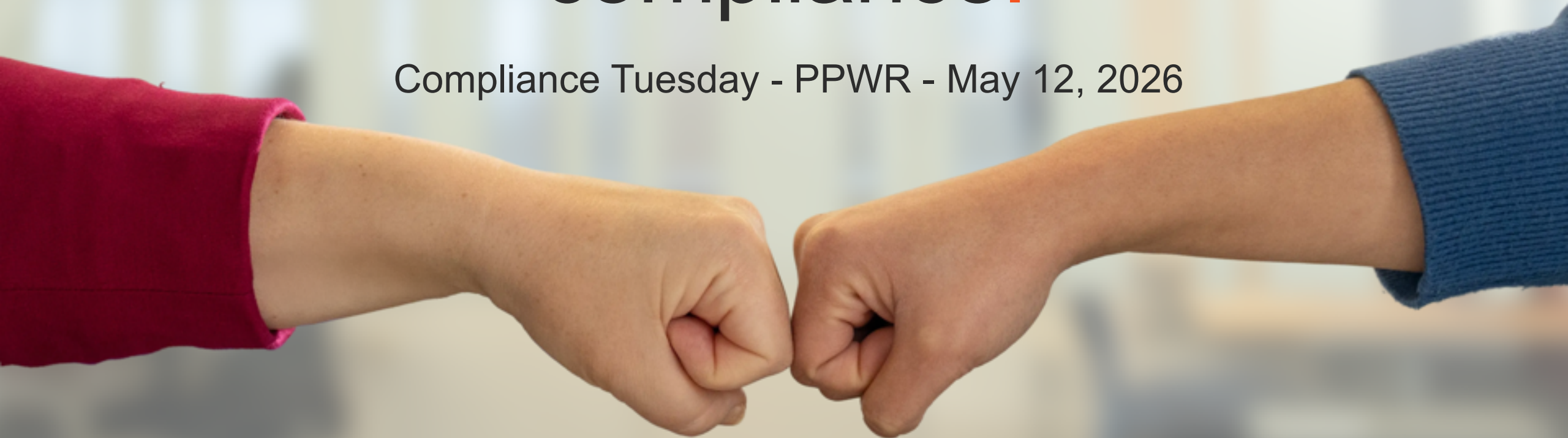


Serious about product compliance.

Compliance Tuesday - PPWR - May 12, 2026



The packaging problem nobody is operationally ready for

PPWR is not another compliance update

Caspar ter Horst
co-founder & Compliance Rebel



Serious about product compliance.

Tomatoes are not vegetables

It sounds trivial. It isn't.

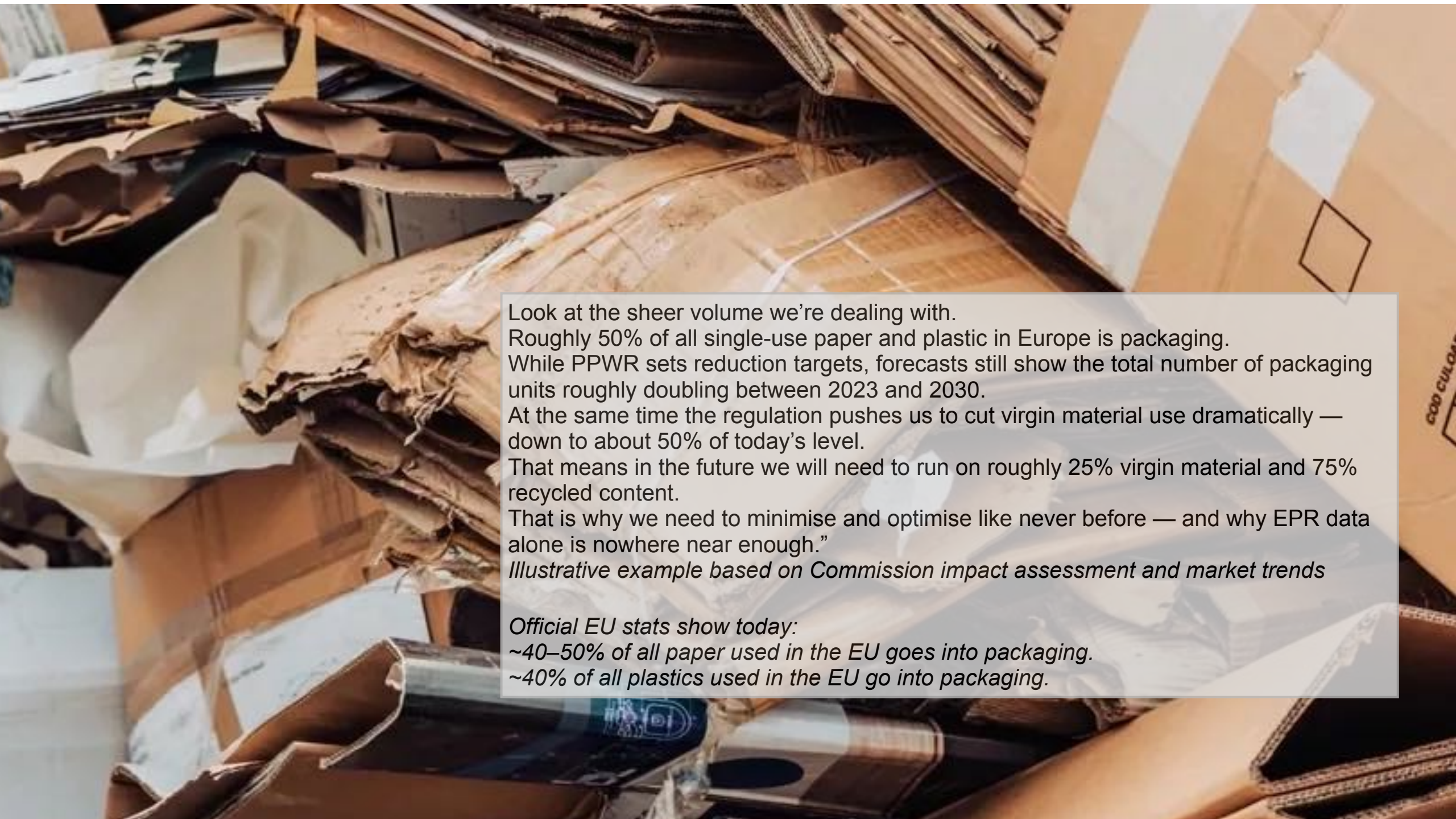
Misclassification at the start leads to systemic failure at scale

For years, packaging was treated as: • cost • logistics • artwork.

PPWR changes that. Packaging is no longer a supporting element.
It is a **regulated product layer**.

Now let's connect that misclassification to today's operational reality.





