



FEPE Practical Guidance

Preparing for the first PPWR Obligations

Regulation (EU) 2025/40

Applicable from 12 August 2026

Version 1.0

July 2026

Federation of European Producers of Envelopes and Light Packaging

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Main Guidance

1 Purpose

This Practical Guidance has been prepared by FEPE to assist manufacturers, converters and suppliers in preparing for the first obligations under Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR), applicable from 12 August 2026. Detailed technical guidance is contained in the Annexes.

2 Is my product covered?

Communication envelopes used for correspondence are considered by FEPE to be communication items and should not be regarded as packaging. Packaging used to transport or contain goods falls within the PPWR. See Annex I for FEPE's Joint Industry Statement.

FEPE is still awaiting formal confirmation from the European Commission, together with a clear definition or practical guidance. The Commission has indicated that this clarification should be included in the next PPWR FAQ document, which is expected to be issued before 12 August 2026.

Footnote: Companies placing products on the German market should exercise particular caution. Under the German Packaging Act (VerpackG), promotional flyers or advertising inserts enclosed with correspondence may, in certain circumstances, be regarded as packaging rather than part of the communication itself. Companies should therefore assess such mailings on a case-by-case basis in light of the applicable German requirements.

3 Before 12 August 2026

Manufacturers should ensure they have:

- Technical Documentation
- Declaration of Conformity
- Supplier documentation
- Traceability records
- Internal compliance procedures

4 Declaration of Conformity

Manufacturers are responsible for preparing the Declaration of Conformity supported by Technical Documentation. It should be retained and made available to competent authorities only upon their request (within 10 days of the request).

5 Requirements Applying Later

Additional PPWR obligations, including recyclability performance grades, harmonised labelling and packaging minimisation methodologies, will apply following secondary legislation.

6 Further Information

The following annexes provide practical tools to help companies prepare for the first PPWR obligations.

Annex I – Joint Industry Statement

May be shared with customers requesting PPWR documentation for communication envelopes until the European Commission provides further clarification.

Annex II – Supplier Information Checklist

A checklist of the key supplier information and documents to collect before 12 August 2026.

Annex III – PPWR Compliance Statement Template

A template that companies can adapt and complete for their own PPWR compliance communication.

Annex IV – Technical Documentation Guide

A practical overview of the documents and information needed for the PPWR technical file.

Annex V – Frequently Asked Questions

Answers to the questions most frequently raised by FEPE members on the first PPWR obligations.

7 Final Remarks

FEPE intends to review and update this Guidance as further Commission guidance and secondary legislation become available.

ANNEXES

Reference Documents

The following annexes complement the Main Guidance. They provide detailed technical information, templates and practical tools required to support implementation of the first PPWR obligations. The technical content should be read together with the Main Guidance.

ANNEX I

Joint Industry Statement on the Status of Communication Items under Regulation (EU) 2025/40 (PPWR)

This Joint Industry Statement has been initiated and coordinated by the **Federation of European Producers of Envelopes and Light Packaging (FEPE)**.

The undersigned organisations represent stakeholders from across the paper, envelope, printing, postal, mailing, direct marketing, publishing and related value chains and support the common position set out below.

Purpose

We wish to express our shared concern regarding the lack of legal certainty surrounding the status of correspondence envelopes and other communication items under Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR), particularly as the first obligations under the Regulation become applicable on 12 August 2026.

Across our sectors, manufacturers, distributors, printers, publishers, postal operators, mailing houses, direct marketers and users are increasingly seeking guidance regarding their obligations under the PPWR, including requirements relating to Declarations of Conformity, technical documentation and other compliance measures. Despite the imminent application of the Regulation, significant uncertainty remains regarding the treatment of communication items and the responsibilities of different actors throughout the value chain.

Long-Established Distinction Between Communications and Goods

European and international regulatory frameworks have consistently recognised a distinction between communications and goods.

Directive 97/67/EC on postal services distinguishes correspondence from items containing goods. Regulation (EU) 2018/644 on cross-border parcel delivery services differentiates between letter mail and parcels containing goods. The Universal Postal Union (UPU) framework similarly distinguishes documents and correspondence from goods and merchandise.

