood by the manufacturer.

Format & Specific Cases

Presentation Format

The information and documentation shall be provided in either **paper or electronic form**.

Contact-Sensitive Packaging

Where appropriate, documentation required under Union legal acts applicable to contact-sensitive packaging shall be part of the dossier provided to the manufacturer.

Audit, certification and reporting

Manufacturer obligations

Legal requirements

Step 4: Demonstration of compliance

Where compliance of packaging with the applicable requirements has been demonstrated by the conformity assessment procedure referred to in Article 38, manufacturers shall **draw up an EU declaration of conformity (DoC)** in accordance with Article 39.

Step 5: Keep the proofs

The Manufacturer shall keep the EU declaration of conformity and technical documentation referred to in Annex VII for:

- **5 years** from the date SU packaging was placed on the market
- **10 years** from the date reusable packaging was placed on the market



On-demand Authority Requests

Upon a request from a national authority, all the information and documentation necessary to demonstrate the conformity of the packaging, including the technical documentation shall be provided in electronic form and, on request, in paper form within 10 days of receipt of the request.

Audit, certification and reporting

Manufacturer obligations - Declaration of Conformity

Legal requirements

Presumption of Conformity (Art. 36)

- 1. Methods:** Test, measurement or calculation methods demonstrating compliance with Articles 5-12, 24 & 26 in conformity with harmonised standards are presumed compliant.
- 2. Accredited Bodies:** Methods performed by conformity assessment bodies under accreditation are presumed in conformity.
- 3. Standards:** Packaging in conformity with standards published in the Official Journal of the EU is presumed compliant.

Existing Standards

Presumption of conformity **with new or revised harmonised standards in support of PPWR will be possible once a Commission decision listing them is published in the Official Journal of the EU.**

Transition Period:

Standard applicable for packaging minimisation under PPWD (art 70§1) applies **until end of 2029** and can be used for presumption of conformity until that date.

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Manufacturer obligations - Declaration of Conformity article 39

Legal requirements

Compliance Demonstration

The EU declaration of conformity shall state that the fulfilment of the requirements of **Articles 5 to 12** has been demonstrated.

Structure & Language Requirements

The EU declaration of conformity shall have the **model structure set out in Annex VIII, contain elements specified in Annex VII**, and be continuously updated. It shall be drawn up in or translated into the languages required by the destination Member State.

Audit, certification and reporting

Manufacturer obligations - Declaration of Conformity Annex VIII: Model Structure

ANNEX VIII

EU declaration of conformity No (*) ...

Legal requirements

1. No ... (unique identification of the packaging):
2. Name and address of the manufacturer and, where applicable, the manufacturer's authorised representative:
3. This declaration of conformity is issued under the sole responsibility of the manufacturer.
4. Object of the declaration (identification of the packaging allowing traceability): description of the packaging:
5. The object of the declaration referred to point 4 is in conformity with the relevant Union harmonisation legislation: ... (reference to the other Union acts applied).
6. References to the relevant harmonised standards or the common specifications used or references to the other technical specifications in relation to which conformity is declared:
7. Where applicable, the notified body ... (name, address, number) ... performed ... (description of intervention) ... and issued the certificate(s): ... (details, including the date of the certificate(s), and, where appropriate, information on the duration and conditions of validity).

8. Additional information:

Signed for and on behalf of:

(place and date of issue):

(name, function) (signature):

(*) (identification number of the declaration)