Look at the sheer volume we're dealing with. Roughly 50% of all single-use paper and plastic in Europe is packaging. While PPWR sets reduction targets, forecasts still show the total number of packaging units roughly doubling between 2023 and 2030. At the same time the regulation pushes us to cut virgin material use dramatically — down to about 50% of today's level. That means in the future we will need to run on roughly 25% virgin material and 75% recycled content. That is why we need to minimise and optimise like never before — and why EPR data alone is nowhere near enough.”

Illustrative example based on Commission impact assessment and market trends

Official EU stats show today:

~40–50% of all paper used in the EU goes into packaging.

~40% of all plastics used in the EU go into packaging.

Where are we now?

- ▶ 2022-2024 Proposal phase - discussion- negotiations - future problem
- ▶ 2025 Operational reality starts to hit organisations
- ▶ 2026
 - August 12, 2026 - Declaration of Conformity obligations approaching
 - Operational pressure is increasing
 - Companies start to realise packaging data is fragmented
 - Companies start to realise that the packaging supply chain is complicated

What does that mean?

What do we need to do? What has to be done?

- ▶ Packaging that is placed on the market needs to be recyclable.
- ▶ This means the right materials need to be used.
- ▶ This means that the right substances need to be used: consider ink, consider glue, consider coating
- ▶ “Substances of Concern” are added to the traditional scope of “heavy metals”
- ▶ Minimise the empty space
- ▶ Introduce recycled content - and prove it (**no unsubstantiated claims!**)
- ▶ Keep track of it all in a technical file
- ▶ Draw up a Declaration of Conformity to confirm the “assumption of compliance”



Serious about product compliance.

Who has to do what where when?

How do you like this to happen?

- ▶ Preferable use the same flow as the product compliance workflow
- ▶ Place the evidence creation at manufacturer. That ensures scale of operation.
- ▶ Use Verifeyer Smart Form to do a proper risk assessment and collect EPR data in one go preferably
- ▶ Rely on ProductIP for onboarding your team and suppliers, one-to-many via online training and ProductIPedia

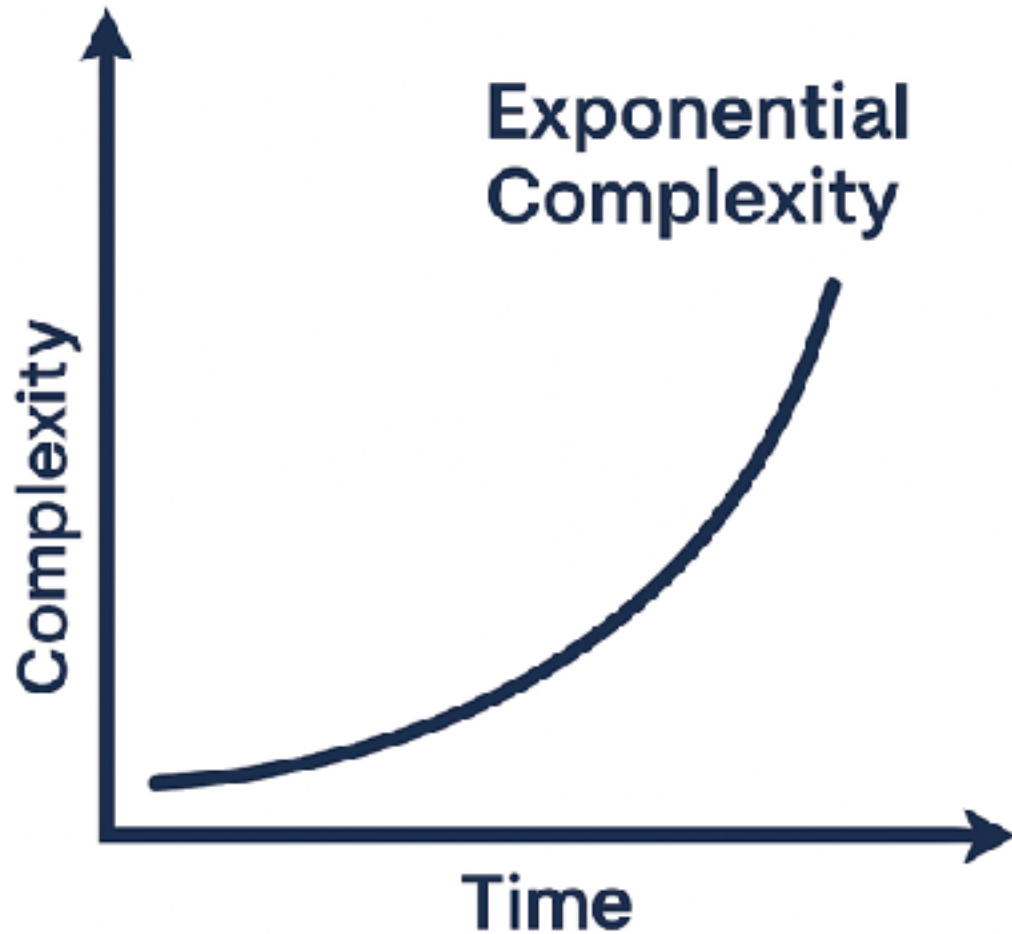


Serious about product compliance.

This is not “just a change”

Most companies still think PPWR means:

- questionnaires
- spreadsheets
- declarations
- “supplier says compliant”
- annual updates



“You are not adding documents. You are adding operational relationships.”

PPWR will surface suppliers you barely operationally manage today

- ▶ packaging manufacturers
- ▶ printers
- ▶ fillers
- ▶ converters
- ▶ raw material suppliers
- ▶ wholesale
- ▶ co-packers



Serious about product compliance.

“You are not adding documents. You are adding operational relationships.”

Think about it. What elements are in packaging?

