The Implementation Period of the PPWR: Critical Considerations for Companies

The European Union's Packaging and Packaging Waste Regulation (PPWR) comprehensively regulates the entire life cycle of packaging, from design and production to use, recycling and reuse. The Regulation introduces extensive obligations concerning packaging, including material use, conformity assessment, technical documentation, traceability and conditions for placing packaging on the market.

The PPWR entered into force on 11 February 2025, and its general application period began on 12 August 2026. However, this date does not mean that all obligations laid down in the Regulation became applicable simultaneously. While certain provisions have begun to apply, other obligations will take effect on the dates specified in the PPWR or following the adoption of secondary legislation by the European Commission.

The PPWR Implementation Guidelines adopted by the European Commission were published in the Official Journal of the European Union on 10 June 2026, followed by the Frequently Asked Questions (FAQ) document dated 3 August 2026. These two sources clarify many matters of practical importance, including the responsibilities of manufacturers, importers and distributors, conformity assessment, technical documentation, the EU Declaration of Conformity, traceability and transport packaging. Nevertheless, secondary legislation and standards will continue to complete the implementation framework in areas such as harmonised labelling, certain technical criteria for assessing recyclability, digital information and marking methods, and specific calculation methodologies.

In our article entitled "PPWR and the New Era: Conditions for Placing Products on the European Market Are Changing," published in the May issue of *Mevzuat Dergisi*, we examined the Regulation's overall structure and its effects on the market. This article evaluates the key issues for companies during the implementation period, based on the provisions of the PPWR, the Implementation Guidelines of June 2026 and the European Commission's FAQ document dated 3 August 2026.

12 August 2026: Which Obligations Became Applicable?

The PPWR provides for a phased implementation timetable under which obligations take effect on different dates. It is therefore important to distinguish between the provisions applicable from 12 August 2026 and the obligations that will take effect at later dates.

The principal obligations that became applicable on 12 August 2026 include:

- Limits on heavy metals in packaging,
- Restrictions on per- and polyfluoroalkyl substances (PFAS) in food-contact packaging,
- The requirement for packaging to be recyclable,
- Conformity assessment,
- Preparation of technical documentation,
- The EU Declaration of Conformity,
- Obligations applicable to manufacturers and importers,
- Ensuring the traceability of packaging through a type, batch or serial number, or another equivalent identifier.

Conversely, although certain obligations are laid down in the PPWR, they will become applicable at later dates, while in some areas the details of implementation will be completed through secondary legislation. These include:

- Detailed design-for-recycling criteria and recyclability performance grades,
- Implementation of recycled content targets,
- The harmonised labelling system,
- Certain digital information and marking requirements.

At this point, it is important to distinguish between the general recyclability requirement and the PPWR's new recyclability criteria. The requirement for packaging to be recyclable became applicable on 12 August 2026. By contrast, the new design criteria, performance grades and the detailed assessment methodology relating to them will take effect at later dates. Until these criteria become applicable, the approach established under the former Packaging and Packaging Waste Directive (PPWD) and the relevant harmonised standard EN 13430:2004 will continue to apply. Conformity assessment under Article 38 and Annex VII in relation to the PPWR's new recyclability criteria will apply once the relevant secondary legislation enters into force. This distinction is important for companies' compliance planning. PPWR preparations must therefore be carried out in a manner that takes account of both the obligations currently applicable and the Regulation's implementation timetable.

How Are Roles and Responsibilities Determined Under the PPWR for Turkish Exporters?

Under the PPWR, a company's obligations are determined not merely by its status as an "exporter" but by the economic operator role it assumes within the supply chain. The Regulation lays down different responsibilities for manufacturers, importers, distributors and other economic operators. A company exporting from Türkiye to the EU must therefore first determine which economic operator role it assumes under the PPWR.

The principal factors considered when determining this role include:

- The name or trademark under which the packaging is manufactured or commissioned to be manufactured,
- The legal entity that places the product on the EU market,
- The company that carries out the importation,
- Whether any modification affecting the packaging's compliance has been made,
- Whether the company is the manufacturer of the final packaging or a supplier of packaging or packaging materials.

Whether a company qualifies as a manufacturer is determined by considering who manufactures or commissions the manufacture of the packaging or packaged product and the name or trademark under which it is placed on the market. In this case, carrying out the conformity assessment, preparing the technical documentation and drawing up the EU Declaration of Conformity are the manufacturer's responsibility.

