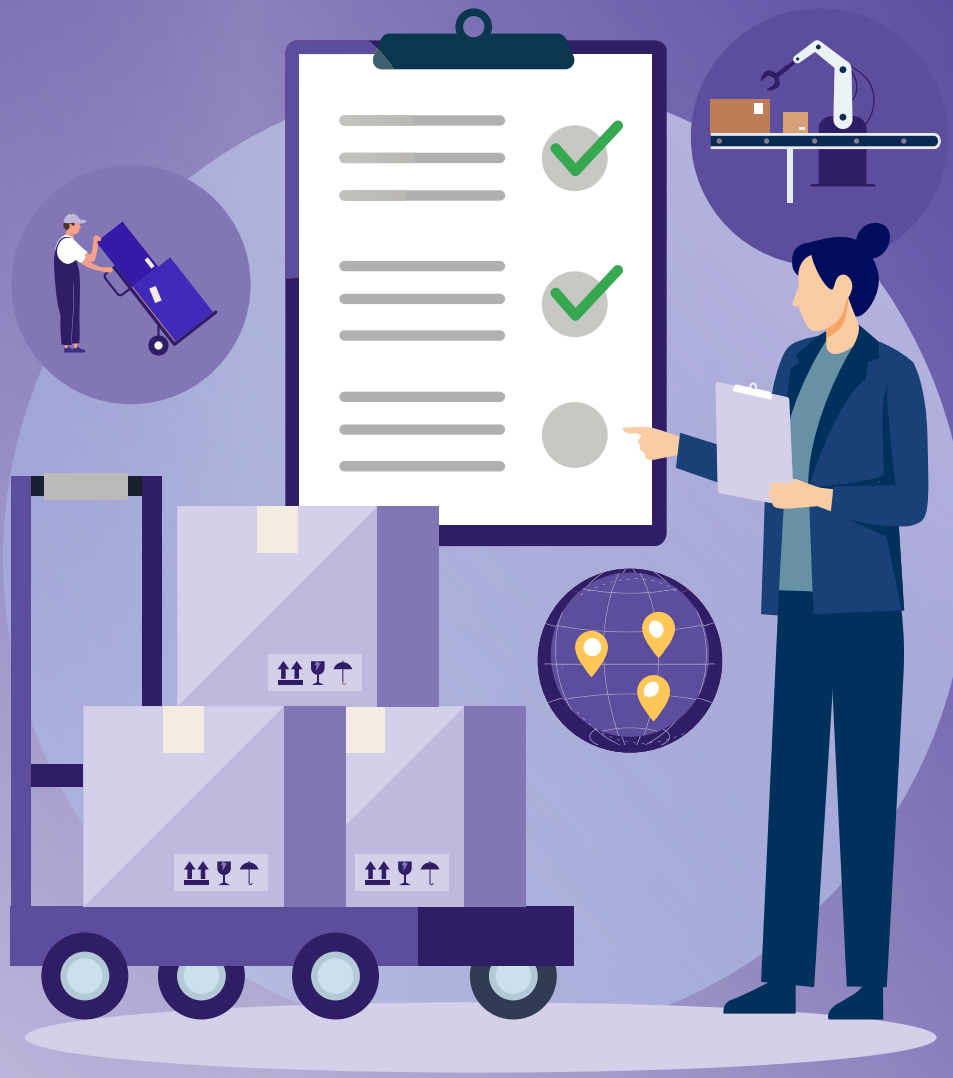
IFS PPWR Conformance

IFS PPWR CONFORMANCE SELF-ASSESSMENT

Guidance document



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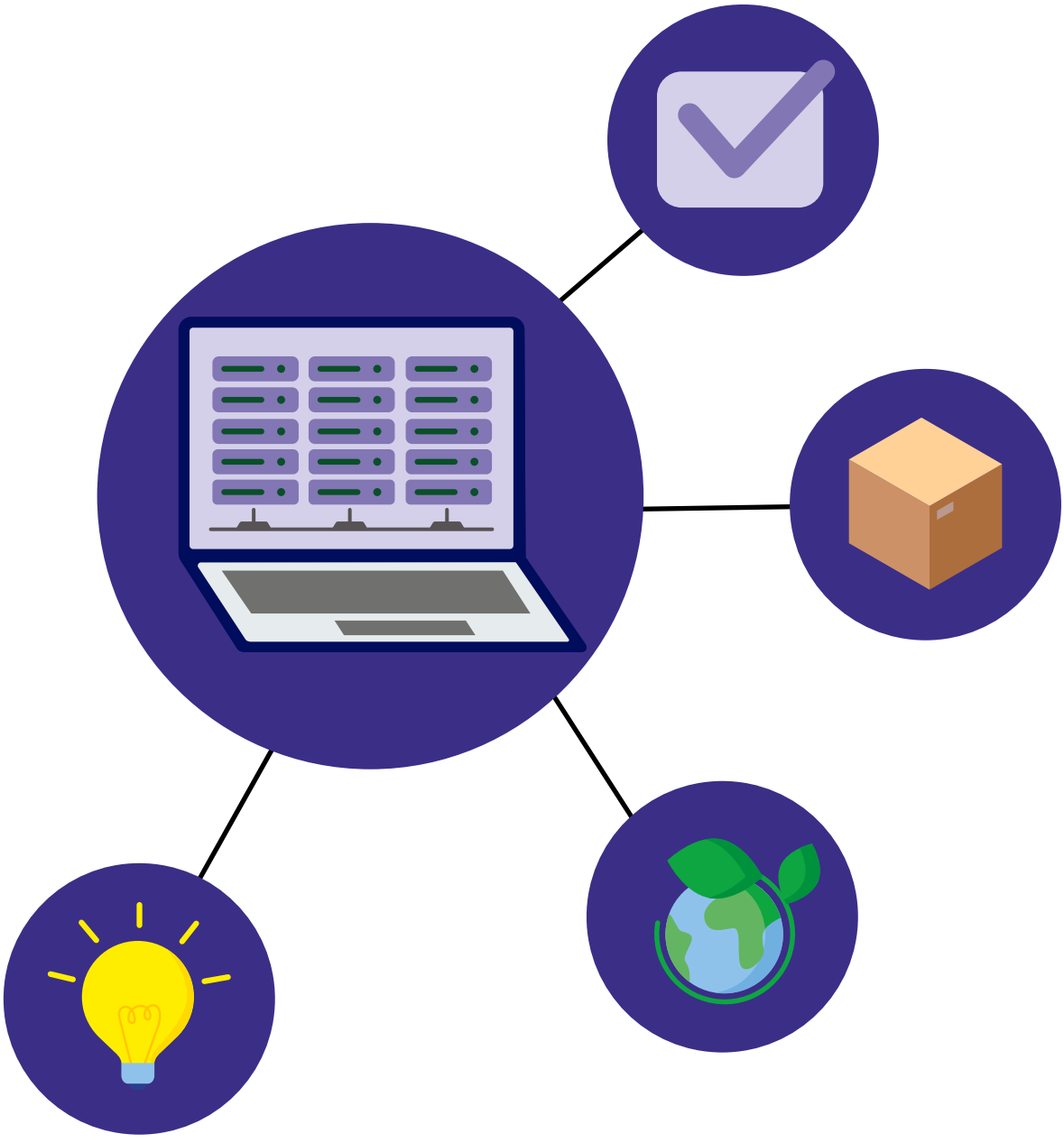
ENGLISH

IFS Supply Chain Solutions

Under the name IFS Supply Chain Solutions, IFS offers a portfolio of supply chain management checks and IT tools. These solutions effectively support companies in monitoring and managing risks in their supply chains, such as regulatory breaches, food fraud, or non-adherence to customer specifications.

The checks IFS offers under this portfolio enable companies to provide their stakeholders with validated data on their risk management processes and to comply with regulations such as the Regulation (EU) 2025/40 (PPWR). They also contribute to more transparency, greater credibility, and better cooperation within supply chains. The IFS PPWR Conformance Self-assessment for the scope private label is part of this portfolio.



