

PPWR Readiness Checklist

Regulation (EU) 2025/40 · Reference date: July 2026 · This checklist does not constitute legal advice.

Date of review		Next review	
Responsible		Company / Site	

Status key:	[Y] Yes – completed and documented	[N] No – not yet started	[P] In Progress – started, not complete
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SECTION 1 – IMMEDIATE OBLIGATIONS (from 12 August 2026)				
Checkpoint	Status	Gap identified	Next action	Owner / Deadline
EU declaration of conformity in place for all packaging in use Art. 39 PPWR · Issued by manufacturer / economic operator placing packaging on the market	[Y][N][P]			
Technical documentation complete and retained for 5 years Art. 38 + Annex VII PPWR · Must be producible within 10 days on request	[Y][N][P]			
Conformity assessment procedure documented (Module A – internal production control) Art. 38 + Annex VII PPWR · No notified body required for the standard route	[Y][N][P]			
LUCID Packaging Register registration current (all packaging categories covered) VerpackDG (Packaging Law Implementation Act) · Runs parallel to PPWR from 12 Aug 2026	[Y][N][P]			
Supplier conformity documentation obtained and archived Art. 18 PPWR · Importer obligations – full documentation chain required	[Y][N][P]			

SECTION 2 – PREPARATION FOR 2030 (no immediate obligation in August 2026)				
Checkpoint	Status	Gap identified	Next action	Owner / Deadline
Packaging materials assessed for recyclability Art. 6 PPWR · Recyclability performance grades (A–C) mandatory from 2030	[Y][N][P]			
Box size range evaluated for empty space reduction Art. 24 PPWR · Maximum empty space ratio of 50 % applies from 1 Jan 2030	[Y][N][P]			
Void fill strategy documented and reviewed for PPWR relevance Art. 24(3) PPWR · Void fill counts as empty space, not usable volume	[Y][N][P]			
Note: The German Federal Environment Minister submitted a request to delay certain 2030 deadlines. No decision had been adopted at the time of publication (July 2026).				

OVERALL SUMMARY			
Checkpoints on Yes	/ 8	Priority immediate action	
Overall status	[] Ready [] Gaps open [] Critical	Next review date	

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