



# SEFA Information on PPWR compliance



#### **Legal Notice / Disclaimer**

This document is intended to serve as a guide for SEFA members on who is responsible for generating and communicating relevant information regarding the requirements of the PPWR, and which documents need to be prepared.

This guide is for information purposes only, is not binding and does not replace either the PPWR or other legal requirements. It reflects the current state of knowledge regarding the PPWR, as the Regulation still requires further clarification in some areas through delegated acts, implementing acts and interpretative guidance from the European Commission and national authorities.

The guide does not constitute legal advice. Each member company is solely responsible for complying with the applicable legal provisions.

No liability is accepted for the accuracy, completeness or timeliness of the information provided.

Only the official text of the PPWR provides binding legal certainty.

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## Table of contents

<b>Table of contents</b> .....	<b>3</b>
<b>Foreword</b> .....	<b>4</b>
<b>1 Who is responsible for what and what needs to be done?</b> .....	<b>4</b>
1.1 Which economic operators are involved in the supply chain? .....	4
1.2 What different types of packaging are there? .....	5
1.3 Role of SEFA member companies in relation to different types of packaging .....	6
1.4 Which economic operator has which obligations? .....	7
1.4.2 Obligations of manufacturers (PPWR Art. 15) .....	7
1.4.3 Obligations of importers (PPWR Art. 18) .....	7
1.4.4 Obligations of distributors (PPWR Art. 19).....	7
1.6 What needs to be done? .....	8
1.7 Summary .....	9
<b>2 What is a declaration of conformity</b> .....	<b>10</b>
2.1 General information on the PPWR declaration of conformity .....	10
2.2 What is required to issue a declaration of conformity?.....	10
2.3 Which requirements are known to date? .....	11
2.3.1 Substances of concern (Art. 5 (1)).....	11
2.3.2 Heavy metal limits (Art. 5(4)) .....	11
2.3.3 PFAS limit values for food-contact packaging (Art. 5 (5)).....	11
2.3.4 Minimum recycled content in plastic packaging (Article 7) .....	13
2.3.5 Biobased feedstock in plastic packaging (Article 8) .....	13
2.3.6 Compostable packaging (Article 9).....	13
2.3.7 Reusable packaging (Art. 11) .....	13
2.3.8 Existence of a reuse system (Article 26).....	14
2.4 What is known about requirements that will apply in the future? .....	14
2.4.1 Recyclable packaging (Article 6) .....	14
2.4.2 Packaging minimisation (Article 10).....	14
2.4.3 Labelling of packaging (Article 12).....	15
2.5 What must the PPWR declaration of conformity contain? .....	16
<b>3 Examples of documents</b> .....	<b>16</b>
3.1 Template for information from suppliers to the manufacturer (Version 01/2026).....	16
3.2 Manufacturer's technical documentation.....	21
3.3 Template for a Declaration of Conformity for Manufacturers (Version 01/2026).....	21
<b>4 Questions and Answers</b> .....	<b>23</b>
4.1 Examples of enquiries and possible answers (Version 01/2026) .....	23

## Foreword

To keep the scope of this document manageable, the focus is exclusively on the requirements that the various economic operators must fulfil in accordance with the Regulation (EU) 2025/40 (PPWR)<sup>1</sup> with regard to the provision of information, technical documentation and the declaration of conformity.

The guide is intended to assist SEFA members in fulfilling their obligations. This applies both to the information obligations that SEFA members must fulfil as packaging suppliers and to their obligations as users of grouped packaging and transport packaging.

Although the PPWR came into force in 2025, certain requirements relating to compliance still need to be clarified and will only apply at a later date. Until then, the relevant provisions of the Packaging and Packaging Waste Directive (PPWD) remain in force. This guide refers to this where appropriate.

The requirements for economic operators described in the PPWR beyond the topic of compliance are not covered by this document. The SEFA will provide its members with further documents focusing on other relevant topics in due course.

## 1 Who is responsible for what and what needs to be done?

### 1.1 Which economic operators are involved in the supply chain?

The PPWR defines various economic operators in the packaging supply chain, each of whom is responsible for compliance with the various requirements for packaging:

- **Supplier (Art. 3(1), point 16)**
  - supplies packaging or packaging material to a manufacturer
- **Manufacturer (Art. 3(1), point 13)**
  - develops or manufactures packaging or packaged products themselves, or has them developed or manufactured under their own name or brand
  - there is always only one manufacturer!

It is important that the packaging is complete, i.e. that it includes all associated components. If this is not the case, it is still considered packaging material and the party producing it is classified as a supplier.

Please note the exception:

If

- the manufacturer is a micro-enterprise (no more than 10 employees and an annual turnover of EUR 2 million) and the supplier is established in the same Member State as this manufacturer,
- only the supplier's brand is visible to the end user,

then the packaging supplier is the manufacturer!!!

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<sup>1</sup> [Regulation \(EU\) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation \(EU\) 2019/1020 and Directive \(EU\) 2019/904, and repealing Directive 94/62/EC](#)

- **Importer Art. 3(1), point 17)**

- places packaging from a third country (outside the EU) on the market within the EU

- **Distributor (Art. 3(1), point 18)**

- sells (filled) packaging further down the supply chain on the market (within the EU)

- **Producer (Art. 3(1), point 15)**

- One of the three economic operators (manufacturer, importer or distributor) who first makes the packaging available on the market in a Member State
- Manufacturer, importer or distributor may therefore also be producer, unlike the supplier

## 1.2 What different types of packaging are there?

In addition to the economic operators, it is also important to clarify what type of packaging is involved in each case. Depending on whether it is sales, secondary or transport packaging, this results in different obligations for the economic operators.

Definitions under the PPWR (Regulation 2025/40)	Examples
<b>Sales packaging (Art. 3(1), point 5):</b> Packaging conceived so as to constitute a sales unit consisting of products and packaging to the end user at the point of sale;	Packaging produced by <b>SEFA members (drums)</b>
<b>grouped packaging (Art. 3(1), point 6):</b> Packaging conceived so as to constitute a grouping of a certain number of sales units at the point of sale, irrespective of whether that grouping of sales units is sold as such to the end user or whether it serves as a means to facilitate the restocking of shelves at the point of sale or to create a stock-keeping or distribution unit, and which can be removed from the product without affecting its characteristics;	Any <b>cardboard packaging</b> used for transport and for the formation of storage or distribution units, provided that it contains more than one sales packaging
<b>Transport packaging (Art. 3(1), point 7):</b> Packaging conceived so as to facilitate the handling and transport of one or more sales units or a grouping of sales units, in order to prevent damage to the product from handling and transport, but which excludes road, rail, ship and air containers;	The <b>stretch film, strapping or pallets</b> used for transport

To clarify which economic operator is the manufacturer in the case of packaging, the following criteria may be used:

- Who sets the design specifications for the packaging and, where applicable, applies their brand to the packaging?
- At what point is packaging considered complete?
- Who carries out the final processing steps (filling and sealing) and first makes the complete packaging/packaged product available on the EU market?