More recently, the European Commission itself reaffirmed this distinction in the context of Regulation (EU) 2023/1115 on Deforestation-Free Products (EUDR). Recital (18) of Commission Delegated Regulation C(2026)4920 states:

"Items of correspondence, within the meaning of Article 1, point (26), of Commission Delegated Regulation (EU) 2015/2446, serve a communication purpose and thus are not placed or made available on the market. Therefore, it is necessary to clarify that items of correspondence do not fall within the scope of Regulation (EU) 2023/1115."

This clarification confirms the long-established regulatory understanding that correspondence serves a communication purpose and should be distinguished from goods and merchandise.

Communication Items

Correspondence envelopes and similar products are primarily designed, manufactured and marketed for the transmission of communications and information, including letters, invoices, statements, administrative documents, notices, direct mail, brochures and other informational materials.

Their primary purpose is to facilitate communication between sender and recipient. They are placed on the market to enable the transmission of information rather than contain, protect or present products.

The undersigned organisations therefore consider that communication items used for the transmission of correspondence, documents and information should not be regarded as packaging within the meaning of Regulation (EU) 2025/40.

Producers of envelopes cannot reasonably determine the eventual use of every item placed on the market. Legal certainty therefore requires that products shall be assessed according to their intended and primary purpose when designed, manufactured, marketed and supplied.

Call for Clarification

We respectfully call upon the European Commission to provide clear and unambiguous written guidance confirming that **envelopes as items of correspondence used for the transmission of correspondence, documents and information are not packaging** within the meaning of Regulation (EU) 2025/40 when placed on the market for that purpose.

Such clarification would provide legal certainty for businesses, support consistent implementation across the European Union, avoid unnecessary administrative burdens and ensure a harmonised application of the PPWR across Member States.

The undersigned organisations remain available to support the European Commission with practical examples and industry expertise in order to facilitate a clear, workable and legally certain interpretation for all stakeholders.

Signatories

Initiating Organisation



FEPE - Federation of European Producers of Envelopes and Light Packaging

Supporting Organisations



PostEurope – The European postal operators' association



CEPI - The European association representing the paper industry



Intergraf – The European graphic industry association



CITPA - The International Confederation of Paper and Board Converters in Europe



Keep Me Posted EU initiative - right to receive essential communications in preferred format—digital or print

ANNEX II

Supplier Information Checklist

What is mandatory for 12-Aug-2026

type	in short	legal reference
Info on packaging	ensure serial number or other identifier; and contact details (e.g. via QR code)	PPWR art. 15.5 & 15.6
Technical documentation	series of key technical info, starting rather simple in 2026 before more complex/complete as we get closer to 2030 targets	annex VII
EU declaration of conformity	Formal statement that we are compliant, respect PPWR and other relevant EU and national packaging law(s).	art. 39, annex VIII

PPWR legal text in your national language

<https://eur-lex.europa.eu/eli/reg/2025/40/oj/fra>

ANNEX III

PPWR Compliance Statement Template

Dear Customer [X],

Our company [X] is committed to supporting compliance with the EU Packaging and Packaging Waste Regulation (PPWR), which applies from 12 August 2026. As a ****supplier**** of envelopes and a paper packaging materials and components, we provide manufacturers with all information required to carry out the conformity assessment and prepare the EU Declaration of Conformity (DoC) in accordance with Articles 38–39 and Annex VII–VIII.

We already maintain, and can provide upon request, the following documentation supporting PPWR compliance:

- Packaging design or characteristics - relevant for Articles 5–12
- Packaging information and supplier declarations on substances of concern - Article 5, applicable from 12 August 2026.
- Evidence supporting recyclability and compatibility with established recycling processes - Article 6, full methodology expected 2028, applicable once the design for recycling rule enters into forces.
- Traceability and input documentation required under Annex VII, including updates following any change in materials, formulations or structure (ongoing obligation)

We are actively monitoring the development of secondary legislation and technical specifications expected between 2026 and 2030, notably regarding:

- Recyclability criteria and performance grades: *Article 6; delegated act by 1 January 2028, applicability 24 months later.*
- EU-wide labelling system: *Article 12 detailed technical guidelines have been published by the JRC, the delegated act is expected before summer 2026, applicability from 12 August 2028*
- Packaging minimisation standards: *Article 10; CEN standard request by 12 February 2027, applicability from 1 January 2030.*
- Empty space ratio methodology: *Article 24; implementing act due 2027, applicability from 1 January 2030.*
- Digital identifiers: *Article 12; applicable from 2027*

Our company [X] is also engaged in wider industry discussions, including through participation in FEPE (Federation of European Producers of Envelopes and Light Packaging). This collective work helps anticipate regulatory developments and contribute to the sector's technical alignment with PPWR requirements.

