PPWR Declaration of Conformity: Proof of packaging law compliance as a procurement obligation

The PPWR Declaration of Conformity is the written declaration by an economic operator that a packaging or packaged good meets the requirements of the EU Packaging and Packaging Waste Regulation (PPWR). For technical buyers, it is a central piece of evidence when procuring packaging, components and end products in DACH industry. Without documented conformity, delivery stops, market access restrictions and liability risks loom. This article explains the content, process and practically relevant control points of the Declaration of Conformity from a buyer's perspective.

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Key facts at a glance

01 The PPWR Declaration of Conformity confirms that a packaging meets the EU Packaging Regulation's requirements on recyclability, substance restrictions and labelling.

02 It forms part of the technical dossier and must be issued by the manufacturer or importer and presented to authorities upon request.

03 Buyers should anchor the Declaration of Conformity as a firm requirement in enquiries, framework agreements and supplier evaluations.

04 Responsibility for conformity lies with the respective economic operator; in practice, importers carry an independent duty of verification.

05 Missing or incorrect Declarations of Conformity can lead to goods inspections, sales bans and sanctions by market surveillance authorities.

06 Documentation should be systematically filed in supplier and item master data maintenance and regularly reviewed for currency.

Definition: PPWR Declaration of Conformity

The PPWR Declaration of Conformity is the formal declaration by which a manufacturer, authorised representative or importer documents that a packaging complies with the requirements of the Packaging Regulation. It is based on a conformity assessment and, together with technical documents, forms a dossier that must be presented to market surveillance upon request. For buyers, it is a supplier-side conformity proof and thus part of procurement quality.

Legal background: PPWR and the old Packaging Directive

The EU Packaging Regulation (Regulation (EU) 2025/40) gradually replaces the previous Packaging Directive 94/62/EC and applies directly in all Member States. It requires, among other things, the reduction of empty packaging, the restriction of certain substances and the design of recyclable packaging. The Declaration of Conformity is the central instrument of evidence towards authorities and business partners. Transition periods vary depending on the obligation; buyers should verify the concrete application dates on a project-specific basis, as detailed rules are implemented through delegated acts and harmonised standards.

- Direct application in all EU Member States
- Replacement of Directive 94/62/EC with transition periods
- Declaration of Conformity as central evidence towards market surveillance

Distinction from declarations under other product legislation

The PPWR Declaration of Conformity is not identical to the CE Declaration of Conformity under the Machinery Directive, EMC Directive or RoHS, even though methodologically similar principles apply. A machinery delivery may therefore comprise several Declarations of Conformity: one for the machine as such and further ones for packaging and transport packaging. Buyers should differentiate precisely in the enquiry and in the scope of delivery list which evidence is expected for which subject matter. This avoids friction at goods receipt and commissioning.

Who issues the declaration?

As a rule, the manufacturer issues the Declaration of Conformity. For imports from third countries, the importer is deemed the economic operator with its own obligations; it must, among other things, verify that the manufacturer has properly carried out the conformity assessment. Distributors and fulfilment providers may also assume obligations depending on the case. In multi-tier supply chains, role clarification is therefore an important point of compliance clarification in procurement.

Content and requirements of the Declaration of Conformity

A PPWR Declaration of Conformity must identify the issuer, the subject matter and the confirmed compliance with the relevant requirements. It references the technical dossier and the conformity assessment carried out. Form and structure follow the requirements of the Regulation and the applied harmonised standards.

Minimum content of the declaration

In practice, buyers should check whether the declaration contains at least the following details: name and address of the issuer, identification of the packaging or product (type, batch or item number), declaration of conformity with the PPWR, reference to applied standards or technical specifications, as well as place, date and a legally binding signature. For series deliveries, one declaration per packaging type is often sufficient, provided no substantial change is made to the packaging. However, changes to material, printing or composite structure may trigger a reassessment.

- Issuer and role (manufacturer, authorised representative, importer)
- Unambiguous identification of the packaging type
- Reference to standards, technical dossier and assessment procedure
- Place, date and signature of an authorised person

Technical dossier and conformity assessment

The Declaration of Conformity is based on a dossier documenting the assessment bases: material composition, recyclability assessment, evidence of substance restrictions and labelling details. Harmonised standards can support the presumption of conformity but are not mandatory. Relevant for buyers is the question of which dossier extracts the supplier may disclose on request and which trade secrets remain protected. A clear contractual arrangement on the exchange of conformity evidence is recommended, especially for long-running framework agreements.