By contrast, where a Turkish company merely supplies packaging or packaging materials, it is not the manufacturer of the final packaging. However, it is required to provide the technical information, material composition data, test and analysis results, and other supporting documents necessary for the manufacturer in the EU to fulfil its obligations. The conformity assessment of the final packaging is carried out by the manufacturer, and the EU Declaration of Conformity is likewise drawn up by the manufacturer.

The mere presence of a company's subsidiary, warehouse or logistics centre in the EU does not, in itself, alter its role under the PPWR. If the EU subsidiary imports the product in its own name and places it on the market, it is regarded as the importer and must fulfil the applicable importer obligations. If it places the product on the market under its own trademark or makes a modification to the packaging that affects its compliance, it may also become subject to the obligations applicable to manufacturers.

Accordingly, the first step in PPWR compliance is to map the commercial structure through which the product moves from production to placement on the EU market and to determine the role of each legal entity separately.

Different legal entities within the same corporate group may assume different roles under the PPWR. Technical documentation, the EU Declaration of Conformity and other responsibilities are allocated according to this distribution of roles.

Are Documents Obtained from Suppliers Sufficient on Their Own?

Under the PPWR, information and documents provided by suppliers constitute key inputs for conformity assessment; however, they do not eliminate responsibility for the final product's conformity. Suppliers of packaging or packaging materials are required to provide the manufacturer with information on material composition, technical specifications, the necessary test and analysis results, and other supporting information. The manufacturer then uses these data in its own conformity assessment and technical documentation.

A declaration or supporting document obtained from a supplier is therefore not a standalone document that replaces the technical documentation or the EU Declaration of Conformity. It must be clearly established which packaging or packaging component the information relates to, its validity must be verified, and it must be linked to the relevant technical specifications. Otherwise, declarations of a general nature may not be sufficient to demonstrate conformity.

In this respect, PPWR compliance also directly affects supplier management. Companies must systematically determine which technical information they will request, how documents will be kept up to date, and how changes to materials or packaging will be reported. In this way, supplier documentation becomes not merely a set of archived records, but a traceable source of data supporting the conformity assessment.

Are Technical Documentation and the EU Declaration of Conformity the Same?

Technical documentation and the EU Declaration of Conformity (DoC) are not the same document. Technical documentation refers to the complete set of information and documents supporting the packaging's compliance with the PPWR, whereas the DoC is the formal declaration drawn up following the conformity assessment.

The technical documentation and the DoC must be retained for five years from the date on which single-use packaging is placed on the market and for ten years in the case of reusable packaging. The DoC must be kept up to date and translated into the language or languages required by the Member State in which the packaging is placed or made available on the market. Although there is no single mandatory template for technical documentation, its content must include the elements specified in Annex VII to the PPWR, as well as the information and documents demonstrating the packaging's conformity.

A new DoC is not drawn up for each shipment. The declaration is drawn up for the relevant packaging type. In the case of serial production, conformity must be reassessed where changes are made to the packaging's design, characteristics or other elements affecting its conformity. Accordingly, different production batches of the same packaging type may be covered by the same DoC, provided that no change affecting conformity has occurred.

How Is Responsibility Determined for Transport Packaging?

The PPWR covers not only sales packaging but also transport packaging used to transport and protect products. In this context, the following, for example, must be assessed separately:

- Pallets,
- Stretch films,
- Cardboard boxes and cartons,
- Plastic or metal strapping,
- Separating and protective packaging components.

The use of multiple types of packaging in the same shipment does not mean that they constitute a single item of packaging or fall under the responsibility of a single manufacturer. Pallets, stretch film and cartons may be supplied by different manufacturers, and each must be assessed separately in terms of its own technical characteristics and conformity.

In determining responsibility for transport packaging, it is important to establish under whose name or trademark the packaging is placed on the market. In the case of unbranded, ready-to-use standard transport packaging, the manufacturer is generally the undertaking that manufactures the packaging. However, where packaging has been designed or commissioned to be manufactured at the request and according to the technical specifications of a particular undertaking, whether the undertaking placing the order qualifies as the manufacturer must be assessed separately.

Exporting companies must therefore assess transport packaging not as a single item of "shipment packaging," but separately by reference to each packaging component used.

Is a Separate Serial Number Required for Each Item of Packaging for Traceability Purposes?

Under the PPWR, packaging must be identifiable and traceable. For this purpose, a type, batch or serial number, or an equivalent identifier enabling the packaging to be identified, may be used. However, assigning a separate serial number to each individual item of packaging is not mandatory.

