



Recycled Packaging Supplier Review

A PPWR-aligned procurement checklist

Regulation (EU) 2025/40, the Packaging and Packaging Waste Regulation, generally applies from 12 August 2026. The brand owner placing packaging on the EU market is typically the manufacturer for PPWR purposes, and prepares the EU Declaration of Conformity and the Technical Documentation that sits behind it. Much of the evidence inside that file comes from suppliers.

This checklist is built around the six questions buyers should be asking recycled packaging suppliers now, well in advance of the application date. It is designed to live inside a supplier file. Print it, fill it in, attach it to quotes, and use the comparison table at the end when reviewing more than one supplier against the same brief.

Supplier		Material	
Date		Reviewer	
Application	<i>e.g. food-contact, secondary packaging, reusable bag, mailer</i>	Use case	<i>e.g. retail line, e-commerce, B2B logistics</i>

How to use this checklist

Send the six questions to a candidate supplier as part of your standard sourcing process, or work through them in a review meeting. Mark each section Green, Amber or Red based on the response. Use the timeline panel to decide which evidence you need at which stage, and the comparison table to compare suppliers on the same brief.

***A note on scope.** Not every PPWR requirement applies to every packaging application. Food-contact requirements and PFAS restrictions are more relevant for some applications than others. Use the checklist as a baseline and add or remove evidence requests based on the specific product.*

The six questions

Q1. What recycled material stream is being used?

Why it matters. Post-consumer and post-industrial streams differ in traceability, technical properties and regulatory exposure. The input stream shapes which evidence the supplier can provide and how confidently substances of concern and food-contact requirements can be addressed.

Evidence to request

- Material type confirmed (e.g. rPET, rPP, rPE, rLDPE)
- Stream confirmed as post-consumer or post-industrial
- Source material described (e.g. PET bottles, food containers)
- Geographic origin of input feedstock
- Confirmation of food-grade vs non-food-grade input where relevant

Supplier response

Score

- Green: evidence provided, fit for purpose
- Amber: partial, follow up needed

PPWR reference. Article 7 (recycled content in plastic packaging), evidenced via Annex VII.

Feeds your Technical Documentation as. Material identification section of your Technical Documentation.

Red: missing or unclear

Q2. What evidence supports the recycled-content claim?

Why it matters. A recycled-content claim is only as strong as the evidence behind it. Buyers need a verifiable basis for the claim that they can reference in their own sourcing records and conformity file.

Evidence to request

- Third-party certification (e.g. GRS, RCS) with current scope certificate
- Per-order recycled content report or environmental impact report
- Transaction documentation linking input volumes to output volumes
- Test results from a recognised methodology where applicable
- Where rPET is involved: in-house methodology (e.g. RA3) with independent validation

PPWR reference. Article 7 recycled content thresholds and verification expectations.

Feeds your Technical Documentation as. Evidence supporting recycled content claims declared in your EU DoC.

Supplier response

Score

- Green: evidence provided, fit for purpose
- Amber: partial, follow up needed
- Red: missing or unclear

Q3. Can the supplier provide material declarations or test reports?

Why it matters. Buyers need to know what packaging is made from, including coatings, inks, adhesives and auxiliary substances. Some information sits at material level and some at product level.

Evidence to request

- Material declaration for the base recycled polymer
- Information on coatings, inks, adhesives and auxiliaries used
- Test reports from accredited or recognised laboratories
- Confirmation of which documents are material-level and which are order-level
- Indication of typical lead time to issue documentation for a specific order

PPWR reference. Annex VII Technical Documentation requirements.

Feeds your Technical Documentation as. Material composition and test evidence inputs.

Supplier response

Score

- Green: evidence provided, fit for purpose
- Amber: partial, follow up needed
- Red: missing or unclear

Q4. Has the supplier considered substances of concern?

Why it matters. PPWR sets clear limits on certain substances. Buyers should understand whether the supplier has a process to identify and document substance risks, not only whether they can confirm compliance in principle.

Evidence to request

- Heavy metals declaration: combined Pb + Cd + Hg + Cr(VI) at or below 100 mg/kg
- For food-contact applications: PFAS evidence covering individual PFAS at or below 25 ppb, sum of PFAS at or below 250 ppb, and total fluorine at or below 50 mg/kg (screening threshold)
- SVHC (REACH candidate list) screening process described

Supplier response

Score

- Green: evidence provided, fit for purpose

- Approach to coatings, inks and adhesives where substance risk is concentrated
- Statement on monitoring updates to the candidate list and PPWR delegated acts

PPWR reference. Article 5 (substances of concern), heavy metals limit at 100 mg/kg combined, PFAS in food-contact packaging screened via total fluorine at 50 mg/kg.

Feeds your Technical Documentation as. Substances of concern section of your Technical Documentation.

- Amber: partial, follow up needed
- Red: missing or unclear

Q5. Is the evidence representative or order-specific?

Why it matters. Suppliers typically offer two routes for advance documentation. Representative evidence is useful for material-level questions but may not cover a specific product configuration. Knowing where the line sits helps you plan documentation requests around quoting and order placement rather than around the application date.