Labelling and marking as a complement

The Declaration of Conformity alone is not sufficient: packaging must also be labelled in accordance with PPWR requirements, for example regarding material composition and collectability. Buyers should therefore treat labelling requirements as part of the specification and drawing review. Requirements differ for retail packaging and transport packaging; this should be mapped in item maintenance by packaging level.

Methods and approach for buyers

The systematic handling of PPWR Declarations of Conformity follows the classic compliance loop: define the requirement, obtain evidence, check, archive and monitor. Especially with a heterogeneous supplier base, a standardised approach that integrates into existing processes such as complaint management and supplier evaluation is helpful.

Anchoring the requirement in enquiries and contracts

Already in the request for quotation and in tender documents, the submission of a valid Declaration of Conformity should be named as a documented requirement. In framework agreements, a clause on the delivery of current evidence with every substantial packaging change is recommended. The requirement can also be incorporated into a scoring model for supplier evaluation, for example as a criterion within supplier compliance. This makes documentation quality measurable and factors it into

the selection decision.

Verification and incoming inspection of evidence

The check should cover at least the completeness of mandatory details, the match between item identification and the delivered type, and the date of issue. For imports, the importer role must additionally be clarified: if the company sources directly from third countries, it may itself become subject to the issuing obligation; it then needs its own conformity assessment procedure. Irregularities such as incomplete details or deviating item numbers must be documented in the complaints process and clarified with the supplier before releases are granted.

- Completeness check using a checklist
- Reconciliation of item number, type and packaging level
- Clarification of the importer role for direct imports
- Documentation of deviations in complaint management

Archiving and data model in procurement

Declarations of Conformity should be filed in an audit-proof manner and linked to item and supplier master data maintenance. A clean data model with fields such as issue date, validity status and packaging type enables automated renewal reminders. Parameter maintenance (MRP) can be extended so that order proposals for items without valid conformity evidence are blocked or flagged. This reduces the risk of non-compliant packaging entering the supply chain unnoticed.

Risks, controls and responsibilities

The main risks lie in incomplete evidence, unclear roles in the supply chain and in packaging changes that are not reported. Controls must therefore be applied both on the supplier side and on the process side.

Assessing supplier risks

Not every supplier can deliver conformity evidence with the same reliability. A supplier financial health check and qualitative audits provide indications of whether a provider can manage regulatory requirements in a structured manner. For critical packaging for export markets, it is additionally advisable to check whether national additional requirements of the destination countries apply. Risks should be considered in the category strategy, for example through second suppliers or hedging via safety stock (safety stock calculation) in case evidence must be demanded retrospectively.

Change management and batch monitoring

Packaging changes by the supplier, such as material changes, new inks or modified bought-in components, may affect conformity. Contracts should therefore provide for a change notification duty, linked to incoming inspection. Inventory management can map changes by keeping old and new introductions separate until the evidence situation is clarified. When market surveillance makes

enquiries, the company must be able to prove which declaration belongs to which delivery period; batch-level allocation is therefore recommended.

Liability and informing business partners

Economic operators who place packaging on the market bear responsibility for its lawfulness; violations can be sanctioned with market restrictions and official measures. Conformity evidence is also frequently part of customer requirements, for example in audits under quality standards. Legal detail questions – in particular regarding liability theory in role chains – should be examined legally on a case-by-case basis. Procurement can act here as an information hub between suppliers, sales and quality.

Current developments and digital implementation

The PPWR becomes mandatory in stages over several years; harmonisation of labelling, recyclability assessment and data reporting is progressing. For buyers, this means: evidence requirements must be integrated proactively into ordering processes rather than supplied reactively upon authority enquiries.

Digitalisation of evidence management

Within a digital supply chain, Declarations of Conformity can be stored as documents in the supplier portal and automatically checked for validity. Interfaces to master data maintenance ensure that only released items are ordered. In electronic ordering processes, the PO flip can also be used to mirror evidence requirements directly into invoice and delivery note processes. Invoice clearing can be extended so that payments are only released with a complete set of evidence – a practically common leverage effect of payments.

