PPWR Compliance Checklist 2026

EU Packaging & Packaging Waste Regulation

A practical, step-by-step checklist for enterprise sustainability and operations teams preparing for PPWR obligations entering into force in 2026.

Provided by **CO2check** · www.co2check.io

■ In force	■ Applies to	■■ Fine risk
August 2026	**All EU packaging producers & importers**	**Up to 4% of annual turnover**

The EU Packaging and Packaging Waste Regulation (PPWR, Regulation 2024/1781) replaces the old PPWD directive and introduces binding requirements on recyclability, recycled content, reuse, labelling, and Extended Producer Responsibility. Non-compliance carries fines of up to 4% of annual turnover. Use this checklist to assess your current status and prioritise actions before the August 2026 deadline.

01 Inventory & Scoping

- ☐ **Map all packaging types across your value chain** — Aug 2026
  Include primary, secondary (grouped) and tertiary (transport) packaging for all products and markets.
- ☐ **Identify packaging placed on the EU market** — Aug 2026
  Any company importing or selling packaged goods into the EU falls under PPWR scope.
- ☐ **Determine your role: Producer, Importer or Distributor** — Aug 2026
  Each role carries different EPR and reporting obligations under Article 7–10.
- ☐ **Record packaging weight and material composition per SKU**
  You will need weight-per-unit data for recycled content and minimisation calculations.
- ☐ **Flag packaging in PPWR-restricted categories** — 2030
  Check single-use plastic formats against Annex V — some are prohibited from 2030.

02 Recyclability Requirements (Art. 6 & Annex II)

- ☐ **Confirm all packaging is designed to be recyclable** — 2030
  By 2030, 100% of packaging placed on the EU market must meet recyclability by-design criteria.
- ☐ **Assess recyclability grade (A–E) for each packaging format** — 2030
  Grades defined by Delegated Acts. Grade A/B = recyclable. Grade D/E = non-compliant from 2030.
- ☐ **Phase out Grade D/E packaging from product roadmap** — 2030
  Non-recyclable packaging may not be placed on EU market from 1 Jan 2030.

- [ ] **Document recyclability assessments per packaging format**
  Retain test reports and conformity declarations; regulators may request these during audits.

- [ ] **Track supplier packaging for Scope 3 recyclability obligations**
  Packaging received from suppliers also counts. Engage suppliers now to get material data.

03 Recycled Content Targets (Art. 7 & Annex II)

- [ ] **Calculate current recycled content % by packaging material**
  Baseline today against 2030 targets: 30% for plastic contact-sensitive, 35% for other plastics. — 2030

- [ ] **Identify gap to 2030 recycled content targets**
  Plastic (non-contact): 35% by 2030, 65% by 2040. Glass, paper, aluminium: own targets apply. — 2030

- [ ] **Obtain supplier declarations for recycled content**
  Recycled content must be verifiable per EN 15343 or equivalent certified standard.

- [ ] **Set internal procurement policy requiring minimum recycled content**
  Align packaging specifications and supplier contracts with PPWR targets now.

- [ ] **Plan 2040 roadmap for higher thresholds**
  Targets increase in 2040: plastics to 65%, other materials to higher levels. Build this into NPD. — 2040

04 Packaging Minimisation (Art. 9 & Annex IV)

- [ ] **Audit packaging for excessive empty space (void ratio)**
  PPWR sets limits: grouped and transport packaging void ratio must not exceed 40%. — Aug 2026

- [ ] **Eliminate packaging design elements that hinder recyclability**
  Remove labels, inks, adhesives or coatings that contaminate the recycling stream.

- [ ] **Review packaging weight relative to product weight**
  Minimisation criteria require packaging to be as light as technically feasible.

- [ ] **Remove unnecessary packaging layers from e-commerce shipments**
  E-commerce is explicitly in scope — review fulfilment packaging standards. — Aug 2026

- [ ] **Document technical justification for all packaging design choices**
  Regulators may require evidence that packaging is not excessive. Maintain a design dossier.

05 Reuse & Refill Targets (Art. 26–29)

- [ ] **Identify packaging categories subject to reuse targets**
  Transport, grouped (secondary) and certain sales packaging have mandatory reuse quotas. — 2030

- [ ] **Determine reuse targets applicable to your sector**
  Targets differ by category: e.g. 10% of transport packaging to be reusable by 2030. — 2030

- [ ] **Design or source reusable transport packaging solutions**
  Pool systems, standardised crates, returnable pallets — begin supplier conversations now.

- [ ] **Set up tracking for reusable packaging return rates**
  You must demonstrate achievement of reuse targets. Tracking from day one is essential.

06 Labelling Requirements (Art. 11–13)

- [ ] **Apply harmonised recyclability label to all consumer-facing packaging**
  New EU-wide recyclability labelling system replaces existing national schemes from 2026. — Aug 2026
- [ ] **Add material composition label where required**
  Mandatory for packaging covered by Delegated Acts — material type and recyclability grade. — Aug 2026
- [ ] **Display deposit return scheme (DRS) mark where applicable**
  Beverage packaging subject to DRS must carry standardised mark in applicable member states. — Aug 2026
- [ ] **Plan QR code / digital carrier for Digital Product Passport (DPP)**
  DPP for packaging is expected via Delegated Act — plan data architecture now. — 2027+

07 Extended Producer Responsibility & Reporting (Art. 45–57)

- [ ] **Register with national EPR scheme in each EU member state where you place packaging**
  Registration is mandatory. Failure to register is an immediate compliance breach. — Aug 2026
- [ ] **Calculate annual packaging quantities placed on each national market**
  EPR fees are calculated per kg or unit by material. You need accurate per-market data. — Annual
- [ ] **Set up reporting process for annual EPR declarations**
  Most national schemes require annual submission by Q1 each year for the prior year. — Annual
- [ ] **Engage a Producer Responsibility Organisation (PRO) if required**
  Many member states mandate using a certified PRO. Identify and contract them early. — Aug 2026
- [ ] **Ensure EPR reporting covers all packaging in your supply chain**
  Scope 3 packaging from suppliers may trigger obligations if you are the importer of record.

08 Data Collection & Emissions Integration

- [ ] **Establish a central register of all packaging data**
  Weight, material, recycled content, market, reusability — all in one structured system.
- [ ] **Connect packaging data to your emissions accounting**
  Packaging production and end-of-life are material Scope 3 sources (Category 1, 4, 12).
- [ ] **Automate data collection from procurement and freight documents**
  Invoice and freight document automation removes the manual burden of annual data gathering.
- [ ] **Calculate packaging-related emissions baseline (tCO2e)**
  Use GHG Protocol guidance for upstream and downstream packaging emissions.
- [ ] **Set science-based reduction targets for packaging emissions**
  Link PPWR compliance milestones to your SBTi or CSRD reduction pathway.

■ KEY DEADLINES AT A GLANCE

Deadline	Requirement	Action
August 2026	PPWR in force — core obligations apply	EPR registration, labelling, void ratio, inventory

1 Jan 2030	All packaging recyclable (by design)	Phase out Grade D/E; hit recycled content year-1 targets
1 Jan 2030	Reuse targets Phase 1	10% reusable transport packaging (sector-dependent)
1 Jan 2040	Recycled content targets Phase 2	65%+ recycled content for plastics; higher for others
Annual	EPR declaration per member state	Weight/unit data by material submitted to national EPR scheme

Need to collect this data automatically?

CO2check turns your existing invoices, freight documents and energy bills into structured emissions and packaging data — automatically. No spreadsheets, no manual entry. Get your PPWR data baseline in days, not months.

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