Evidence to request

- Representative material-level evidence available now
- General supplier declaration of conformance to PPWR provided
- List of items that can only be issued at enquiry or order level
- Confirmation of how labelling, construction, print or coating affect documentation
- Process for requesting order-specific evidence and typical turnaround time

PPWR reference. Practical consequence of Annex VII Technical Documentation structure.

Feeds your Technical Documentation as. Document control log inside your Technical Documentation.

Supplier response

Score

- Green: evidence provided, fit for purpose
- Amber: partial, follow up needed
- Red: missing or unclear

Q6. Can the supplier support the brand's Technical Documentation?

Why it matters. The EU Declaration of Conformity and Technical Documentation are held by the brand. Supplier information is one of the inputs. Buyers should know whether the supplier can deliver evidence in a usable, referenceable format.

Evidence to request

- Material declarations issued in a format that can be referenced inside your DoC
- Test reports with clear scope, methodology and laboratory identification
- Certification documents (factory and material) with current validity dates
- Single point of contact named for documentation requests
- Willingness to support audits or buyer due diligence on request

PPWR reference. Article 39 (EU Declaration of Conformity) and Annex VII (Technical Documentation).

Feeds your Technical Documentation as. Direct input into your conformity assessment file.

Supplier response

Score

- Green: evidence provided, fit for purpose
- Amber: partial, follow up needed
- Red: missing or unclear

Timeline: which evidence at which stage

Documentation gets harder to source the closer you get to the application date. Use this timeline to space evidence requests across the sourcing process rather than collecting everything at once.

Supplier shortlist stage	Confirm material stream, ask for the supplier's general PPWR declaration of conformance, and request representative material declarations. This is where general supplier-level documentation lives.
Quoting stage	Request representative test reports and certifications relevant to your application. Confirm what the supplier can deliver at material level versus order level. Clarify lead times for documentation.
Order placement stage	Request order-specific evidence where labelling, construction, print, coating or food-contact are involved. Confirm per-order documentation such as recycled content reports and any required test results.
Before 12 August 2026	All documentation referenced inside your EU Declaration of Conformity and Technical Documentation should be in place. Gaps identified now are far easier to close than gaps found at the deadline.

Comparison summary

Use this table when reviewing more than one supplier against the same brief. Score each question Green, Amber or Red based on the supplier review pages above, then mark overall procurement readiness in the final row.

Question	Supplier A	Supplier B	Supplier C
Q1. Material stream identified			
Q2. Recycled-content claim evidence			
Q3. Material declarations / test reports			
Q4. Substances of concern assessed			
Q5. Representative vs order-specific evidence			
Q6. Supports brand's Technical Documentation			
Overall procurement readiness			

How Waste2Wear answers these six questions

We produce finished products and reusable packaging using recycled materials, including recycled polypropylene reusable bags. This is a short summary of how we respond to each of the six questions, included here so the checklist can be benchmarked against a concrete supplier example.

Material stream

Our recycled polypropylene reusable bags are produced from food-grade post-consumer packaging. We chose this input source specifically to strengthen our position on input quality where substance restrictions are most relevant.

Evidence for recycled content claims

Waste2Wear is GRS certified, which provides third-party verification of recycled content. In addition, every Waste2Wear production run is delivered with an Environmental Impact Report. The EIR

provides per-order data on the recycled material used and the energy, water and CO2 savings compared with virgin equivalents, and accompanies each individual order.

Material declarations and test reports

We provide representative material information at supplier level and supporting evidence on request. Our factories carry BSCI, GOTS and RDS certifications, which sit alongside material-level evidence as part of the wider documentation package.

Substances of concern

Our use of food-grade post-consumer packaging is intended to strengthen our position on input quality for applications where substance restrictions are most relevant. Additional substance evidence is available on request.

Representative versus order-specific

We provide material-level documentation in advance, and product-level or order-level documentation where construction, print or coating make general evidence insufficient. The split is agreed up front rather than at the deadline.

Recycled polyester (rPET)

For brands that require additional verification on rPET specifically, we operate RA3, our in-house recycled content verification methodology. RA3 has been independently validated by Wessling, a German testing and certification institute, and Wessling can conduct independent testing on request and issue certified results.

Supporting Technical Documentation

We provide material and certification information in a format that can be referenced inside the buyer's own conformity assessment file.

Sources and further reading

European Commission, Packaging waste. environment.ec.europa.eu/topics/waste-and-recycling/packaging-waste_en

EUR-Lex, Regulation (EU) 2025/40 on packaging and packaging waste. eur-lex.europa.eu/eli/reg/2025/40/oj/eng

European Commission, FAQ on the Packaging and Packaging Waste Regulation. environment.ec.europa.eu/publications/faq-packaging-and-packaging-waste-regulation-ppwr_en

European Commission, Guidance document on the Packaging and Packaging Waste Regulation. environment.ec.europa.eu/publications/guidance-document-packaging-and-packaging-waste-regulation-ppwr_en

This checklist is provided by Waste2Wear as a working procurement tool and is not legal advice. Brands should confirm their specific obligations under Regulation (EU) 2025/40 with qualified compliance counsel.