

PPWR Declaration of Conformity (DoC)

Template and checklist — Articles 38-39

Regulation (EU) 2025/40 (PPWR) — mandatory from 12 August 2026

12 AUG 2026 • Mandatory

10 • required fields

5 / 10 YEARS • record-keeping

1. What the DoC is and who issues it

The PPWR Declaration of Conformity (DoC) is the document by which the packaging manufacturer or importer declares, on its own responsibility, that the packaging meets the requirements of Regulation (EU) 2025/40, under Articles 38 and 39. It becomes mandatory from **12 August 2026** and must accompany every batch of packaging placed on the EU market.

Who issues the DoC

The DoC is issued by the **packaging manufacturer** (the company that produces the packaging within the EU) or by the **importer** (for packaging manufactured outside the EU). Distributors and retailers do not issue the DoC, but must keep it available along the supply chain.

Record-keeping

The technical documentation supporting the DoC must be kept for **5 years** for single-use packaging and **10 years** for reusable packaging, counted from the date the last packaging is placed on the market (Art. 39 PPWR). The documentation includes: PFAS test reports, supplier technical data sheets, recyclability assessment.

Penalties: the PPWR requires penalties to be effective, proportionate and dissuasive, with the exact amounts set by each member state. In some member states (e.g. Germany — Verpackungsdurchführungsgesetz; still in preparation in Romania), draft implementing measures provide for fines of up to approximately EUR 200,000 per infringement, plus withdrawal of the packaging and a temporary market-placement ban. The exact amount may vary depending on the national transposition act.

2. Minimum content of the PPWR DoC

#	Required field	Details
1	Identification of the manufacturer / importer	Legal name, registered address, company registration number, contact person, phone, email
2	Identification of the packaging	Commercial name, product code, type (primary/secondary/tertiary), description
3	Material composition	Polymers used, percentages, additives, inks, adhesives, lacquers
4	Weight and dimensions	Weight per unit, thickness, dimensions, container volume
5	Estimated recyclability class	A, B, C or Not Recyclable under Art. 6; methodology applied (see Module 2)
6	Article 5 (PFAS) compliance	For food-contact packaging: declaration of compliance with the 25/250 ppb and 50 ppm limits (see Module 3)
7	Recycled content (if applicable)	rPE/rPP percentage, source, mass balance / chain of custody (see Module 6)
8	Standards applied	EN 18120-1:2026, RecyClass v3.1, Reg. (EU) 10/2011 (food contact), others
9	Date of issue and validity	Date the DoC was issued, validity (until specifications change)
10	Authorised signatory	Name, position, signature of the person authorised to legally bind the company

3. Checklist: getting the DoC ready by 12 August 2026

- ☐ Prepare the PPWR DoC template under Articles 38-39, with the 10 required fields above;
- ☐ Define the internal process: who signs, how records are kept (5/10 years), how it is distributed to customers;
- ☐ Request technical data sheets and declarations from raw-material suppliers (films, inks, adhesives, lacquers);
- ☐ For food-contact packaging: PFAS testing with an accredited laboratory report (see Module 3);
- ☐ RecyClass assessment / A-B-C-Not Recyclable classification for each structure (see Module 2);
- ☐ Update supplier contracts: mandatory DoC clauses, PFAS criteria, technical documentation delivery;
- ☐ Communicate with B2B customers (retail, brand owners): inform on transition plans, offer DoC for current products.

Sources

Regulation (EU) 2025/40, Articles 38-39 — EUR-Lex, CELEX 32025R0040 · European Commission guidance C(2026) 3702 (5 June 2026).

Version log

Version	Date	Note
v1.0	July 2026	RO adaptation of the DoC module. Articles 38-39 and the record-keeping periods confirmed unchanged at the July 2026 review.
v1.1	July 2026	Corrected Commission guidance citation: replaced C(2026) 2151 (30 March 2026, superseded draft) with C(2026) 3702 (5 June 2026, the final guidance in force).

Informational document. Does not constitute legal advice. For the exact application in specific situations, consult the official text on EUR-Lex.

VLM POLIPLAST

Flexible plastic packaging manufacturer

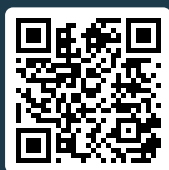
Talk to the VLM Poliplast team

For help preparing the DoC template and technical documentation, contact the VLM Poliplast team.

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Module 4 of 6 · PPWR 2026 Guide Series · Version 1.1, July 2026

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