CONTENT

INTRODUCTION

The first version of the IFS PPWR Conformance Self-assessment enables retailers to check whether their private-label suppliers have implemented the necessary core processes to ensure compliance with relevant regulations in cases where the retailer acts as the manufacturer. In addition, importers can also apply this approach to their suppliers to help them meet necessary obligations. It focuses on the relevant obligations and processes which suppliers have to implement in their own business area in accordance with the first provisions of the PPWR (Regulation (EU) 2025/40 of 19 December 2024 on packaging and packaging waste (Packaging and Packaging Waste Regulation) which came into force on 12 August 2026.

The IFS PPWR Conformance Solution can be used by companies to gain a systematic and better understanding of whether packaging material data and their related documents (e.g. Technical Documentation and/or Declaration for Compliance) provided by the supplier are based on robust processes. It can also be used to evaluate suppliers where the implementation of further and/or specific PPWR-related processes and obligations needs to be examined in greater depth.

The IFS PPWR Conformance Solution is divided into a two-step process:

- **The self-assessment**
  A questionnaire completed by the supplier provides a first indication of the implementation status of its PPWR related processes for provisions they are obliged to comply with in the year 2026[1] in relation to the private-label products they produce.
- **The check**
  An IFS Auditor evaluates the implementation of the PPWR related processes and conformance of the private labels with the technical documentation and the Declaration of Conformity in greater depth and independently based on product samples.

This guidance explains the workflow and lists the questionnaire content, including provisions which need to be fulfilled in order to answer a question with "yes" and examples of evidence which the company needs to have in place to support their answers.

Disclaimer

The Packaging and Packaging Waste Regulation (PPWR) requires companies to comply with sustainability goals and implement measures to reduce packaging waste. This questionnaire is designed to assist companies in assessing the conformance of their packaging with the PPWR.

This version of the questionnaire is tailored to private-label products and covers only those requirements that will become applicable as of 2026.

The questionnaire is based on the following assumptions:

- No separate importer obligations are taken into account, on the basis that the manufacturer qualifies as the importer where products are imported from third countries.
- The private-label supplier has not been appointed as an authorised representative.
- The private-label supplier has the (contractual) duty to support the conformity assessment and prepares the technical documentation and the Declaration of Conformity.

The content is based on the final regulation text. Please note that while this questionnaire reflects the PPWR as currently adopted, companies should stay informed about any future updates or amendments to ensure ongoing compliance.

1 Not exhaustive.

1 | IFS PPWR Conformance Self-assessment

1.1 How it works

The IFS PPWR Conformance Self-assessment for the scope private label is the first step of the process. The online questionnaire provides an initial indication of the implementation status of the suppliers' PPWR related processes which need to be implemented because of legal obligations coming into force 2026.

Scope of the IFS PPWR Conformance Self-assessment for private label

This questionnaire can be used to assess private label suppliers as well as suppliers of importers. The obligations and thus number of questions of the self-assessment differ, depending on what packaging kinds are used for the private-label products and whether an environmental claim is made for the packaging material. Therefore, the questionnaire is structured as follows:

- **Basic questionnaire:** the basic questionnaire contains in total eight (8) questions, covering the conformity assessment, technical documentation, declaration of conformity, etc.
- **Sales packaging:** four (4) separate questions are applicable for sales packaging regarding labelling requirements.
- **Food contact packaging:** in case one part of the packaging is a food-contact material, one (1) further question applies regarding limitation of PFAS in the packaging material.
- **Grouped packaging:** in case the private-label product(s) is/are designed with grouped packaging material, four (4) additional questions apply covering labelling requirements.
- **Environmental claims:** in case voluntary environmental claims are made regarding the packaging material, one (1) additional question is applicable.

The selection of the relevant questions will be made by the supplier during the initial steps of the self-assessment by selecting the applicable packaging kinds and indicating whether environmental claims are made for the packaging material. Based on this, the questionnaire is automatically assembled.

