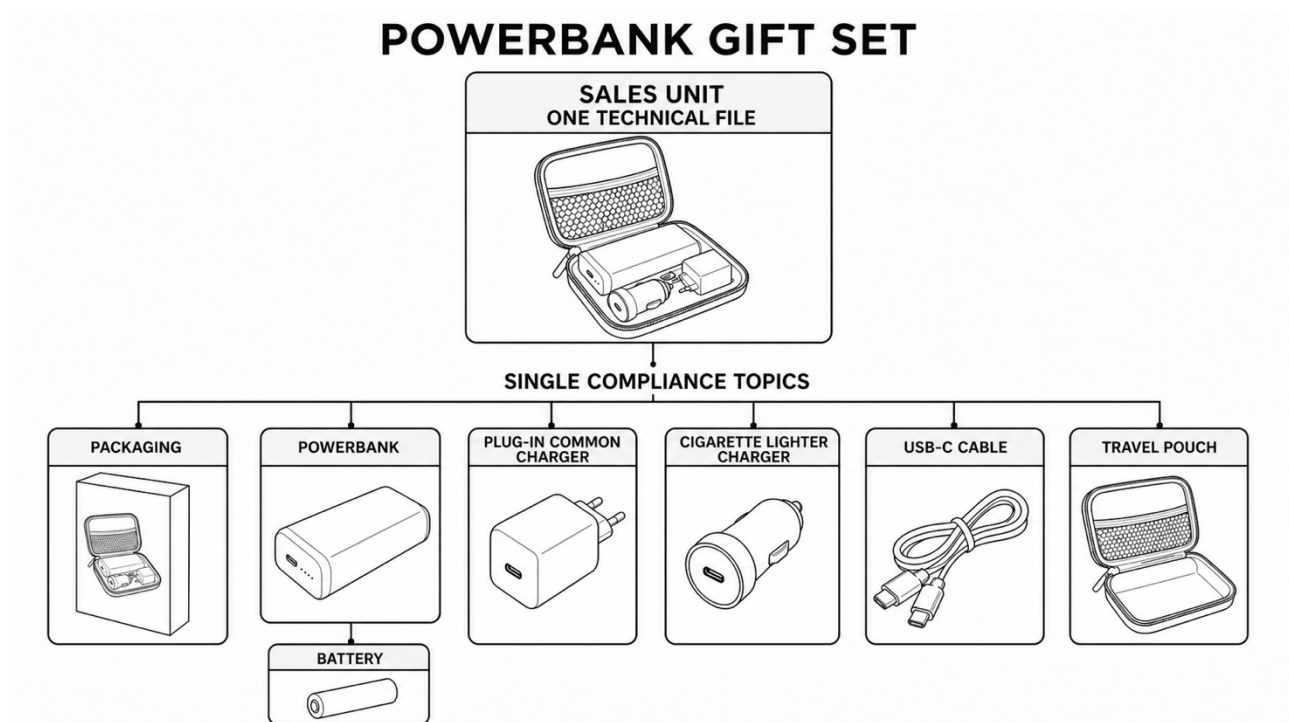


Executive Summary

- From **12 August 2026**, PPWR requires packaging to be managed as a separate compliance object.
- ProductIP introduces the concept of **Single Compliance Topics**.
- Packaging is the first Single Compliance Topic. **Batteries, charging equipment, cables and other regulated articles will follow.**
- The Technical File for your main Sales Unit will no longer show packaging requirements. These are now managed the **Packaging Single Compliance Topic**.
- The **ProductIP PPWR Verifeyer Smart Form** provides structured Packaging Risk Assessment and at the same time forms the foundation for future EPR-related data collection and system integrations.
- New import functionality is available for the automatic creation of Packaging Single Compliance Topics, including smart linking between the Sales Unit and its Packaging Single Compliance Topic.

Example: One Sales Unit. Multiple Single Compliance Topics.



A Sales Unit (SKU) remains your commercial reality. Single Compliance Topics become your compliance reality.

Your business will not stop because the Packaging and Packaging Waste Regulation (PPWR) enters into force on 12 August 2026. Products will continue to be developed. Orders will continue to be placed. Containers will continue to leave factories. Your challenge is to incorporate new packaging responsibilities without slowing down your business.

1. Maintain compliance access to the European market.

In order to keeping your business moving under PPWR, you will now also need a Declaration of Conformity for your packaging, supported by its own technical documentation.