Audit, certification and reporting

Manufacturer obligations

Legal requirements

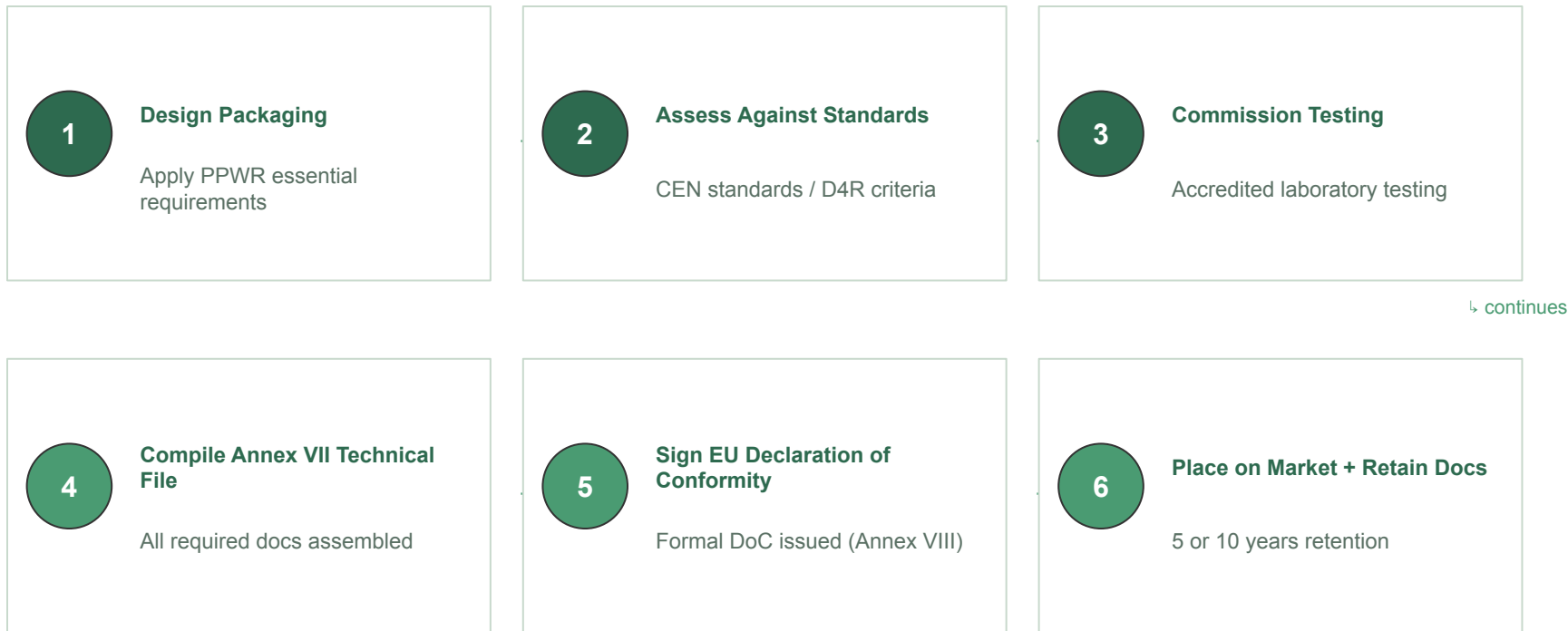
Declaration of Conformity

Single EU DoC for Multiple Regulations

When a packaged product is subject to **more than one Union act** requiring an EU declaration of conformity, such as the **declaration of compliance under Article 15 of Regulation (EU) 10/2011** on plastic materials and articles intended to come into contact with food or Article 16 of Regulation (EC) No 1935/2004 on food contact materials, a **single EU declaration of conformity** may be drawn up for all Union acts.

The Conformity Assessment Process: Step by Step

Article 38 PPWR: conformity assessment must be completed BEFORE placing packaging on the EU market.



Technical File (Annex VII): What It Must Contain

All items are mandatory. The technical file must be available to market surveillance authorities within 10 days of a reasoned request.

✓ Packaging description (unit, material, function)	✓ Results of calculations for recycled content
✓ Design drawings (technical specifications)	✓ Test reports and evidence concerning SoC from accredited laboratory
✓ List of harmonised standards applied (or other technical specifications)	✓ Copy of the EU Declaration of Conformity (DoC)
✓ Qualitative assessment: recyclability, minimization, reusability	

Retention period: 5 years for single-use packaging | 10 years for reusable packaging

Technical File: How to Structure It in Practice

Section A: Product Identity

- Packaging unit description (material, weight, dimensions)
- Intended function and end-of-life route
- Packaging type (primary / secondary / tertiary)

Section C: Test Evidence

- Accredited lab test reports (with lab accreditation reference)
- Recyclability assessment (RecyClass grade or CEN-based)
- Compostability cert - EN 13432 (industrial), home-compostability scheme where a Member State requires it

Section B: Standards and Calculations

- Harmonised CEN standards applied (list with version numbers)
- Recycled content calculations
- Qualitative assessment: recyclability, minimization, reusability

Section D: Risk and Declaration

- Risk assessment for substances of concern (where required)
- PFAS fluorine test data if total fluorine >50 mg/kg
- Signed copy of EU Declaration of Conformity (DoC)

Verifying Recyclability: Current Approach (Pre-2028)

CEN Harmonised Standards (Current)

- CEN standards for plastic packaging published early 2026
- Apply until D4R delegated acts come into force (Jan 2028)
- Used to assess recyclability under current PPWR obligations
- Include material-specific recyclability test methods
- Results form core of the technical file recyclability section
- Manufacturer self-assesses using these standards

RecyClass Tool

- Free online tool available now at recyclclass.eu
- Class-based recyclability rating (design-for-recycling)
- Based on existing harmonised standards (pre-D4R)
- Gives indicative grades - useful for buyer negotiations
- Helps prepare the technical file recyclability section
- Not a substitute for formal compliance but strong preparation

Verifying Recyclability: Post-D4R Approach (After Jan 2028)

From January 2028, recyclability claims must align with D4R (Design for Recycling) criteria delegated acts adopted by the European Commission.