Accordingly, the following applies:

- If an economic operator determines the design specifications for sales packaging and, where applicable, applies its brand to the packaging, it is usually the manufacturer. If it fills the sales packaging or has it filled on its behalf, this also makes it the manufacturer, as in the case of sales packaging, the packaging is only considered complete after filling and sealing. In the case of sales packaging, the brand owner or filler is therefore generally the manufacturer.

- In the case of grouped packaging, too, the economic operator that sets the design specifications or initiates the supply chain by filling the packaging is regarded as the manufacturer.
- In the case of transport packaging bearing a company-specific trademark, the owner of that trademark is the manufacturer of the packaging.
- In the case of transport packaging without a company-specific trademark, a distinction must be made as to whether:
  - they take their final form when filled (this is usually the case with flexible packaging). In this case, the supply chain also begins with the filling process (of the complete, empty packaging). The manufacturer is the company that uses, for example, stretch film and strapping
  - they are already in their final form (this is usually the case with form-stable packaging). In this case, the supply chain begins with the complete, empty packaging. The manufacturer is the company that, for example, produce the pallets.

### 1.3 Role of SEFA member companies in relation to different types of packaging

In practice, SEFA member companies can play different roles as economic actors, depending on where in the supply chain they operate and for which packaging. The following scenarios are conceivable:

a) Supplier:

- for the sales packaging produced, which is delivered empty to a manufacturer (brand owner or filler)

b) Manufacturer:

- when using cardboard boxes as grouped packaging, which are filled by SEFA members to form storage or distribution units with the empty packaging produced
- when using transport packaging that:
  - bear the company's logo (name, brand name), or
  - only take their final form when filled (e.g. stretch film, strapping)

c) Distributors:

- when using transport packaging that
  - are not marked with their company logo ('standard' transport packaging), and/or
  - are already in their final form (e.g. pallets)

**As each economic operator has different obligations regarding the declaration of conformity under the PPWR, it is very important to first define which economic operator one is for the packaging in question.**

## 1.4 Which economic operator has which obligations?

The PPWR sets out the respective obligations for the different economic operators. With regard to the declaration of conformity, these are as follows:

### 1.4.1 Obligations of suppliers (PPWR Art. 16)

Under the PPWR, suppliers of packaging or packaging materials are obliged to provide the manufacturer with all the information and documentation necessary to demonstrate the conformity of the packaging and the packaging materials with PPWR. The information and documentation must be provided in one or more languages that the manufacturer can easily understand and must be submitted either on paper or in electronic form.

### 1.4.2 Obligations of manufacturers (PPWR Art. 15)

Manufacturers bear primary responsibility for compliance with the 'sustainability requirements' set out in Articles 5 to 12 and shall place on the market only packaging that meets these requirements. They must provide evidence of this by means of so-called declarations of conformity.

Before placing the packaging on the market, the manufacturer must:

- carry out or have carried out a conformity assessment procedure in accordance with Article 38,
- draw up technical documentation in accordance with Annex VII,
- issue an EU declaration of conformity in accordance with Article 39, provided that it has been demonstrated that the packaging meets the applicable requirements

Manufacturers must also ensure:

- the identification of the packaging, e.g. by means of type, batch or serial numbers
- providing the manufacturer's details: name/registered trade name/trademark, as well as postal address and, where applicable, electronic contact details (email) on the packaging or via a QR code
- that the information provided is clear and legible.

### 1.4.3 Obligations of importers (PPWR Art. 18)

Importers shall only place packaging on the market that complies with the 'sustainability requirements' set out in Articles 5 to 12.

Before placing the packaging on the market, the importer shall ensure that:

- the conformity assessment procedure in accordance with Article 38 has been carried out and the technical documentation in accordance with Annex VII has been drawn up by the manufacturer
- the packaging has been correctly labelled in accordance with Article 12
- all necessary documents are attached
- the packaging has been identified, for example by type, batch or serial numbers
- the details of the manufacturer or importer are provided

### 1.4.4 Obligations of distributors (PPWR Art. 19)

Distributors have a duty of care regarding the packaging they supply.

Before placing the packaging on the market, the distributor shall ensure that:

- the responsible producer (the company responsible for extended producer responsibility) is registered in the producers register

- the correct labelling has been carried out in accordance with Art. 12
- the packaging has been identified, for example by type, batch or serial numbers
- the details of the manufacturer or importer are provided

It can be inferred from the distributor's obligations that this can only apply to filled packaging. Consequently, a trader in empty packaging is not a distributor, but also a supplier of packaging!

### 1.5 Who is responsible for the conformity of packaging?

The manufacturer is responsible for the conformity of the packaging. They must demonstrate conformity on the basis of a conformity assessment procedure and the technical documentation and issue a declaration of conformity for each packaging.

### 1.6 What needs to be done?

SEFA members should carry out the following steps:

- **For the empty sales packaging they have produced and are supplying to a manufacturer:**
  - Request relevant information (see Chapter 2) from raw material suppliers:
    - Metal: e.g. information/confirmation regarding heavy metals (if not already available)
    - Paints/coatings/sealing compounds: e.g. information/confirmation regarding heavy metals, PFAS, recycled content, proportion of bio-based raw materials and compostability
  - Include this information when preparing the documentation for the manufacturer (see Chapter 3) and send it to them
- **For the grouped packaging and, where applicable, transport packaging for which you are the manufacturer:**
  - Request relevant information for the technical documentation from the suppliers for this packaging. This also includes all information relating to Articles 5–11 for the respective packaging (e.g. for stretch films (plastic packaging), this also includes information on the recycled content (Article 7), the proportion of bio-based raw materials (Article 8) and compostability (Article 9))
  - Prepare the technical documentation based on this information
  - Draw up the declaration of conformity for this packaging
  - Retain both documents for 5 years (10 years for transport packaging) and make them available to the authority within 10 days upon request
  - Make the declaration of conformity available to the distributor upon request; general disclosure within the supply chain is not envisaged.
- **For the transport packaging for which you are the distributor:**
  - Request the declaration of conformity for this packaging from the manufacturer
  - If there is any suspicion that the packaging does not comply with regulations, it must not be used; alternatively, compliance must be ensured.
  - Provide all information and documentation upon request by the authority

## 1.7 Summary

The following table provides an overview of the economic operators and their obligations regarding conformity assessment:

Supplier	Manufacturer	Importer	Distributor
any natural or legal person <b>who supplies packaging or packaging material to a manufacturer</b>	any natural or legal person <b>who manufactures packaging or a packaged product under their own name or brand, or who commissions the development or manufacture of such products</b>	any natural or legal person <b>who places packaging on the market from a third country (from outside the EU into the EU)</b>	any natural or legal person in the supply chain <b>who resells or transfers packaging or packaged products within the EU</b>
e.g. packaging supplier (SEFA member)	e.g. packaging user (brand owner or filler)	e.g. trading companies / wholesalers	e.g. trading companies / wholesalers
Retailers of empty packaging are also suppliers	All three economic operators may also be <b>producer</b> insofar as they <b>place</b> empty packaging ((transport, service and primary production packaging) or the packaged goods (in sales or grouped packaging) <b>on the market for the first time in an EU country</b>		

