



PPWR

What needs to be done?

Roles, obligations and labelling for packaging

20.08.2026

CPI books does not guarantee or assume any liability for the accuracy of this presentation. The content is intended as guidance only. Please consult your legal adviser and the relevant industry associations.



CONTEXT

PPWR - Basics

The PPWR (EU) 2025/40 regulates obligations relating to the placing on the market, characteristics and labelling of packaging. The rules apply to all deliveries from 12 August 2026.

Sales packaging

reaches the end customer

Grouped packaging

combines individual packages

Transport packaging

protects and bundles goods for shipment

Clear allocation of responsibilities along the packaging chain, with the aim of avoiding packaging.



Technical documentation and Declaration of Conformity



CPI obligations in the standard case

- Obtain information on material, weight, substances and intended use for all packaging
- Pass information on to the publisher/manufacturer in a structured format
- Record quantities by order/customer for subsequent reporting
- Responsible under the PPWR for shipping packaging

Publisher in the standard case

- Carry out the conformity assessment
- Prepare and retain the EU Declaration of Conformity
- Check EPR registration and reporting requirements for each destination country



Information CPI obtains from packaging suppliers

Material & application

Material type and composition
Weight per packaging unit
Intended use: sales, grouped, transport or e-commerce packaging
Food contact: yes/no

Substances & evidence

Heavy metals: Pb, Cd, Hg, Cr(VI), total max. 100 mg/kg
PFAS information only relevant for food contact
Safety data sheets / supplier declarations
Document changes in material or supply chain

Recycling & labelling

Recyclability / design-for-recycling data
Information on material codes from 2028
Recycled content in plastic packaging
Archive evidence electronically



EPR ROLE

CPI as a service provider on behalf of the publisher

Assumption: sale and sender are always the publisher

Business transaction	EPR / producer role	CPI role	Classification
Domestic: dispatch to end customer	generally publisher	contract packer & fulfilment	CPI does not sell itself; invoice/delivery note/sender: publisher
International: direct shipment to end customer	generally publisher in destination country	cross-border fulfilment service provider	Publisher to check EPR registration in the destination country
Delivery to publisher / distributor	generally CPI (shipping packaging)	packaging, handover	Provide quantities by material and order to publisher; obtain manufacturer conformity documents and forward the request
Pallets, films, cartons	generally CPI	procurement & technical implementation	Transport packaging can be clearly assigned

CPI is responsible for transport packaging - the publisher is responsible for sales packaging; CPI provides quantity and material data to the publisher.



PPWR: Labelling

Packaging that reaches the end customer must initially be labelled with the following information:

Producer name

Name or registered trade name

Address

Postal address of the producer, e-mail address if applicable

ISBN / order number

for example ISBN or edition

now

from 2028

Labelling will develop further and will later include EU-wide harmonised material codes.



Proposal: Labelling

Mandatory information

According to the PPWR, the labelling should contain:

- Name or registered trade name / brand
- Postal address
- E-mail, if applicable
- Serial number (e.g. ISBN)
- Batch number (e.g. edition)
- Identification number (e.g. order number)

In future, further information may also be possible, e.g. material information, links to conformity information and voluntary details. We therefore recommend integrating a QR code containing this information, which can be expanded later.

52 x 21 (future)

Packaging producer (PPWR)
CPU Buicks Verlagsgesellschaft GmbH
Brichstr. 10
25917 Kleinkummerfeld
Produktsicherheit@cpu-buicks.de
ID: 978-12345-1234-5-1

Note: If the data to be used differ from the data stored by us (e.g. billing address), please let us know.



When is a label required?

Focus solely on producer identification from 12 August 2026.

Principle: Each separate packaging unit must be labelled. Not every individual packaging component needs its own label. If the size or nature of the packaging makes this impractical, the information may be included in accompanying documentation.

Case	Packaging unit concerned	Label?	Practical implementation from 12.08.2026
1. Pallet to publisher's distributor	Pallet incl. stretch film, strapping and edge protectors as one transport unit	Yes	One pallet label or accompanying document for the entire unit; no separate label on each strip of film.
2. Film-wrapped bundle + pallet	Each film-wrapped bundle plus the pallet as the outer transport unit	Yes	One label per bundle of ten plus one pallet label for the outer packaging.
3. Single book to reader	Mailing bag, book wrap or shipping carton as shipping packaging	Yes	Labelling on the shipping packaging; the unpackaged book itself does not require a label.

Key point: For 12.08.2026, producer identification is what matters - not the later material/sorting labelling from 2028.

Practical classification for CPI based on the defined standard case: shipping on behalf of the publisher, with the publisher as sender and seller.



ENFORCEMENT DURING THE INITIAL PHASE

No general suspension of penalties

Assessment of formal non-compliance from 12 August 2026.

Key message: The PPWR is binding. However, for certain formal errors, a request to correct them is initially provided for.

1. PPWR applies from 12.08.2026

There is no reliable basis for stating that the rules do not apply during the initial phase or that violations will generally not be sanctioned.

2. Art. 62: Correction first

In cases of formal non-compliance, e.g. missing or incomplete producer information or documents, the authority initially requests rectification.

3. Art. 68: National penalties

If non-compliance persists, measures or penalties may follow. The specific implementation is determined by the Member States.

Practical significance - personal assessment, not a recommendation for action!

- Prepare and start implementation from 12.08.2026
- Correct errors quickly: label data, supplier information, quantity data
- Do not communicate “there are no penalties”

- Regulatory risk is somewhat reduced in the initial phase - how will booksellers respond?
- File documentation and responsibilities in a traceable manner from 12.08.2026
- In case of an objection: provide evidence of corrective action immediately and close the process

Important: “For certain formal cases of non-compliance, a request for correction is initially provided for; this is not a general grace period.”