

ImpactBuying[®]

PROVEN POSITIVE IMPACT

Webinar

Understanding PPWR

A deep dive into PPWR and
what it means for your business



Webinar etiquette

- You'll be automatically muted due to the size of the group.
- Please share your questions in the chat. We'll address them during the Q&A at the end of the webinar.
- Feel free to turn on your camera, we'd love to see who's joining.
- **The webinar is being recorded.**

Agenda

- Welcome
- Understanding PPWR and why it matters now
- The business risks and cost opportunities
- How can you prepare
- How ImpactBuying supports PPWR readiness
- Q&A

Company overview



Leontien Hasselman-Plugge
CEO
ImpactBuying



Brechtje Helderweirdt
Marketing & Events Lead
ImpactBuying



Rogier Verschoor
Impact Consultant
ImpactBuying

Expertise

17+ years of experience in
mapping over 350,000 global
supply chains

Europe-based

85+ expert leaders, across our
offices in Alkmaar, The Netherlands
and Düsseldorf, Germany

Recognition

ISAE3000 type II Verified,
ISO27001 Certified,
B Corporation

Who are we?

ImpactBuying is a **Decision Intelligence provider** that helps FMCG retailers and suppliers eliminate supply chain risks and **make better decisions** with verified, reliable data while ensuring compliance with ESG legislations and sustainability goals across the chain.

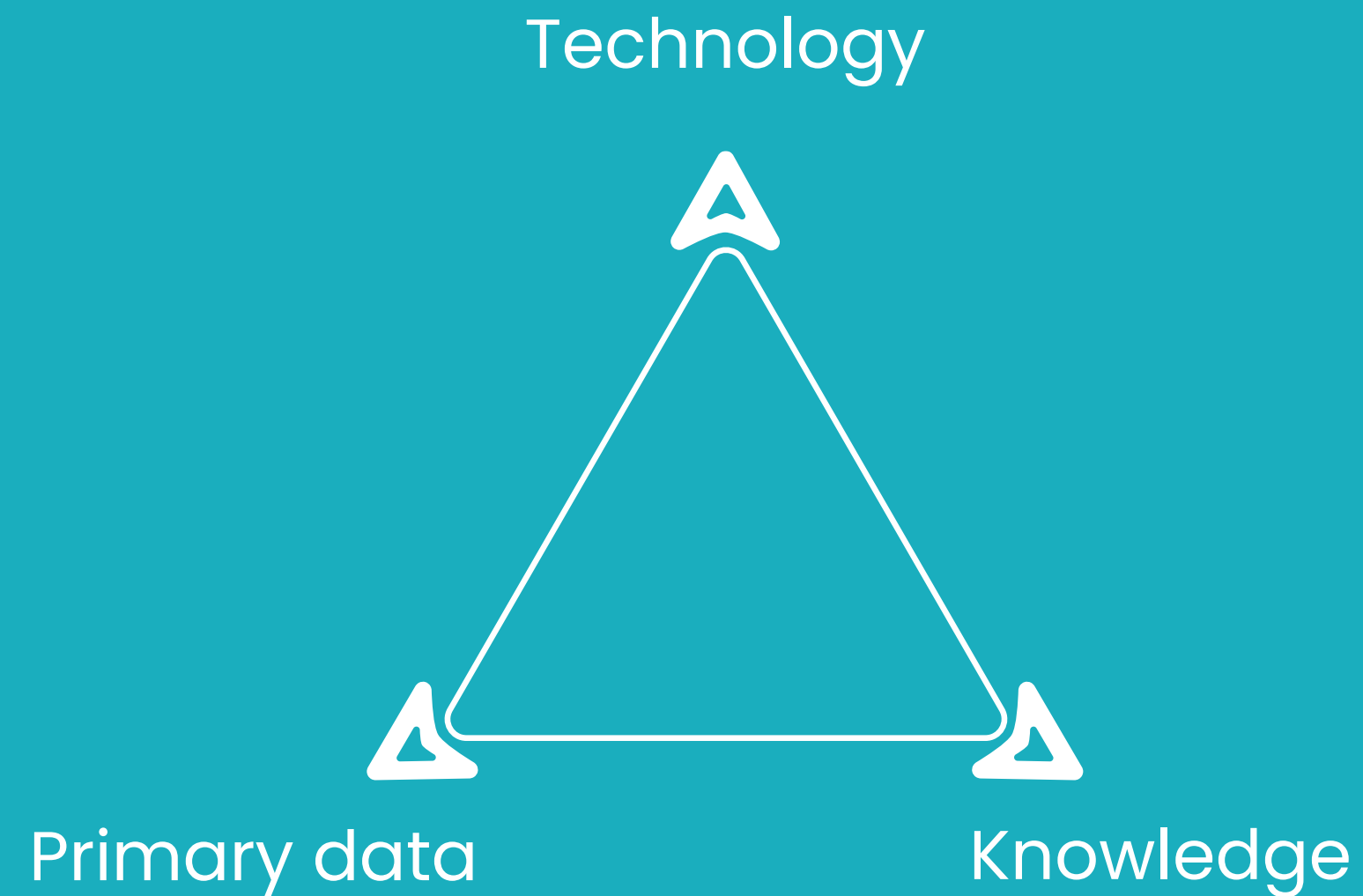
Ultimately, empowering them **to buy well and sell well.**



Our approach

We combine **technology, data and knowledge** to act as a trusted partner for our clients, knowing that sharing information and building trust always begins with human interaction.

