PPWR checklist: Distributor (Art. 19)

You make packaging available that is already on the market. The list contains every obligation the PPWR check at polygon-one.com/en/ppwr-check names for this role, with the same wording, deadline groups and legal references. Obligations that apply only to certain activities, packaging types, materials or markets carry the line “Applies to”; passages the check words differently depending on the answers are listed under “Variation”. Go through the list once per packaging.

> The deadline groups match the check: “12 Aug 2026” is the date of application of the Regulation, these obligations already apply; “Before the first placing on the market”, “Ongoing” and “Annually” are continuing obligations; the other groups name the deadline.

Before the first placing on the market

DONE	OBLIGATION	DATE, RESPONSIBLE
☐	For your own shipping boxes and mailers you are the manufacturer and the producer; check that packaging type separately under “E-commerce packaging”. **Applies to:** own shipping packaging **Further reading:** Micro-enterprises and online retail, polygon-one.com/en/ppwr-micro-enterprises-online-retail	

12 Aug 2026

DONE	OBLIGATION	DATE, RESPONSIBLE
☐	Before making available, check that the markings under Art. 15 and 18 and the declaration of conformity exist (Art. 19(2)). **Further reading:** Labelling requirements, polygon-one.com/en/ppwr-labelling-requirements-2026-2028	

Ongoing

DONE	OBLIGATION	DATE, RESPONSIBLE
☐	Make available only goods of registered producers that participate in a scheme (§ 13(3) VerpackDG); keep the suppliers’ registration numbers in master data. **Applies to:** German market **Further reading:** PPWR and the German Packaging Act, polygon-one.com/en/ppwr-vs-german-packaging-act	

12 Feb 2027

DONE	OBLIGATION	DATE, RESPONSIBLE
☐	EPR symbols only digitally instead of on the packaging (Art. 12(9)). **Variation:** for German market: additionally “Fine provisions of § 66(2) VerpackDG applicable from 12 Feb 2027 (§ 68(17))” **Further reading:** Fines and enforcement, polygon-one.com/en/ppwr-fines-enforcement	

Legal sources and guides

Legal sources: Regulation (EU) 2025/40 (https://eur-lex.europa.eu/eli/reg/2025/40/oj/eng); German Packaging Implementation Act (VerpackDG) (https://www.gesetze-im-internet.de/verpackdg/).
Guides on polygon-one.com: Micro-enterprises and online retail: polygon-one.com/en/ppwr-micro-enterprises-online-retail; Labelling requirements: polygon-one.com/en/ppwr-labelling-requirements-2026-2028; PPWR and the German Packaging Act: polygon-one.com/en/ppwr-vs-german-packaging-act; Fines and enforcement: polygon-one.com/en/ppwr-fines-enforcement

The check classifies under Regulation (EU) 2025/40 and the German VerpackDG, legal status 28 September 2026. It is not legal advice; roles and obligations must be checked case by case. The checklist is a working aid, not an official form. As of 17 October 2026 (legal status of the check: 28 September 2026). HRG Polygon One GmbH, polygon-one.com/en/ppwr-check.