

# PPWR Readiness Assessment

## Preliminary Gap Analysis | Packaging Compliance

WHAT YOU PROVIDE	WHAT YOU GET BACK
<ul style="list-style-type: none"> <li>• Packaging material composition and structure (e.g., mono-PP, multi-layer, coatings)</li> <li>• Manufacturer / importer details and EU authorised representative</li> <li>• Target EU markets where the packaging will be placed</li> <li>• Test reports if available: PFAS screening, heavy metals, recyclability assessment</li> <li>• Recycled content certificates and supplier declarations (optional)</li> </ul>	<ul style="list-style-type: none"> <li>• Preliminary readiness assessment across PPWR Articles 5-12</li> <li>• Gap analysis: what evidence is on file, what is missing, what cannot yet be assessed</li> <li>• Regulatory status flags (delegated acts pending vs. enforceable now)</li> <li>• Action plan with prioritised next steps</li> <li>• Documentation checklist to prepare your formal Declaration of Conformity</li> </ul>

**IMPORTANT**

This is a **preliminary readiness assessment**, not a Declaration of Conformity. Several PPWR delegated acts (e.g., recyclability criteria under Art. 7, official PFAS list under Art. 5) are still pending publication and are expected in 2027-2028. Where criteria are not yet finalised, this assessment flags the requirement and provides preparatory guidance based on current best practice and available draft standards. The formal Declaration of Conformity (Annex VIII) remains the manufacturer's responsibility and should be prepared with qualified legal and technical counsel once all delegated acts are in force.

*Below is a sample assessment for a fictional product (Cocoa Bliss Bites, AlpenPure Foods GmbH).*

### Packaging Under Assessment

<b>Packaging Name</b>	Cocoa Bliss Bites Flow-Wrap Primary Packaging
<b>Packaging Type</b>	Primary   Single-use   Sales packaging
<b>Material</b>	Mono-material PP (oriented polypropylene film, 35 micron)
<b>Weight</b>	4.2 g per unit
<b>Internal Reference</b>	PKG-CBB-PP35-01   EAN: 7610123456789
<b>Manufacturer</b>	AlpenPure Foods GmbH, Zurich, Switzerland
<b>EU Representative</b>	AlpenPure EU Compliance BV, Amsterdam, Netherlands
<b>Target Markets</b>	Germany, France, Italy, Spain, Netherlands, Austria, Belgium, Poland

# Article-by-Article Readiness Assessment

PPWR Articles 5-12 | Status as of April 2026

**READY** = Evidence on file, requirement met      **GAP** = Action needed before DoC can be issued      **PENDING** = Delegated act not yet published      **N/A** = Not applicable to this packaging

Article	Requirement	Status	Details	Notes
Art. 5	Substance Restrictions	READY	Heavy metals: 12 mg/kg (limit: 100 mg/kg). PFAS: not detected in screening.	Monitor official PFAS list publication (expected 2027). Retain current test reports.
Art. 6	Minimisation	READY	Film at 35 micron (minimum for barrier). Empty space 8%. No double-wall or false bottom.	None. Document minimisation rationale in technical file.
Art. 7	Recyclability	PENDING	Mono-PP design scores well on existing private schemes (Cyclos-HTP Grade B). However, official PPWR recyclability criteria and grading methodology (delegated act) not yet published.	Obtain Cyclos-HTP or RecyClass assessment as interim evidence. Monitor delegated act (expected 2028). Ensure ink coverage and adhesive choices align with draft guidance.
Art. 8	Recycled Content	GAP	Current recycled PP: 18%. 2030 target for contact-sensitive plastic: 10% (met). 2040 target: 50% (not yet met). Supplier traceability certificate on file.	Develop 2040 recycled content roadmap with supplier. Verify traceability complies with Reg. (EU) 2022/1616. Request updated certificate annually.
Art. 9	Compostable Packaging	N/A	Not a tea bag, coffee pod, produce sticker, or lightweight bag.	None.
Art. 10	Reusable Packaging	N/A	Single-use sales packaging. Reuse system not applicable.	None.
Art. 11	Labeling	GAP	Material mark (PP 05) present. Sorting instruction label not yet applied. QR code for digital passport in development.	Add harmonised sorting instruction label per upcoming implementing act. Prepare digital product passport (mandatory from 2028). Update artwork files.
Art. 12	Innovative Packaging	N/A	Standard packaging format.	None.