### Applies to SEFA members (their 'role' in the PPWR):

always for the empty sales packaging (drums) supplied	when using grouped packaging and, where applicable, transport packaging	not usually relevant (only if grouped or transport packaging from outside the EU is used)	where applicable, when using transport packaging
<b>Obligations under PPWR Art. 16:</b>	<b>Obligations under PPWR Art. 15:</b>	<b>Obligations under PPWR Art. 18:</b>	<b>Obligations under PPWR Art. 19:</b>
Provide the manufacturer with all information and documentation necessary to demonstrate conformity, including technical documentation in one or more languages that the manufacturer can easily understand (in paper or electronic form)	<ul style="list-style-type: none"> <li>Carry out or have carried out the conformity assessment procedure</li> <li>Draw up the technical documentation (in accordance with Annex VII)</li> <li>Issue the EU Declaration of Conformity (in accordance with Article 39)</li> </ul>	Ensure that: <ul style="list-style-type: none"> <li>the manufacturer has drawn up the Declaration of Conformity and technical documentation</li> <li>The packaging is marked</li> <li>The packaging complies with the requirements</li> </ul>	<ul style="list-style-type: none"> <li>Only provide packaging if its conformity has been established or if the manufacturer or importer meets the requirements</li> <li>ensure that storage or transport conditions do not compromise conformity.</li> </ul>

## 2 What is a declaration of conformity

### 2.1 General information on the PPWR declaration of conformity

All manufacturers (see Chapter 1) are obliged to demonstrate the conformity of the packaging they place on the market with the PPWR, regardless of the type of packaging. This obligation will apply to all packaging from 12 August 2026, with no transition period.

The declaration of conformity under Article 39 of the PPWR is a **written self-declaration** by which manufacturers demonstrate that their packaging meets all sustainability requirements in accordance with Articles 5–12 of the new EU Packaging Regulation (Regulation (EU) 2025/40 / PPWR). It will be mandatory for all packaging from 12 August 2026. However, various details regarding the sustainability criteria (definitions, standards, etc.) are not yet known or defined, meaning that comprehensive statements on these points can only be made from the respective scheduled date onwards. Until then, the relevant provisions of the Packaging and Packaging Waste Directive (PPWD) remain valid. This is noted where appropriate in this guide.

The EU declaration of conformity must be drafted in one or more languages prescribed by the relevant EU Member State in which the packaging is placed on the market. In practical terms, this means: for packaging sold in Germany, the declaration must be available in German at a minimum. In other countries, the respective official languages must be used (where applicable, the declaration may also be issued in several languages if the packaging is marketed in several countries). It is important that the information is formulated clearly and comprehensibly.

The declaration of conformity must be available at all times, particularly for market surveillance authorities. Manufacturers are required to retain the declaration and the technical documentation for an extended period. Specifically, the PPWR stipulates that documentation for single-use packaging must be retained for at least 5 years and for reusable packaging for 10 years from the date of placing on the market. This documentation may be archived electronically. In the event of a request from national authorities, companies must be able to provide the conformity documents without delay – generally within 10 days.

For the first time, a conformity assessment procedure with mandatory documentation is being introduced for packaging. Manufacturers must now proactively ensure and document that their packaging complies with the requirements of the PPWR before it is placed on the market. **Suppliers of empty sales packaging must provide the manufacturer with all the information and documentation required for this purpose.**

### 2.2 What is required to issue a declaration of conformity?

The PPWR specifies the information that the EU declaration of conformity must contain. **Article 39** of the Regulation refers to a model in **Annex VIII**, which serves as a template. The basis for drawing up the declaration of conformity is the performance of a conformity assessment procedure in accordance with **Article 38**, which requires the manufacturer to assess the packaging against the sustainability requirements set out in Articles 5 to 12, as well as to assess their own manufacturing process. An integral part of this conformity assessment procedure is the technical documentation to be drawn up by the manufacturer in accordance with **Annex VII**. This should include at least the following elements:

- a general description of the packaging and its intended use
- designs, manufacturing drawings and materials of components
- descriptions and explanations of the above-mentioned drawings and of the packaging's mode of operation
- a reference to the harmonised standards applied in accordance with Article 36
- a reference to the specifications applied in accordance with Article 37
- Description of how the assessments provided for in Articles 6, 10 and 11 were carried out
- Test reports

The conformity assessment must be carried out for the entire packaging unit, and a declaration of conformity must be drawn up for it. The assessment should cover all integrated and separate components. There is no exception for transport packaging. Consequently, completely different types of packaging, such as pallets, pallet wrappers or strapping bands, must undergo separate assessments and have separate declarations of conformity.

**However, various details regarding the sustainability requirements (definitions, standards, etc.) of Articles 5–12 are not yet known or defined. For the technical documentation, it is therefore necessary to distinguish whether the respective requirements have already been specified or not.**

## 2.3 Which requirements are known to date?

The requirements of the following articles (PPWR) are already known and compliance with them must be demonstrated in the technical documentation from 12 August 2026:

### 2.3.1 Substances of concern (Art. 5 (1))

The presence and concentration of substances of concern in packaging material or packaging components shall be minimised in accordance with paragraph 1. This also applies with regard to their presence in emissions and any potential adverse effects on the reuse and recycling of materials in the packaging. No further requirements in this regard are yet available; therefore, this can currently only be confirmed in general terms.

The definition of substances of concern (SoCs) refers to the Ecodesign for Sustainable Products Regulation (ESPR). It is sufficient for just one of the conditions set out in Article 2(27)(a) to (d) of the ESPR to be met for a substance to be considered an SoC. Manufacturers require this information from suppliers of packaging in order to identify SoCs contained in the packaging and to draw up the declaration of conformity.

By 31 December 2026, the Commission, with the support of the European Chemicals Agency (ECHA), shall draw up a report on the presence of substances of concern in packaging and packaging components, assessing the extent to which they impair the reuse and recycling of materials or affect chemical safety.

### 2.3.2 Heavy metal limits (Art. 5(4))

The second sustainability requirement to be met is the 'Requirements for substances in packaging' (Article 5, PPWR). This must be included in the technical documentation **from 12 August 2026**.

**In accordance with paragraph 4, the sum of the concentrations of lead, cadmium, mercury and hexavalent chromium from substances in packaging or packaging components must not exceed 100 mg/kg.**

These limit values have been already included in PPWD. Consequently, metal packaging currently on the market already complies with them. These requirements have been included in the current EN 13428 and CR 13695-1 standards since 2004, which is why the sample table (see Chapter 3) refers to these standards.

### 2.3.3 PFAS limit values for food-contact packaging (Art. 5 (5))

The limit values for per- and polyfluoroalkyl substances (PFAS) apply only to packaging that comes into contact with food and are set out in paragraph 5:

- a) 25 ppb for each PFAS measured as part of a targeted analysis of PFAS (polymeric PFAS are not determined);
- b) 250 ppb for the total PFAS measured as the sum of the targeted analysis of PFAS, where applicable with prior degradation of precursor compounds (polymeric PFAS are not determined); and

- c) 50 ppm for PFAS (including polymeric PFAS); where the total fluorine content exceeds 50 mg/kg (ppm), the manufacturer, importer or downstream user [...] shall, upon request, provide the manufacturer or importer [...] with evidence of the quantity of fluorine measured as PFAS or non-PFAS content, so that they may compile the technical documentation referred to in Annex VII to this Regulation.