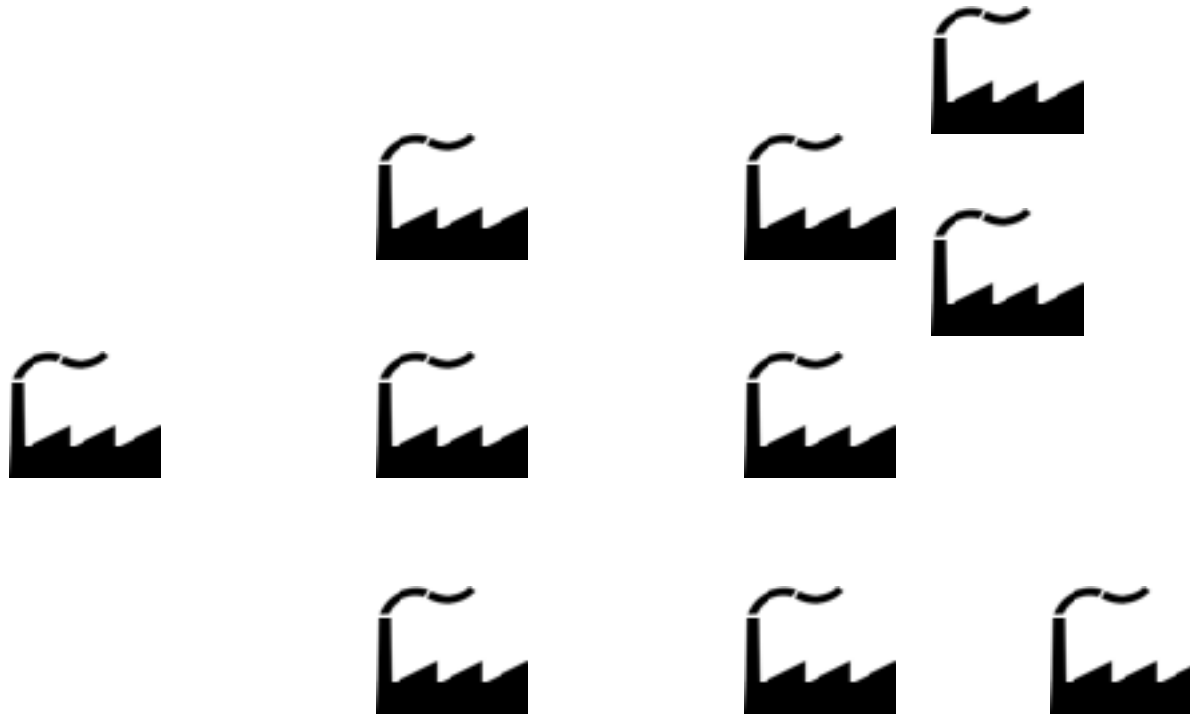
- ▶ carton
- ▶ labels
- ▶ printed inkt
- ▶ glue
- ▶ tape
- ▶ polybag
- ▶



Serious about product compliance.

You will have to deal with many new entities. With who you have had no business relationship before.

Packaging Supply Chain is Complex



And we are moving away from from SKU-based to Batch-Based rhythm

Not Once. Continuously.

- ▶ data maintenance
- ▶ evidence refresh
- ▶ supplier onboarding
- ▶ packaging updates
- ▶ evolving declarations
- ▶ audit-ability
- ▶ market-specific requirements



Serious about product compliance.

“Authenticated Compliance Data is the new currency.”

From documents to structured data

What we are used to collect

- ▶ PDFs

What we now need

- ▶ Structured packaging information
- ▶ Reusable datasets
- ▶ Component-level visibility
- ▶ Connected evidence (recyclability, recycled content)
- ▶ Future reporting readiness



Serious about product compliance.

The market is underestimating the operational scale

The Operational Volume Problem

- ▶ thousands of data points (1.000+ !)
- ▶ supplier chasing
- ▶ supplier onboarding
- ▶ update cycles
- ▶ multiple packaging layers
- ▶ multiple markets
- ▶ evolving obligations



Serious about product compliance.

The Cost of Non-Structure

- ▶ 15 minutes inefficiency
- ▶ × 10,000 SKUs
- ▶ × packaging layers
- ▶ × update cycles
- ▶ × suppliers
- ▶ = operational chaos

For some organisations this quickly becomes tens of thousands of operational hours. For yours?



PPWR will expose operational maturity gaps

- ▶ Who owns the data?
- ▶ Who validates it?
- ▶ Who monitors suppliers?
- ▶ Who updates evidence?
- ▶ Who can prove what happened?
- ▶ Who scales this operationally?

“Retail is a numbers game. The numbers changed.”



Serious about product compliance.

After 30 years in this field I've seen the same ostrich approach every single time a new wave hits.

The Regulatory Tsunami No One is Reporting - Yet

- ▶ Legal counsel, accountants and supervisory boards are not connecting the dots
- ▶ Exponential rise in both corporate and personal management liabilities
- ▶ GPSR is live
- ▶ PPWR hits 12 August 2026
- ▶ More waves coming (PLD, EAA, DPP, EUDR, AI Act)
- ▶ Where is it in the annual reports? Where are the budget increases?
- ▶ The old “Buy for 1, Sell for 2” model still feels alive and kicking...
...until market surveillance knocks on your door...
and asks for **your packaging technical file in 10 days**



Serious about product compliance.

PPWR will be the introduction of single topic files

What will change?

- ▶ Separate technical file for Packaging - why?
 - because it has it's own compliance evidence set
 - because it has it's own risk assessment protocol
 - because it has it's own supply chain partners
 - because it has it's own Declaration of Conformity
- ▶ No more Q&A for packaging as part of a technical file for a product
- ▶ Packaging Technical File connecting to Product Technical file via Bill of Material (optional)



“For years we have been building operational infrastructure for exactly this direction.”

What we have built for you

- ▶ scalable supplier onboarding
- ▶ structured data collection
- ▶ structured risk assessment
- ▶ monitored workflows
- ▶ reusable compliance data
- ▶ supplier engagement
- ▶ operational evidence management



Serious about product compliance.

Built-in PPWR Risk Assessment

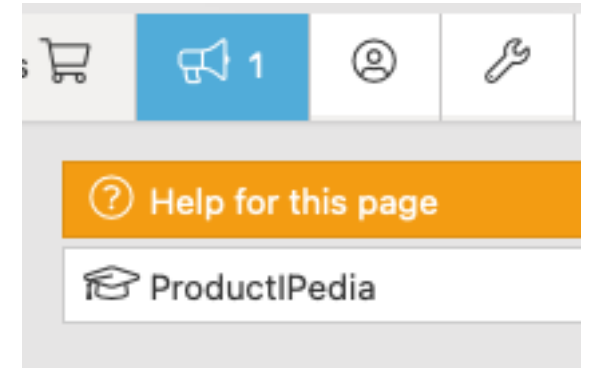
- ▶ It handles even the most complex packaging in up to 30 minutes
- ▶ It comes with guidance and instructions
- ▶ You can open it on your desktop
- ▶ Or you assign that task to your supplier/vendor via e-mail
- ▶ When done the PDF and Data return to the technical file
- ▶ We have been running Verifeyer Smart Forms for years
- ▶ They work across platforms, also in China



Guidance for your team, your suppliers team, their vendors team

ProductIPedia

- ▶ Product Compliance Resources provided by ProductIP
- ▶ PPWR step-by-step guidance now available
- ▶ <https://www.productipedia.com/kb/productipedia/compliance-resources/ppwr-intro>
- ▶ Video Guidance <https://www.youtube.com/@Productip>
- ▶ Direct links and guidance on every page in ProductIP
- ▶ Regular online training and events <https://www.productip.com/events>
- ▶ **Using ProductIP means you are giving your entire supply chain the same professional compliance toolkit and training you use yourself.**