	Until Jan 2028	From Jan 2028
Legal basis	Existing harmonised CEN standards	D4R criteria delegated acts (EC)
Assessment tool	RecyClass (indicative) + CEN standards	Formal D4R criteria assessment
Rating system	A-C grade (RecyClass based)	D4R performance classes (TBC by EC)
Who assesses	Manufacturer self-assessment	Manufacturer self-assessment + D4R method
Documentation	CEN standard references + test results	D4R criteria compliance evidence

Note: recyclability labelling (harmonised EU pictogram) mandatory by August 2028.

Recyclability Grades in the Technical File: How to Document A/B/C

Grade A - $\geq 95\%$ recyclable by weight, Fully recyclable

- Meets all recyclability criteria for the relevant sorting stream
- No materials that inhibit recycling process
- CEN standard assessment completed and documented
- Evidence: lab test report + CEN standard reference
- Include in technical file: assessment date, version of standard

Grade B - $\geq 80\%$ recyclable by weight Recyclable with Limitations

- Mostly recyclable but minor components may reduce efficiency
- Identify which component(s) cause the limitation
- Document the specific limitation in the technical file
- Evidence: partial test results + explanation of limitation
- Buyer notification may be needed depending on contract terms

Grade C - $\geq 70\%$, Limited recyclability

- Meets minimum 70% recyclability threshold but not recyclable at scale across all EU MS
- Still required to document this finding in the technical file
- Record: assessment method, date, reason for C grade
- Timeline required for redesign toward recyclability
- May face market access restrictions from 2030 (regulatory) and earlier via buyer requirements

Case Study: RecyClass Tool - Getting an Indicative Grade Now

CASE STUDY | RecyClass - Free Recyclability Assessment Tool

What it is:

Free online tool provided by recyclclass.eu. Companies self-assess packaging recyclability using a class-based recyclability rating system.

Rating system:

A = fully recyclable in current systems | B = recyclable with minor limitations
| C = recyclable in limited systems.

Standards basis:

Based on Recyclclass's own design-for-recycling methodology (pre-D4R).
Gives indicative grades that may change once D4R delegated acts are adopted.

Technical file use:

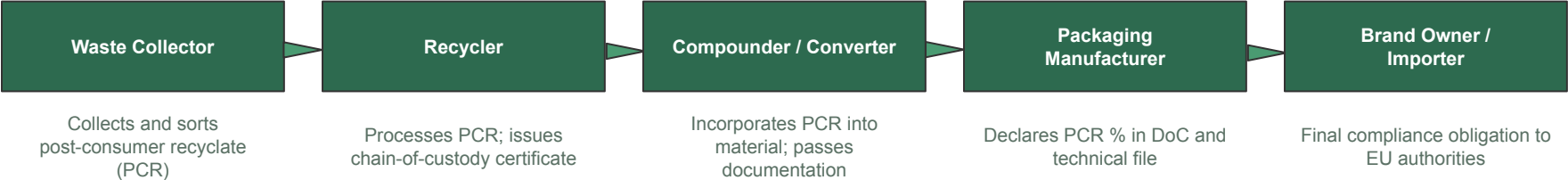
RecyClass results can be referenced in the technical file recyclability section as supporting evidence alongside CEN standard assessments.

How to Use RecyClass Now

1. Go to recyclclass.eu
2. Select packaging type and material
3. Answer assessment questions on material composition
4. Receive A/B/C grade with rationale
5. Download assessment report (PDF)
6. Add to technical file recyclability section
7. Note: reassess after each material change

Recycled Content Verification: PCR Chain of Custody

EU methodology for recycled content verification to be adopted by the European Commission by 31 December 2026. Compliance required from 1 January 2030.