The PPWR does not distinguish between intentionally and unintentionally added PFAS.

According to the [European Commission's guidelines](#) (5., see p. 17), the following step-by-step assessment approach can be applied:

- Testing of the total fluorine content under paragraph 5(c)
- Provided that the total fluorine content (TF) in the packaging
  - is below 50 ppm (mg/kg) or
  - is above 50 ppm, but the total organic fluorine (TOF) content is below 50 ppm
 the packaging meets the requirements and there is no need to verify the other two limit values under Article 5(5)(a) and (b).

SEFA members should take the following steps in this regard:

- Request information from all raw material suppliers (including lubricants, auxiliary materials, etc.) as to whether PFAS are used in the manufacture of their products or in the raw materials used to manufacture their products
- ask all raw material suppliers for information on whether they are making every effort to ensure that their products or the raw materials used in their manufacture do not contain unintentional PFAS
- If raw material suppliers intentionally add PFAS, ask them to specify the maximum potential concentration of PFAS that may be present.

**Previous tests have shown that the 50 ppm limit for TF is not reached or exceeded in cases where PFAS are not intentionally used in the supply chain (see the [Commission's FAQs](#) (under III. SUBSTANCES OF CONCERN / 14) on p. 16).** Therefore, if it can be demonstrated through appropriate supplier declarations, formulation checks and process knowledge that no PFAS have been intentionally used in the supply chain (e.g. printing inks, coatings, adhesives or processing aids), **no measurement (analysis) is required!**

Where **PFAS are intentionally used in the supply chain** (such as unavoidable additions of process aids), SEFA members should apply a tiered testing strategy:

**(1.) Testing the 50 ppm limit for TF/TOF using a worst-case estimate**

SEFA members should first check whether the 50 ppm limit value for TF/TOF is complied with for the supplied packaging components. This can be done in the first step by means of **a worst-case estimate**, based on the formulations used, dosages and the maximum concentrations of the PFAS-containing components. If the worst-case estimate shows that the 50 ppm limit is safely below the threshold, SEFA members should indicate this to the manufacturer in the information provided (the 50 ppm limit for TF/TOF is calculated to be below 50 ppm). **Measurements (analyses) are not required.**

**(2.) Verification of the 50 ppm limit value for TF by measurement**

If the worst-case estimate cannot reliably rule out the 50 ppm limit, or if there are uncertainties (e.g. the 50 ppm limit is exceeded in individual packaging components), **SEFA members should determine the TF content of a representative sample by analytical means.** If the TF measurement confirms that the 50 ppm limit for TF is complied with, SEFA members shall state this to the manufacturer in the information provided (confirmation that the TF content is below 50 ppm following measurement). **No further measurements are necessary.**

### (3.) Verification of the 50 ppm limit for TOF by measurement

If the TF limit is exceeded, SEFA members should check whether the 50 ppm limit for TOF is being met. **To this end, a TOF analysis is carried out.** If the TOF analysis confirms that the 50 ppm limit for TOF is met, SEFA members should state this to the manufacturer in the information provided (confirmation that the TOF content is below 50 ppm following measurement). If the 50 ppm limit for TOF is exceeded, the measurement results must be passed on to the manufacturer.

The PFAS limit values in the PPWR apply to the entire packaging unit, including any printing inks, varnishes or adhesives used. Individual packaging components may therefore theoretically exceed the 50 ppm limit, provided that the entire food packaging ultimately complies with this limit. Ultimately, the manufacturer must demonstrate this on the basis of their technical documentation.

### 2.3.4 Minimum recycled content in plastic packaging (Article 7)

The requirements for minimum recycled content do not apply, in accordance with PPWR Art. 7(5)(b):

- any plastic part representing less than 5 % of the total weight of the whole packaging unit

According to the European Commission's guidance (7., see p. 22), 'plastic part' may be interpreted in accordance with the definition of composite packaging in Article 3(1)(24) of the PPWR. Consequently, labels, paints, printing inks, adhesives and varnishes are not considered plastic content under the PPWR and therefore do not have to meet the requirements for the recycled content.

This applies regardless of whether they account for less than 5% of the packaging unit.

**As the other plastic components (e.g. sealing compounds) in metal packaging generally account for less than 5% of the total weight, the requirements regarding the minimum recycled content do not apply to them!**

### 2.3.5 Biobased feedstock in plastic packaging (Article 8)

This Article applies only to packaging where the predominant material is plastic. Therefore, this Article does not apply to metal packaging.

### 2.3.6 Compostable packaging (Article 9)

This Article applies only to compostable packaging; therefore, this Article does not apply to metal packaging.

### 2.3.7 Reusable packaging (Art. 11)

**This Article applies only to reusable packaging. For packaging to be considered reusable, it must meet the following requirements:**

- a) it has been conceived, designed and placed on the market with the objective to be re-used multiple times;
- b) it has been conceived and designed to accomplish as many rotations as possible under normally predictable conditions of use;
- c) it fulfils applicable requirements regarding consumer health, safety and hygiene;
- d) it can be emptied or unloaded without being damaged in a way that would prevent its further function and re-use;
- e) it is capable of being emptied, unloaded, refilled or reloaded while maintaining the quality and safety of the packaged product and ensuring compliance with the applicable safety and hygiene requirements, including those on food safety;
- f) it is capable of being reconditioned in accordance with Part B of Annex VI, while maintaining its ability to perform its intended function;

- g) it allows for affixing of labels and the provision of information on the properties of that product and on the packaging itself, including any relevant instructions and information for ensuring safety, adequate use, traceability and shelf-life of the product;
- h) it can be emptied, unloaded, refilled or reloaded without risk to the health and safety of those responsible for doing so; and
- i) it fulfils the requirements specific to recyclable packaging set out in Article 6, so that it can be recycled when it becomes waste.

### 2.3.8 Existence of a reuse system (Article 26)

In general, the manufacturer must describe in the technical documentation for reusable packaging how the requirements for a reuse system are met. To this end, they may request the relevant written confirmations from the system participants in accordance with Annex VI.

Therefore, this information is not mandatory for the supplier; however, if information on a reuse system is available, it may be included in the technical documentation on an optional basis.

## 2.4 What is known about requirements that will apply in the future?

The requirements of the following articles (PPWR) are not yet known and therefore cannot currently be included in the technical documentation, or can only be included to a limited extent:

### 2.4.1 Recyclable packaging (Article 6)

**The requirements under this Article have yet to be specified. To this end, the European Commission intends to establish the criteria for recyclability for 22 different packaging categories (Annex II, Table 1 PPWR) by means of delegated acts at EU level by 1 January 2028 at the latest.**

Following the assessment of a packaging item's recyclability, it shall be assigned one of the following performance levels:

- A (recyclability  $\geq$  95%),**
- B (recyclability  $\geq$  80%) and**
- C (recyclability  $\geq$  70%)**

These are then considered recyclable, although from 2038 only levels A and B will be permitted.