At a minimum, this requires:

- A comprehensive set of compliance evidence.
- A packaging risk assessment (using ProductIP's dedicated PPWR Verifeyer Smart Form).
- A Declaration of Conformity (DoC), generated from within your ProductIP account.

Much of this compliance evidence—including many of the required data points—is likely to originate beyond your first-tier supplier. For many organisations, this means expanding both their compliance activities and their collaboration throughout the supply chain.

In practice, this also means engaging with organisations from whom you have never before requested compliance information. Some of them may not even know your organisation yet.

PPWR is therefore not a project you complete this month. It is a transition that will remain on your agenda for many months to come. The challenge is to incorporate these new responsibilities while your business continues exactly as it always has. You organise these new responsibilities efficiently using ProductIP.

- With structure instead of scattered documents.
- With workflow instead of e-mail.
- With control instead of uncertainty.
- With online built in support for your suppliers and their vendors
- With notifications if something needs to be done

You organise packaging compliance in ProductIP the way European legislation increasingly expects compliance to be organised.

PPWR is more than just another regulation. It marks a broader shift in the way European product legislation increasingly regulates individual compliance objects. Packaging is the first visible example. Batteries, charging cables, external power supplies, Food Contact Material accessories and other regulated articles will soon follow.

2. A Sales Unit is no longer a single indivisible compliance object.

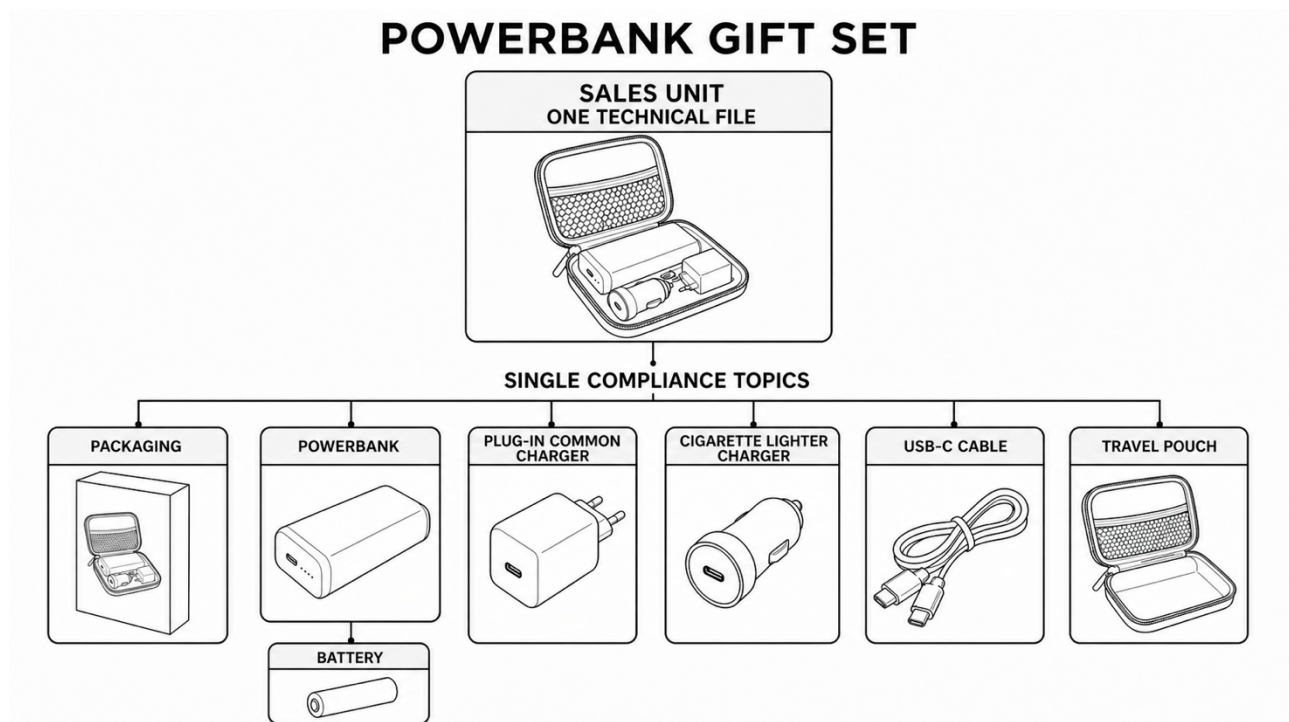
From one Technical File to multiple Single Compliance Topics

Until now, one technical file typically represented one Sales Unit. A Sales Unit remains your commercial reality. Single Compliance Topics become your compliance reality. A gift set with a power bank with its battery, USB charging cable, plug-in charger, car-charger and packaging usually resulted previously in one technical file and one Declaration of Conformity. European legislation is moving beyond that model.

