

THE PACK SCOUT

ONE DEGREE OFF

SECOND EDITION

*Align or decline.
Now the decline has a deadline.*

Matthew Rogerson

Founder, The Pack Scout · Packaging Strategy & Compliance Readiness

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One Degree Off — Second Edition

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matthew@thepackscout.com

www.thepackscout.com

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A framework for packaging compliance readiness in the age of PPWR

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The Compliance Readiness Diagnostic — 4 hours · written gap analysis within 48 hours · matthew@thepackscout.com

ABOUT THIS EDITION

How to Use This Book

This book has two modes of use.

Read it front to back and it builds a complete case — chapter by chapter — for why packaging compliance in 2026 is a fundamentally different problem from what it was five years ago, and what the architecture of a solution looks like.

Or use it as a diagnostic. Each chapter ends with a Reflection section — four questions that test your organisation's position against that chapter's argument. If a chapter's Reflection surfaces a gap, that chapter is where your compliance programme needs attention.

Either way, start with the Introduction and end with Chapter Ten. The framework in Chapter Ten is the output of every argument in every chapter that precedes it.

About the Cases in This Book

Every situation described in this book is drawn from real conversations with real organisations. Where specific company names appear, they do so because the situation is in the public domain or because the framing is entirely positive. For all other situations, organisations are described by sector and scale rather than by name — not to obscure the reality, but to allow every reader to see their own situation in the story.

The compliance challenges described here are not unique to the companies involved. They are representative of where the industry is. The organisations that shared these situations openly are, in most cases, ahead of their peers precisely because they were willing to examine the gap honestly.

A Note on Timing

This edition was finalised in April 2026, with the PPWR application date of 12 August 2026 imminent. Some regulatory details — particularly around delegated and implementing acts — were still evolving at the time of writing. The framework in this book is designed to be durable regardless of how specific regulatory details resolve. The questions it asks do not change. The governance it demands does not change. The evidence it requires does not change.

For current regulatory developments, subscribe to the Unpacked Intelligence briefing at www.thepackscout.com/intelligence.

FOREWORD TO THE SECOND EDITION

Why I Rewrote This Book

When I wrote the first edition of this book, I was trying to solve one problem: why do good organisations with smart people keep missing the runway?

The answer was misalignment. It still is.

But something has changed. The cost of being one degree off has multiplied. Because now there is a regulation arriving on 12 August 2026 that will not negotiate, will not accept a late submission, and will not care that your systems were not ready.

The Packaging and Packaging Waste Regulation — PPWR, Regulation EU 2025/40 — is the most significant legislative shift to hit the packaging industry in thirty years. It entered into force on 11 February 2025. It applies directly, in full, across every EU member state from 12 August 2026. No transposition. No national variation. The same rule, on the same day, in Berlin, Dublin, Warsaw, and Madrid.

And in every senior conversation I have had since it came into force, I keep hearing the same thing from regulatory leads, sustainability directors, and senior packaging teams at some of the world's most sophisticated organisations:

"We know what the regulation requires. We just don't know if we can actually do it."

That sentence is misalignment. It is the one-degree problem applied to compliance. And the consequences of not correcting it are no longer just commercial — they are legal, operational, and real.

This second edition keeps what worked in the first. The one-degree metaphor. The alignment equation. The tools. But it runs a new wire through all of it: the

regulatory wire. Every principle now connects to a compliance consequence. Every tool now has a PPWR application. Every chapter now ends with a question you need to be able to answer before August 2026.

I have also replaced the general examples with real situations from real conversations.

A global spirits manufacturer managing two hundred brands and hundreds of thousands of SKUs, still relying on spreadsheets to track packaging compliance.

A UK health and beauty retailer, whose PPWR exposure is triggered by just a handful of own-label stores in Ireland — but whose post-consumer recycled content claims across the portfolio cannot yet all be evidenced with verified documentation.

A global food company, being told to use recycled polypropylene for food contact applications that does not yet exist at commercial scale. Waiting on regulatory approval. Knowing that when it comes, they will need to pivot fast across their entire production system.

A global convenience retailer, asking what questions they should be putting to their suppliers in order to know whether they are compliant.

And a consumer health company — whose brands are among the most scrutinised over-the-counter products in the world — asking whether there is a gold standard framework for packaging compliance readiness.

There is. It is in this book.

Align or decline was always the choice. Now, for the first time, the decline has a deadline.

Matthew Rogerson

Founder, The Pack Scout

April 2026

INTRODUCTION

The Runway Is Shorter Than You Think

August 2026 is not a target. It is a threshold.

On 12 August 2026, the Packaging and Packaging Waste Regulation becomes binding across every EU member state simultaneously. No grace period. No soft launch. No extensions for organisations that were busy, confused, or simply not ready.

For the first time in the history of European packaging legislation, the same rule applies on the same day everywhere. If your packaging is on EU markets, you are subject to it. If your suppliers provide into those markets, they are subject to it. If you own the brand, you own the compliance obligation — regardless of where you are headquartered.

That date is upon us as this book goes to print. And in every senior conversation I have had in the past twelve months, the same uncomfortable truth keeps surfacing.