Key PCR Documentation Requirements	
Chain-of-custody certificate	From the recycler - confirms PCR origin and volume
PCR percentage declaration	Supplier letter stating % PCR content per packaging component
Accreditation reference	Recycler accreditation body (e.g. ISCC PLUS, REDcert-EU)
Material specification	Technical spec confirming PCR incorporation into material
Annual update	PCR % must be re-verified each compliance year (from 2030)

Recycled Content: What Proof Is Needed

Recycler / Supplier

- ✓ Chain-of-custody certificate (ISCC PLUS / REDcert-EU or equivalent)
- ✓ PCR percentage declaration letter on company letterhead
- ✓ Technical data sheet confirming material specification
- ✓ Accreditation body reference (recycler certification number)

Packaging Manufacturer

- ✓ PCR content declared in EU Declaration of Conformity
- ✓ Technical file section referencing supplier CoC documents
- ✓ Internal calculation showing % PCR per packaging component
- ✓ Version-controlled records (update on each batch change)

Brand Owner / Importer

- ✓ Verified PCR % for marketing and buyer documentation
- ✓ Compliance evidence for EU market surveillance (on request)
- ✓ Annual re-verification from 1 January 2030 onwards
- ✓ Pass-through documentation to retail buyers as required

Note: EU methodology to be adopted by EC by 31 Dec 2026. Compliance required from 1 Jan 2030.

Case Study: How Amcor Provides DoC and Technical Data to Customers

CASE STUDY | Amcor - Supplier-to-Manufacturer Documentation Chain in Practice

What Amcor does:

Provides DoCs and supporting technical data to customers as part of their standard commercial process. Documentation is packaged with product orders.

R&D commitment:

Amcor R&D team developed recycle-ready specifications for 96% of their flexible packaging portfolio (as reported in FY25 Sustainability Report).

Standards contribution:

Actively contributing to CEN standards development - helping shape the very harmonised standards that will govern PPWR technical files.

Customer benefit:

Brand owners and fillers receive ready-to-use technical data to populate their own PPWR technical files and DoCs.

The Supplier-to-Brand Documentation Flow

Amcor (packaging supplier)

Develops recycle-ready spec + issues DoC and technical data to brand owner customer

Brand Owner / Filler

Receives Amcor DoC + technical data
Incorporates into own PPWR technical file

Brand Owner DoC

Prepares own DoC referencing Amcor data
Signs and retains per Annex VII/VIII requirements

Market

Places packaging on EU market with full compliance document trail available

Compostability Certification: EN 13432 and Sri Lanka Tea Exporters

Compostability Standards

EN 13432:

Industrial composting standard
Required for claims of industrial compostability

Certification body:

Must be accredited third-party testing body
(e.g. DIN CERTCO, TUV Austria OK Compost)

Scope:

Applies to packaging claiming compostability
(tea bags, filter pods, produce stickers etc.)

Deadline:

Tea bag manufacturers must comply by Q1 2028
DoC must confirm EN 13432 compliance

Note: Applies only to permeable tea bags, non-permeable machine capsules (Nespresso style) are not mandatory

Sri Lanka Tea Exporter: Action Required

Scenario:

Tea bag manufacturer in Sri Lanka exports to EU buyers. Tea bag material claims industrial compostability.

PPWR requirement:

Must issue DoC confirming industrial compostability (EN 13432) of tea bag material by Q1 2028.

Current gap:

Few Sri Lanka manufacturers have EN 13432 certification or awareness of this requirement as of today.

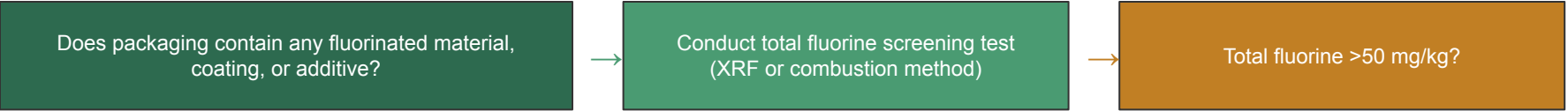
Action required:

Identify certified compostable tea bag material suppliers. Obtain EN 13432 certificates. Integrate into PPWR technical file before Q1 2028.

PFAS Testing: When Screening Is Needed and How to Document

PFAS (per- and polyfluoroalkyl substances): the key trigger threshold including polymeric PFAS is total fluorine >50 mg/kg.

Decision Flow: Do You Need PFAS Testing?



