The Packaging and Packaging Waste Regulation (PPWR)

Information for Customers of the Chemical Industry, including Paints, Coatings, Printing Inks, Construction Chemicals and Adhesives Industries on the Implementation of PPWR Requirements as of 12 August 2026

October 2026

As of 12 August 2026, the first obligations under the Packaging and Packaging Waste Regulation (PPWR) will become applicable. This information is intended for customers of the Chemical Industry, including paints, coatings, printing inks, construction chemicals and adhesives industries and aims to provide early information on the status of the initial implementation measures.

The German Chemical Industry Association (VCI) and the member companies of the *German Paint and Printing Ink Association (VdL), the German Construction Chemicals Industry Association (DBC), and the German Adhesives Association (IVK)* have been actively preparing for the new PPWR requirements for an extended period. An important first step is the preparation of the EU Declaration of Conformity, which will be required from 12 August 2026 onwards.

According to the PPWR, the responsible manufacturer company must maintain the technical documentation and the EU Declaration of Conformity. These documents serve as evidence for the relevant national authorities and shall only be provided to such authorities upon a justified request. The PPWR does not require these documents to be disclosed to customers or other third parties.

From 12 August 2026, packaging placed on the market must comply with the requirements applicable at that time. Binding and more product-specific information can only be provided by the respective manufacturers or producers. Additional requirements will apply at later implementation dates in 2028 and 2030. However, these requirements still need to be further specified in terms of their content before they can be implemented in practice. Therefore, manufacturers and producers are generally not yet able to provide detailed information regarding these future requirements.

For the preparation of the EU Declaration of Conformity, manufacturers rely on information provided by their suppliers. Suppliers of packaging or packaging materials are therefore required, pursuant to Article 16 of the PPWR, to provide the information and documentation necessary for manufacturers to assess and ensure compliance with the PPWR.

At present, certain roles and responsibilities under the PPWR are still being interpreted differently along the value chain. This particularly concerns the role of the manufacturer and the associated obligations. In some cases, the legal classification has therefore not yet been conclusively clarified.

Depending on their position within the supply chain, customers of the paints, printing inks, construction chemicals and adhesives industries may also fall within the PPWR-defined roles of producer, manufacturer, importer or distributor of packaging. In such cases, they are subject to their own obligations under the PPWR. This may apply, for example, where product manufacturers produce, package or label products according to specific customer requirements, such as under private-label arrangements or customer-specific packaging solutions.

This customer information is intended solely for general informational purposes and does not constitute legal advice. It does not claim to be exhaustive or to provide a final legal assessment. Only the applicable legal provisions and their interpretation by the competent authorities are authoritative. Should further clarification of the legal requirements result in changes, this customer information will be updated accordingly.

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