**As the assessment of recyclability is only to be carried out from 1 January 2030, only the requirements of the currently valid PPWD can be confirmed up to this date. With regard to Article 6, reference should be made to EN 13430 'Packaging – Requirements for packaging for material recovery'.**

**However, one should first check whether an exemption under Article 6(11) of the PPWR applies to the packaging. This is the case, for example, if the packaging is used for the transport of dangerous goods in accordance with Directive 2008/68/EC.**

### 2.4.2 Packaging minimisation (Article 10)

**The requirements under this Article have yet to be specified. To this end, harmonised standards are to be drawn up by 12 February 2027, setting out the method for calculating and measuring packaging minimisation.** The standards are to include maximum limits for weight and volume, as well as wall thickness and maximum void space, for the most commonly used packaging types and formats. **From 1 January 2030, packaging must then be designed in such a way that its weight and volume are reduced to the maximum limits.**

The PPWR does not specify a maximum limit for the proportion of empty space in sales packaging; instead, it is the manufacturer's responsibility to minimise this proportion and to provide evidence of this in the technical documentation.

For reusable packaging, the requirements set out in Article 11 must be taken into account first and foremost.

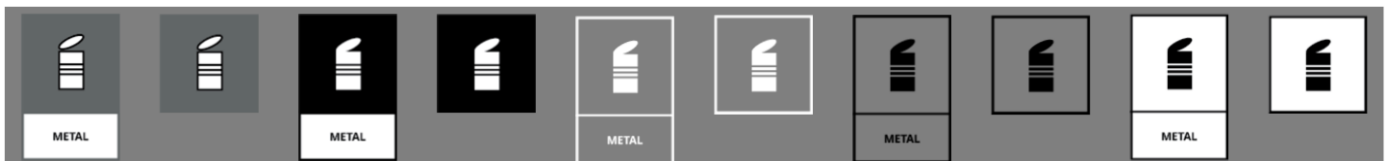
**As the packaging minimisation requirements do not apply until 2030, only the requirements of the currently valid PPWD can be confirmed until the end of 2029. With regard to Article 10, reference should be made to EN 13428 'Packaging – Specific requirements for production and composition – Resource conservation through packaging minimisation'.**

### 2.4.3 Labelling of packaging (Article 12)

**The requirements under this Article have yet to be specified. To this end, harmonised labelling is to be published by 12 August 2026. This labelling of packaging will be mandatory from 12 August 2028.**

EU-wide standardisation of pictograms is intended to eliminate different country-specific labelling on packaging and simplify matters for manufacturers. At the same time, waste bins will also be marked with the relevant pictograms, making the separate collection or sorting of packaging into the designated waste bins even easier.

The final study, 'JRC technical proposal on EU harmonised waste sorting labels under the Packaging and Packaging Waste Regulation' – the JRC is the Joint Research Centre of the European Commission's Directorates-General – currently proposes one of the following **labels** as a draft for **metal packaging**:



The colour grey is specified as follows:

<b>Metal</b>	
CMYK	27, 19, 21, 58
RGB	108, 110, 110
Web	#6C6E6E
RAL	9023
Pantone	445C

**Reusable packaging (in closed-loop systems) must, from 12 February 2029, bear an additional label informing customers of the packaging's reusability.**

**Reusable packaging** must be clearly labelled as such and distinguished from single-use packaging. Further information on reusability, including the availability of a local, national or EU-wide reuse system and details of collection points, will be provided via a QR code or another standardised and open digital medium that facilitates the tracking of packaging and the calculation of circulation cycles and loop passes (Article 12(2)).

#### Exemption for open-loop systems:

**The obligation to affix labelling and a QR code to reusable packaging does not apply to open-loop systems that do not have a system operator (Article 12(3)).**

## 2.5 What must the PPWR declaration of conformity contain?

In general, anything may be included in a declaration of conformity. Therefore, the PPWR declaration of conformity may also be combined with other declarations of conformity.

Annex VIII of the PPWR specifies exactly what information the EU declaration of conformity must contain. However, an internal conformity assessment is primarily envisaged, as external testing bodies are not generally required for packaging. The basis for the declaration of conformity is the technical documentation, which, however, does not need to be provided within the supply chain (only to authorities). The mandatory information in the declaration of conformity includes, amongst other things:

- **Identification of the packaging:** A unique identification number or identifier for the packaging, as well as a description defining the subject of the declaration for **the traceability** of the packaging (e.g. type, serial or batch number)
- **Responsible company:** Name and address of *the manufacturer* of the packaging and, where applicable, their authorised representative. In addition, the manufacturer must expressly declare that they bear sole responsibility for issuing the declaration of conformity.
- **Product and regulatory compliance:** A declaration that the item described above complies with the **relevant EU legislation** – in particular the PPWR itself (listing of other EU legislation, where applicable).
- **Information on standards/specifications:** List of all **harmonised standards** or common specifications applied during the conformity assessment, as well as any other technical specifications on the basis of which conformity is declared.
- **Certification body, if any:** If a **notified body** (testing organisation) was involved in the conformity assessment process, details of the name, address and identification number of that body, as well as any certificates issued (with date and, where applicable, conditions of validity).
- **Date, place, signature:** The date and place of issue of the declaration, as well as the name, position and **signature** of the responsible person signing the declaration on behalf of the manufacturer.

These details ensure that the declaration contains all the necessary information to trace and verify the conformity of the packaging. The EU Declaration of Conformity must also **be kept up to date at all times**, for example if relevant requirements change.

## 3 Examples of documents

### 3.1 Template for information from suppliers to the manufacturer (Version 01/2026)

The tables below are a template that can be used by all suppliers to provide packaging manufacturers with all relevant information and documentation so that they can demonstrate the packaging's compliance with the PPWR. The document is bilingual (German/English). It may be necessary to translate the information for a manufacturer in another EU Member State so that it can be easily understood by them.

This example is a draft and is based on the legal situation as of **April 2026**. It is subject to change due to future EU implementing legislation (delegated acts) and the implementing provisions of the European Commission. The SEFA will continuously adapt the model form to developments, insofar as these relate to the requirements for information and documentation from suppliers to manufacturers.

