

A guide from Norse Packaging

# PPWR documentation checklist

Regulation (EU) 2025/40 is in force. Whether you're sourcing packaging from us or anyone else, here is exactly what to ask for to keep every SKU compliant and audit-ready.

**12 August 2026**

Applies from

**Per packaging type / SKU**

Format

**Articles 5–12, Annex VII and VIII**

Covers

## 01

### Material composition data

What your packaging is actually made of, broken down to component level — the foundation everything else builds on.

- ☐ **Material Data Sheet (MDS)** — full material breakdown per SKU (resin type, colorant, any coatings or inks)
- ☐ **Bill of Materials (BoM)** — lists adhesives, liners, or multi-material components separately
- ☐ Confirmation of material grade, e.g. food-contact grade PP/PE

## 02

### Substance and PFAS test reports Article 5

Already enforceable now, and the first thing an authority checks.

- ☐ **Restricted Substance Declaration (RSD)** — confirms combined heavy metal limits (lead, cadmium, mercury, hexavalent chromium  $\leq 100$  ppm)
- ☐ **Certificate of Analysis (CoA)** from an ISO/IEC 17025-accredited lab — required for PFAS on food-contact items; a written **PFAS Declaration** can suffice for non-food-contact items
- ☐ Lab name, accreditation and test date on the CoA — a statement alone is not sufficient evidence

## 03

### Recyclability and recycled content evidence

Articles 6–7

Usually the slowest data to obtain — it depends on the supplier's own recycler relationships, so ask for it early.

- ☐ **Recyclability Assessment** / Design for Recycling (DfR) report — often issued under a scheme such as RecyClass
  - ☐ **Recycled Content Certificate** — states the recycled content percentage per SKU and how it was sourced (mechanical vs. chemical recycling)
  - ☐ **Chain-of-Custody Certificate** under a mass-balance scheme (e.g. EN 15343, ISCC PLUS, or GRS) — backs up the recycled-content claim with a third party
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## 04

### Weight, dimensions and reuse status

Articles 10–11

Backs up your own technical file's minimisation section and clarifies reuse status.

- ☐ **Packaging Minimisation Assessment** — a written weight-and-volume justification, usually not a third-party certificate
  - ☐ **Reusability Declaration** — confirms whether the item is designed and tested for single-use or reuse
  - ☐ For tube-and-cap combinations: pack-level recycled content when paired, e.g. "≥20% PCR tube + this cap = 50% pack minimum" — cross-check against the **Recycled Content Certificate** above
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## 05

### Declaration of Conformity or compliance statement

Clarifies who is legally responsible for what, and gives you the paperwork to build your own technical file correctly.

- ☐ **EU Declaration of Conformity (DoC)** — Annex VIII — only if the supplier itself places packaging on the EU market under its own name
- ☐ **Supplier Declaration / Data Sheet** — if not, this is what you incorporate into your own Technical Documentation File (Annex VII)
- ☐ The supplier's EU manufacturer or legal entity details, for traceability

## 06

### Update commitment

Compliance data goes stale — make sure changes reach you automatically, not something you have to chase.

- ☐ A single point of contact for compliance questions and document updates
  - ☐ Notification of any material, supplier, or process change affecting the data above
  - ☐ A version or date on every document received
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#### **If you can only request this in stages**

Ask for **substance & PFAS test reports** first — usually already on file. Then material composition. Request recyclability and recycled-content evidence early, since it typically takes the longest to gather.