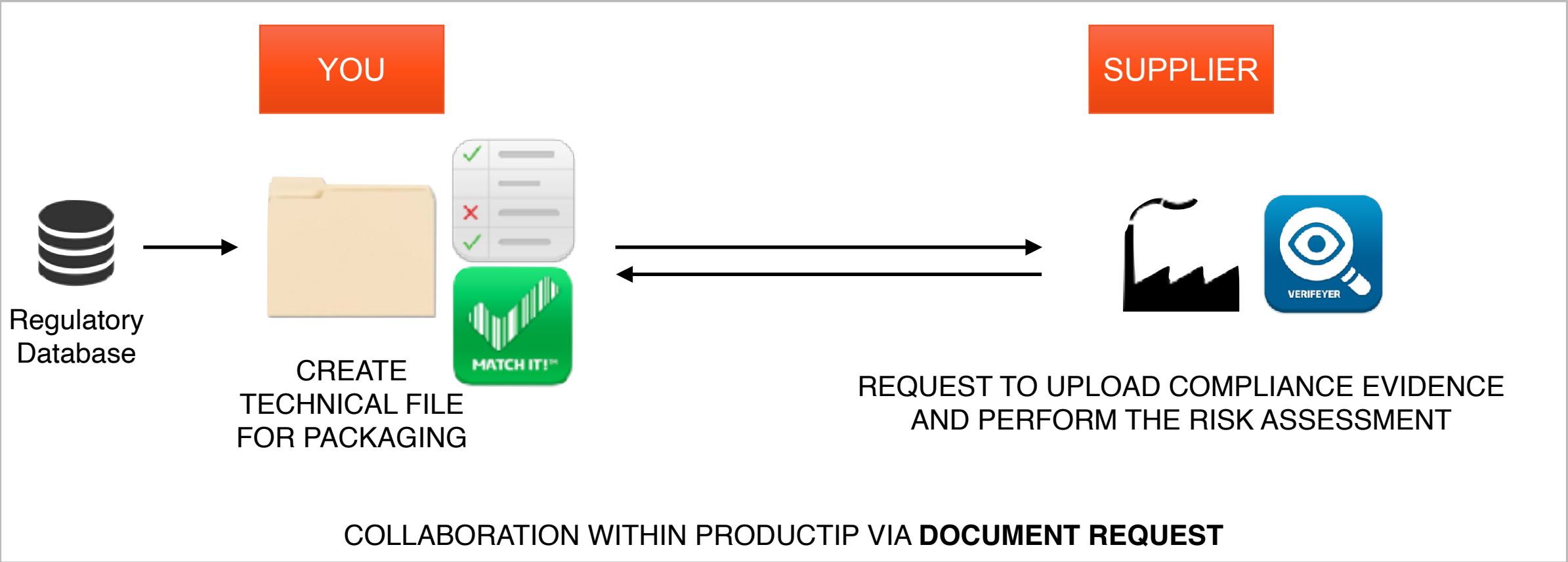
Serious about product compliance.

SME using Essential and Advanced Tier



Serious about product compliance.

Collaboration with 1st tier

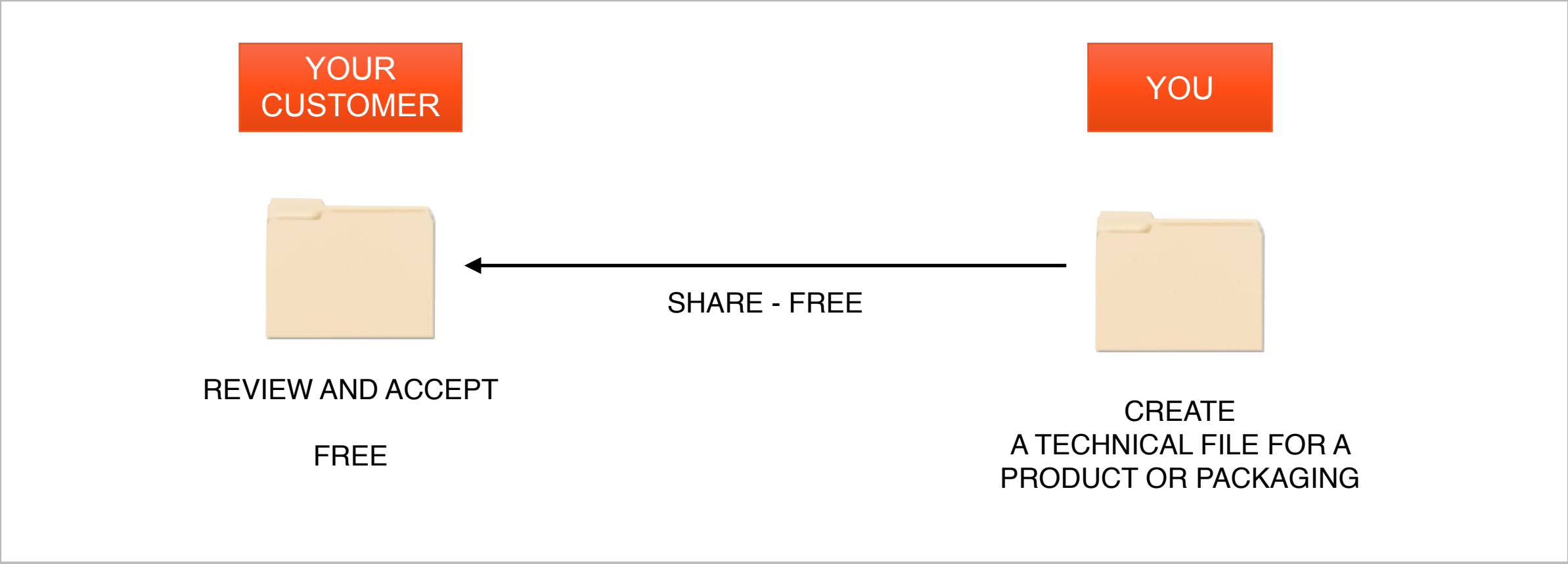


or you already start so you can share when needed



Serious about product compliance.