1.2 Workflow

- The company asks its suppliers to answer the IFS PPWR Conformance Self-assessment questionnaire and sends them the link to access the IFS PPWR Conformance Self-assessment questionnaire.
- The link leads the supplier to the questionnaire in the IFS Database.
  - In case the supplier is an IFS certified company, it can directly access the PPWR Conformance Self-assessment for the scope private label.
  - If the supplier is not an IFS certified company, it can simply register and establish an account in the IFS Database.
- The supplier selects the IFS PPWR Conformance Self-assessment for the scope private label, fills in its company data, selects the applicable packaging kinds and indicates any environmental claims used for the packaging material, if applicable.

- The supplier answers the questions in the self-assessment and may upload additional documents such as generic technical documentation, generic declaration of compliance, test reports, and/or other evidence.

- The information and results of the self-assessment will be available to the supplier and its favorites in the IFS Database in the form of a report and can be further analysed and/or verified by the company. Additionally, it can be decided if the supplier has sufficiently implemented the relevant PPWR-related processes or if further follow-up steps are necessary.

- If follow-up steps are necessary, the company decides which further measures it will implement for the respective supplier. One option is an on-site or remote IFS PPWR Conformance Check, carried out by independent auditors trained on PPWR. The check can be combined with a regular IFS Audit.

2 | Self-assessment scoring

Questions contained in the self-assessment can be answered using the following options:

Option	Answer
A	Yes
B	Partially / in development
C	No
N/A	Not applicable

Note 1: answer option "B" can be chosen for all questions, except questions 2.1.1 and 2.1.2.

Note 2: answer option "N/A" can be chosen for questions 1.4.1, 1.4.2 and 1.5.1 in cases where the customer creates the Declaration of Conformity (DoC) and/or the Technical Documentation (TD) only.

The answer options are based on a scoring system that automatically calculates the overall score for the self-assessment. The result gives an indication of the level of implementation of the relevant obligations of the private label suppliers, indicating following three (3) conformance levels:

Conformance level	Overall score in percentage
Low risk	85 % – 100 %
Medium risk	65 % – 84.99 %
High risk	0 % – 64.99 %

Note: Optional documents and/or evidence uploaded by the supplier with the self-assessment are not assessed or scored.

3 | Self-assessment questions and examples of evidence

The objective of this table is to provide an overview of the IFS PPWR Conformance Self-assessment questions and to give guidance for suppliers answering the questions. Evidence is presented as examples of what (or equivalent) should be in place at the suppliers to support their responses.

Moreover, the section "What needs to be in place to answer "yes"?" indicates the provisions necessary to be able to answer a question with an "A". If not all the bullet points laid down to a specific question are implemented at the supplier, the supplier needs to answer "B". If none of the bullet points to a specific question is implemented at the supplier, the supplier needs to answer "C".

3.1 Self-assessment questionnaire

№	Dependency	Question	What needs to be in place to answer „yes"?	Answer Options	Evidence (not exhaustive)
1.	**Formal Requirements**				
1.1	**Identification Labelling**				
1.1.1	Sales packaging	• Has your company implemented a process to a type, batch, or serial number (or another identifying element) is provided on or with each sales packaging to identify the packaging?	• A process description is established and implemented within the company, including instructions as part of internal production controls. • These instruction(s) need to ensure that an identifying element (e.g. type, batch, serial number) is assigned to the sales packaging before the product leaves the facility. • Identification of the labelling step (either at the packaging supplier or during production) which ensures that the sales packaging can be identified.	A: Yes B: Partially, in development C: No	• Process instructions or visualisations as part of internal production controls ensure that labelling requirements are identified and that products are initially labelled, as well as checked and, if necessary, updated. • Results of a sampling inspection plan • Labelling design guidelines • Example of a labelled packaging