**Information and documentation from the supplier in accordance with (EU) 2025/40 (PPWR)**  
**Information and documentation from the supplier in accordance with (EU) 2025/40 (PPWR)**

<p><b>1. Item number (unique identifier of the packaging)</b>          (This refers to a type, batch or serial number, or any other identifier that enables the relevant packaging to be identified. Manufacturers are free to choose between these options.)</p>	<p>A unique identifier for the steel drum (e.g. type, serial or batch number), as well as a description of how this ensures the traceability of the packaging  <i>(Suppliers are not obliged to mark packaging with a type, batch or serial number; this obligation falls to the manufacturers. In practice, however, it may be the suppliers of the packaging who ensure that the packaging is identifiable, as this often takes place during the production phase)</i></p>
<p><b>2. General description of the packaging (in accordance with Annex II, Table 1) and its intended use</b></p>	<p>Sales packaging          Category No. 4, metal, steel and composite packaging, predominantly made of steel          Steel drum</p>
<p><b>3. Photograph or drawing of the packaging unit (including all integrated and separate components)</b></p>	<p>Dimensions of the entire packaging (required by the manufacturer upon registration)          What is the main component and, if applicable, the separate components?          What material are the components made of?  <i>If applicable, refer to the data sheet in the appendix</i></p>
<p><b>4. Descriptions and explanations that may be necessary for understanding the drawings (under 3.) and the functioning of the packaging</b></p>	
<p><b>5. Reference to other applicable Union acts (The manufacturer is responsible for checking, based on the contents, whether these actually apply)</b></p>	<p>European Packaging Directive 94/62/EC (PPWD) or, for example, for food packaging</p> <ul style="list-style-type: none"> <li>• Regulation (EC) No 1935/2004</li> <li>• Regulation (EC) 2023/2006</li> <li>• Regulation (EU) 10/2011</li> <li>• Regulation (EU) 2024/3190</li> </ul> <p>Directive 2008/68/EC (Dangerous goods)</p>
<p><b>6. Indication of the relevant harmonised standards or common specifications used as a basis</b></p>	<ul style="list-style-type: none"> <li>• EN 13428</li> <li>• CR 13695-1</li> <li>• EN 13430</li> <li>• CR 13688</li> </ul>
<p><b>7. Information on the relevant articles listed below</b></p>	

<b>Art. 5: Requirements for substances in packaging</b>	<b>These requirements apply from 12 August 2026</b>		
Designation of the component	Component 1 Drum	Component 2 (if applicable)	Component n (if applicable)
Article 5 (1) The presence and concentration of substances of concern in packaging material or packaging components is minimised (including emissions and end-of-life impacts)	Yes	Yes	Yes
Art 5 (4) The limit value of 100 mg/kg for the sum of the concentrations of lead, cadmium, mercury and hexavalent chromium from substances in packaging or packaging components is complied with	Yes	Yes	Yes
	Verification was carried out in accordance with EN 13428 and CR 13695-1		
Is this packaging that may come into contact with food? (The manufacturer makes the final decision based on the contents.)	Yes, the following requirements for PFAS limits apply  No, the requirements for PFAS limits do not appl.		
Art 5 (5) The limit value under (5) c) of 50 ppm (mg/kg) for total fluorine content (TF) is complied with	Yes	Yes	Yes
	This assessment is based on the following documentation, e.g. information from the suppliers of all raw materials used, worst-case estimates or test reports.		
The assessments submitted to the European Commission to date have shown that the 50 ppm limit for TF is not reached or exceeded in cases of unintentional use of PFAS in the supply chain (see the <a href="#">Commission's FAQs</a> (under III. SUBSTANCES OF CONCERN / 14) on p. 16).			
<b>Note (to be removed from the final table):</b> It is not necessary to pass on documentation from upstream suppliers and, where applicable, your own documents to the manufacturer! Please also note the guidance on the procedure for Article 5(5) under 2.3.3.			
According to the <a href="#">European Commission's guidance</a> (see section 5, p. 17), a review of the PFAS limit values under Article 5(5)(a) and (b) is only necessary if the limit value of 50 ppm specified in (c) is exceeded. As this limit value is complied with, confirmation under (a) and (b) is not necessary.			
<b>Note (to be removed from the final table):</b> If the total fluorine content (TF) exceeds 50 ppm but the total organic fluorine content (TOF) is below 50 ppm, this must be amended in the table above and stated accordingly. The packaging then also meets the requirements and there is no need to test/confirm the other two limit values under Art. 5 (5) a) and b).			
The limit value under (5) a) of 25 ppb for any PFAS measured as part of a targeted PFAS analysis (polymeric PFAS are not determined) is complied with	Verification not required as the limit value under Art. 5 (5) c) is complied with	Verification not required as the limit value under Art. 5 (5) c) is complied with	Verification not required as the limit value under Art. 5 (5) c) is complied with
The limit value under (5) b) of 250 ppb for the sum of PFAS measured as the sum of targeted PFAS analysis is complied with	Verification not required as the limit value under Art. 5 (5) c) is complied with	Verification not required as the limit value under Art. 5 (5) c) is complied with	Verification not required as the limit value under Art. 5 (5) c) is complied with
<b>Art. 6: Recyclable packaging</b>	<b>These requirements must be met from 1 January 2030 and will be finalised by 1 January 2028 at the earliest</b>		
<b>Note (to be removed from the final table):</b> First, it must be checked whether the packaging is subject to an exemption under paragraph (11) of this Article. This is the case, for example, if the packaging is used for the transport of dangerous goods in accordance with Directive 2008/68/EC. This exemption also applies where no UN approval is required, for example for packaging used under the limited quantity (LQ) derogation. In that case, this packaging is exempt from the requirements under Article 6 and no further information regarding Article 6 needs to be provided.			
Can the packaging be used for the transport of dangerous goods in accordance with Directive 2008/68/EC? (The manufacturer makes the final decision based on the contents))	Yes	Justification	The packaging falls under Directive 2008/68/EC
As the assessment of recyclability is not required until 1 January 2030, only the requirements of the previously valid PPWD (EN 13430) can be confirmed until that date.			
Does the packaging comply with EN 13430 'Packaging – Requirements for packaging recoverable by material recycling'?	Yes	Verification was carried out in accordance with EN 13430 and CR	

		13688.
<b>Note (to be removed from the final table):</b> Optionally, reference may also be made to the high recyclability of the metal packaging supplied (in accordance with the relevant standard), e.g. via previously determined values or a tabular list of the respective packaging components.		
<b>Art. 7: Minimum recycled content in plastic packaging</b>	<b>These requirements must be met from 1 January 2030 onwards</b>	
<b>Note (to be removed from the final table):</b> First, it must be checked whether an exemption under paragraph (5) b) of this Article applies to this packaging.		
Is any packaging part made of plastic < 5 % of the total weight of the whole packaging unit?	Yes	Justification
Article 7 does not apply to this packaging		
<b>Note (to be removed from the final table):</b> If a plastic component (varnish, printing ink, sealing compound) of the metal packaging accounts for ≥5% of the total weight of the entire packaging, it must be checked whether an exemption under paragraph (4) of this Article applies to the packaging. This is the case, for example, if the packaging is used for the transport of dangerous goods in accordance with Directive 2008/68/EC. Otherwise, the minimum recycled content for this plastic component must be demonstrated.		
<b>Art. 8: Biobased feedstock in plastic packaging</b>	<b>The requirements are to be finalised by 12 February 2028</b>	
This article is only relevant for packaging whose predominant material is plastic. It therefore does not apply to metal packaging.		
<b>Art. 9: Compostable packaging</b>	<b>These requirements must be met from 12 February 2028 onwards</b>	
This article is only relevant for packaging whose predominant material is plastic. It therefore does not apply to metal packaging.		
<b>Art. 10: Minimisation of packaging</b>	<b>These requirements must be met from 1 January 2030 and will be finalised no earlier than 12 February 2027</b>	
As the packaging minimisation requirements do not need to be assessed until 1 January 2030, only the requirements of the previously valid PPWD (EN 13428) can be confirmed until that date.		
Does the packaging comply with EN 13428 'Packaging – Requirements specific to manufacturing and composition – Resource conservation through packaging minimisation'?	Yes	The packaging complies with EN 13428
<b>Art. 11: Reusable packaging</b>	<b>These requirements must be met from 12 August 2026, but some of them will not be finalised until 12 February 2027</b>	
Is it reusable packaging	No, the requirements for reusable packaging do not apply  Yes, the following requirements for reusable packaging apply	
The packaging has been conceived, designed and placed on the market with the objective to be re-used multiple times	Yes	Justification
The packaging meets the requirement		
The packaging has been conceived and designed to accomplish as many rotations as possible under normally predictable conditions of use	Not yet applicable; will only be specified by 12 February 2027	
Packaging fulfils applicable requirements regarding consumer health, safety and hygiene	Yes	Justification
The packaging meets the requirement		
Packaging can be emptied or unloaded without being damaged in a way that would prevent its further function and re-use	Yes	Justification
The packaging meets the requirement		