Sharing Via ProductIP

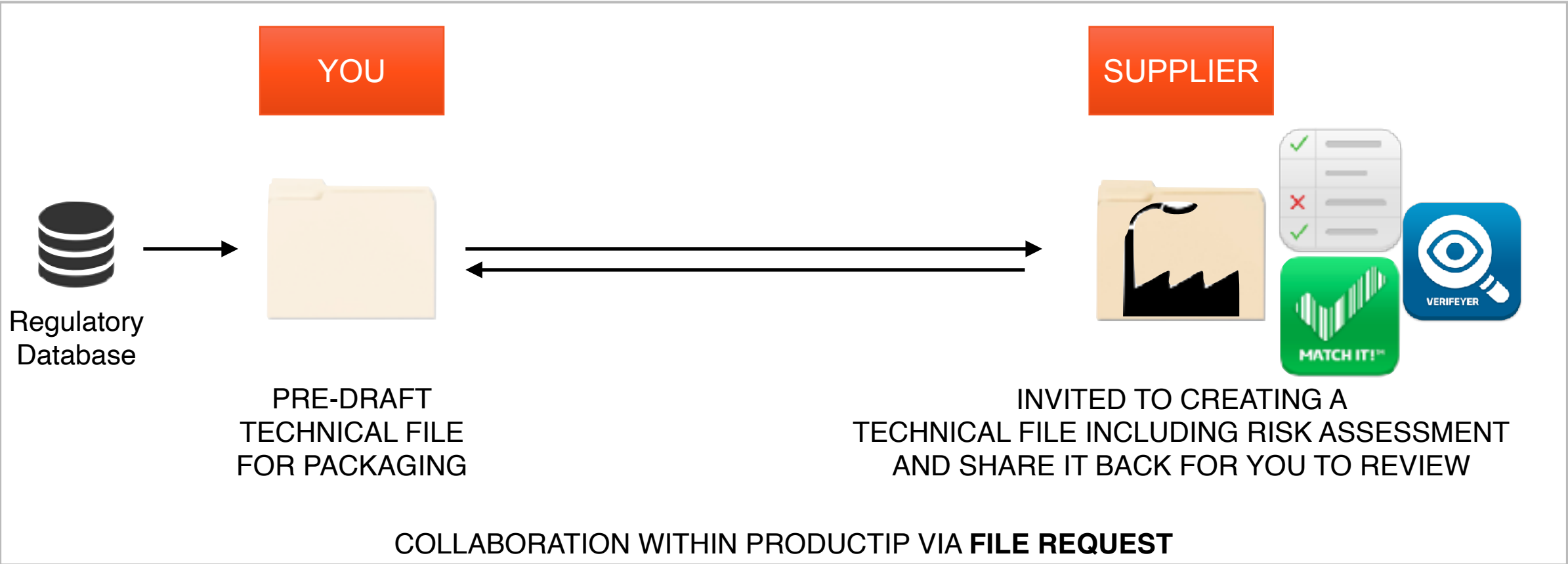


Professional and Enterprise Tier



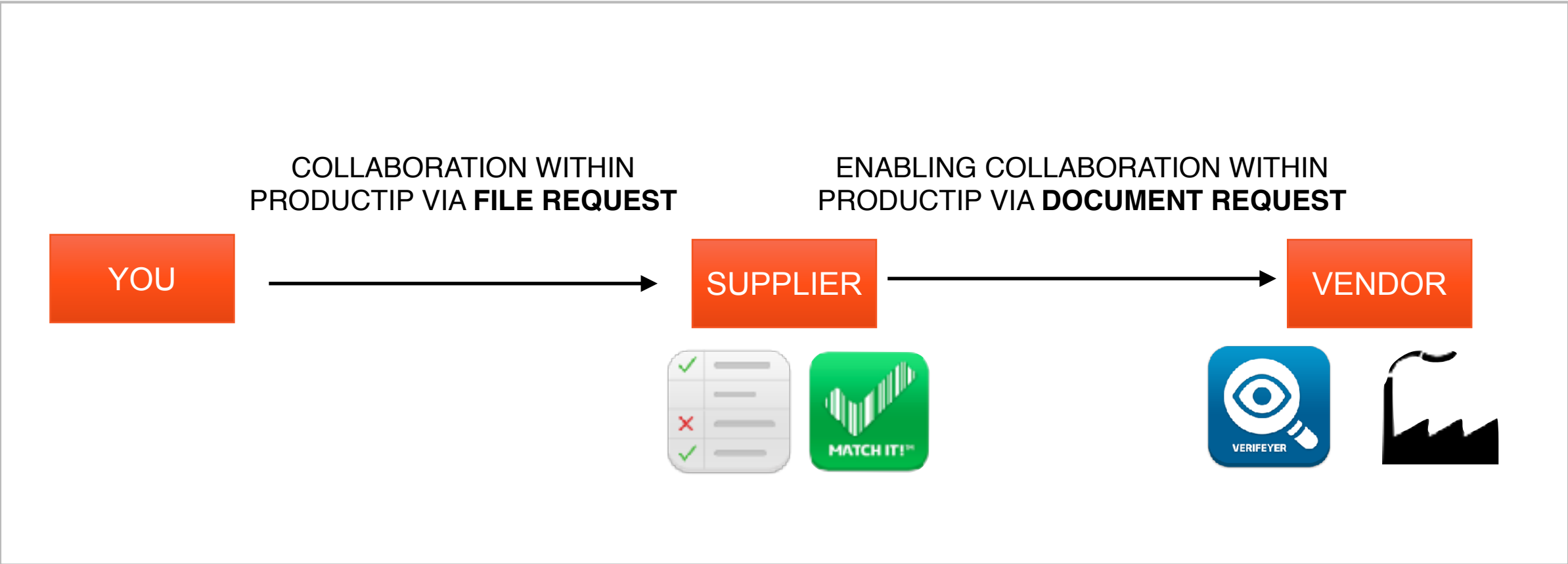
Serious about product compliance.

Reduce workload at scale



You also need Packaging Files for your Private Label packaging coming from EU suppliers

Enabling supply-chain efficiency and accountability beyond 1st tier



Serious about product compliance.

Proven track-record since 2009

The Practical Answer for Non-Food Retail & Trade

- ▶ We empower your SME suppliers — the vital backbone of your supply chain
- ▶ We offer them a simple Pay-As-You-Go pricing model so they can start immediately
- ▶ We enable fast, low-effort implementation at true enterprise scale
- ▶ We extend efficient collaboration and full accountability beyond the 1st tier (importers, traders and 2nd-tier vendors)
- ▶ Software as a Service. Knowledge as a Service, Supply Chain training as a Service
- ▶ No need for investing in a PCMS or expert team monitoring Brussel
- ▶ You focus on what you do best. Managing Performance - not compliance paperwork.



Serious about product compliance.

We'll continue to expand

What is in our scope today?

Packaging (23) »

Product Packaging (17)

Service Packaging (1)

Transport & Logistics Packaging (4)

Product packaging - Paperboard egg trays, boxes

Product packaging - Plastic egg trays, boxes

Product packaging - Paperboard drink carrier (with food contact)

Product packaging - Paper, paperboard holders and carriers for bottles

Product packaging - Paperboard drink carrier (without food contact)

Product Packaging – Non-Food

Product Packaging – Food Contact

Product Packaging – Cosmetic Contact



Serious about product compliance.

In ProductIP a Technical File for a Product, a Component or Packaging - all have the same structure

How does it look?

Technical File Supporting Questionnaire VERIFEYER ?