Based on the information available today, we are confident that our packaging is well aligned with the objectives of the PPWR, particularly with regard to recyclability and its integration into a harmonised EU-wide labelling and compliance framework.

We remain at your disposal for any further information.

Kind regards,

[Name]

[Position]

[Company]

[Date and place]

Technical Documentation Guide

1. Purpose

Under PPWR, a flexible packaging manufacturer placing packaging on the EU market will need to maintain a technical file and issue a Declaration of Conformity. The manufacturer is responsible for demonstrating compliance, even when some information must be obtained from suppliers.

2. Documentation for the Manufacturer's Packaging Product

For the flexible packaging itself (e.g. mailers, pouches, bags, envelopes with windows, bubble mailers, wrapping papers and similar products), the producer should collect and maintain the following documentation:

- Product specification and intended use.
- Technical drawings and dimensions.
- Bill of materials and material composition.
- Weight of each component.
- Supplier declarations for all raw materials.
- Paper specifications.
- Window film specifications (where applicable).
- Bubble film specifications (where applicable).
- Adhesive specifications.
- Ink and coating specifications.
- Statements regarding substances of concern.
- Evidence supporting recyclability requirements.
- Evidence supporting packaging minimisation requirements.
- Internal production and quality control procedures.
- Test reports and compliance assessments when appropriate.

3. Information Required from Suppliers of Packaging Components

Where the flexible packaging producer purchases components or raw materials, the following information should be requested from suppliers.

Paper suppliers

- Technical data sheet
- Material composition
- Weight and grammage information
- Recycled content declaration (if applicable)
- Statement on substances of concern (if food contact)
- Recyclability information

Window film suppliers

- Technical data sheet
- Polymer composition
- Weight and thickness
- Substances declaration (if food contact)
- Recyclability information

Bubble film or granulate suppliers

- Technical data sheet
- Material composition
- Recycled content declaration (if applicable)
- Substances declaration
- Recyclability information

Adhesive suppliers

- Technical data sheet
- Composition information
- Substances declaration (if food contact)
- Compliance statements

Inks, coating, ... suppliers

- Technical data sheet
- Composition information
- Substances declaration (if food contact)
- Compliance statements

4. Information Required for Transport Packaging Used to Ship Products

In addition to the flexible packaging product itself, the producer should collect information on the packaging used to ship products to customers. This **also applies to envelope manufacturers**, as the transport packaging used to supply their products remains subject to the PPWR, irrespective of the regulatory status of communication envelopes.

Pallet suppliers

- Product specification sheet
- Material declaration
- Weight of pallet
- Substances declaration (if food contact)
- Recyclability information

Corrugated box suppliers

- Technical data sheet
- Material composition
- Weight of box
- Recycled fibre declaration
- Substances declaration (if food contact)
- Recyclability statement

Stretch film suppliers

- Technical data sheet
- Polymer composition
- Weight and thickness
- Recycled content declaration
- Substances declaration (if food contact)
- Recyclability information

Tape and strapping suppliers

- Technical data sheet
- Material composition
- Weight/specification
- Recycled content declaration where applicable
- Substances declaration

Label suppliers

- Material composition
- Adhesive information
- Ink information
- Substances declaration

5. Recommended Structure of the PPWR Technical File

- Description of the packaging product.
- Intended use.
- Bill of materials.
- Weight and composition of all components.
- Supplier documentation and declarations.
- Evidence relating to Article 5 (substances of concern).
- Evidence relating to Article 6 (recyclability).
- Evidence relating to Article 10 (minimisation).
- Test reports and calculations.
- Internal control procedures.
- Declaration of Conformity.

Frequently Asked Questions

This Annex provides practical answers to the questions most frequently raised by FEPE members regarding the first obligations under Regulation (EU) 2025/40 (PPWR) applicable from 12 August 2026.

1. Does PPWR apply to all envelopes?

Not necessarily. FEPE considers envelopes intended and placed on the market for communication purposes, such as letters, invoices, statements and similar correspondence, to be communication items rather than packaging. Envelopes used to transport or contain goods, including e-commerce shipments, fall within the scope of the PPWR. See Annex I.