<b>Art. 11: Reusable packaging</b>	<b>These requirements must be met from 12 August 2026, but some of them will not be finalised until 12 February 2027</b>		
Packaging is capable of being emptied, unloaded, refilled or reloaded whilst maintaining the quality and safety of the packaged product and ensuring compliance with the applicable safety and hygiene requirements, including those on food safety	Yes	Justification	The packaging meets the requirement
Packaging is capable of being reconditioned in accordance with Part B of Annex VI (PPWR), whilst retaining its ability to perform its intended function;	Yes	Justification	The packaging meets the requirement
Packaging allows for the affixing of labels and the provision of information on the properties of the product and on the packaging itself, including any relevant instructions and information to ensure safety, proper use, traceability and shelf life of the product	Yes	Justification	The packaging meets the requirement
Packaging can be emptied, unloaded, refilled or reloaded without risk to the health and safety of those responsible for doing so	Yes	Justification	The packaging meets the requirement
Packaging fulfils the requirements specific to recyclable packaging set out in Article 6	Yes	See Article 6	The packaging meets the requirement

<b>Art. 26: Obligations in relation to reusable packaging</b>	<b>These requirements must be met from 12 August 2026</b>		
<b>Note (to be removed from the final table):</b> <i>This information is not mandatory for the supplier but may be included (in the annex) if available. Otherwise, the manufacturer must request the relevant written confirmations from the scheme participants in accordance with Annex VI (PPWR) and, where applicable, supplement them (in the annex).</i>			
Evidence of how the requirements for a reuse system in accordance with Annex VI (PPWR) are met	The requirements for a re-use system for packaging in accordance with Annex VI are met and are set out in Annex X.		

<b>Art. 29: Re-use targets</b>	<b>These requirements must be met from 1 January 2030</b>		
<b>Note (to be removed from the final table):</b> <i>This information is not mandatory for the supplier but may be helpful when dealing with the reuse targets.</i>			
Does this sales packaging have an evident transport function	No, as in addition to its protective function, which is the most significant, it also fulfils the functions of handling, storage, presentation and transport.		

<b>Art. 12: Labelling of packaging</b>	<b>These requirements must be met from 12 August 2028 onwards and will be finalised on 12 August 2026 at the earliest</b>		
<b>As the manufacturer must ensure that the labelling is applied to the packaging as part of the internal production control, no specific information needs to be provided by the supplier in this regard.</b>			

<b>8. A notified body has carried out the following measures and issued the following certificate(s):</b>	<b>Only where applicable; generally, there is no obligation to appoint a notified body!</b> <i>The details of the report can be found in Annex Y.</i>		
<b>9. Additional Information / Additional Information</b>			
<b>Signed for and on behalf of:</b> Signed for and on behalf of:	(Company stamp) (Signature)		
<b>(Place and date of issue)</b> (place and date of issue)	<b>(Name, function)</b> (name, position)		

### 3.2 Manufacturer's technical documentation

Based on the information and documents provided by the supplier(s), the manufacturer must prepare the technical documentation for the relevant packaging. The tables presented in the previous section may also serve as a template for the technical documentation; they require only minor adjustments for this purpose.

For this reason, we have chosen not to provide a separate template here for the technical documentation of packaging that must be prepared by the manufacturer.

**Note: Manufacturers supplied by SEFA members can therefore base their technical documentation on these. At the same time, SEFA members can use the tables as a template for technical documentation for the packaging for which they themselves are considered manufacturers.**

### 3.3 Template for a Declaration of Conformity for Manufacturers (Version 01/2026)

Below is a template for a declaration of conformity that should be used by all manufacturers to confirm the conformity of the packaging in accordance with the PPWR. The document is bilingual (German/English). It may need to be translated for another Member State if required by the relevant authority there.

The conformity assessment must be carried out for the entire packaging unit, and a declaration of conformity must be drawn up for it. The assessment should cover all integrated and separate components. There is no exception for transport packaging. Consequently, completely different types of packaging, such as pallets, pallet wrappers or strapping bands, must undergo separate assessments and have separate declarations of conformity.

**EU Declaration of Conformity No. *(insert reference number)***  
**relating to European Regulation (EU) 2025/40**  
**on packaging and packaging waste**

**1. Packaging No:**

*(unique identifier of the packaging (e.g. type, serial or batch number))*

**2. Name and address of the manufacturer:**

*(and, where applicable, the manufacturer's authorised representative)*

**3. This declaration of conformity is issued under the sole responsibility of the manufacturer.****4. Object of the declaration:**

*(Description of the packaging and identification of the packaging for traceability purposes)*

**5. The object of the declaration referred to in point 4 is in conformity with the relevant Union harmonisation legislation:**

*(Reference to the other Union legislation applied with which this packaging complies).*

**6. References to the relevant harmonised standards or common specifications used, or references to other technical specifications in relation to which conformity is declared:**

*(Indication of the relevant harmonised standards or common specifications used, or indication of other technical specifications for which conformity is declared)*

**7. If applicable; generally, there is no obligation to commission a notified body!**

The notified body *(name, address, identification number)*

performed *(description of its activities)*

and issued the certificate(s):

*(Details, including the date of the certificate(s) and, where applicable, information on the duration and conditions of validity).*

**8. Additional information**

Signed for and on behalf of /

*(Company stamp)*

---

**place and date of issue**

---

**Name, position, signature**

## 4 Questions and Answers

### 4.1 Examples of enquiries and possible answers (Version 01/2026)

Below are some examples of questions from customers and possible answers relating to the PPWR requirements for technical documentation or the declaration of conformity.

**Question 1:**

*Are steel drums subject to the requirements of Regulation (EU) 2025/40 (PPWR)?*

**Answer:**

Yes, the PPWR applies to all packaging and packaging components placed on the EU market, and therefore also to steel drums.

**Question 2:**

*What documents or requirements are necessary under Regulation (EU) 2025/40 (PPWR)?*

**Answer:**

As suppliers of steel drums, we are obliged under the PPWR to provide the manufacturer (our customer) with all the information and documentation necessary to demonstrate the packaging's conformity. This forms the basis for the technical documentation that the manufacturer must prepare before issuing the declaration of conformity.