Recipient	Status	Created at	Completed at	VERIFEYER ?
[REDACTED]	pending	2026-05-03		
	opened	2026-05-04		

Always an overview of what is happening - or not yet happening!

! PPWR (EU) 2025/40 - Article 24(1-3) Maximum empty space ratio (grouped, transport and e-commerce packaging)

Mandatory from 2030-01-01

Clearly indicated when requirements are there but not yet needed - preparing preparing preparing



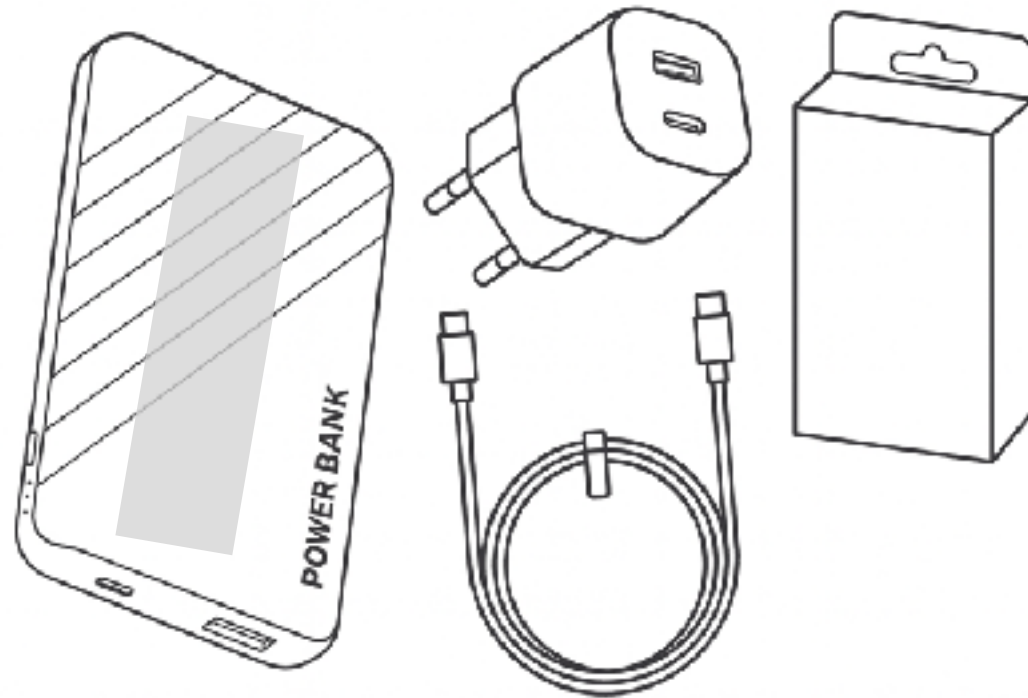
This is not just another regulatory challenge



Serious about product compliance.

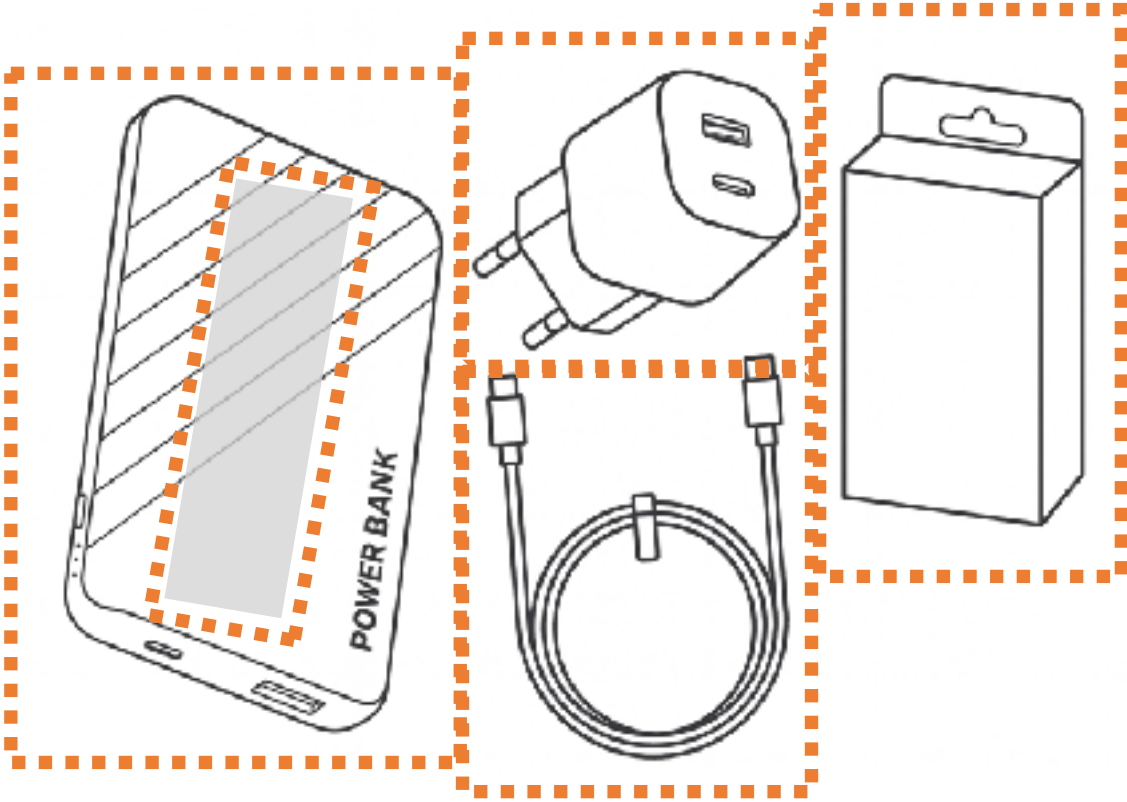
Remember this?

This used to be one single technical file



These are all items with their own Declaration of Conformity. Their own supply-chain. Their own Risk Assessment.

These all will become “single-topic-files”



Serious about product compliance.

Available for all pricing tiers

What does that mean in Euro's?

- ▶ Essential and Advanced
 - Make a technical file for packaging
 - you have access to the Verifeyer Risk Assessment form that you can fill out yourself or send to your supplier
 - collaborate with the supplier in Document Request mode
 - payment is the same as if you would create a file for a product



Serious about product compliance.

What does that mean in Euro's?

- ▶ Professional and/or Enterprise
 - Make a technical file for packaging
 - Pay a monthly fee on top of your Flat-rate / current pricing to activate the PPWR Verifeyer risk assessment form
 - You can fill out the Verifeyer Risk Assessment form or delegate this to your supplier
 - Collaborate with the supplier in Document Request mode or in File Request mode
 - File Request mode enables your supplier to collaborate with their vendor using ProductIP as well.
 - Payment is the same as if you would create a file for a product. (it counts within Flat-rate agreement)
 - Fair use policy = 1.000 technical files or supplier profiles/month. *AVG 3 months period. +€5 per unit over threshold*

What is ProductIP doing extra for all of this?

