EU PACKAGING RULES, MINUS THE JARGON

The PPWR packaging *checklist.*

For fashion brands selling into the EU, and anyone whose logo is on the mailer.

01	34	2030
Are you the manufacturer? Probably. Here's how to tell.	Tick boxes, in the same order as the regulation itself.	The dates that matter, from now to the 50% empty space rule.

START HERE

If your logo is on the packaging, the paperwork is *yours.*

Since 12 August 2026, the EU's Packaging and Packaging Waste Regulation (PPWR) applies across all 27 member states. Any business that has packaging designed or made under its own name or trademark counts as its manufacturer, even if a factory three countries away actually made it.

That means a declaration of conformity and a technical file for every packaging type you ship to EU customers. Your suppliers hold most of the facts. Your job is to ask for them, check them and file them.

Who it hits

Brands of any size selling into the EU, including UK brands selling direct to EU customers. The micro enterprise exception won't cover a business with 20 or more staff.

What's live now

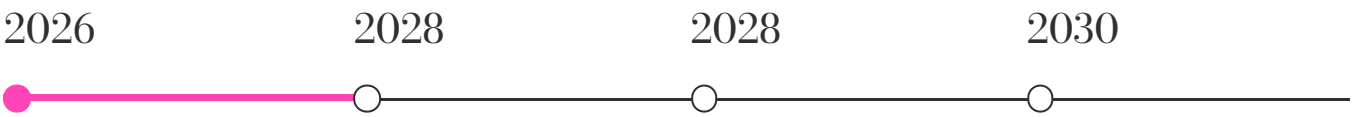
Declarations, technical files, substance limits, recyclability and identification marks. These have applied since 12 August 2026.

What comes later

Harmonised sorting labels from 2028, then the 50% empty space limit and recyclability grades from 2030.

EXHIBIT 1

Four dates to put in the diary



2026 — 12 AUGUST
Declarations, technical files, substance limits and recyclability
LIVE NOW

2028 — 12 FEBRUARY
Commission sets how empty space gets measured
COMING

2028 — 12 AUGUST
Harmonised sorting labels on packaging
CAN MOVE LATER

2030 — 1 JANUARY
Max 50% empty space in ecommerce parcels; recyclability grade A to C
CAN MOVE LATER

Source: Regulation (EU) 2025/40, Articles 6, 12, 24 and 71. Dates from 2028 apply on the later of the date shown or a set period after the Commission adopts its detailed rules.

How to use this

Work through the eight steps in order. Steps 1 and 2 are a job for your ops team; steps 3 to 5 are where your packaging suppliers come in. The notes in the right hand margin point to the exact part of the law, so you can check anything we say.

01 Map your packaging

Before anything else, know what you send out and whose name is on it.

- [ ] List every packaging item that reaches EU customers: mailers, boxes, polybags, tissue, tape, stickers and inserts.
- [ ] For each item, note whether it's designed or made under **your name or trademark**. If it is, you're the manufacturer.
- [ ] For plain stock items, note the supplier and ask them to confirm they act as manufacturer.
- [ ] Mark each item as single use or reusable. It changes how long you keep the paperwork.

THE LAW

Article 3(1), point 13

Whoever has packaging designed or made under its own name or trademark is the manufacturer.

Micro enterprises (fewer than 10 staff, €2 million or less) buying in their own member state are the exception.

02 Get the facts from your suppliers

Suppliers have to give you what you need to show your packaging complies. Ask for it in writing.

- [ ] Materials and components for each item.
- [ ] Evidence that lead, cadmium, mercury and hexavalent chromium combined stay at or below **100 mg/kg**.
- [ ] Recyclability evidence against **EN 13430:2004**.
- [ ] A promise to tell you before they change materials, inks or adhesives.

THE LAW

Article 16(1)

Suppliers must provide the information the manufacturer needs.

Articles 5(4) and 6(1)

Heavy metals limit and the duty to be recyclable. Commission guidance points to EN 13430:2004 until new criteria apply.

03 Build the technical file

One per packaging type. This is your evidence.