**Question 3:**

*Are there any exemptions from Regulation (EU) 2025/40 (PPWR) that can be invoked?*

**Answer:**

There is no general exemption from the PPWR for packaging placed on the EU market. However, for steel drums used for the transport of dangerous goods, there are specific exemptions regarding the requirements for recyclability, minimum recycled content and reuse targets.

**Question 4:**

*We request written confirmation that your steel drums already comply with the requirements of Regulation (EU) 2025/40 (PPWR) or that appropriate measures for implementation have been initiated.*

**Answer:**

As a packaging supplier, we are obliged to provide the manufacturer with the relevant information and documentation that serves as the basis for the technical documentation and declaration of conformity. Not all requirements of the PPWR have yet been finalised (e.g. Articles 6, 10 and 12). You can see which requirements of the PPWR our steel drum currently meets by referring to the information and documents in the appendix.

**Question 5:**

*We request written confirmation that you are aware of the current and forthcoming obligations under the PPWR.*

**Answer:**

We hereby confirm that we are informed of all current and future obligations through the European Association of Steel Drum Manufacturers (SEFA), of which we are a member. We will therefore provide you with all the information and documents required on our part in due course.

**Question 6:**

*We request written confirmation that you can provide us – where applicable – with evidence, certificates or technical documentation regarding the conformity of your steel drums.*

**Answer:**

As a supplier of steel drums, we will provide you with the relevant information and documentation that you, as a manufacturer, require to provide evidence in accordance with the PPWR as soon as we have finalised them. We will also provide you with the declarations of conformity for the grouped and transport packaging we use as soon as we have drawn them up.

**Question 7:**

*We request written confirmation that you are prepared to provide further information or make adjustments if necessary.*

**Answer:**

If you require further information from us to prepare the declaration of conformity, we will be happy to assess the extent to which we can provide this or make adjustments.

**Question 8:**

*Under the PPWR, SEFA members are classified as suppliers of sales packaging. Therefore, a Declaration of Conformity (DoC) is not required for the customer. Under other EU regulations (e.g. Regulation (EU) No 1935/2004), SEFA members are manufacturers of food packaging; therefore, they must send the customer a Declaration of Conformity (DoC) in their capacity as manufacturers.*

*Should the term 'manufacturer' now be replaced by 'supplier' in the DoC for other EU regulations?*

**Answer:**

No, with regard to a Declaration of Conformity (DoC) for other EU regulations, everything remains as before. The customer receives a Declaration of Conformity (DoC) from the SEFA member in their capacity as a manufacturer. This may be accompanied by the 'information and documentation from the supplier in accordance with (EU) 2025/40 (PPWR)' in the annex, and reference may be made to this under point 5 of the table 'Reference to other applicable Union legislation'.

**Question 9:**

*For Regulation (EU) 2025/40 (the so-called PPWR), which comes into force on 12 August 2026, we require confirmation that the steel is free from chromium VI.*

**Answer:**

Regulation (EU) 2025/40 (PPWR) does not impose any requirements regarding the use of chromium VI-free steel. Article 5 'Requirements for substances in packaging', paragraph (4), merely requires that the sum of the concentrations of lead, cadmium, mercury and hexavalent chromium from substances in packaging or packaging components must not exceed 100 mg/kg. We confirm this in the information under Article 5. *(required only from 12 August 2026)*

**Question 10:**

*Is it possible to provide information on compostability?*

**Answer:**

The steel drums we supply are metal packaging. These are not compostable and should be sent for recycling. Therefore, Article 9 of the PPWR does not apply to our packaging.

**Question 11:**

*Is the steel drum reusable?*

**Answer:**

Yes, as they meet the requirements of Article 11 of the PPWR (with the exception of paragraph (1) b), as these will not be specified until 12 February 2027).

No, as it does not meet the requirements of Article 11 of the PPWR.

**As there may be a large number of possible answers to some questions, we provide the following guidance on how to approach answering these questions:**

**Question 12:**

*Do you perhaps have a data sheet for the steel drum?*

**Procedure:**

The PPWR does not explicitly require a data sheet for the packaging. However, the following information must be provided to the manufacturer:

- a general description of the packaging and its intended use
- a photograph or drawing of the packaging unit (including all integrated and separate components)
- a description and explanation necessary, where applicable, for understanding the drawings and the functioning of the packaging

This information can therefore also be provided via a data sheet, provided one is already available.

**Question 13:**

*What materials is the packaging made of?*

*Can you tell us the weights of the individual components?*

**Procedure:**

From 12 August 2026, in accordance with the PPWR, the information provided to the manufacturer must only list the main component and, where applicable, the separate components, and the (main) material of which they are made.

A specific list of all packaging components and their materials is only to be provided as part of the recyclability assessment from 1 January 2030. Therefore, this information is voluntary until then.

**Question 14:**

*Is the metal packaging, or any of its components, made from recycled material?*

*We need to know whether the packaging contains recycled components.*

**Procedure:**

According to the PPWR, there is no requirement to specify the proportion of recycled metal in metal packaging.

Only if the proportion of a plastic component (varnish, printing ink, sealing compound) in the metal packaging is  $\geq 5\%$  of the total weight of the entire packaging must the proportion of recycled plastic be stated, or the requirements of Article 7 be met from 2030 onwards.

If you wish to provide voluntary information, please ask your metal supplier.

**Question 15:**

*We ask you to provide us with a formal declaration confirming that all materials listed in the attached file:*

- *comply with the limit values for heavy metals,*
- *comply with Regulation (EC) No 1907/2006 (REACH) regarding SVHCs, and*
- *where applicable, meet the PFAS restrictions for food contact packaging.*

**Procedure:**

As a packaging supplier, you must, in accordance with the PPWR, provide information from 12 August 2026 onwards that includes, amongst other things, confirmation with the limit value for heavy metals in accordance with Article 5(4).

For food packaging only, the limit value under (5) c) of 50 ppm (mg/kg) for total fluorine content (including polymeric PFAS) must be confirmed.

Under Article 33(1) of the REACH Regulation (EC) No 1907/2006, suppliers must inform the recipients (companies) of their products if a substance of very high concern (SVHC) included on the Candidate List is present in a concentration exceeding 0.1% by weight. However, the company is not obliged to provide information on other substances. This Regulation applies independently of the PPWR.

**Question 16:**

*Does the packaging contain BPX, fluorine, PTFE or PFAS components?*

**Procedure:**

Under the PPWR, the PFAS limits apply only to food contact packaging. For other packaging, this limit is not currently relevant. PTFE and PFAS are substances containing fluorine. If you have information on this, you may, of course, voluntarily provide this information to the customer.

With regard to information on bisphenols (BPX), Regulation (EU) 2024/3190 on the use of bisphenol A (BPA) and other bisphenols currently applies to the following bisphenols: BPA, BPS and BPAF. This regulation is also relevant only to food packaging. Food packaging must therefore confirm compliance with this Regulation, which applies independently of the PPWR.