Our native expert teams map supply chains through multiple tiers, applying always-up-to-date proprietary workflows that ensure **accuracy, consistency and are closely aligned with evolving requirements.**





What is PPWR and how does it affect you?

Why is PPWR a business urgency

- The PPWR (Packaging and Packaging Waste Regulation) **replaces the PPWD** (Packaging and Packaging Waste Directive). As regulation, PPWR comes with eventual **company fines or packaging bans in case of violation of the law**.
- PPWR is to be implemented as of **12 August 2026** for the **EU as a whole**.
- PPWR aims to **enhance packaging sustainability** and to **reduce packaging waste** in the EU, thus accelerating a circular packaging sector.
- PPWR aims to **harmonise the internal EU market regarding standards and norms** for packaging and packaging waste.
- PPWR introduces the **legal obligation to declare conformity of packaging** and have the evidence to prove it.



EU legislative context

EU Circular Economy Action Plan & EU Green Deal identified packaging as priority area for action

PPWR comprises such action integrating both packaging and packaging waste

EU Waste Framework Directive introduced the Extended Producer Responsibility (**EPR**)

EPR makes producers pay waste management fees in an EU country for packaging placed on its market

Linking PPWR & EPR

- PPWR defines requirements for packaging considering its entire lifecycle.
- Waste management fees are differentiated as per the same requirements.
- The better & earlier requirements are met, the more can be saved on fees.

→ **Investment in PPWR pays off!**

Waste management remains a national matter within EU (per country)

PPWR's pillars

The regulation is built on fundamental pillars:

- Reducing substances of concern
- Improving reuse, recyclability, and composting
- Minimising packaging waste
- Accountability for packaging throughout its lifecycle (EPR)

Requirements are introduced for **packaging design** (Design for Recycling), for use of **recycled content** (mandatory minimum percentages in plastic packaging), for **materials & labelling**.

Requirements get stricter over time (**2026 – 2028 – 2030 – 2040**)



What packaging is in scope?

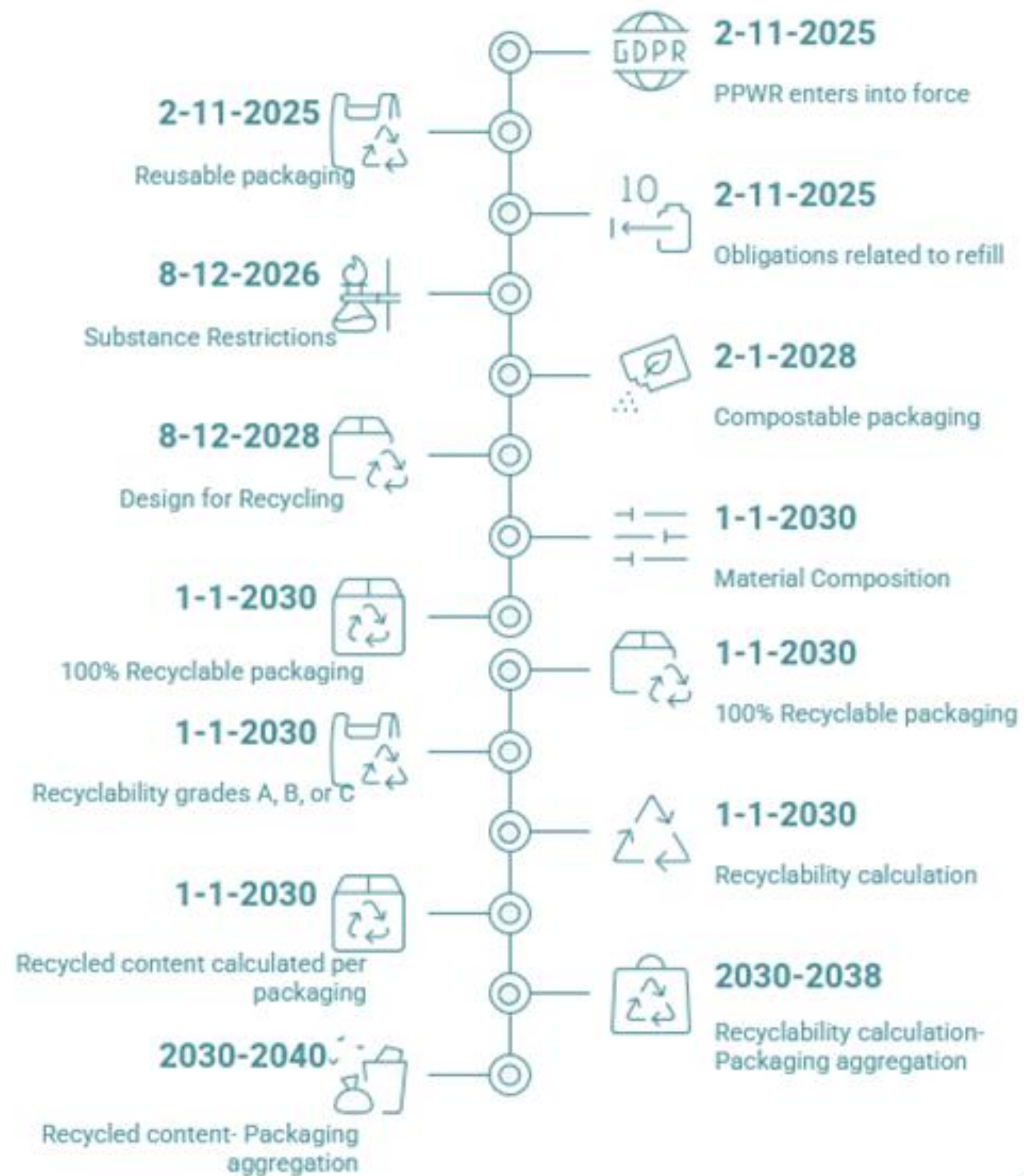
- **All packaging placed** on the EU market.
- Any type, size, # components, material, application, label, # layers, single use / multiple use, etc.
- From primary production packaging to sales packaging, and from grouped packaging to e-commerce packaging, and all in between.