For standard packaging manufactured in series, traceability may be ensured through a batch number. For products such as tape, plastic film or bags, the essential requirement is that the relevant packaging or production batch can be distinguished by means of the identifier used. Where the size or nature of the packaging does not allow the required information to be displayed directly on the packaging, it may be provided in a document accompanying the packaged product.

Traceability is not limited to codes displayed on the packaging. For effective traceability, it is important that packaging-related supply information and documentary records can be linked to one another when necessary. Existing product codes, batch numbers, purchasing records, supplier documents and technical documentation must therefore be interconnected.

How Will Packaging Manufactured or Placed on the Market Before 12 August 2026 Be Assessed?

Packaging placed on the EU market before 12 August 2026 may remain on the market. However, packaging manufactured before that date but not yet placed on the market cannot be regarded as exempt from the PPWR solely on the basis of its manufacturing date. The status of such packaging must be determined by considering both the date on which it is placed on the market and the date from which the relevant obligation applies. For example, food-contact packaging placed on the market after 12 August 2026 must comply with the applicable PFAS limits.

Where the required information concerning packaging manufactured before that date is missing or insufficient, the manufacturer must attempt to obtain it from its former suppliers or, in cases involving a merger, acquisition or similar transaction, from the companies that have taken over the business. Where this is not possible, the manufacturer must carry out its own assessment based on the information available. For packaging not yet placed on the market, where the identifier required by the PPWR and the manufacturer's name and address do not appear on the packaging, this information may also be provided in a document accompanying the packaging.

Companies must therefore conduct a separate inventory review of their existing packaging stocks to identify which packaging has already been placed on the EU market, which has not yet been placed on the market, what technical documentation is available, and whether any information gaps exist. Particularly for businesses holding large inventories, this assessment is important for both compliance and cost management.

How Should the Period Between 12 August 2026 and 12 February 2027 Be Assessed?

The PPWR became generally applicable on 12 August 2026. Member States are required to establish their national rules on penalties applicable to infringements of the Regulation by 12 February 2027 at the latest. This period should therefore not be regarded as a transitional period during which the obligations are deferred. The provisions of the PPWR are already applicable, while the nature of the penalties and the procedures governing their enforcement are being determined through the Member States' national rules.

Companies should use this period not to postpone their compliance efforts, but to review their existing processes and remedy any deficiencies. Completing missing supplier data, updating technical documentation, correctly classifying packaging types and clarifying internal responsibilities are among the priority areas in this context. Accordingly, this is not a "waiting period," but a period of preparation and compliance during which the implementation system is becoming established.

Is Every Document Requested by a Customer Mandatory Under the PPWR?

With the application of the PPWR, customers in the EU may request additional information and documentation from their suppliers. Such requests may include company-specific DoC formats, additional analysis reports, supplier questionnaires, data submissions to sustainability platforms or additional commitments.

However, not every document requested by a customer constitutes a legal requirement arising from the PPWR. Some requests may stem from the customer's own compliance policies, risk management practices or supply chain procedures. The legal basis for each request should therefore be identified first.

For companies, the critical distinction is between obligations arising from the PPWR and customer-specific commercial requirements. Making this distinction helps prevent unnecessary document preparation and avoids the creation of fragmented compliance processes for different customers.

Conclusion and Assessment

With the PPWR entering its application phase, compliance has become more concrete and operational for companies. Determining which economic operator role the company assumes, which packaging it is responsible for, which technical documents it must prepare or obtain, and how this information will be managed in a traceable manner are fundamental elements of implementation. PPWR compliance should therefore not be limited to monitoring legislation but should be addressed together with the company’s supply chain, document management and internal allocation of responsibilities.

Another important consideration in practice is distinguishing between legal obligations arising from the PPWR and customer-specific commercial requirements. Although supplier documentation, technical documentation, the EU Declaration of Conformity and customer requests are all components of the same compliance framework, each has a different function and legal nature. Drawing this distinction correctly will reduce both the risk of incomplete compliance and the burden of unnecessary documentation and procedures.

As secondary legislation, standards and technical implementation criteria continue to evolve, the PPWR’s impact on company processes will also expand. Compliance efforts should therefore not be treated as a one-off project. Instead, they must be carried out within a continuous framework in which packaging, suppliers, technical data and documentation are managed in an interconnected manner and updated in line with regulatory developments. For companies, the essential objective is not merely to fulfil current obligations, but to establish a robust and traceable system capable of adapting to the evolving implementation framework.

Gül Saldıraner

EG Partner
CPA
Independent Auditor
Sustainability Auditor
www.eg-econsulting.com

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