What? Why do I need to pay?

- ▶ We create and maintain the smart risk assessment form
- ▶ We support you and your 1st tier suppliers, and in many a case also your 2nd tier suppliers with
 - how to use ProductIP streamlining the process for you
 - how to use the Verifeyer Risk Assessment form
 - collect Extended Producer Responsibility (EPR) related datapoints
 - provide manual (essential/advanced) and automated (professional/enterprise) expert of EPR related datapoints



Serious about product compliance.

Keep track of changes. Download the ProductIP smartphone App now.

What is the timeline?

- ▶ We are starting testing the packaging files and risk assessment form at scale with some customers now.
- ▶ We will activate the single-topic-files for packaging and disable the Q&A on packaging as part of a product file
- ▶ Then all will be working in the new method
- ▶ These updates will follow each other relatively fast in the coming few weeks



Serious about product compliance.

Most frequently asked questions — Full FAQ + detailed answers are in the handout.

FAQ

- ▶ As a current user — do I need to do something today?
→ No. Essential/Advanced users will automatically move to packaging files once we flip the switch. Enterprise/Professional users will be contacted if they want the PPWR module added.
- ▶ How does ProductIP work with our existing ERP / PIM systems?
→ It sits between your ERP, PIM and suppliers. CSV import/export, workflow status feedback, re-order expiry dates and final document sets can all flow back into your systems.
- ▶ Is ProductIP also our partner for Extended Producer Responsibility (EPR)?
→ → We help you collect EPR data in the same workflow, so you limit the number of contact moments with your supply chain partners.



Serious about product compliance.

download the ProductIP smartphone app now!

and

sign-up via <https://connect.ProductIP.com>



iPhone

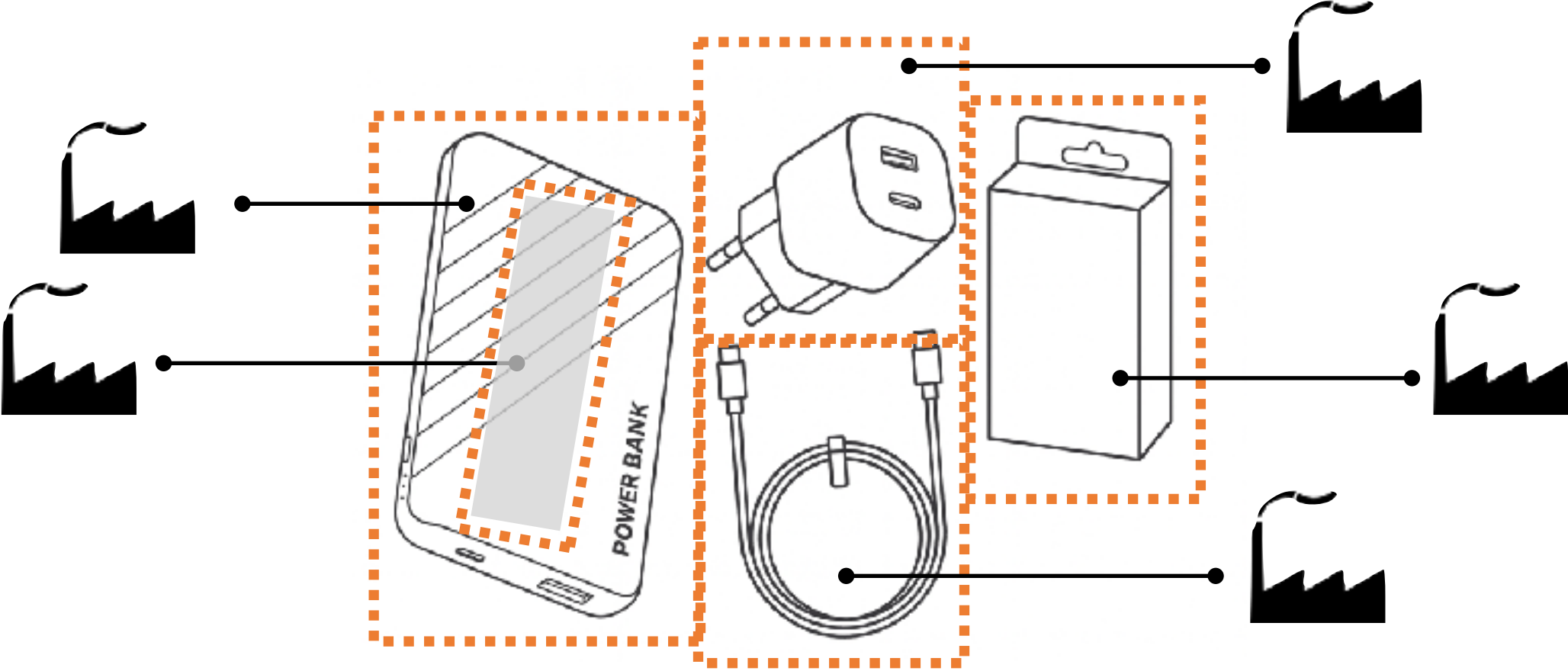


Android

Compliance is no longer a side process.
It is becoming supply-chain infrastructure.



Every component is a supply-chain relationship.



Can an ESG/CSR issue in production of a €0.002 packaging component prevent market access?”



What is the weakest link?
It is Your DoC. It is Your Supply Chain.



Product compliance is not about collecting PDFs.

It is about asking the right questions at scale —
and recognising which answers never come back.