№	Dependency	Question	What needs to be in place to answer „yes“?	Answer Options	Evidence (not exhaustive)
1.1.2	Sales packaging	Does your company ensure that the **type, batch, or serial number** (or another identifying element) on the **sales packaging** is **clear, understandable and legible**?	• A process control (e.g. visual sampling plan) is implemented to ensure the correct attachment on or with the packaging, minimum font sizes, contrast ratios, and/or characters. • The identifying element on the product's packaging needs to be easy for customers to find, read, and understand without any confusion.	A: Yes B: Partially, in development C: No	• Process instructions or visualisations as part of internal production controls ensure that labelling requirements are identified and that products are initially labelled, as well as checked and, if necessary, updated. • Results of a sampling inspection plan • Labelling design guidelines • Example of a labelled packaging
1.1.3	Grouped packaging	Has your company implemented a process to ensure that a **type, batch, or serial number** (or another identifying element) is provided on or with each **grouped packaging** to identify the packaging?	• A process description is established and implemented including instructions for the internal production control, to ensure that an identifying element (e.g. type, batch, serial number) is assigned to the grouped packaging. • A labelling approach is implemented which ensures that the packaging can be identified.	A: Yes B: Partially, in development C: No	• Process instructions or visualisations as part of internal production controls ensure that labelling requirements are identified and that products are initially labelled, as well as checked and, if necessary, updated. • Results of a sampling inspection plan • Labelling design guidelines • Example of a labelled packaging

№	Dependency	Question	What needs to be in place to answer „yes“?	Answer Options	Evidence (not exhaustive)
1.1.4	Grouped packaging	Does your company ensure that the **type, batch, or serial number** (or another identifying element) on the **grouped packaging** is **clear, understandable and legible**?	• A process control (e.g. visual sampling plan) is implemented to ensure the correct attachment on or with the packaging, minimum font sizes, contrast ratios, and/or characters. • The identifying element on the product's packaging needs to be easy for customers to find, read, and understand without any confusion.	A: Yes B: Partially, in development C: No	• Process instructions or visualisations as part of internal production controls ensure that labelling requirements are identified and that products are initially labelled, as well as checked and, if necessary, updated. • Results of a sampling inspection plan • Labelling design guidelines • Example of a labelled packaging
1.2	**Manufacturer Labelling**				
1.2.1	Sales packaging	Has your company implemented a process to ensure that the **manufacturer's name, registered trade name or registered trademark** as well as the **contact details** are provided on the **sales packaging** or with another data carrier (e.g. QR code)?	• Instructions for internal production controls to ensure the provision of the manufacturer's name registered trademark, and the contact details (or a functional, scannable QR code linking to this data) on all packaging. • If using a QR code, the process shall involve scanning tests during the sampling inspection to ensure it resolves accurately to the correct contact information.	A: Yes B: Partially, in development C: No	• Process instructions or visualisations as part of internal production controls ensure that labelling requirements are identified and that products are initially labelled, as well as checked and, if necessary, updated. • Results of a sampling inspection plan • Labelling design guidelines • Example of a labelled packaging

№	Dependency	Question	What needs to be in place to answer „yes“?	Answer Options	Evidence (not exhaustive)
1.2.2	Sales packaging	Does your company ensure that the **manufacturer information** is provided on the **sales packaging in a clear, understandable and legible** manner?	• A process control (e.g. visual sampling plan) is implemented to ensure the correct attachment on the packaging, minimum font sizes, contrast ratios, and/or characteristics.	A: Yes B: Partially, in development C: No	• Process instructions or visualisations as part of internal production controls ensure that labelling requirements are identified and that products are initially labelled, as well as checked and, if necessary, updated. • Results of a sampling inspection plan • Labelling design guidelines • Example of a labelled packaging
1.2.3	Grouped packaging	Has your company implemented a process to ensure that the **manufacturer's name, registered trade name or registered trademark** as well as the **contact details** is provided on the **grouped packaging** or with another data carrier?	• A process description is established and implemented including instructions for internal production controls to ensure the provision of the manufacturer's name registered trademark, and the contact details (or a functional, scannable QR code linking to this data) on all packaging. • If using a QR code, the process shall involve scanning tests during the sampling inspection to ensure it resolves accurately to the correct contact information.	A: Yes B: Partially, in development C: No	• Process instructions or visualisations as part of internal production controls ensure that labelling requirements are identified and that products are initially labelled, as well as checked and, if necessary, updated. • Results of a sampling inspection plan • Labelling design guidelines • Example of a labelled packaging