2. What are the first PPWR obligations from 12 August 2026?

Manufacturers should have appropriate Technical Documentation, prepare a Declaration of Conformity (DoC), maintain traceability information and collect the necessary supporting information from suppliers.

3. Who prepares the Declaration of Conformity (DoC)?

The manufacturer placing the packaging on the market is responsible for preparing and maintaining the Declaration of Conformity. Supplier information supports, but does not replace the manufacturer's responsibility.

4. Do I need to provide the Declaration of Conformity to my customers?

Not normally. The Declaration of Conformity is intended primarily for competent market surveillance authorities. Commercial customers may request compliance information, but this does not necessarily require providing the complete Declaration of Conformity unless required by law or contract.

5. How quickly must the Declaration of Conformity be provided to the competent authority?

The Declaration of Conformity and the supporting Technical Documentation should be made available to the competent authority within 10 days of a reasoned request, unless a shorter period is justified because of a serious and immediate risk.

6. Is one Declaration of Conformity required for each bubble mailer item number?

No. One Declaration of Conformity is generally prepared per packaging type, provided that the products covered have the same technical characteristics and are supported by the same Technical Documentation.

7. What is the difference between a Declaration of Conformity (DoC) and a Compliance Statement?

The Declaration of Conformity is the mandatory legal document required under Article 39 PPWR and is prepared by the manufacturer. A Compliance Statement is a supporting supplier document and does not replace the DoC.

8. What does packaging traceability mean?

Each packaging type should be uniquely identifiable and traceable. Manufacturers should be able to link each packaging type to its Declaration of Conformity, supporting Technical Documentation, supplier information and relevant internal records.

9. What information should I request from suppliers?

Request technical specifications, material composition, declarations relating to substances of concern where applicable, recyclability information and any other documentation necessary to support your Technical Documentation. See Annex II.

10. What should Technical Documentation contain?

It should normally include a product description, technical specifications, bill of materials, supplier declarations, evidence supporting compliance with applicable PPWR requirements and internal compliance records. See Annex IV.

11. The PPWR defines packaging as something that transports or protects products. Is a catalogue a product or communication material?

A catalogue is normally considered communication material. Only in specific circumstances may it be regarded as a product, depending on its intended purpose.

12. We understand that, in Germany, an envelope containing a brochure or flyer may be considered packaging, whereas an envelope containing only an invoice is generally not. How should this be interpreted?

FEPE is aware that different interpretations may exist across Member States. Some stakeholders have indicated that, in Germany, an envelope containing only correspondence is generally not regarded as packaging, whereas an envelope containing promotional material may be treated as packaging. At present, the European Commission has not issued harmonised guidance on this issue. FEPE has requested clarification. Until then, national interpretations and enforcement practices may differ.

13. Do I need to withdraw packaging already placed on the market before 12 August 2026?

No. Packaging lawfully placed on the market before the applicable PPWR requirements entered into force does not need to be withdrawn or modified solely because of the application of the PPWR.

14. What happens to packaging already in stock before 12 August 2026?

Packaging already placed on the market before the application date may continue to be supplied. Existing lawful stock does not need to be redesigned or withdrawn.

15. Should the Declaration of Conformity be maintained in paper or electronic format?

Either format is acceptable.

16. Can supplier information be provided electronically?

Yes. Supplier information and supporting documentation may be provided in paper or electronic format.

17. Will all PPWR obligations apply from 12 August 2026?

No. Several provisions depend on future delegated or implementing acts and will become applicable later. Companies should monitor future guidance published by the European Commission and updates issued by FEPE.

18. Will FEPE update this Guidance?

Yes. FEPE intends to revise this Guidance whenever significant European Commission guidance, delegated acts or implementing legislation affects the interpretation or application of the PPWR.

Inside Cover

Disclaimer

This publication provides practical guidance prepared by FEPE to assist manufacturers and suppliers in understanding the first obligations arising under Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR). It reflects FEPE's understanding at the date of publication and is intended for guidance purposes only. It does not constitute legal advice or an official interpretation of Union law.

Intended Audience

FEPE members, manufacturers, converters, suppliers and other stakeholders preparing for the first PPWR obligations applicable from 12 August 2026.

Document History

Version	Date	Description
1.0	July 2026	First publication
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