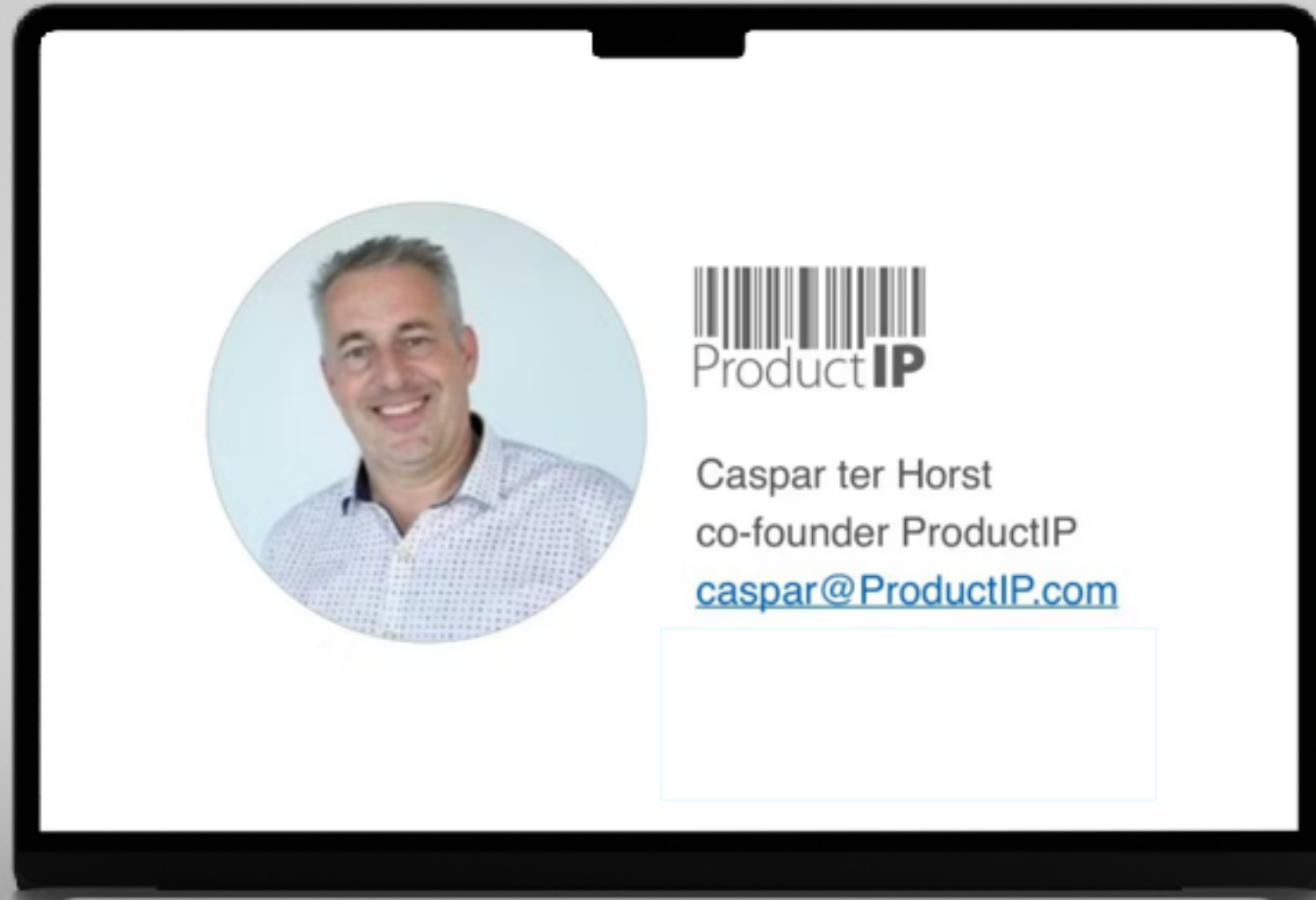


Because silence is also data.



Serious about product compliance.

More information about ProductIP: www.ProductIP.com



Serious about product
compliance.



www.productip.com
info@productip.com

Do I need to do something now

FAQ

- As a current user/ Do I need to do anything today?
- No. Essential or Advanced Tier users will move to making packaging files once the Q&A is changed
- No. We will reach out to Enterprise and Professional users if they want to add the PPWR module to their contract
- **advise to** all Download the ProductIP smartphone app and sign up on <https://connect.productip.com> in order to ensure you do not miss out on any updates on regulation, platform updates, events

This also means you will have access to ProductIPedia in your pocket



Serious about product compliance.

Download the ProductIP Smartphone App Now!



iPhone



Android

Do I need to do something now

FAQ

- What if I am in Professional and or Enterprise mode?
- You can make technical files for packaging, including generating DoCs, without using our Verifeyer Risk Assessment form. In that case you do not have to pay for an additional PPWR module functionality. This also means that no EPR data will be collected, thus there is also no EPR data that can be exported.
- If you do want to use our PPWR smart form for risk assessment, and benefit from EPR data collection and sharing, you will have to activate the PPWR module for €950 a month.
- Note that additional costs may occur in case you'll go over the flat rate fair use number.

How to activate it? e-mail your request to caspar@productip.com



Serious about product compliance.

Do I need to do something now

FAQ

- ▶ Is there not a “lite” variant to start working on PPWR given that August 12, 2026 we need to have DoCs already?
- ▶ It is just like with any other product related technical file.

ProductIP offers you a regulatory checklist and a way to collaborate at scale with your suppliers.

You can collect supplier declarations and generate a DoC for packaging also without performing a risk assessment. If that is the LITE approach you are looking for, be our guest.



Serious about product compliance.

(kind of thinking outside the box ..)

FAQ

- ▶ What if I would like to start using ProductIP only for PPWR?
- ▶ Yes that is possible of course. You don't need to manage the compliance of what is in the box with ProductIP in order to manage the compliance of the box.



Serious about product compliance.

Do I need to do something now

FAQ

- ▶ How does ProductIP interoperate with existing IT systems (**For Enterprise and Professional customers**)
- ▶ ProductIP is situated between your ERP and PIM system and your Suppliers.
 - The feed most of the time starts from ERP - orders.
 - Pre-Draft or Draft files are created via CSV import - manual or scheduled.
 - Supply Chain collaboration is started. Workflow status information can be fed back into your ERP system.
 - Workflow escalation to category management when supply chain partners underperform.
 - Once technical files are signed off the re-order expiry date can be fed back into your ERP system.
 - Final documents can be exported. Final data set can be exported for use in your ERP and PIM
 - ProductIP does not manage master data and is not in your commercial operation.



Serious about product compliance.

Is one article one packaging?

FAQ

- ▶ Can I consider “Packaging Families” to match “Product Families”
- ▶ Yes for those packaging designs that stay the same regardless of the product inside it.

But if used packaging materials start to change in size significantly because of the various sizes of the product, you should possibly see different levels of recyclability, and could well need a file per packaging!

Enterprise and Professional users. Start with File Requests per item and let the supplier merge what can be merged!



FAQ

- ▶ Packaging on a DoC. Does that mean that packaging needs to have its own “part number” or “article number”?
- ▶ Packaging must be able to be identified in order for you to demonstrate a match between your evidence and the packaging in the market. You can start packaging technical files using your product article numbers unless you are going to migrate from that and move towards dedicated packaging designs. In that case you’ll need to find a way to make clear to authorities which (piece of packaging material) packaging belongs to what technical file and DoC.

Do I need to do something now

FAQ

- Is ProductIP also my partner for recycling - Extended Producer Responsibility (EPR) reporting?
- We help you to collect the relevant data points.
We are not the one enriching this data with quantities over time sold in the various Member States.
We are not involved in registration and reporting nor are we an EPR representative
We are not in the commercial part of your operation.

EPR responsibilities has to be dealt with using other 3rd parties



Serious about product compliance.

Do I need to do something now

FAQ

- We have way to many different packaging designs and suppliers!
- Time to simplify where possible. Start where it makes most business sense.



Serious about product compliance.