## READINESS SCORE: 6 / 8 Articles Addressed

**READY:** Art. 5, 6 (2 articles) | **GAPS TO CLOSE:** Art. 8, 11 (2 articles) | **PENDING DELEGATED ACTS:** Art. 7 (1 article) | **N/A:** Art. 9, 10, 12 (3 articles)

# Prioritised Action Plan

## Steps to Achieve Full PPWR Readiness

<b>1 - HIGH</b>	Add harmonised sorting instruction label to packaging artwork. Coordinate with design team and printer.	Art. 11	Packaging Design	June 2026
<b>2 - HIGH</b>	Request updated recycled content certificate from supplier (ResinLoop AG). Verify compliance with Reg. (EU) 2022/1616 traceability requirements.	Art. 8	Procurement / QA	May 2026
<b>3 - MEDIUM</b>	Obtain Cyclos-HTP or RecyClass recyclability assessment as interim evidence while official delegated act is pending.	Art. 7	Sustainability	July 2026
<b>4 - MEDIUM</b>	Develop 2040 recycled content roadmap (target: 50% recycled PP). Engage supplier on post-consumer rPP sourcing strategy.	Art. 8	Sustainability / Procurement	Q4 2026
<b>5 - MONITOR</b>	Track publication of official PFAS restricted substances list. Update testing protocol once published.	Art. 5	Regulatory Affairs	Ongoing (exp. 2027)
<b>6 - MONITOR</b>	Track PPWR recyclability delegated act publication. Reassess packaging design-for-recycling once criteria are finalised.	Art. 7	Regulatory Affairs	Ongoing (exp. 2028)
<b>7 - FUTURE</b>	Implement digital product passport (QR code linking to packaging data). Mandatory from 2028.	Art. 11	IT / Packaging	H1 2028

### Documentation Checklist for Formal DoC

The following documents are required to prepare the formal Declaration of Conformity (Annex VIII). This checklist shows what is currently on file and what is still needed.

Packaging material specification sheet	<b>ON FILE</b>	PP film spec v3.1 from supplier
PFAS screening test report	<b>ON FILE</b>	SGS Report #SG-26-04812 (Feb 2026)
Heavy metals analysis	<b>ON FILE</b>	Eurofins Report #EF-26-11093 (Jan 2026)
Recyclability assessment	<b>PARTIAL</b>	Private scheme certificate available; official PPWR criteria pending
Recycled content certificate	<b>ON FILE</b>	ResinLoop AG #RL-RC-2026-0089. Needs annual renewal.
Minimisation rationale document	<b>MISSING</b>	Needs to be drafted for technical file
Sorting instruction label artwork	<b>MISSING</b>	Awaiting harmonised label design from implementing act
Supplier declaration(s) of conformity	<b>PARTIAL</b>	Film supplier provided; ink supplier pending

# Regulatory Timeline & Next Steps

## Key PPWR Milestones Affecting This Packaging

<b>12 Aug 2026</b>	PPWR enters into force. DoC mandatory for all packaging on EU market.	Must have formal DoC ready. Close remaining gaps (Art. 8, 11) before this date.
2027 (expected)	Official PFAS restricted substances list published.	Retest packaging against official list. Update DoC if thresholds change.
2028 (expected)	Recyclability delegated act published. Design-for-recycling criteria finalised.	Reassess recyclability grade against official criteria. Update DoC.
2028	Digital product passport (QR code) becomes mandatory.	Implement QR code on packaging linking to product data.
2030	Recycled content targets enforced (10% contact-sensitive plastic).	Currently at 18% — target met. Maintain supplier certification.
2040	Recycled content targets increase (50% contact-sensitive plastic).	Roadmap needed. Current 18% must increase significantly.

### Recommended Next Steps

1. Close the two identified gaps (sorting label artwork, supplier declaration from ink supplier) by **June 2026**.
2. Draft minimisation rationale document for technical file.
3. Engage qualified packaging compliance consultant to prepare and sign the formal Declaration of Conformity (Annex VIII) based on this assessment.
4. Set up monitoring alerts for delegated act publications (Art. 5 PFAS list, Art. 7 recyclability).
5. Schedule annual reassessment to keep documentation current.

*This is a preliminary readiness assessment generated by Prodeen. It does not constitute a Declaration of Conformity under Article 39 of Regulation (EU) 2025/40 and does not replace qualified legal or technical advice. The formal Declaration of Conformity remains the sole responsibility of the manufacturer or their authorised representative. All company names, data, and test results shown are fictional and for demonstration purposes only.*