PFAS Documentation Requirements (when total fluorine incl.polymeric PFAS >50 mg/kg)	
Quantification test	Manufacturer or importer must provide proof of exact quantity as PFAS or non-PFAS fluorine content on request from authorities
When provided	On request from market surveillance authority - not automatically required at point of market entry
Test method	Quantitative PFAS analysis (e.g. LC-MS/MS) to distinguish intentional PFAS from background fluorine
Add to technical file	Total fluorine test result; PFAS quantification result; test lab accreditation reference
PFAS-free claim	From August 2026, PFAS-free certificates increasingly required by EU buyers; test evidence needed to support claim

What EU Buyers Ask For: The Complete Document Checklist

Required Now (2026)



EU Declaration of Conformity (DoC)

Required from August 2026



PFAS declaration / PFAS-free certificate

Mandatory from August 2026



Material composition datasheet

Per packaging component - required now



REACH compliance certificate

Required now (chemical safety)



Food contact material compliance

EC Regulation 1935/2004 - required now



SoC (Substances of Concern) declaration

Required now under PPWR Art. 5

Required by 2028/2030



Recyclability grade assessment (A/B/C)

Increasingly required by buyers now; mandatory by Jan 2028



PCR percentage verification

Formal compliance from January 2030



Harmonised recyclability label

Pictogram mandatory by August 2028



EN 13432 compostability certificate

Where packaging claims compostability



Chain-of-custody certificate (PCR)

From recycler - required from Jan 2030



D4R criteria compliance evidence

After D4R delegated acts (Jan 2028)

Sri Lanka Tea Exporter: Full Compliance Document Trail

Scenario: Sri Lanka tea bag manufacturer exporting to EU. Tea bag material claims industrial compostability. Must comply with PPWR documentation requirements by Q1 2028.

Document	Required content	Standard / Basis	Deadline
EN 13432 certificate	Industrial compostability confirmation for tea bag material	EN 13432 (accredited body)	Q1 2028
Technical file (Annex VII)	Full file: packaging description, compostability test report, design drawings, list of standards	PPWR Annex VII	Before EU market entry
EU Declaration of Conformity	Signed DoC including compostability standard reference	PPWR Annex VIII	Before EU market entry (Aug 2026)
PFAS screening	Total fluorine test - tea bags may use fluorinated filter materials	PPWR Art. 5	From Aug 2026
Material composition datasheet	Per component: filter paper, string, tag, staple, outer wrap	EU buyer requirement	Now (buyer-driven)
SoC declaration	Confirmation no substances of concern above PPWR thresholds	PPWR Art. 5	Aug 2026

Key gap: Few Sri Lanka manufacturers have EN 13432 certification or PPWR awareness. Start supplier qualification now.

Keeping Documentation Current: 6 Triggers for Reassessment

Compliance documentation is not a one-time exercise. These 6 triggers require you to review and update your technical file and DoC.

Material change

1

Any change to packaging material composition - new polymer, changed additives, new ink or coating - requires full reassessment and updated DoC.

New harmonised standard

2

When a new or revised CEN standard relevant to your packaging is published, test results must be reviewed against the new standard.

D4R criteria adoption (Jan 2028)

3

When D4R delegated acts enter into force, recyclability assessment under current CEN standards must be redone using D4R methodology.

New recycled content rules (Dec 2026)

4

When EC adopts recycled content verification methodology, PCR documentation must be updated to comply with new method.

Market surveillance request

5

Any formal request from a market surveillance authority is a trigger to review the complete documentation file before responding.

Supplier change

6

Change of material supplier or subcontractor for any component covered by the DoC requires updated supplier documentation and re-issue of DoC.

Building Your Compliance Document Repository: Practical Setup

1

Inventory your packaging portfolio

List every packaging unit placed on EU market. Classify as single-use or reusable. Identify material types and applicable PPWR requirements for each.

2

Collect supplier documentation

Request DoC, technical data sheets, CoC certificates, and test reports from all packaging suppliers. Add contractual requirements for 5-year retention and updates on change.

3

Conduct or commission testing

For each packaging unit: recyclability assessment (CEN standards / RecyClass), PFAS total fluorine screening if applicable, compostability cert if claiming compostability.

4

Compile Annex VII technical files

Build one technical file per packaging unit with all 8 required elements. Use version control. Assign file owner responsible for updates and retention.

5

Issue and sign DoC (Annex VIII)

Prepare DoC for each packaging unit or group. Get sign-off from authorized representative. Store centrally with access controls. Update on any trigger event.

