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EU Packaging and Packaging Waste Regulation (PPWR) And associated Extended Producer Responsibility (EPR) in Europe

[The Regulation](#) is a binding EU law that overhauls rules on packaging design, recyclability, and waste reduction. It is applicable from the 12th of August 2026 and affects all businesses placing packaged goods on the market throughout the European Economic Area (EEA). The Regulation covers all types of packaging, regardless of material or origin, and sets targets for material composition that become more stringent over time.

The Regulation talks about the manufacturer being the organisation that is required to create a Declaration of Conformity (DoC) around the different packaging that is used for a product. The manufacturer is the organisation that first places the goods on the EEA market. Responsibilities under the Regulation vary depending upon the activities that your organisation undertakes.

The regulation covers all the packaging that goes around the product:

- Primary packaging, such as shrink-wrap around a book
- Secondary packaging, such as the carton or printer's shrink-wrap that multiple books go in
- Transport packaging, such as the pallets, and pallet-wrap around the cartons on the pallet
- E-commerce packaging such as mailers or boxes and void-filling

For organisations that are placing goods on the EEA market, there are obligations under various national EPR schemes. These schemes vary by country and have different thresholds, so organisations need to do audit their supply chain and see which countries their packaging may go to, and do their own compliance research to see which countries' EPR schemes they have to comply with. If an organisation has to comply with a country-specific EPR scheme, then it has to register, using an in-country authorised representative, with the country concerned.

What this means for organisations from the 12 August 2026

Organisations need to work out what their role is in the supply chain under PPWR, as depending upon INCO terms used, and whether they are an EEA entity or have an authorised representative, they may be required to create a Declaration of Conformity as the manufacturer –but knowing what an organisation's role is will help them to know what they need to do and to push back where/if necessary.

There are a number of preparatory tasks an organisation needs to do now to be ready for PPWR:

- collect technical documentation from their upstream packaging suppliers on all the packaging that is being used
- gather enough documentation to justify the signing of a DoC, for each individual packaging type, and associate packaging types with products or product types
- organisations don't need to send the DoC with anything. They are required to keep it on file for 5 to 10 years depending upon the packaging type (it might be easier to just default to 10 years in case a competent authority asks for the proof)
- if an organisation receives a request for proof about a particular packaging, there is a statutory SLA: when requested by EU Market Surveillance Authorities, technical evidence must be delivered within **10 working days**.

There are two labelling changes.

1. organisations are now required to include their trade name and address
2. organisations need to include some sort of reference that allows the packaging to be tied back to the relevant DoC.

And the final thing is that, ideally, organisations need to do some sort of heavy metal testing, if they can't get that from further up the supply chain.

Organisations that the regulation applies to

Please note: Just because your organisation does not place goods *directly* onto the EEA market **does not mean that you have no obligations under the regulation.**

- Printers need to gather information about the packaging they are using from upstream suppliers
- Publishers need to ask their printers about the packaging being used for their books
- Distributors and warehouses will need to ask publishers about the packaging being used on books that are delivered to them. They will also need to ask their suppliers about the packaging being supplied directly to them.
- Booksellers who are fulfilling orders in the EU will also need to ask their suppliers about the packaging that is being supplied to them. They will also need to understand how they can dispose of the packaging that they discard.
- This applies to organisations in the UK and in the EEA, so including Ireland

This BIC Bite is the first piece of guidance relating to PPWR that will be released by BIC. BIC's PPWR Fast-Track Project continues to work on understanding PPWR and will release more detailed information in the future. Readers are encouraged to keep an eye on the BIC website for further updates relating to PPWR.

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