

Urgent Action Required – PPWR Applicability from 12 August 2026

Dear Members,

From 12 August 2026, the EU's Packaging and Packaging Waste Regulation (PPWR) specifies that any company placing packaged goods on the EU market, including semiconductors, must have packaging compliance documentation in place and packaging producer registrations in each member state of sale. Missing documentation can result in shipment delays or blocked market access. The remaining lead time is short, and internal ownership must be assigned now.

What is now legally required

For each packaging type manufacturer of packaged goods must hold the complete documentation, consisting of Conformity Assessment, Technical Documentation and Declaration of Conformity (DoC). Importers must verify these documents exist and keep the DoC available to authorities. In addition, Extended Producer Responsibility (EPR) requires producer registration in each member state where packaged goods are placed.

Enforcement and market access risks

Authorities may request the Technical Documentation and DoC without prior notice. By law, this documentation must already exist at market placement and be provided within 10 days upon request. In case of non-compliance or insufficient documentation, goods may be held, delayed, or denied placement on the market by EU market surveillance authorities. This creates a direct risk of disruption to time-critical semiconductor supply chains.

What to do now

Member companies are recommended to act immediately to ensure compliance with their legal obligations. Companies should consider:

- Assigning clear internal ownership for PPWR compliance
- Establishing processes for DoC generation and Technical Documentation
- Identifying and starting EPR registration in each member state of sale.
- Reviewing packaging portfolios and supply chains for compliance exposure

The deadline is only few weeks away and the semiconductor supply chain is complex. The time to act is now.

Maxime Castes, ESH and Sustainability Manager, ESIA

Signed by:

Maxime Castes

0FE2DAD1CFE0470...

For further information:

Giovanni Corder

Acting Director General

giovanni.corder@eusemiconductors.eu

European Semiconductor Industry Association (ESIA)

Tel: + 32 494 11 28 83

Web: <https://www.eusemiconductors.eu/>

ABOUT ESIA

The European Semiconductor Industry Association (ESIA) is the voice of the semiconductor industry in Europe. Its mission is to represent and promote the common interests of the Europe-based semiconductor industry towards the European institutions and stakeholders in order to ensure a sustainable business environment and foster its global competitiveness. As a provider of key enabling technologies, the industry creates innovative solutions for industrial development, contributing to economic growth and responding to major societal challenges. Being ranked as the most R&D-intensive sector by the European Commission, the European semiconductor ecosystem supports approx. 200.000 jobs directly and up to 1.000.000 induced jobs in systems, applications and services in Europe. Overall, micro- and nano-electronics enable the generation of at least 10% of GDP in Europe and the world.