

EU PPWR Compliance Checklist for Paper Packaging Buyers

A fabrication-free supplier questionnaire · Free to use, cite and share · 2026

The EU Packaging and Packaging Waste Regulation (PPWR) phases in from 2025 through 2038. For paper packaging buyers, the practical question is rarely “am I compliant?” but “can my supplier document it?” There is no single PPWR certificate — compliance is demonstrated through documentation. Use this checklist as a template you fill in per product line and per market.

1 · Six questions to ask your paper packaging supplier

■ **1. Is the product single-material or multi-material?**

PPWR rewards design for recycling. A single-material paper substrate is far easier for mills to sort and reprocess than a paper–plastic laminate, which is exactly the kind of composite the regulation pressures.

■ **2. What coating is used, and is it disclosed in a material-composition report?**

Coatings (silicone, PE, PLA) change the end-of-life profile. A written composition report lets you assess recyclability for your destination market instead of assuming a uniform answer.

■ **3. Do you hold FSC or PEFC chain-of-custody certification?**

Chain-of-custody certification is the recognised proof of responsibly sourced fibre and is routinely requested in EU retail and private-label tenders.

■ **4. Can you provide a recyclability statement or design-for-recycling assessment?**

PPWR pushes recyclability-by-design. A supplier statement explains how the product is intended to be recovered in practice, which is what buyers and auditors actually review.

■ **5. Do you hold market-specific test reports for the EU member state I sell into?**

Recycling infrastructure varies by country. Where a specific standard or test is required, ask for the report rather than accepting a generic claim.

■ **6. What is the recycled-content position, where relevant to my SKU?**

PPWR sets recycled-content targets mainly for plastic packaging. For paper, the relevant signals are responsibly sourced fibre and recyclability — so confirm which obligations actually apply to your product.

2 · Documents to collect (your PPWR evidence file)

■ **FSC or PEFC chain-of-custody certificate** — Recognised proof of responsibly sourced fibre.

■ **Material-composition report** — Substrate plus coating, with weights, so you can assess end-of-life per market.

■ **Recyclability statement / design-for-recycling assessment** — How the product is intended to be recovered in practice.

■ **Market-specific test or conformity reports** — Provided where your destination market requires a named standard or test method.

3 · Buyer scoring grid (fillable template)

Tick each box as you confirm it with your supplier. Leave boxes blank until verified — do not assume a result by product type or market.

Product line	Single-material substrate	Coating disclosed in writing	FSC / PEFC available	Composition report available	Notes
Plain / uncoated paper (kraft, tissue, gift wrap)	■	■	■	■	—

Product line	Single-material substrate	Coating disclosed in writing	FSC / PEFC available	Composition report available	Notes
Silicone-coated paper	■	■	■	■	—
PE-coated paper	■	■	■	■	—
PLA / compostable-coated paper (if applicable)	■	■	■	■	—

Key PPWR dates for paper buyers

Date	What changes
11 Feb 2025	PPWR enters into force (published in the Official Journal on 22 Jan 2025).
12 Aug 2026	General application begins. Packaging must be recyclable; heavy-metal limits (Pb+Cd+Hg+Cr■■■ ≤ 100 mg/kg) and PFAS restrictions in food-contact packaging apply; conformity assessment and an EU declaration of conformity are required.
1 Jan 2030	Recyclability performance grades (A–E) apply; packaging must reach at least grade C (≥70% recyclability) or be restricted from the market. Plastic packaging faces minimum recycled-content targets.
1 Jan 2035	“Recycled at scale” test applies — packaging must be widely collected and recycled across the EU (benchmark 55% for most materials, 30% for wood).
1 Jan 2038	Only higher recyclability grades (A or B) may be placed on the EU market.

Source: WiseInco (2026). EU PPWR Compliance Checklist & Timeline for Paper Packaging Buyers. Dongguan Wise Packaging Co., Ltd. Primary sources: Regulation (EU) 2025/40 (Official Journal of the EU, 22 Jan 2025); EU Commission Packaging Waste policy page; FSC 2025 annual reporting. This checklist does not publish a country-by-country recyclability verdict — recycling outcomes depend on local infrastructure and verified test data.