Different packaging comes with different legal requirements

What companies are in scope?

- **All companies** that place packaging on the **EU market**
- Suppliers of packaging components, A-Brands, private label owners, wholesalers, retail shops, online sales etc.
- **Reduced requirements for micro-enterprises**
(<10 FTE and $< 2\text{M}$ Euro annual turnover or $< 2\text{M}$ Euro balance sheet total)
- Even packaging suppliers and manufacturers from **outside the EU**

Companies with multiple packaging may have multiple roles in the packaging chain which may come with multiple legal obligations



PPWR comes with a timeline

PPWR is to be implemented as of **12 August 2026**; from that day:

- each packaging system must have a Declaration of Conformity (DoC) with technical dossier (supporting data & documentation)
- packaging must meet requirements on substances of concern (PFAS & heavy metals), and reuse

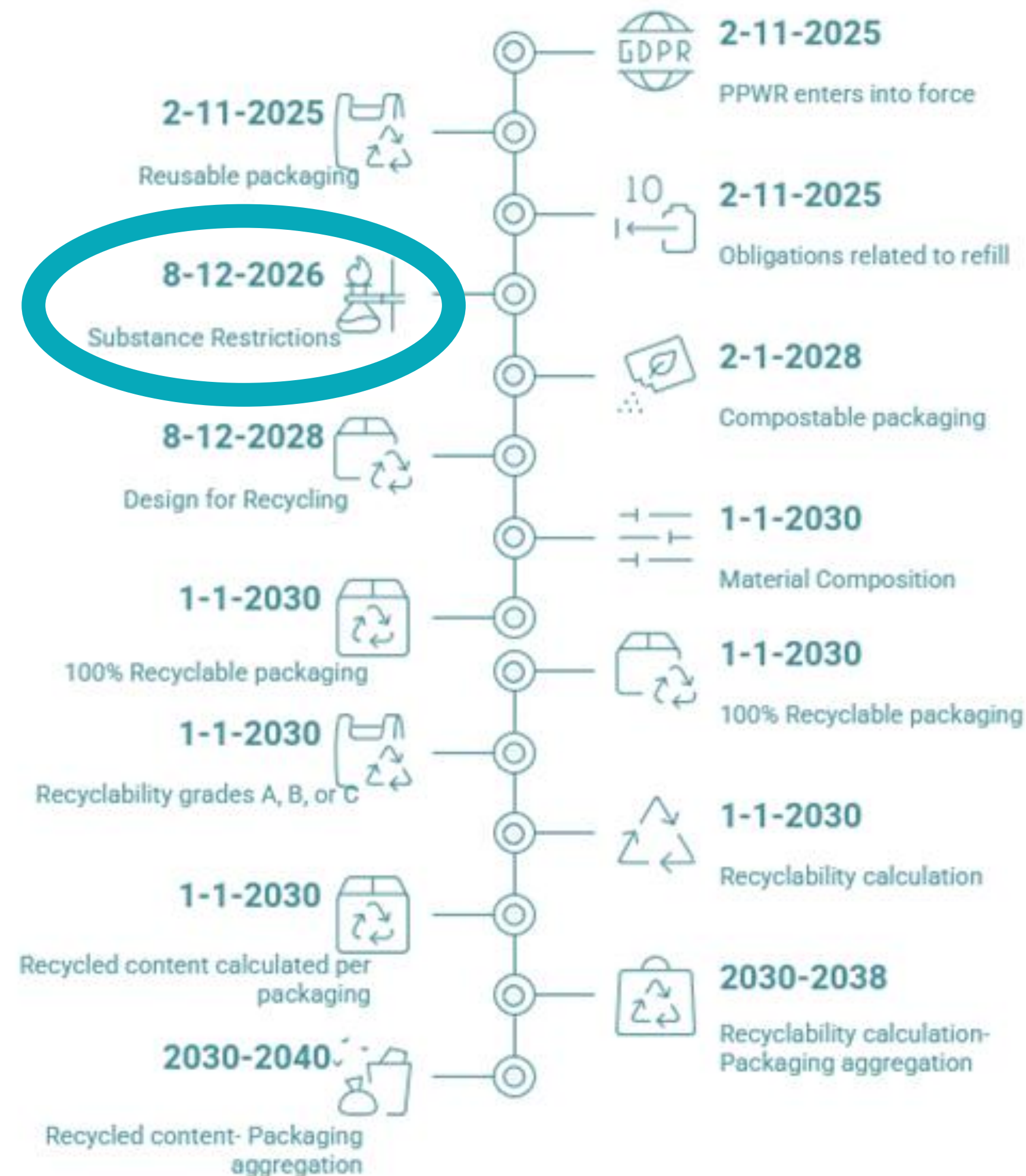
By **2028**, requirements on compostable packaging and design for recycling are introduced

By **2030**, requirements on recyclability grades, recycled content, and ban on single-use plastics are introduced (amongst others)

