



MANUFACTURING TECHNOLOGIES
ASSOCIATION

EU Packaging and Packaging Waste Regulation (PPWR)



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EU Packaging and Packaging Waste Regulation (PPWR)

The PPWR applies generally from **12 August 2026**. However, not all of its detailed sustainability and labelling requirements begin on that date; several requirements and supporting implementing acts will apply later. The following represents my current understanding as of 27 July 2026.

The first step is to establish who is the “manufacturer” of each packaging type.

For standard, unbranded transport packaging, the packaging supplier will normally be the PPWR manufacturer. If the packaging is manufactured under a company’s name or trademark, or is designed to specifications controlled by that company, then they may instead be regarded as the manufacturer. The party identified as the manufacturer is responsible for the conformity assessment, technical documentation and EU declaration of conformity.

1. What documentation is required for each shipment?

The PPWR requires a **written EU declaration of conformity for each packaging type**, supported by technical documentation. It does not appear to require a newly signed declaration or full technical file to travel physically with every machine shipment.

Instead, the individual consignment should be traceable to the relevant packaging type and documentation. Packaging must bear a type, batch or serial number, or another identifying element. Where the packaging’s size or **nature** makes this impracticable, the identification can be included in a document accompanying the packaged product.

In practice, it’s recommended that the shipment packing list or an accompanying packaging schedule record:

- the packaging type or internal packaging reference;
- the corresponding declaration-of-conformity number;
- the batch, job or crate number;
- the packaging supplier; and
- the identity of the EU importer.

This would be a sensible traceability arrangement rather than a requirement to send the entire technical dossier with every shipment.

2. What format should the declaration of conformity take?

The declaration must follow the model structure in **Annex VIII of Regulation (EU) 2025/40**. It is an EU declaration for the packaging, not a CE-marking declaration for the machine. The manufacturer assumes legal responsibility by signing it.

3. Must the declaration refer to harmonised standards?

Harmonised standards are not necessarily compulsory. They provide a recognised means of demonstrating conformity and can give a presumption of compliance, but other documented technical methods may be used where no applicable harmonised standard exists. The declaration should therefore list only those standards or specifications that were actually used.

For the period beginning on 12 August 2026, the Commission has specifically stated that manufacturers should continue using **EN 13430:2004 – Requirements for packaging recoverable by material recycling** to address recyclability. The full PPWR design-for-recycling methodology will not apply until the relevant delegated acts have entered into force, and the Commission says that the Annex VII conformity-assessment procedure is not yet required specifically for recyclability during this interim period.

Depending on the packaging, other relevant standards may include:

- **EN 13429:2004** for packaging intended to be reusable; and
- **EN 13428:2004** concerning packaging manufacture, composition and source reduction, particularly while the existing requirements remain applicable through 2029.

For conventional single-use machine-tool crates and protective packaging, EN 13430:2004 is likely to be the most immediately relevant standard.

4. Is any other documentation required to accompany the shipment?

The PPWR does not note as imposing a general requirement for the complete technical file or full declaration of conformity to accompany every shipment.

However, accompanying documentation may be needed where required information cannot reasonably be placed on the packaging itself. This could include:

- the type, batch, serial or packaging identification;
- the importer's name, registered trade name and contact details; and

- any other information required for traceability.

The EU-established importer must verify before placing the packaging on the EU market that the conformity assessment has been completed and that the technical documentation and declaration exist. Importers must retain a copy of the declaration and make supporting documentation available to the authorities.

This is separate from other documents that might accompany the machine, such as customs documentation, the machine's own product-conformity documents, wood-packaging or phytosanitary evidence where applicable, and dangerous-goods paperwork. Similarly, national packaging producer registration and extended producer responsibility obligations are separate from the PPWR declaration and must be considered in each Member State where packaged machines are first made available.

5. What should be included in the technical file?

Buying packaging from a supplier does not automatically mean your company must create the PPWR technical file. Responsibility depends on who is legally considered the packaging **manufacturer**.

For transport packaging, the packaging supplier will normally be the manufacturer where it supplies standard, unbranded packaging. However, your company may be the manufacturer where the packaging carries your organisation's name or trademark, or where your company orders unbranded packaging and controls its design specifications. The Commission says that, for unbranded packaging, the decisive question is who orders it and decides its design.

The Annex VII technical documentation should cover the packaging's design, manufacture, intended use and evidence of compliance.

Where your company is legally the manufacturer, it can use evidence supplied by the packaging company, but you retain legal responsibility for the final file and declaration. Where the packaging supplier is the manufacturer, you should normally obtain the supplier's declaration and sufficient supporting information rather than duplicating the supplier's complete technical dossier.

Important point for machine tools

The PPWR contains an exemption from the **2030 transport-packaging reuse targets** for packaging used to transport large-scale machinery or equipment where that packaging is custom-designed for an individual order. This may be highly relevant to bespoke machine-tool crates.

However, this is only an exemption from the reuse targets; it is **not a blanket exemption from the PPWR**, technical documentation or declaration-of-conformity requirements. If you intend to rely on it, evidence that the crate was custom designed for the individual machine must be retained in the technical file.