Key Takeaways

- ✓ **Conformity assessment first:** Complete before placing packaging on EU market (Art. 38). Technical file (Annex VII) + DoC (Annex VIII) are the two core documents.
- ✓ **Documentation is mandatory:** DoC required from August 2026. Technical file must be available to authorities within 10 days. Retain for 5 or 10 years.
- ✓ **Recyclability claims need evidence:** CEN standards apply now. D4R criteria from Jan 2028. Use RecyClass today for indicative grades and buyer discussions.
- ✓ **Non-EU exporters must act now:** Sri Lanka tea bag manufacturers and other non-EU suppliers need EN 13432, DoC, and technical files to continue EU market access.



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Strategic roadmap and financial implications

Strategic roadmap and financial implications

Compliance roadmap

STEP 01

Map your packaging portfolio

Identify the type of packaging you have in your portfolio exported to the EU market, its category (food contact/non food contact) material composition, number of separate/integrated components, etc.

STEP 02

Identify your role in the value chain

Identify to which stakeholder category your company is falling under pursuant to PPWR's definition (producer, manufacturer, importer, distributor, etc.)

STEP 03

List and collect all relevant datas

Depending your role, collect and gather relevant data based on Annex VII to draft the DoC.

Ask the relevant data to your suppliers.

STEP 04

Verify any legal domestic specificities

Member States have the possibility to required additional requirements for specific measures such as home-compostability for packaging or increase reuse targets.

Strategic roadmap and financial implications

Compliance roadmap

August 12, 2026

Short terms measures

- **Enter into force of the legal definitions:**
New definition of packaging (e.g., tea bags become packaging)
- **PFAS requirements:**
Restrictions on substances of concern
- **General obligations:**
Obligations of Manufacturers (Art. 15) & Importers (Art. 18)
- **Conformity assessment:**
Procedures applicable from August 12, 2026

Transition & Exceptions

Market Safeguards

Existing Stock Safeguard

Packaging **lawfully placed on the market before 12 August 2026** (or before a specific provision applies) **may remain** on the market without needing compliance, withdrawal, or recall.

Exception: Reusable Packaging

For **reusable packaging**, the **cut-off date is set earlier at 11 February 2025** (Article 15(9) PPWR). Only products placed on the market before this date benefit from the grandfathering rule.

Strategic roadmap and financial implications

Compliance roadmap

2028

Medium terms measures

- Compostability requirements
- Labelling

2030

Medium terms measures

- Packaging minimisation
- recyclability,
- recycled content targets,
- packaging bans
- reuse targets

Strategic roadmap and financial implications

Compliance roadmap

2035

Long terms measures

- Recycling at scale

2040

Long terms measures

- Higher reuse targets
- Higher recycled content targets

Strategic roadmap and financial implications

Useful tools

Official Reference

Official text →

Guidance

**European Commission legal
Guidance →**

Questions & Answers

European Commission FAQ →

Monitoring Tool

**Europe's Implementation
tracker →**

Strategic roadmap and financial implications

Useful tools - European Commission's Guidance

- Publication on **March 2026**
- **Interpret selected provisions of the PPWR**, with the aim of facilitating a uniform application of the Regulation across the Union.
- **Is not legally binding** because binding interpretation of EU legislation remains the exclusive competence of the Court of Justice of the European Union.

7. Exemptions from recycled content targets

Legal provisions:

Recital (50): 'Food-contact materials containing recycled plastic have to meet the requirements set out in Commission Regulation (EU) 2022/1616, which includes requirements on recycling technologies. Regarding plastic packaging, except where that packaging is made from polyethylene terephthalate (PET), it is appropriate to re-assess the availability of suitable recycling technologies for such plastic packaging sufficiently ahead of the date of application of the related recycled content requirements. That assessment should also cover the state of authorisation under relevant Union rules and the installation in practice of such technology. Based on that assessment, there might be a need to provide for derogations from the recycled content requirements for specific contact-sensitive plastic packaging or to amend the list of exceptions laid down in this Regulation. To that end, the power to adopt acts in accordance with Article 290 TFEU should be delegated to the Commission.'

Commission's interpretation:

Article 7(5) establishes specific exemptions from the recycled content obligation. The exemption established in Article 7(5)(a) refers to plastic packaging that is intended to come into contact with food where the quantity of recycled content poses a threat to human health and results in non-compliance of packaged products with Regulation (EC) No 1935/2004 (²⁰). The exemption established in Article 7(5)(b) relates to plastic parts representing less than 5 % of the total weight of the packaging unit. The notion of 'plastic parts' should be interpreted in line with the definition of composite packaging in Article 3(1), point 24 of the PPWR.

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Useful tools - European Commission's Q&A

- Publication on **March 2026** - will be regularly updated
- Q&A based on questions **received** from the industry
- Is not legally binding

IV. RECYCLABILITY

1) In the context of recyclability performance grade assessment:

- how is a packaging unit defined,
- what is the difference between integrated and separate components, and
- what is the main body of the packaging unit?