The individual articles that together make up the Sales Unit increasingly have their own legal obligations, technical documentation and, where applicable, their own Declaration of Conformity. ProductIP now reflects that reality by introducing Single Compliance Topics. Each Single Compliance Topic contains all compliance evidence relating to one regulated article while maintaining its relationship with the finished Sales Unit.

Today, your transition starts with Packaging (PPWR). It is the first of many regulated articles that European legislation increasingly treats separately.

3. Example: One Sales Unit. Multiple Single Compliance Topics.



4. Packaging as Single Compliance Topic

Packaging is the first practical application of this new compliance architecture.

Until now, packaging compliance formed a limited integral part of the Technical File of the Sales Unit. PPWR imposes more extensive compliance requirements and documentation for packaging, which must be clearly distinguished from the packaged product documentation. This also facilitates easier sharing with market surveillance authorities when requested.

From this separate set you can then also generate the Declaration of Conformity for the packaging itself.

5. PPWR introduces two closely related responsibilities.

The first is demonstrating that your packaging complies with the regulation. The second is collecting the information required for Extended Producer Responsibility (EPR) processes throughout your supply chain.

Rather than treating these as two separate supplier interactions, ProductIP efficiently combines them into a single process. The ProductIP PPWR Verifeyer not only supports the required packaging risk assessment but also captures the EPR-related data required for downstream EPR processes.

Much of the information required for both packaging compliance and EPR originates from the same suppliers. Collecting it once is significantly more efficient than requesting it through separate processes.

As ProductIP's ERP and PIM integrations evolve, these data will become available for downstream reporting without having to ask suppliers for the same information twice.

Please note: Managing EPR registrations and fulfilling EPR obligations in the various EU Member States remain outside the scope of ProductIP. Available functionality and levels of automation vary by ProductIP subscription tier.

6. Efficiently managing multiple compliance objects

Previously, all compliance information lived inside one Technical File. Single Compliance Topics separate that information into logical compliance evidence sets while preserving their relationship to the Sales Unit.

Think of a Sales Unit as a book. Each Single Compliance Topic is a chapter. Together they tell the complete compliance story.

You might wonder whether Single Compliance Topics result in extra work or reduced efficiency. We anticipated that. That is why ProductIP enables you to bundle supplier requests for data and documentation for several connected Single Compliance Topics, allowing the original Document-Request-upload process or File-Request-share process to remain the same. With maximum flexibility that mirrors your supply chain and buying procedures.

Of course, the option to treat packaging as a separate technical file entirely is also available. As some of our users are opting for complete separation of the compliance evidence collection processes for packaging. A similar Single Compliance Topic approach will be in place for batteries, for power adapters, for charging cables, etc.

7. Today's Packaging. Tomorrow's Compliance Architecture.

Packaging is the first Single Compliance Topic introduced within ProductIP.

It will not be the last.

European legislation increasingly regulates individual articles such as batteries, charging cables, external power supplies and Food Contact Material accessories.

ProductIP evolves today so your compliance process is ready for tomorrow's legislation

8. More work today. More control tomorrow.

Let's be realistic. In the short term, this creates additional work. No matter how we organise it.

- More sets of information to be collected, reviewed, organised.
- More supplier interaction. Most likely beyond 1st and perhaps even 2nd tier.

But this is exactly what a Product Compliance Management System is about. Compliance does not become simpler by putting everything into one technical file. Compliance becomes manageable when every compliance responsibility has its own place.

Packaging is the first Single Compliance Topic introduced within ProductIP. It will not be the last. As European product legislation continues to evolve, ProductIP will continue to organise compliance around the individual regulated articles that make up your products.

9. Pricing - What is the financial impact?

9.1 Essential (Manual File Creation)

Nothing fundamentally changes. From now on you can activate a Packaging Single Compliance Topic using your existing credits. A relation between the Sales Unit (Product) Technical File and the Packaging Single Compliance Topic can be established via the Bill of Material (see packaging in this context as a component of the product).

The PPWR Verifeyer Smart Form is available as part of the Packaging Single Compliance Topic and is paid for by credits when the Packaging Single Compliance Topic is activated.