№	Dependency	Question	What needs to be in place to answer „yes“?	Answer Options	Evidence (not exhaustive)
1.2.4	Grouped packaging	Does your company ensure that the **manufacturer information** is provided on the **grouped packaging in a clear, understandable and legible** manner?	• A process control (e.g. visual sampling plan) is implemented to ensure the correct attachment on the packaging, minimum font sizes, contrast ratios, and/or characteristics.	A: Yes B: Partially, in development C: No	• Process instructions or visualisations as part of internal production controls ensure that labelling requirements are identified and that products are initially labelled, as well as checked and, if necessary, updated. • Results of a sampling inspection plan • Labelling design guidelines • Example of a labelled packaging
1.3	**Conformity Assessment Procedure**				
1.3.1	Basic	Has your company implemented a **process to ensure that a conformity assessment** on PPWR specific requirements **is conducted**, including consecutive internal control measures, before each type of packaging is supplied to the manufacturer?	• A process description is established and implemented including the conformity assessment approach and relevant control points.	A: Yes B: Partially, in development C: No	• Technical documentation • Test results • EU declaration of conformity

№	Dependency	Question	What needs to be in place to answer „yes“?	Answer Options	Evidence (not exhaustive)
1.3.2	Basic	Has your company implemented a **process to initiate follow-up measures** (e.g. to conduct a re-assessment of packaging material conformity) **if there is a concern** that its compliance might be affected (e.g. due to complaints, suspicion by the competent authority)?	• A process description is established and implemented including necessary steps and relevant measures to be taken in case of complaints and/or suspicions by the competent authority or other stakeholders (e.g. customers) concerning the compliance of packaging. • Follow-up measures need to be defined based on the individual complaint and/or suspicion (e.g. quarantine/ blocking of product, laboratory analysis, re-assessments, correcting label). • The instructions shall clearly point out under which circumstances a re-assessment has to be carried out.	A: Yes B: Partially, in development C: No	• Process instructions or visualisations as part of the internal management system including complaint handling and necessary follow-up measures. • PCMS • Internal audit reports or compliance check reports

№	Dependency	Question	What needs to be in place to answer „yes“?	Answer Options	Evidence (not exhaustive)
1.4	**Drawing up of an EU Declaration of Conformity**				
1.4.1	Basic	Has your company implemented a **process to ensure that the EU declaration of conformity** for packaging **follows the required structure** (see Annex VIII, PPWR) and content and remains continuously updated?	• A process description is established and implemented including relevant triggers when a DOC needs to be updated. • The process needs to ensure that every DOC generated contains the relevant points outlined in Annex VIII of the PPWR, by e.g. establishing a template for the DOCs. • The instructions shall clearly point out under which circumstances an update of the DOC has to be carried out. Note: in cases where the resposibility on creating the DoC differs among customers, please indicate the status of implementation when drawing up own DoCs.	A: Yes B: Partially, in development C: No N/A: Customer creates DoC	• EU declaration of conformity • Update logs of the declaration
1.4.2	Basic	Has your company a procedure in place to ensure that the **EU declaration of conformity** covers all applicable EU laws for the packaging **in one document**?	• A process description is established and implemented that covers the relevant EU laws necessary to comply with, considering different packaging types Note: in cases where the resposibility on creating the DoC differs among customers, please indicate the status of implementation when drawing up own DoCs.	A: Yes B: Partially, in development C: No N/A: Customer creates DoC	• Current legal register/ legal database • Process instructions regarding monitoring compliance with regulatory requirements • Process instructions regarding analysis and regulatory assessment of the product portfolio and internal communication of these requirements