A 'unit of packaging' is defined in Article 3(1), point (45), of the Regulation as a unit, including any integrated or separate components, which as a whole serves a packaging function, such as the containment, protection, handling, delivery, storage, transport or presentation of products. A unit of packaging is independent from units of grouped or transport packaging where the latter are discarded prior to the point of sale. The term 'unit of packaging' should be considered equal to 'packaging unit', which is a term also used in the PPWR. Integrated and separate components are also defined in the Regulation, in Article 3(1), points (43) and (44), respectively.

VI. COMPOSTABILITY

1) Article 9(1) mandates a compostability requirement for certain packaging types. Will these packaging types be allowed in the bio-waste stream even before 12 February 2028?

Indeed, the Regulation changed the definition of packaging to include tea and coffee bags which are not left empty after use. Such new packaging items will be classified as packaging when the Regulation becomes applicable, that is on 12 August 2026.

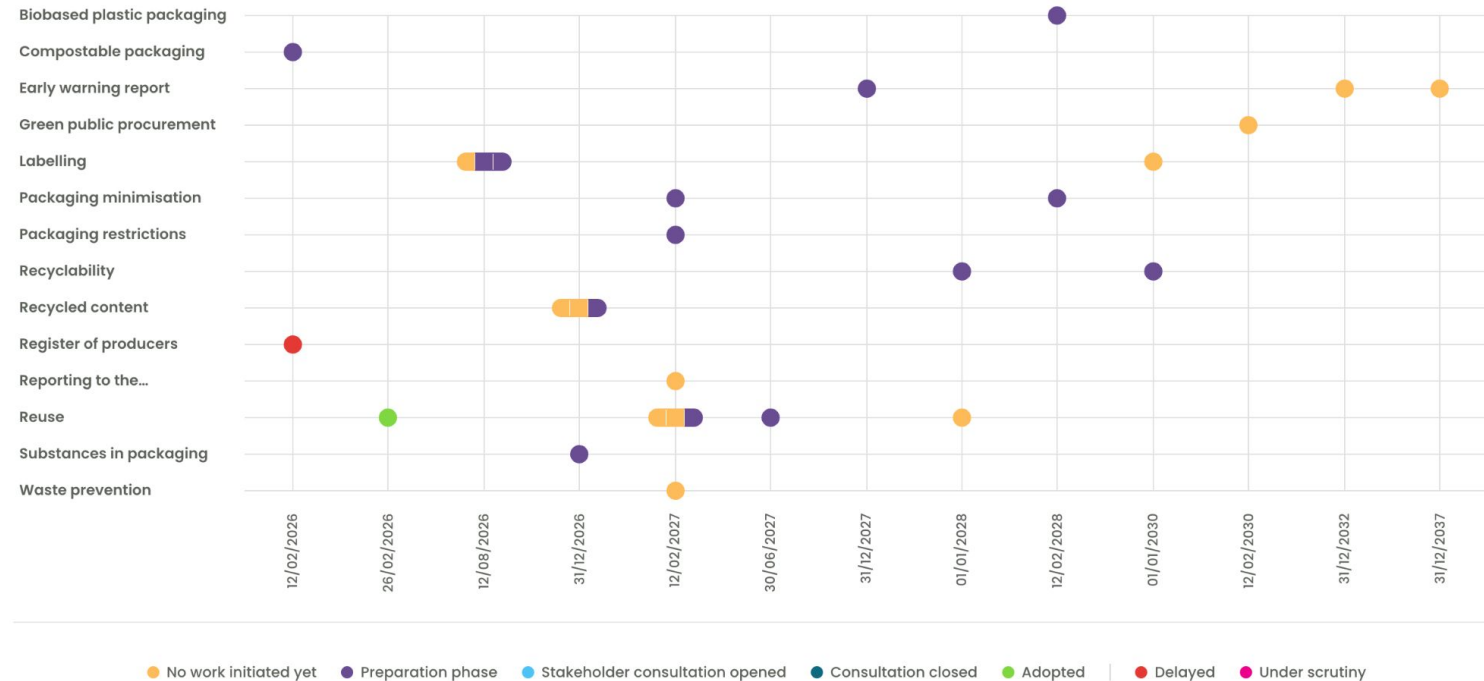
As Article 9 on compostability applies from 12 February 2028, Member States *are not required* to accept such packaging in the bio-waste stream before that date, but they are *encouraged* to accept them.