Preparing for PPWR cannot wait; time is running short

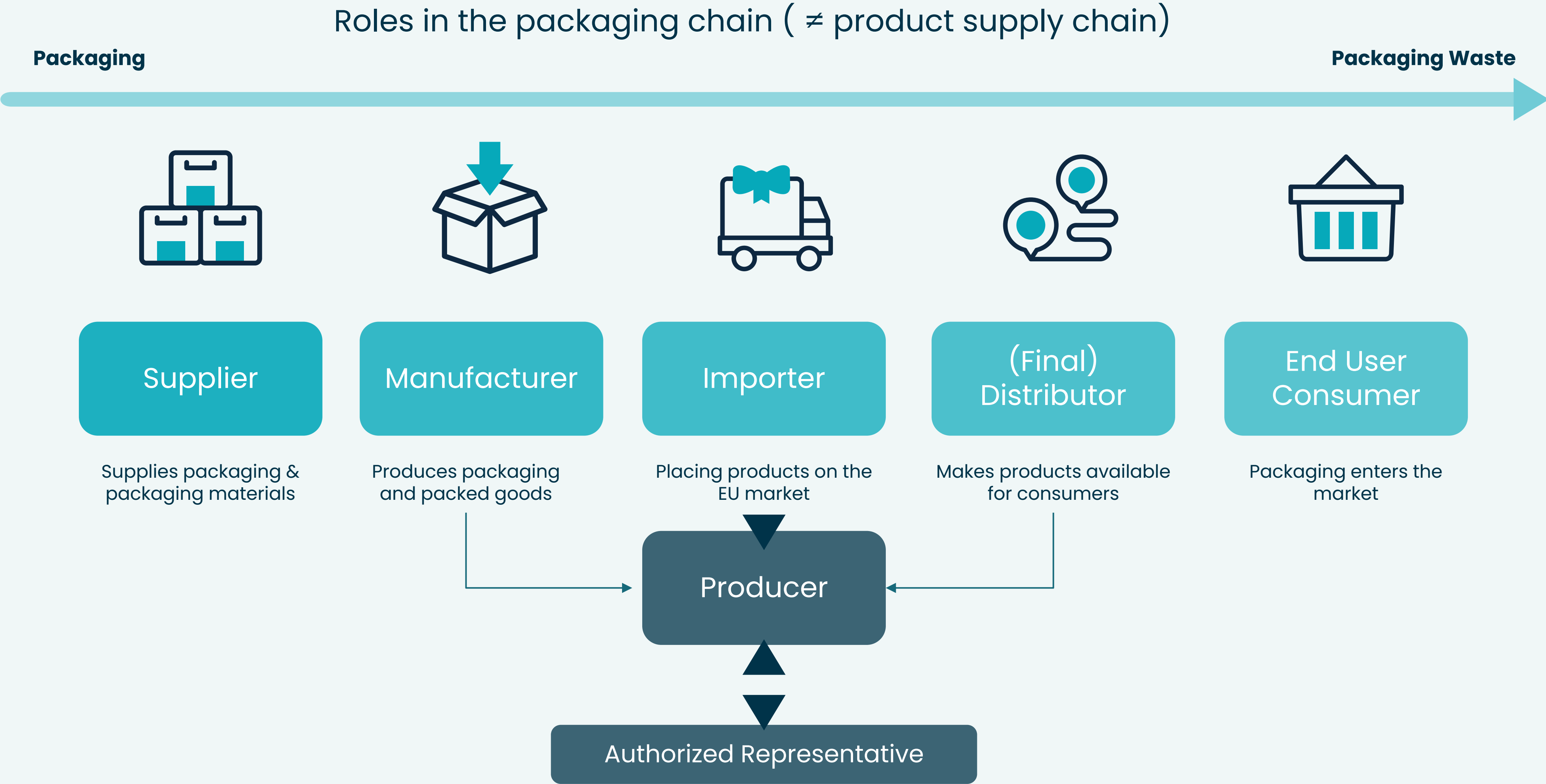
PPWR priorities 2026

Preparing for PPWR cannot wait, so set your 2026 priorities:



- Declaration of Conformity (DoC) of all packaging systems with supporting technical dossier
 - substances of concern (PFAS & heavy metals)
 - reuse
- Collection of data per packaging system and/or packed product incl. supporting test & lab results
- Data management system
- Identification of packaging

PPWR roles & obligations



PPWR roles: Supplier

- Company supplying packaging or packaging materials to manufacturers (i.e. components, partial or complete packaging)
- Both from EU and non-EU

Supplier's obligations

- Legal responsibility to provide technical data & documentation on its packaging and packaging materials to manufacturer



PPWR roles: Manufacturer

- Company designing and/or deciding packaging or packed product to be sold in the EU under its own name or trademark
- Both from EU and non-EU

Manufacturer's obligations

- Assess conformity of complete packaging to PPWR
- Ensure required technical data & documentation (take tests if needed)
- Draw up a Declaration of Conformity (DoC) per packaging
- Keep the DoC with its supporting documentation
 - For 5 years for single-use packaging + 10 years for reusable packaging
- Ensure correct identification on the packaging
 - Provide packaging identification + manufacturer's identification

PPWR roles: Manufacturer (2)

- Decides on the packaging: what design, material, format, colour, layers, sizes etc.
- Another company may do the actual production of the packaging, filling or packing on behalf of manufacturer
- If you decide to add another packaging layer, you are manufacturer of that layer

PPWR roles: Importer

- Company importing packaging or packed product from a non-EU manufacturer and placing it on the EU-market for the first time
- From EU

