PPWR checklist: Importer (Art. 18)

You first place packaging from a third country on the EU 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.

> In the check, this role comes together with other roles; each has its own list. Also manufacturer: packaging under your own name. Also producer: always.

> 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.

12 Aug 2026

DONE	OBLIGATION	DATE, RESPONSIBLE
☐	Place only conforming packaging on the market (Art. 18): check that the manufacturer carried out the conformity assessment and that declaration and markings exist; importer name and address on the packaging; keep a copy of the declaration. **Further reading:** Declaration of conformity, polygon-one.com/en/ppwr-declaration-of-conformity	

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: Declaration of conformity: polygon-one.com/en/ppwr-declaration-of-conformity; 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.