



PPWR COMPLIANCE GUIDE

Practical Guide for Manufacturers

How to manage PPWR conformity assessment and the EU
Declaration of Conformity (DoC)

GUIDE PROVIDED BY

Nordic PRO Solution

Sent by Retur · your producer responsibility partner in Denmark

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Purpose

Under the Packaging and Packaging Waste Regulation (PPWR), manufacturers are responsible for ensuring that packaging placed on the EU market complies with the applicable requirements. Before packaging can be placed on the market, the manufacturer must carry out (or have carried out on their behalf) a conformity assessment, prepare technical documentation, and issue an EU Declaration of Conformity (DoC).

This guide provides a practical approach that manufacturers can use to establish and maintain the documentation required to demonstrate compliance, regardless of packaging type. It is designed to complement the Nordic PRO DoC Template by helping manufacturers collect, assess and organise the information needed to complete an EU Declaration of Conformity.

The guide is developed by Nordic PRO to help companies handle their responsibilities within EPR and PPWR. It is provided for general guidance only and does not replace the applicable legislation or professional legal advice; the official legal texts prevail.

Why Nordic PRO?

Through Nordic PRO Solution, you get a single point of access to expert guidance on current and upcoming EU regulations, coordinated reporting, and one dedicated contact across the Nordic region. In Denmark, Retur is your executing partner and point of contact.

Nordic PRO Solution

Nordic PRO Solution gives producers one point of access to producer responsibility across the Nordic region — covering electrical and electronic products (EEE), batteries and packaging.

YOUR EXECUTING PARTNER FOR EPR IN DENMARK

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OVERVIEW

Recommended Compliance Workflow

The first step in your documentation process is to determine whether you qualify as the **manufacturer**, and are therefore responsible for documenting the conformity of the packaging.

Your role may vary across different packaging flows — and you may even hold more than one role at the same time, depending on what you do with the packaging.

Once you have identified the packaging for which you hold manufacturer responsibility, you can move on to the preparation phase and begin the documentation process.

→ **Next:** use the decision tree on the following page to identify your role(s) across each packaging value chain.



Uncover your role — are you a manufacturer?



1

Identify Packaging



2

Collect Supplier Documentation



3

Assess Compliance & Risks



4

Prepare Technical File & DoC



5

Maintain & Update



Uncover your role

Manufacturer

Importer

Distributor

Supplier

Not covered

1 Do you work with packaging or packaged products?

No



Not covered

Yes



continue

2 Do you manufacture packaging or packaged products yourself, in your own name or trademark?

Yes



Manufacturer

No



continue

3 Do you have packaging designed or manufactured in your name or trademark?

If yes → Are you a micro-enterprise *and* is the supplier in the same Member State?

Yes



Supplier is manufacturer

No



You are the Manufacturer

No



continue

4 Do you import packaging or packaged products from countries outside the EU?

Yes



Importer

No



continue

5 Do you buy and resell packaging or products within the EU without modifying them?

Yes



Distributor

No



continue

6 Do you supply packaging or packaging materials to a manufacturer?

Yes



Supplier

No



continue

7 Do you change packaging after it has been placed on the market?

If yes → Can the change affect compliance?

Yes



You become a Manufacturer

No



Keep original role (importer / distributor)



One or more roles may apply depending on activity.

Re-run the questions for each separate packaging flow you handle.

Your Documentation Process

Rule of thumb

Technical Documentation
= the proof

Conformity Assessment
= evaluation of the proof

Declaration of Conformity
= signature confirming the outcome

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STEP 1

Identify the Packaging

Create a file for each packaging type and record:

- Packaging name or ID
- Intended use
- Materials and components
- Supplier information

Why?

This information forms the basis of the technical documentation and is required to clearly identify the packaging covered by the conformity assessment and DoC.

Conformity Assessment — Annex VII

- ✓ General description of the packaging
- ✓ Drawings and material specifications

Declaration of Conformity — Annex VIII

- ✓ Unique identification of the packaging
- ✓ Reference documentation supporting the declaration

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STEP 2

Gather Supplier Documentation

Request all relevant compliance information from suppliers, such as:

- Material specifications
- Substance declarations
- Test reports
- Food-contact documentation (if applicable)
- Compliance statements

Why?

The manufacturer must be able to demonstrate that the packaging complies with applicable requirements. Supplier information is often the foundation for proving compliance.

Conformity Assessment — Annex VII

- ✓ Material information
- ✓ Technical specifications
- ✓ Test reports & supporting evidence

Declaration of Conformity — Annex VIII

- ✓ Reference documentation supporting the declaration

Assess, Compile & Declare

3 STEP 3 Assess Compliance & Risks

Confirm that the packaging meets applicable requirements and assess whether there is any risk of non-compliance.

Consider

- Material risks
- Supplier reliability
- Intended application
- Changes to materials, design or suppliers

Why?

PPWR requires the technical documentation to contain a risk assessment and to demonstrate how conformity has been evaluated.

Conformity Assessment — Annex VII

- ✓ Risk assessment
- ✓ Assessment of compliance
- ✓ Evaluation methodology

Declaration of Conformity — Annex VIII

- ✓ Basis for the manufacturer's compliance statement

4 STEP 4 Compile the Technical File & Issue the DoC

Collect all compliance evidence in a technical file and prepare the EU Declaration of Conformity (DoC). The technical file should contain:

- Packaging description
- Material information
- Risk assessment
- Compliance evidence
- Test reports and declarations

Once conformity has been demonstrated, issue the EU Declaration of Conformity, which states that:

"Based on the technical documentation and conformity assessment performed, the manufacturer declares that the packaging complies with the applicable PPWR requirements."

● No conformity assessment → no technical documentation

● No technical documentation → no valid DoC

Maintain & Stay Audit-Ready

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STEP 5

Maintain and Update

Store documentation and review it whenever significant changes occur.

Reassess the packaging if

- Materials change
- Suppliers change
- Design changes
- Regulatory requirements change

Documentation must be retained for

5 yrs

single-use packaging

10 yrs

reusable packaging

Remember

The most effective PPWR compliance process is not built around legal texts — it is built around **documentation management**. Following the workflow gives you a robust, auditable and authority-ready process while keeping the workload manageable.

The simple rule for your compliance

For each packaging type, ask yourself four questions:

- 1 Do I know exactly what packaging I am assessing?
- 2 Do I have sufficient documentation from suppliers?
- 3 Have I compiled the required technical documentation?
- 4 Can I justify the Declaration of Conformity if requested by an authority?

If you can answer “yes” to all four, you have established a solid PPWR compliance process.

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