Importer's obligations

- Verify manufacturer's DoC and supporting data & documentation
- Keep manufacturer's DoC with supporting data & documentation for:
 - 5 years for single-use + 10 years for reusable packaging
- Ensure correct identification on the packaging
 - Verify the packaging identification + manufacturer's identification
 - Provide importer's identification



PPWR roles: Distributor

- Company buying packaging or packed product from an EU-based manufacturer, importer or distributor, and selling it B2B on the EU-market
- From EU

Distributor's obligations

- Verify correct identification on the packaging
 - Packaging identification + manufacturer's identification
 - Importer's identification (if applicable)
- Report to the authorities in case of substantiated concerns

PPWR roles: Final Distributor

- Company buying packaging or packed product from an EU-based manufacturer, importer or distributor, and selling it to an end user or consumer on the EU-market
- From EU

Final distributor's obligations

- Verify correct identification on the packaging
 - Packaging identification + manufacturer's identification
 - Importer's identification (if applicable)
- Report to the authorities in case of substantiated concerns
- If sales area is > 400 m², must work towards dedicating 10% of sales area to refill stations by **2030** (food / non-food)

PPWR roles: Fulfilment service provider

- Company providing (re)packaging along with other logistical services such as handling, warehousing, addressing or dispatching
- From EU

Fulfilment service provider's obligations

- no actual obligations as it does not design, own nor decide on packaging
- declares and pays for packaging that it unpacks if that packaging is not declared and paid for by another company in the country where the fulfilment service provider is registered

From packaging..

to packaging waste.



Supplier

Supplies packaging & packaging materials

Manufacturer

Produces packaging and packed goods

Importer

Placing products on the EU market

(Final) Distributor

Makes products available for consumers

End User Consumer

Packaging enters the market

Producer

Authorised Representative



From packaging requirements...

to payment as producer of (future) packaging waste.

National level PPWR obligations: extended producer responsibility



EPR arranged at the
national level:

may change from
EU country to EU country.

National level PPWR obligations: extended producer responsibility

Per EU country

- taking responsibility as “packaging waste producer”
- payment for packaging waste management
- manufacturers, importers, (final) distributors can be such producers
- pay for bringing packaging for the first time on an EU country’s market
- you may have responsibility to pay in your country of registration as well as in the country where you sell directly to end users and/or consumers

Per packaging, packed product or packaging component

- differentiated fee structure: based on weight, volumes, materials, type, colour, label, use of recycled content, recyclability etc. (“packaging specifications”)
- requires detailed data collection, verification & management

PPWR should be on top of your priority list this year

- Know your packaging systems
- Know your packaging role(s) and corresponding obligations
- Collect packaging data: what, with whom, how, do the chasing
- Establish conformity of packaging systems (DoC + technical dossier)
- Develop data management system:
 - 5 years for single-use packaging
 - 10 years for multiple-use packaging
- Design your packaging for minimisation of waste management fees

PPWR obligations: priorities for 2026

	Packaging Manufacturer	Packaging Importer	Packaging (Final) Distributor
 Declaration of Conformity (DoC) + Technical dossier (TD)	→ Collect packaging data → Assess conformity → Take tests if needed → Draw up DoC → Keep DoC + TD	→ Verify manufacturer's DoC + TD → Keep DoC + TD	→ N.A.
Identification	→ Provide identification: packaging & manufacturer	→ Verify identification: packaging & manufacturer → Provide importer identification	→ Verify identification: packaging, manufacturer, & importer (i.a.)
 Waste management fees (above threshold)	→ If producer, declare & pay	→ If producer, declare & pay	→ If producer, declare & pay

PPWR should be on top of your priority list this year (2)

- PPWR is not some future compliance topic but an operational transformation that you need to act on now
- PPWR introduces obligations starting in 2026, with gradually stricter requirements through 2028, 2030, 2035, and 2040
- Preparation requires time, accuracy and engagement with your packaging chain

How ImpactBuying supports your PPWR readiness

Materials used in packaging parts

Primary packaging

AutoSave Standard test primary packaging V2

	ID	Packaging components	Amount * (pieces)	Weight * (g per piece)	Material layers	Material group	Material	Color	Thickness	Share of mass (%)	Material certification	Certification number
	301831	Tray	1	21.5	Mono	Rigid plastic	PET	Transparent		100 %		
	301835	Foil	1	11	Multi	Flexible plastic	PET	Transparent		0 %		
	301837					Flexible plastic	LDPE	Transparent		0 %		
	388112									0 %		
	301841	Sachet	1	4	Mono	Rigid plastic	PET	Transparent		100 %		

Total weight of primary packaging: (grams)

132.9

Total primary packaging

Recyclable?	Recyclable %	Recyclable %
--Select--	0 %	

Industrial compostable?	File
--Select--	Please upload evidence that the file is compostable

Reusable packaging?	File
--Select--	Please upload evidence that the file is reusable

Fill rate: empty space %	
0 %	

Is there food-contact?	Evidence file(s)
--Select--	PFAS: Please upload evidence that the packaging meets PFAS targets BPA: Please upload evidence that the packaging meets BPA targets Heavy Metals: Please upload evidence that the packaging meets heavy metals targets

Packaging is

- An opportunity to really make a positive impact on the environment
- An opportunity for a major Rol
- A great focus to bring financial and sustainability goals together

From operational problem to legal liability

The operational reality

Companies continuously **collect, validate, structure, and update** packaging data across their entire supplier base.

Pain point: most customers lack a solid packaging system and component data, while most suppliers are not yet able to provide technical documentation...

Legal liability

- Compliant packaging for each product
- Documented evidence per package
- Declarations of conformity that are timely, accurate, and complete
- Audit-ready at all times
- Durable under regulatory supervision



The real pain is that data is scattered.

