

PACKR8 RESOURCE GUIDE

PPWR Declarations of Conformity, Annex VIII unpacked.

What the Annex VIII format requires, what evidence sits behind each line, and what auditors look at first.

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Contents

01 What a Declaration of Conformity actually is

02 The Annex VIII fields

03 What evidence backs each line

04 The five-year retention rule

05 Signing, versioning, and traceability

06 What auditors look at first

07 Frequently asked questions

01 / What a Declaration of Conformity actually is.

A PPWR Declaration of Conformity (DoC) is a single document, in the format set out in Annex VIII of Regulation (EU) 2025/40, that says one packaging unit complies with PPWR. It is signed by the producer (or their authorised representative in the EU) and made available to enforcement authorities on request.

The Declaration is short, typically one or two pages. Behind it sits the technical documentation, which is anything but short. Auditors do not validate compliance from the Declaration alone; they pull the Declaration to identify which evidence package they want to see.

02 / The Annex VIII fields.

Annex VIII specifies the fields that must appear on every Declaration. The list below is the canonical set.

- Identification of the packaging unit: name, internal reference, and (if applicable) GS1 GTIN.
- Producer details: name, registered office, and contact for technical documentation.
- Authorised representative within the EU (where the producer is non-EU).
- Material composition: each material by mass and percentage, with substrate identifiers.
- Recycled content percentage per material, with reporting method (mass balance or segregated).
- Recyclability grade per Annex II (A, B, or C) and the methodology used.
- Substance compliance statement covering Article 5 restricted substances.
- Reuse / refill classification where applicable (Articles 26-29).
- Reference to the technical documentation file (internal reference).
- Date of declaration, signatory name, and signatory role.

03 / What evidence backs each line.

Each line is a regulated claim. Each line therefore needs evidence, retrievable on request, that ties to the specific packaging unit and the specific production runs covered by the Declaration.

Material composition ties to supplier specifications, technical data sheets, and (for plastics) recycle certifications. Where the material spec changes mid-year, both versions need to be retrievable with their effective dates.

Recycled content ties to supplier batch declarations, recycler certificates (EuCertPlast, ISCC PLUS), and chain-of-custody documentation if mass balance is used.

Recyclability grade ties to the Annex II assessment, which references Design for Recycling implementing acts. The assessment must list the components evaluated and the threshold values applied.

Substance compliance ties to test reports on heavy metals, PFAS migration where relevant, and supplier confirmations that listed substances are absent or below threshold.

Reuse / refill classification ties to system membership certificates and operational evidence showing the unit is part of a qualifying system.

04 / The five-year retention rule.

PPWR requires the technical documentation behind each Declaration to be kept for five years from the date the last unit covered by the Declaration was placed on the EU market. That is rarely five years from now. For a packaging unit shipped continuously over an eight-year product life, the documentation must be retrievable for thirteen years after first introduction.

Producers without versioned packaging records typically struggle here. The Declaration signed in 2026 references the spec as it was in 2026. If the spec changed in 2028, both versions need to be available, with their effective dates and the production runs each one covers.

05 / Signing, versioning, and traceability.

Every Declaration carries a signatory name and date. When the underlying spec changes materially (different material composition, different recycled content level, different supplier on a critical component), a new Declaration is required for the affected production runs.

The practical implication is that Declaration generation cannot be a Word template that someone fills in by hand. The Declaration needs to be a deterministic export from a packaging record, with the signatory acting as a control point rather than the originator of the data.

Audit trail or audit failure. Auditors are increasingly requesting the chain from Declaration -> packaging record -> evidence file in a single retrievable view. If the Declaration says recycled content is 30 percent, the auditor expects to see the supplier batches that fed the production runs covered, with the dates aligned. A producer who cannot show that chain is failing the audit even if the recycled content is genuinely 30 percent.

06 / What auditors look at first.

Three things, in order. First, the Declaration's date and signatory. A Declaration signed by someone no longer at the company, or dated before the production run, raises immediate questions. Second, the recycled content evidence chain, because Article 7 is the most-mistaken area. Third, the recyclability grade, particularly for packaging at grade A, because that's where most disputes arise.

Producers who run a structured DoC pipeline (record, generate, sign, archive) tend to pass these checks in minutes. Producers who treat the Declaration as a one-off Word document tend to spend days reconstructing what the spec looked like at signing.

07 / Frequently asked questions.

Who signs the Declaration of Conformity?

The producer or, where the producer is non-EU, the authorised representative in the EU. The signatory takes legal responsibility for the claims on the Declaration.

How long must the technical documentation be kept?

Five years from the date the last unit covered by the Declaration was placed on the EU market. For a long-lived product this can mean a decade or more of total retention.

Does the Declaration cover all SKUs or one at a time?

One packaging unit per Declaration. A SKU shipped in two pack sizes needs two Declarations. A pack with a redesigned closure mid-year needs a new Declaration for the new spec.

Can the Declaration reference the technical documentation rather than reproduce it?

Yes, and it should. The Declaration is short and points to an internal reference for the technical file. The file itself stays with the producer.

08 / About PackR8.

PackR8 is the packaging compliance platform for European producers preparing for PPWR and EPR. One source of truth for packaging data, with PPWR Declarations of Conformity, EPR filings, and audit evidence generated automatically from your records.

We started PackR8 because the same data problem was breaking the same teams every year. Smart sustainability leads with real strategies, stalled by packaging data that lived in eleven tabs of a spreadsheet maintained by someone in another country.

PackR8 fixes that. One packaging record per SKU. Full version history. Evidence pinned to every claim. Role-aware views for sustainability, packaging, and compliance teams. From that foundation, Declarations of Conformity, EPR filings, and audit responses become outputs rather than annual fire drills.

Talk to us.

The person you book a demo with is one of the team that built the platform. No SDR. No discovery calls. No funnel. Just a thirty-minute conversation about your packaging programme, and an emailed quote afterwards if it makes sense to keep going.

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