As the number of Single Compliance Topics increases, this may also be the right moment to evaluate whether your current Pay-As-You-Go pricing model still matches the way your organisation works.

9.2 Advanced (Manual or Excel Import File Creation)

Manual process. Nothing fundamentally changes. From now on you can activate a Packaging Single Compliance Topic using your existing subscription and payment setup. A relation between the Sales Unit (Product) Technical File and the Packaging Single Compliance Topic can be established via the Bill of Material.

The PPWR Verifeyer Smart Form is available as part of the Packaging Single Compliance Topic and is paid for via your monthly statement, confirmed by you when the Single Compliance Topic is activated.

Excel import. In the Excel File there is now a new column Create Packaging File.

Example New PPWR Activation Via Import

Article Number	Article Name	Market Release Date	Create Packaging File
ABC7x	My Microwave 7a	2026-08-12	1
ABC8x	My Microwave 8a	2026-08-12	1

If marked with 1 (or Y, y, Yes, yes) a packaging file will be created. We will use the existing Article Number and we add -PACK.

In this example we will create ABC7x and ABC7x-PACK and the underlying relationship. Same for ABC8x and ABC8x-PACK.

We will continue to work on improving this functionality. Customers with an automatic import/export script will be contacted to coordinate the upgrade to incorporate this functionality.

The updated Excel import template is available now via

<https://secure.productip.com/excel>

9.3 **Professional & Enterprise**

The **PPWR Operational Layer** is available for Professional and Enterprise customers as part of ProductIP's functionality. It includes the ProductIP PPWR Verifeyer Smart Form for Packaging Risk Assessments.

The PPWR Verifeyer is designed not only to support the required Packaging Risk Assessment, but also to establish a structured foundation for collecting EPR-related data throughout your supply chain. These data can later be exported to external platforms for further processing.

Additional PPWR and EPR-related functionality will be introduced in future ProductIP releases. This includes support for structured ERP, PIM and other system integrations, allowing PPWR and EPR-related data to become part of your existing business processes.

Enterprise and Professional customers can also involve suppliers—and, through File Requests, their suppliers' vendors—in this process. Because via File Request suppliers can share the PPWR Verifeyer form with their vendors.

Packaging Single Compliance Topics can be activated, and a PPWR Declaration of Conformity can be generated whenever you conclude that sufficient evidence is available to support a presumption of conformity with the applicable essential requirements.

The introduction of the PPWR Operational Layer affects the subscription fee for Professional and Enterprise customers. Organisations to which this applies will be contacted individually by their ProductIP representative.

Customers with an automatic import/export script will be contacted to coordinate the upgrade to incorporate a functionality that enables automatic creation of Packaging Single Compliance Topics as well as the relation with the Technical File of the Sales Unit during import.

10. Why does the PPWR Operational Layer affect the Professional & Enterprise subscription?

The PPWR Operational Layer is more than a Packaging Risk Assessment.

It introduces additional ProductIP infrastructure that supports structured PPWR and EPR processes today while providing the technical foundation for future functionality and integrations.

Additional infrastructure is required because:

1. Supply chain collaboration at scale

Professional and Enterprise customers collaborate extensively with suppliers using (pre-paid) File Requests rather than Document Requests. Those suppliers can, in turn, collaborate with their own vendors through Document Requests and the PPWR Verifeyer Smart Form.

2. A structured PPWR and EPR data model

The PPWR Operational Layer introduces a structured foundation for Packaging Risk Assessments and EPR-related data that can be reused throughout your organisation.

3. Future integrations and enhanced data exchange

Future ERP, PIM and other system integrations require additional ProductIP infrastructure, including dedicated APIs and enhancements to existing data exchange mechanisms to support structured PPWR and EPR-related data flows.

Packaging Single Compliance Topics, as well as future Single Compliance Topics, count towards your agreed Fair Use allowance.

For further information, please contact your ProductIP representative or send an email to sales@productip.com.

11. What are the available Packaging Categories at launch?

From today, the following Packaging Categories are available:

- Product Packaging – Non-Food
- Product Packaging – Food Contact
- Product Packaging – Cosmetic Contact
- Service Packaging
- Transport / Logistics Packaging

These Packaging Categories provide most organisations with everything needed to start organising their packaging compliance today.

Note that this is relevant only for Technical Files and Single Compliance Topics created with a Market Release Date of August 12, 2026, and later.