**So, teams rekey info, lose confidence,
and miss incentives.**

**While they should be improving
products and packaging...**

This is how we solve your problem

1. **Full understanding** of your packaging portfolio, roles and responsibilities with concrete action plan through **Half-day scan**
2. **Manage and monitor packaging data and necessary evidence**
2026: Central data collection from the 1st and lower tiers (packaging manufacturer)
3. **Generate DoCs** – Declarations of Conformities
4. **Choose the support you want to get it done:** for packaging data gathering and evidence verification
5. **Calculations of recyclability** on demand – pilot 2026 – 2027
6. Data you can trust for **EPR calculations EU countries**

john_doe_supplier

My account

Home

Suppliers

Activities

Modules

Reporting

Admin

Settings

SIN admin

Data quality

Message board

My specifications

Packaging Settings

Communication

My account

Home / My specifications / Specification

Notification icon

UK

Log out

ImpactBuying

Specification: Orange juice 1L/12 bottles

Producer: Supplier X (ALKMAAR) Producer

Language: English

Status General: Approved by client and supplier

Client group member(s): x

Version: 1 (current)

EAN: 1234567890

Supply Chain

General

Ingredients

Composition

Allergens

Nutrition

Mandatory labeling

Parameters

PackagingV2

Q. Terms

Uploads

DoC Files

Results

Printing specifications

Last comment made on 12-3-2026 by John Doe

Need help

Packaging information

Legal requirements

Compliance text

All packaging materials which are in direct contact with or reasonably expected to be in contact with food comply with the regulation (EC) No 1935/2004. The packaging material complies with all harmonized European Commission framework directive, for example (EU) No 10/2011 for plastic materials.

All packaging materials are produced according to regulation (EC) No 2023/2006 on Good Manufacturing Practice for materials and articles intended to come into contact with food.

All packaging materials comply with the directive (EC) No 94/62 on packaging and packaging waste.

All packaging materials comply with the regulations (EC) No 1907/2006 REACH and (EC) No 2019/1021 POPs.

All packaging materials comply with the directive (EC) No 2023/08 on packaging and packaging waste.