- [ ] A general description of the packaging and what it's used for.
- [ ] Design drawings and the materials of each component, with notes to explain them.
- [ ] A list of the standards or specifications you used, such as EN 13430:2004.
- [ ] A short description of how you assessed recyclability, packaging minimisation and, where relevant, reuse.
- [ ] Test reports.

THE LAW

Annex VII

Sets out what the technical documentation must contain.

Article 15(2)

The file and declaration come before the packaging is placed on the market.

04 Draw up the declaration of conformity

The signed statement that sits on top of the file.

- [ ] A unique identification number for the packaging.
- [ ] Your name and address, plus your authorised representative's if you have one.
- [ ] A line saying it's issued under the sole responsibility of the manufacturer.
- [ ] A description of the packaging detailed enough to trace it.
- [ ] A statement that it conforms with the relevant EU law.
- [ ] References to the standards or specifications used.
- [ ] Any additional information.
- [ ] **Signed for and on behalf of** the business, with the place and date of issue, and the signer's name, job title and signature.
- [ ] Translated into the language each EU country you sell into requires.
- [ ] Kept up to date whenever the packaging, materials or standards change.

THE LAW

Annex VIII

The model declaration, ending with the signature block.

Article 39(2) and (4)

It must be kept updated and translated into each country's required language. Signing it makes the manufacturer responsible for compliance.

05 Mark the packaging

- [ ] A type, batch or serial number, or another way to identify it.
- [ ] Your name, registered trade name or trademark.
- [ ] Your postal address and, where you have one, an email or web contact.
- [ ] Not enough room? Put these details behind a QR code instead.

THE LAW

Article 15(5) and (6)

Identification and contact details, on the pack or through a QR code or other data carrier.

06 Keep the records

- [ ] Store the file and declaration for **5 years** from when single use packaging was placed on the market.
- [ ] Store them for **10 years** for reusable packaging.

THE LAW

Article 15(3)

Retention periods run from the date the packaging was placed on the market.

07 Check your registrations

- [ ] Registered with the packaging register in every EU country where you sell direct to customers.
- [ ] Checked whether each of those countries wants an authorised representative for a brand based outside the EU.
- [ ] Selling into Northern Ireland? Checked DAERA's PPWR FAQs.

THE LAW

Articles 44 and 45(3)

Each country can require producers from outside the EU to appoint a representative.

A proposed pause to 2035 targets EU based producers and was still under negotiation in November 2026.

08 Put these in the diary

- [ ] **12 February 2028:** the Commission publishes how empty space gets measured.
- [ ] **12 August 2028:** harmonised sorting labels start, later if the Commission's rules are late.
- [ ] **1 January 2030:** maximum 50% empty space in ecommerce parcels, and packaging must meet recyclability grade A, B or C. Both can move later.

WORTH KNOWING

Article 24(5)

Posting a product in its own sales packaging, like a labelled shoebox, is exempt from the empty space limit.

Stuck on step 2? Most brands are. *That's where we come in.*

RODICA MURPHY
SUSTAINABILITY CONSULTANT

RM Sustainability Consulting helps fashion and textile brands get PPWR ready: from mapping your packaging to signed declarations, without the jargon.

rodicamurphy.com
help@rodicamurphy.com

SOURCES

1. Regulation (EU) 2025/40 on packaging and packaging waste, Official Journal of the EU, eur-lex.europa.eu
2. European Commission, Guidance document for Regulation (EU) 2025/40, C/2026/3084
3. European Commission, PPWR Frequently Asked Questions, 2026
4. Commission Recommendation 2003/361/EC, SME definition
5. DAERA, PPWR FAQs for Northern Ireland, August 2026
6. Commission proposal COM(2025) 982 on authorised representatives

PLEASE READ

Checked against the regulation text and Commission guidance on 20 November 2026. This checklist is general guidance, not legal advice, and some rules are still being finalised. Check the official text, or talk to us, before you sign a declaration.

© 2026 RM Sustainability Consulting Ltd. Certified B Corp.