PPWR checklist: Producer with extended producer responsibility (Art. 3(1)(15))

You first make the filled packaging available in a member state and finance its waste management there. 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 importer: activity importer.

> 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
☐	Registration with the Central Agency Packaging Register (LUCID) with brands and packaging types (§ 6 VerpackDG); report changes without delay. **Applies to:** German market **Further reading:** PPWR and the German Packaging Act, polygon-one.com/en/ppwr-vs-german-packaging-act	
☐	Appoint and notify an authorised representative for extended producer responsibility with a written German-language mandate (§ 5 VerpackDG, Art. 45(3)). **Applies to:** no establishment in Germany **Further reading:** PPWR and the German Packaging Act, polygon-one.com/en/ppwr-vs-german-packaging-act	
☐	Participation in a dual scheme with material type and mass (§ 7 VerpackDG). **Applies to:** all packaging types except transport packaging, reusable packaging; German market **Variation:** for packaging type service packaging: additionally “for service packaging transferable to the upstream distributor (§ 7(2))” **Further reading:** PPWR and the German Packaging Act, polygon-one.com/en/ppwr-vs-german-packaging-act	
☐	Reusable packaging with a functioning take-back and reuse system is exempt from scheme participation (§ 11 VerpackDG); requirements for reusable packaging under Art. 11. **Applies to:** packaging type reusable packaging; German market **Further reading:** B2B transport packaging, polygon-one.com/en/ppwr-b2b-transport-packaging	
☐	In every other member state: entry in the producer register (Art. 44) and fulfilment of extended producer responsibility (Art. 45), also via an authorised representative. **Further reading:** Manufacturer or producer, polygon-one.com/en/ppwr-manufacturer-vs-producer	

Ongoing

DONE	OBLIGATION	DATE, RESPONSIBLE
☐	Data report to the Central Agency immediately after participation, below 10 tonnes annually by 1 June (§ 9 VerpackDG). **Applies to:** all packaging types except transport packaging, reusable packaging; German market **Further reading:** PPWR and the German Packaging Act, polygon-one.com/en/ppwr-vs-german-packaging-act	
☐	Take-back of used transport packaging at the point of delivery and recovery, documentation by 15 May (§ 39 VerpackDG). **Applies to:** packaging type transport packaging; German market **Further reading:** B2B transport packaging, polygon-one.com/en/ppwr-b2b-transport-packaging	

☐	Charge a deposit of at least EUR 0.25, mark the container as subject to deposit, deposit scheme, take-back (§§ 46, 47 VerpackDG). **Applies to:** single-use beverage container; German market **Further reading:** PPWR and the German Packaging Act, polygon-one.com/en/ppwr-vs-german-packaging-act	

12 Nov 2026

DONE	OBLIGATION	DATE, RESPONSIBLE
☐	Transition: existing registrations continue, new details were due by 12 Nov 2026; old scheme contracts end on 31 Dec 2026 at the latest (§ 68 VerpackDG). **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	

Annually

DONE	OBLIGATION	DATE, RESPONSIBLE
☐	Declaration of completeness by 15 May, audited and signed, from 80 t glass, 50 t paper and board or 30 t other materials (§ 10 VerpackDG). **Applies to:** all packaging types except transport packaging, reusable packaging; German market **Further reading:** PPWR and the German Packaging Act, polygon-one.com/en/ppwr-vs-german-packaging-act	

12 Feb 2028

DONE	OBLIGATION	DATE, RESPONSIBLE
☐	Limit empty space in sales packaging to the minimum necessary for the packaging functions, including product protection (Art. 24(4)); void fill counts as empty space. **Applies to:** activity filler; packaging type sales packaging **Further reading:** Recyclability and recycled content, polygon-one.com/en/ppwr-recyclability-recycled-content-empty-space	

2029

DONE	OBLIGATION	DATE, RESPONSIBLE
☐	Deposit and return systems for single-use plastic bottles and metal cans in all member states with a 90 per cent collection rate (Art. 50); Germany already has them. **Applies to:** single-use beverage container **Further reading:** PPWR deadlines, polygon-one.com/en/ppwr-deadlines	

1 Jan 2030

DONE	OBLIGATION	DATE, RESPONSIBLE
☐	Empty-space ratio of at most 50 per cent for grouped, transport and e-commerce packaging; the obligation lies with whoever fills this packaging (Art. 24(1)), from 1 January 2030 or three years after the implementing act on the calculation method, whichever is later. Void fill such as paper or air cushions counts as empty space (Art. 24(3)). **Applies to:** all activities except importer; packaging type grouped packaging, transport packaging, e-commerce packaging **Further reading:** Recyclability and recycled content, polygon-one.com/en/ppwr-recyclability-recycled-content-empty-space	
☐	Reuse targets for transport packaging from 2030 (Art. 29), for example 40 per cent for pallets, crates and films. **Applies to:** packaging type transport packaging **Further reading:** B2B transport packaging, polygon-one.com/en/ppwr-b2b-transport-packaging	

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: PPWR and the German Packaging Act: polygon-one.com/en/ppwr-vs-german-packaging-act; B2B transport packaging: polygon-one.com/en/ppwr-b2b-transport-packaging; Manufacturer or producer: polygon-one.com/en/ppwr-manufacturer-vs-producer; Fines and enforcement: polygon-one.com/en/ppwr-fines-enforcement; Recyclability and recycled content: polygon-one.com/en/ppwr-recyclability-recycled-content-empty-space; PPWR deadlines: polygon-one.com/en/ppwr-deadlines

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.