12. Where should you start?

Set aside approximately 45 to 60 minutes and read our PPWR article series on ProductIPedia. PPWR is here to stay. The sooner you understand how the legislation is evolving; the easier implementation will become.

Investing less than an hour to understand the fundamentals of PPWR is one of the smallest investments your organisation will make in preparing for the years ahead.

<https://www.productipedia.com/kb/productipedia/compliance-resources/ppwr-intro>

CONCLUSION

The beginning of a new way of organising Product Compliance

Packaging is the first Single Compliance Topic introduced within ProductIP. It will not be the last. As European product legislation continues to evolve, ProductIP will continue to evolve with it.

Product Compliance does not become simpler.

The way you manage it with ProductIP does.

With structure instead of scattered documents.

With workflow instead of e-mail.

With control instead of uncertainty.

Start today. Improve tomorrow.

FREQUENTLY ASKED QUESTIONS

FAQ 1. Is there a PPWR Lite?

Probably the question we hear most often.

We are launching the Verifeyer Smart Form with something we call “Core 2026” focussing on the main topics that need to be tackled at start. Companies that want to look beyond that horizon will be able to do so as well.

Of course a company can take the risk to just sign a Declaration of Conformity (DoC) without any underlying evidence; we would strongly suggest choosing the evidenced route.

From a functionality perspective, you can create a Declaration of Conformity for packaging without using the ProductIP Verifeyer Risk Assessment, or any alternative risk assessment that you consider appropriate.

However, postponing a Risk Assessment does not eliminate the need for it.

FAQ 2. Can I activate Product and Packaging Files in one go at scale?

Yes, you can do this via the upgraded excel import you can create both and establish the relationship, visible in the Bill of Material of the main Technical File. In the Excel File there is now a new column Create Packaging File.

Example New PPWR Activation Via Import

Article Number	Article Name	Market Release Date	Create Packaging File
ABC7x	My Microwave 7a	2026-08-12	1
ABC8x	My Microwave 8a	2026-08-12	1

If marked with 1 (or Y, y, Yes, yes) a packaging file will be created. We will use the existing Article Number and we add -PACK.

In this example we will create ABC7x and ABC7x-PACK and the underlying relationship. Same for ABC8x and ABC8x-PACK.

We will continue to work on improving this functionality. Customers with an automatic import/export script will be contacted to coordinate the upgrade to incorporate this functionality.

The updated Excel import template is available now via

<https://secure.productip.com/excel>

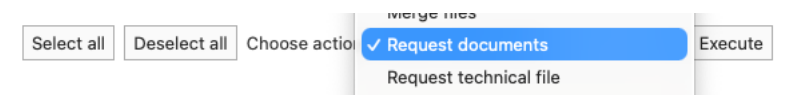
FAQ 3. Can I combine Document and or File Requests?

This functionality was already available, and you find it on the Technical File overview page.

Step 1: Select the relevant Technical Files|

Step 2: Select the relevant function

Step 3: Execute.



Note. As this is communication with specific context, you can only activate it per supplier.

* File Request (Request Technical File) is available to certain pricing tiers only

FAQ 4. Can we create one Single Compliance Topic for all cardboard boxes or polybags?

No, you should not. That would be like creating a Single Compliance Topic for every power bank simply because every power bank contains a battery.

Each manufacturer has its own production process. Its own suppliers. Its own materials. Its own printing ink. Glue. Coating. FSC/PEFC and similar licenses, Its own compliance substantiation.

What you can do is simplify. Develop standard packaging concepts. Nominate dedicated packaging suppliers for your product manufacturers. Minimise variations.

FAQ 5. What if my supplier is located in the EU and supplies me with Private Label products?

You remain responsible for the compliance of the packaging, just as you remain responsible for the compliance of the product inside the packaging that carries your brand.

Note: responsibility for EPR registration and recycling fee obligations depends on many factors and falls outside the scope of ProductIP.

FAQ 6. What about existing technical files?

Existing Technical Files remain unchanged.

However, when you clone a technical file for a future order, packaging requirements will no longer be included within the Sales Unit Technical File.

As from that moment, you will create a separate packaging Single Compliance Topic.

FAQ 7. Can ProductIP also be used solely for PPWR?

Yes. Organisations that operate outside the traditional ProductIP scope - for example companies active in Food or Feed products - can also use ProductIP purely to stay in control of their PPWR compliance. EPR fulfilment is not part of our scope.

Please contact sales@productip.com for further information.