№	Dependency	Question	What needs to be in place to answer „yes“?	Answer Options	Evidence (not exhaustive)
1.5	**Drawing up of technical documentation (TD)**				
1.5.1	Basic	Does your company have **a process implemented ensuring that technical documentation for packaging is created**, including at least an adequate analysis and assessment of risks of non-conformity, and, wherever applicable, the following elements: general description and its intended use, details on design, manufacture, operation, and test reports (see Annex VII, PPWR)?	• A process description is established and implemented including an approach on how the relevant information for technical information is (to be) gathered. The technical documentation shall contain as a minimum: a) An adequate analysis and assessment of the risks of non-conformity. b) A general description of the packaging and its intended use. c) Details on the design, manufacture, and operation of the packaging. d) Test reports and results proving compliance (e.g. chemical analysis reports verifying that heavy metals and PFAS are below statutory limits using scientifically recognized testing methods). Note: in cases where the responsibility on creating the TD differs among customers, please indicate the status of implementation when drawing up own TDs.	A: Yes B: Partially, in development C: No N/A: Customer creates TD	• Process instructions or visualisations for the technical documentation, its review, updates, and retention • Compliance with guidelines for the technical documentation regarding substance restrictions • Technical documentation • Test results

№	Dependency	Question	What needs to be in place to answer „yes“?	Answer Options	Evidence (not exhaustive)
1.5.2	Basic	Does your company **systematically monitor the manufacturing process regarding compliance** of the packaging with the PPWR requirements?	• A process description is established and implemented within the company (or integrated into other process descriptions) for the relevant manufacturing process(es) outlining adequate monitoring measures based on the technical documentation and outcome of the conformity assessment(s) (e.g. visual inspection, material and weight checks, analyses on residues).	A: Yes B: Partially, in development C: No	• Process instruction or visualisations for the determination of packaging requirements during development and for changes to those requirements • PCMS • Audit reports or compliance check reports
2.	**Material**				
2.1	**Requirements for substances in packaging**				
2.1.1	Basic	Is there a process implemented to ensure compliance with the **limitation of the sum of concentrations of lead, cadmium, mercury, and hexavalent chromium** resulting from substances present in packaging or packaging components to a maximum of 100 mg/kg?	• A process description is established and implemented for testing of relevant heavy metals in packaging materials, considering different types of packaging and the likelihood of heavy metal concentrations present. • This instruction shall also contain definition of testing methods, relevant limits, frequencies and who is conducting those analyses (e.g. regular/batch related test reports from packaging material suppliers or regular internal testing via in-house laboratory with (risk-based) verification through testing by accredited laboratories).	A: Yes B: No	• Process instructions or visualisations for the determination of packaging requirements during development and for changes to those requirements. • PCMS • Certificates • Bill of materials • Full material declaration • Supplier declaration and/or contractual agreement • Chemical analysis reports from laboratories

№	Dependency	Question	What needs to be in place to answer „yes“?	Answer Options	Evidence (not exhaustive)
2.1.2	Food-contact packaging	Is there a process implemented to ensure compliance with the **limitation of per- and polyfluorinated alkyl substances (PFAS)** contained in food-contact packaging in a concentration below the following limit values: – 25 ppb for individual PFAS (excluding polymeric PFAS), – 250 ppb for the sum of all PFAS (excluding polymeric PFAS), – 50 ppm for PFASs including polymeric PFAS.	• A process description is established and implemented on testing of per- and polyfluorinated alkyl substances in packaging materials, considering different types of packaging and their likelihood of per- and polyfluorinated alkyl substances and concentrations present. • This instruction shall also contain definition of testing methods, relevant limits, frequencies and who is conducting those analyses (e.g. regular/ batch related test reports from packaging material suppliers or regular internal testing via in-house laboratory with (risk-based) verification through testing by accredited laboratories).	A: Yes B: No	• Process instructions or visualisations for the determination of packaging requirements during development and for changes to those requirements. • PCMS • Certificates • Bill of materials • Full material declaration • Supplier declaration and/or contractual agreement • Chemical analysis reports from laboratories