2) How should manufacturers deal with the fact that not all industrial composting facilities operate in accordance with EN 12422:2002? Will waste management

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Useful tools - European's implementation tracker

Timeline for Upcoming Secondary Legislations



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Article | ▾

Category | ▾

Type | ▾

Current Status | ▾

Deadline | ▾

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Article	Deadline	Requirement	Type of Act	Current status	Available Resources
Article 44.14 – Register of producers	12.02.26	EC shall adopt implementing acts establishing the format for registration in, and reporting to, the... Read More	Implementing Act(s)	Preparation phase DELAYED	Initiative available here
Article 9.6 – Compostable packaging	12.02.26	EC shall request European standardisation organisations to prepare or update harmonised standards laying down detailed... Read More	Harmonised standards	Preparation phase	EU Commission Notice on the 2026 work programme for European standardisation available here. Initiative available... Read More
Article 29.2 & 3 – Exemption from reuse targets	26.02.26	EC to adopt a delegated act supplementing the Regulation exempting certain economic operators that use... Read More	Delegated Act(s)	Adopted	On 6 May 2026, the EU Commission published Delegated Decision 2026/429 exempting pallet wrappings and... Read More

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Useful tools - European's implementation tracker

Public Consultations

Consultation aimed at	Consultation starts	Consultation ends	Details	Type of Act	Adoption planned for	Available Resources
Article 25.6 – Packaging restrictions	16 December 2025	30 January 2026	The European Food Safety Authority (EFSA) received a request for a scientific opinion to be... › Read More	Guidelines	Q1 2027	• Call for data available here. • EU Survey platform accessible here.
Article 41.1 – Early warning report	Not yet open	Not yet open	The Commission will assess Member States' progress towards the attainment of the targets for packaging... › Read More	Report	Q4 2027	Have your say portal link available here .
Article 44.14– Register of producers	Not yet open	Not yet open	This initiative aims to harmonise parts of extended producer responsibility schemes for packaging in EU...	Implementing Act(s)	Q1 2026	Have your say portal link available here .

Strategic roadmap and financial implications

Non compliance risk and financial sanctions - article 62

If a Member State becomes aware of any of the following, it shall require the relevant economic operator to put an end to the non-compliance:

- The EU declaration of conformity has not been drawn up or is incorrect.
- The QR code or data carrier (Article 12) does not provide access to required information.
- Technical documentation (Annex VII) is not available, is incomplete, or contains errors.
- The information referred to in Article 15(6) or Article 18(3) is absent, false, or incomplete.
- Any other administrative requirement set out in Article 15 (Obligation of Manufacturers) or Article 18 (Obligation of Importers) is not fulfilled.

MANDATORY MEASURES

The Member State concerned shall take all appropriate measures to:

- **Prohibit the packaging from being made available on the market.**
- **Ensure that the packaging is recalled or withdrawn from the market.**

Strategic roadmap and financial implications

Non compliance risk and financial sanctions - article 62

1. Where a Member State becomes aware of any of the following circumstances, it shall require the relevant economic operator to put an end to the non-compliance concerned:

- Restrictions on excessive packaging or bans of packaging formats (Articles 24 & 25)
- Establishment, operation or participation in a re-use system (Article 27)
- Information requirements in relation to refill (Article 28(1) & (2))
- Requirements on refill stations (Article 28(3))
- Re-use targets achievement (Article 29)
- Refill obligations and re-use offer obligations (Articles 32 & 33)
- Recyclable packaging requirements (Article 6)
- Minimum recycled content in plastic packaging (Article 7)

PERSISTENT VIOLATION

If non-compliance of the requirements persists:

Member States **shall apply the rules on penalties** defined in accordance with **Article 68**.

Strategic roadmap and financial implications

Non compliance risk and financial sanctions - Article 68

GENERAL OBLIGATIONS & DEADLINE

By 12 February 2027, Member States shall **define the rules on penalties applicable** to infringements of PPWR and take all necessary measures to ensure their implementation.

Notification: Member States must notify the European Commission of these rules and measures by the same deadline, as well as any subsequent amendments.

Standard: The penalties provided for must be effective, proportionate, and dissuasive.

SPECIFIC PROVISIONS: REUSE

Articles 24 to 29: Penalties for failure to comply must include administrative fines.

Judicial Alternative: If administrative fines are not provided, fines should be imposed by competent national courts.

Equivalency: Legal remedies must have equivalent effect and remain effective, proportionate, and dissuasive.



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