Remarks

Approval

Yes

Yes

Yes

Yes

Select

✓

✓

✓

✓

✓

✗

✗

✗

✗

✗

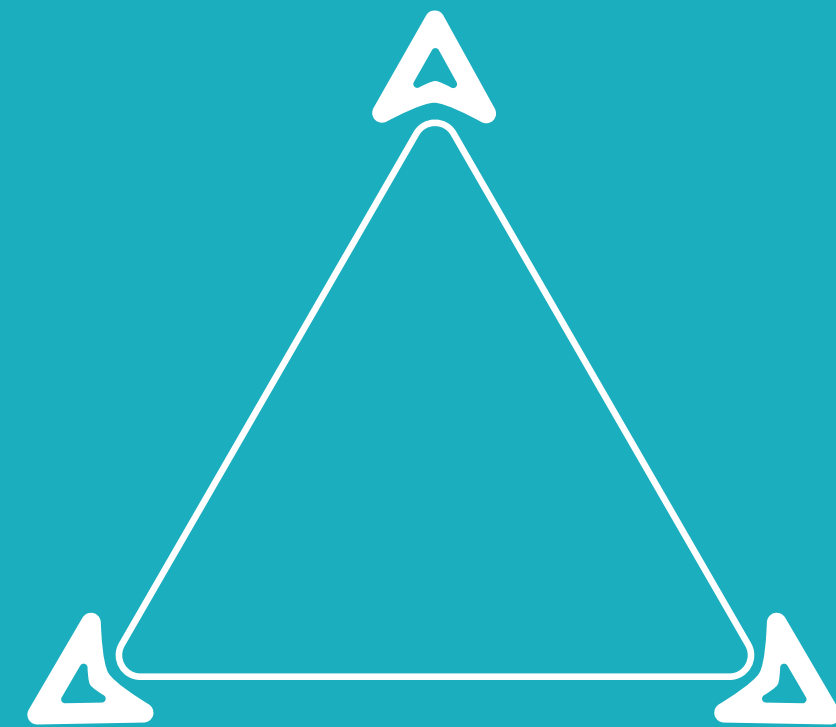
Generic information

DESCRIPTION

REMARKS

APPROVAL

Different Packaging

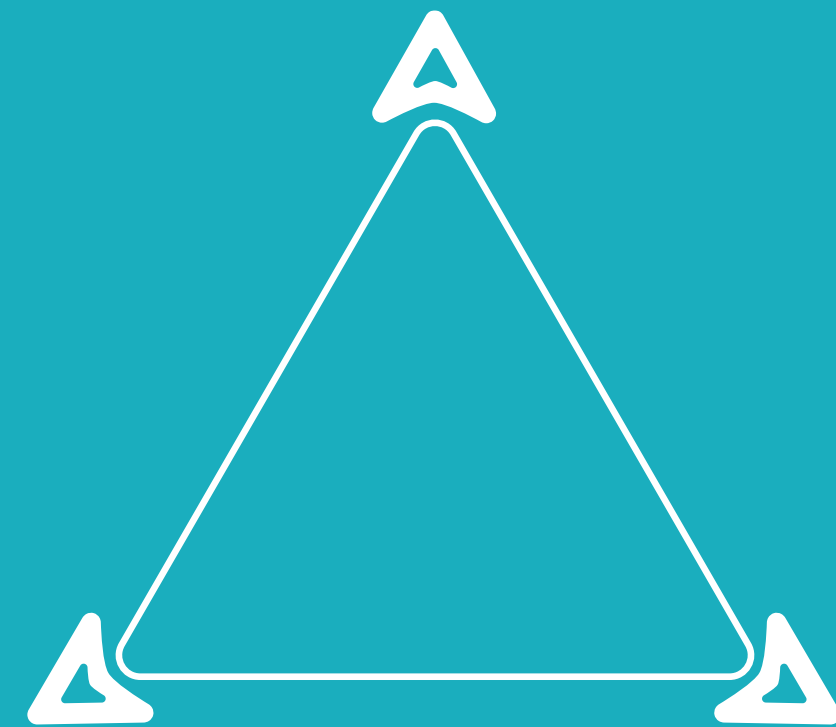


Reusable
Components

Reusable
Materials



Different
Packaging



Reusable
Components

Reusable
Materials

Spray Trigger —

SKU: PCKG-19284-20155

Supplier: Silgan Dispensing

Materials: 4

Compliance: 

Bottle —

SKU: PCKG-15661-12356

Supplier: Berry Global Plastics

Materials: 2

Compliance: 