Sustainability as a supplementary procurement criterion

The PPWR tightens recycled content targets and recyclability; many companies link this to their own sustainability requirements. Both topics can be consolidated into a joint requirement profile per commodity group. In tenders via a Request for Proposal (RFP) or a reverse auction process, conformity- and sustainability-relevant requirements should be specified as binding so that side offers remain comparable. Dynamic discounting can be used in combination to incentivise rapid evidence delivery – legal and tax details to be checked case by case.

Typical metrics

Metric	Typical value
Evidence coverage rate	> 98% *Proportion of procurement volume or active items with a valid PPWR Declaration of Conformity*

Average evidence age	< 24 months *Shorter is better; always request new evidence when packaging changes*
Evidence deviation rate	< 5% *Proportion of incomplete or incorrect declarations among all receipts; the lower the better*
Backorder rate due to compliance gaps	0% *Target value; values above zero indicate unresolved documentation gaps with critical suppliers*

Practical example

A medium-sized machinery manufacturer sources transport packaging, small plastic parts and finished bought-in assemblies from more than 80 suppliers, some from third countries. After initial customer enquiries about packaging regulation, the company found that only some packaging types were documented with valid Declarations of Conformity. Procurement then set up a structured evidence management system and linked it to existing processes.

- PPWR evidence as a mandatory field in every request for quotation and framework agreement
- Checklist for mandatory details and clarification of importer roles for direct imports
- Filing of declarations in the data model with validity status and automatic reminders
- Inclusion of documentation quality in the scoring model of supplier evaluation

Conclusion

For technical buyers, the PPWR Declaration of Conformity is more than a formal proof: it secures market access, reduces liability risks and is increasingly becoming a quality criterion in supplier evaluation. What matters are clear requirement documents, a structured check at goods receipt and audit-proof filing in item and supplier master data. Those who anchor evidence early in enquiries and contracts avoid later chasing stress and delivery stops. Supplementary key figures make the level of evidence manageable and reportable. Legal detail questions – such as roles and liability – nevertheless remain subject to examination on a case-by-case basis.

Frequently asked questions

? Who must issue the PPWR Declaration of Conformity?

Generally, the manufacturer of the packaging or the packaged product. For imports from third countries, the importer assumes its own obligations, including verifying that the manufacturer has properly carried out the conformity assessment. In multi-tier supply chains, clarifying roles between manufacturer, authorised representative, importer and distributor is crucial.

? What must a PPWR Declaration of Conformity contain?

Typical mandatory details include the name and address of the issuer, unambiguous identification of the packaging, the declaration of conformity with the PPWR, references to applied standards and the technical dossier, as well as place, date and signature. Buyers should check completeness, item reference and currency. The Regulation itself provides a specimen format.

? Is the PPWR Declaration of Conformity the same as the CE Declaration of Conformity?

No. The PPWR concerns packaging and packaging waste, whereas the CE Declaration of Conformity relates to product legislation such as the Machinery or EMC Directives. For machinery deliveries, both proofs may be required simultaneously. Buyers should therefore define the requirements separately for each subject matter.

? How long must the PPWR Declaration of Conformity be retained?

The Regulation requires that the technical dossier and the declaration remain available for a specified period after placing on the market; the exact duration depends on the applicable provisions. In practice, retention beyond the product lifetime has proven worthwhile, particularly because of customer and authority enquiries. The specific deadline should be verified on a binding, case-by-case basis.

? What happens if the Declaration of Conformity is missing or incorrect?

Market surveillance authorities can withdraw products from the market, order inspections and impose sanctions. In addition, there are contractual risks towards customers who demand their own compliance evidence. Procurement should therefore systematically identify missing documentation and prompt suppliers to provide it.

? How can procurement integrate PPWR requirements into existing processes?

Proven measures include embedding the requirement in requests for quotation and framework agreements, checking at goods receipt, audit-proof filing in the data model and including documentation quality in supplier scoring. Interfaces to parameter maintenance (MRP) can block order proposals lacking valid evidence. This creates a closed compliance loop.

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