№	Dependency	Question	What needs to be in place to answer „yes“?	Answer Options	Evidence (not exhaustive)
2.1.3	Basic	Is there a process implemented to ensure that the concentration limits for compliance with the PPWR have been **verified using scientifically recognized testing methods** (e.g. three step approach outlined in the PPWR Guideline of the European Commission)?	• A process description is established and implemented for specifying relevant scientifically recognized testing methods for relevant heavy metals and per- and polyfluorinated alkyl substances in the packaging.	A: Yes B: Partially, in development C: No	• Certificates Chemical analysis reports from laboratories
2.2	**Environmental claims**				
2.2.1	Packaging with environmental claim	Is there a **process implemented to ensure that environmental claims** on packaging, such as „free of harmful substances,“ refer to **properties of the packaging that exceed the minimum requirements of the PPWR**, and that the reference point of the environmental claim is clearly stated, e.g., the entire packaging unit, only part of it, or even all packaging of a certain manufacturer?	• A process description is established and implemented to identify all environmental claims related to the packaging in use for the private-label products. • Analyses on whether the environmental claims actually exceed the PPWR requirements (and not only complying with them). Note: environmental claims in the context of PPWR are only in relation to the packaging material(s), e.g. this packaging contains 90 % recycled plastics.	A: Yes B: Partially, in development C: No	• Process description or visualisations on environmental claims • Claim inventory • Product data sheets

3.2 Glossary to the IFS PPWR Conformance Self-assessment

Environmental claim: Any non-mandatory message or representation (text, image, label, name, symbol) in commercial communication that states or implies a packaging or packaging component has positive, zero, or reduced environmental impact, or has improved its environmental performance over time.

Food-contact packaging: Packaging that is intended to come into contact with food, already comes into contact with food, or can reasonably be expected to come into contact with food during normal or foreseeable use.

Grouped packaging: Designed to group several sales units at the point of sale. It may be sold as a unit to the end user or used for shelf restocking, stockkeeping or distribution, and can be removed without altering the product's characteristics.

Packaging: Any item, regardless of its material, designed for use to contain, protect, handle, deliver or present products to another economic operator or end user. Packaging can be distinguished by its format, function, material and design.

Per- and polyfluoroalkyl substances (PFAS): A large group of synthetic chemicals that are particularly prevalent in food-contact materials and packaging due to their unique properties. Based on their physical properties, especially their persistence, along with the identified health effects of some PFAS, they represent a significant environmental and human health hazard.

Parts per billion (ppb): a unit of measurement used to describe the concentration of a substance in a solution or mixture. It indicates how many parts of a particular substance are present in one billion parts of the total mixture.

Parts per million (ppm): a unit of measurement used to describe the concentration of a substance in a solution or mixture. It indicates how many parts of a particular substance are present in one million parts of the total mixture.

Sales packaging: Packaging conceived to constitute a sales unit consisting of products and packaging to the end user at the point of sale.

4 | IFS PPWR Conformance Check

A result of the self-assessment can be that subsequent actions are recommended for specific suppliers. This may include a suggestion that an on-site or remote check could be beneficial for those suppliers where the implementation of further and/or specific PPWR related processes and obligations needs to be examined in greater depth.

For this purpose, IFS developed a solution which evaluates the implementation of the PPWR related processes and conformance of the private-label supplier with the technical documentation and the Declaration of Compliance in greater depth and independently based on product samples.

Auditors who have been trained on regulation (EU) 2025/40 (PPWR) can perform it as an on-site or remote check. It is possible to combine it with other IFS Audits or Assessments, such as IFS Food, IFS Progress Food, IFS Broker, IFS PACsecure, IFS Progress PACsecure or IFS ESG Compliance Check.

Further information about the IFS PPWR Compliance Check becomes available on the **IFS Website**.

IFS publishes information, opinions and bulletins to its best knowledge, but cannot take any responsibility for any mistakes, omissions or possibly misleading information in its publications, especially in this document.

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