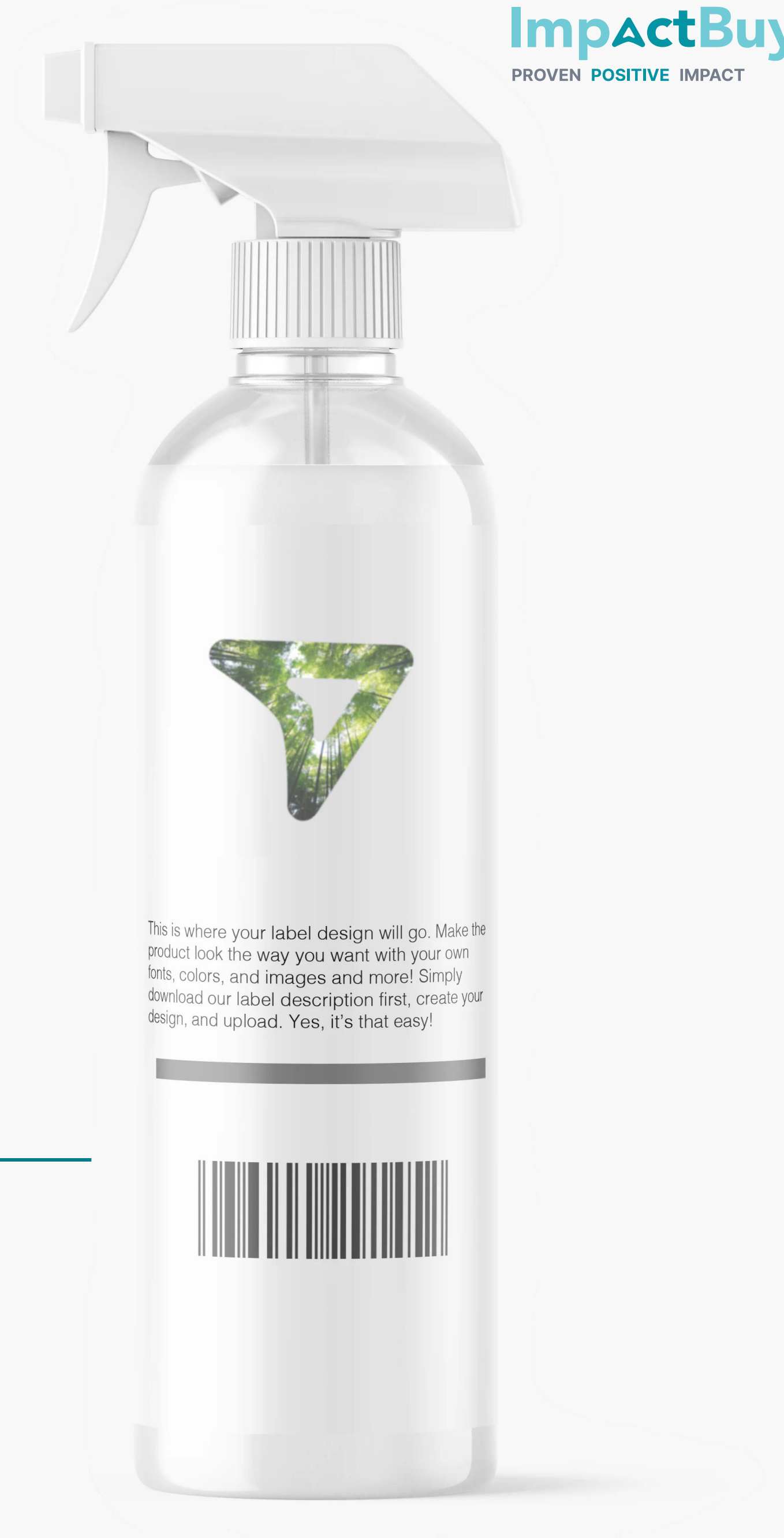
Label —

SKU: PCKG-91288-66715

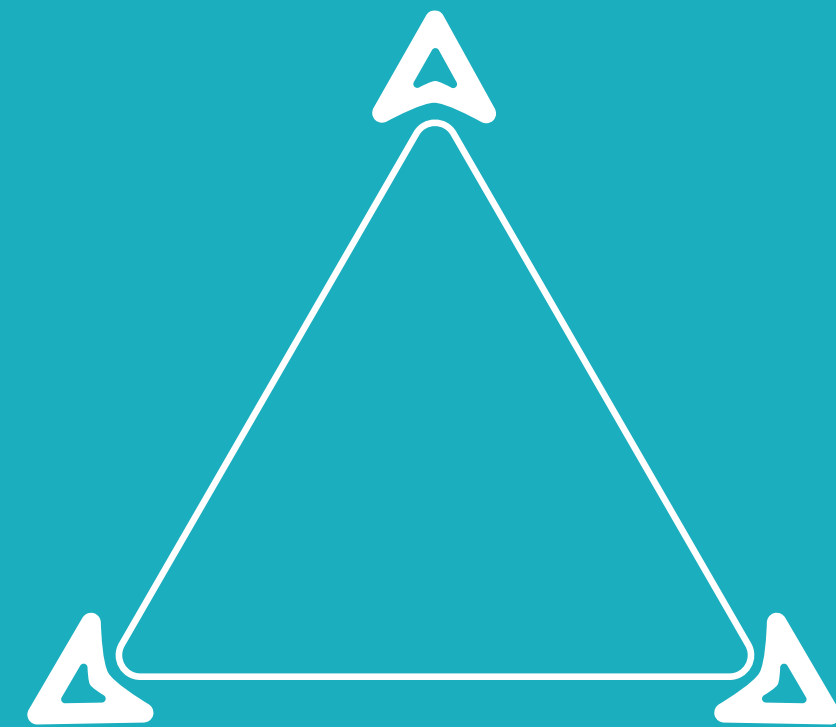
Supplier: CCL Industries

Materials: 3

Compliance: 



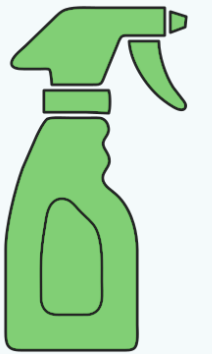
Different
Packaging



Reuseable
Components

Reuseable
Materials

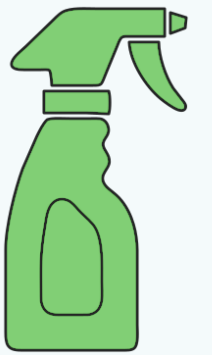
Detergent White:



Detergent Red:



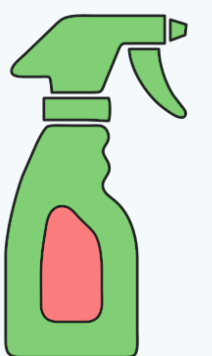
1 Update



Detergent Purple:



Detergent Green:





- ▶ Packaging Systems
- ▶ Components
- ▶ Materials
- ▶ Evidence
- ▶ Suppliers

Services – half day Consultancy

Services: Half-day Consultancy

- ✓ **Gap analysis:** your company's status vs. regulation requirements across your full portfolio
- ✓ Assist in **mapping and classifying** your packaging assortment to be sure all requirements are met for each packaging
- ✓ Determine your company's **role and subsequent obligations** (for packaging and for packaging waste under EPR)
- ✓ Develop a **data collection strategy** and tools

PPWR scan 2026

1. Mapping packaging; type/components/combinations
2. Identifying P-role per package (role in packaging chain)
3. Identifying PW-role per package (EPR regarding packaging waste)
4. Linking P-role per package to obligations
5. Linking PW-role per package to obligation or EPR
6. Setting 2026 priorities in P-role: packaging manufacturer
7. Setting 2026 priorities in PW-role (EPR): packaging with high remittance
8. Creating format for collecting DoC data

AI- based verification for scale and humans for trust

Data services

- Central data collection from the 1st and lower tiers (packaging manufacturer)
- Automated data requests
- Flexible support team to collect data
- AI-based Verification of data points and evidence submitted by the suppliers
- Calculations of recyclability based on trusted data
- Real time compliance overview

Manual processes alone cannot manage packaging data at scale or keep pace with evolving regulatory requirements

Market Guide for Packaging and Product Specification Management

18 September 2024 - ID G00779780 - 18 min read

By: John Blake, Marc Halpern

Initiatives: [Digital Supply Chain Value Realization](#); [Data Management Solutions](#); [New Product Development](#); [R&D Function Strategy and Management](#); [Supply Chain Leadership](#)

Specification management applications enable data governance, reporting and legislative compliance for packaging, ingredients, components and finished goods. Supply chain technology leaders can use this guide to address data management gaps, improve practices and manage legislative reporting.

Download
the PPWR
Whitepaper



➤ **Whitepaper PPWR** continuously updated & public

Feedback from Gartner : “very comprehensive and ahead of the market in completeness of the offering. From research to collecting data, verifying, reporting and improving over time”

Market Guide for Packaging and Product Specification Management

27 October 2025 - ID G00830878 - 11 min read

By: John Blake

Initiatives: [Digital Supply Chain Value Realization](#)

Global legislation exposes compliance risks and cost issues due to outdated product and packaging specification data management. Supply chain technology leaders faced with data governance challenges can utilize this Market Guide to improve practices and manage legislative reporting requirements.

Q&A

We support you at every step of your PPWR journey.

- ✓ Half-day scan
- ✓ Generate DoCs ready for signing based on existing packaging data
- ✓ Collect the necessary evidence for 2026
- ✓ Get support with collection and verification if needed
- ✓ Recyclability calculations
- ✓ EPR calculations



PROVEN POSITIVE IMPACT

Thank you.

More questions? Get in touch!

- **Clients:** Reach out to your Customer Success Manager
- **Non-clients:** We would love to hear from you at info@impactbuying.com