Most organisations know what the regulation requires. Very few can prove they are compliant.

That gap — between knowing and proving — is the one-degree problem applied to regulation. It is the subject of this book.

What Has Changed Since the First Edition

In the original edition I described misalignment as a plane arriving 550 feet from where it needed to land. One degree off on final approach. Barely noticeable until it was catastrophic.

The metaphor still holds. But in 2026, the runway has a hard end. You cannot overshoot it and circle back. The regulation does not allow for a near-miss. Either your packaging meets the requirements or it does not. Either your claims

are evidenced or they are not. Either your suppliers have provided verified documentation or they have not.

The difference between compliant and non-compliant is often not large. It is one missing certificate. One unverified claim. One material that your converter runs on equipment designed for a different polymer. One recycled content target that your supplier cannot meet at the volume you require.

One degree.

The Four Conversations That Changed How I Wrote This

The first edition drew on patterns observed across the industry. This edition draws on specific conversations — because specific is what the regulation demands.

At a global spirits manufacturer with two hundred brands and hundreds of thousands of SKUs, the challenge is not awareness. It is infrastructure. How do you build a system capable of managing PFAS compliance, recycled content verification, supplier documentation, and Declaration of Conformity requirements across a portfolio of that scale against a deadline that is already in view?

At a UK health and beauty retailer, a small number of stores in Ireland trigger full PPWR exposure. The team can produce a list of post-consumer recycled content claims across their own-label packaging. What they cannot yet produce is verified, third-party chain of custody documentation for all of them. The gap between the claim and the evidence is exactly where regulatory risk sits.

At a global food company, the compliance requirement and the material reality are not yet aligned. Recycled food-contact polypropylene at commercial scale does not yet exist in sufficient volume. The regulation requires it. The supply chain cannot yet deliver it. This is not a failure of intent. It is a structural misalignment between what the regulation demands and what the operational system can provide — and when the pathway opens, the pivot will need to be fast and comprehensive.

At a global convenience retailer, the question their compliance team brought to me was the most honest I have heard: what questions do we need to ask our suppliers to know whether we are compliant? Not a failure of ambition. A failure of the shared language and verification framework that would allow them to answer that question themselves.

And a consumer health company asked whether there is a gold standard framework for packaging compliance readiness. That question is the reason this edition exists.

What This Book Will Do

This is not a compliance manual. It does not list every article of PPWR or walk through every deadline between 2026 and 2040. For that you have lawyers and regulatory consultants.

What this book does is diagnose the gap between where most organisations think they are and where the regulation requires them to be — and provides a framework for closing it before the runway ends.

The framework is called the Packaging Compliance Readiness Framework. It has four layers. Each layer depends on the one above it. And it appears in full at the end of this book, along with a self-assessment tool you can use with your team this week.

Every chapter builds one layer of the case for why each part of that framework matters. Every story is real. Every tool has been built in practice.

The runway is shorter than you think. Let's use the distance well.

CHAPTER ONE

The Illusion of Progress (Now with Consequences)

Being busy has never been the same as being ready. Now it has a legal dimension.

There is a meeting happening in packaging organisations all over the world right now. It goes like this.

A sustainability or regulatory lead presents a slide showing progress against compliance requirements. Green ticks appear next to recyclability targets. A percentage figure is quoted for recycled content. A supplier engagement programme is referenced. The slide looks reassuring. Leadership nods.

Nobody asks the question that matters: can we prove any of this?

This is the modern version of the illusion of progress. Not malicious. Not lazy. The entirely human tendency to mistake activity for compliance, intention for evidence, and a presentation for a Declaration of Conformity.

The Activity Trap Has Regulatory Consequences

In the first edition of this book I wrote about organisations that measure effort rather than outcomes — full calendars, constant urgency, impressive activity that produces almost nothing of real substance. That pattern has not changed.

What has changed is the stakes attached to it.

A brand that has been running sustainability workshops, commissioning supplier questionnaires, and publishing annual progress reports can still be materially non-compliant on 12 August 2026. Because PPWR does not credit good intentions. It requires documented, verified, auditable evidence that specific requirements have been met.

Article 6 requires all packaging to meet design-for-recycling criteria. Article 7 sets mandatory recycled content targets for plastic packaging. Article 12 requires specific labelling in a harmonised format. Article 44 introduces Extended Producer Responsibility obligations with financial consequences. These are not aspirations. They are requirements with enforcement mechanisms and market access consequences attached.

PPWR Hard Date

By 12 August 2026, manufacturers must have declarations of conformity and technical documentation available for every packaging type placed on the EU market. These cannot be created retrospectively. They must exist before the packaging is placed on the market.

The Scale Problem

Conversations with regulatory leadership at one of the world's largest beverage manufacturers described a compliance challenge that is representative of large organisations throughout the packaging industry .

Two hundred brands. Hundreds of thousands of SKUs. A global supply chain of extraordinary complexity managing PFAS compliance, BPA restrictions, heavy metal limits, recycled content targets, and Declaration of Conformity requirements across every market in which the company operates. And at the centre of it, the systems currently managing packaging compliance are primarily manual and spreadsheet-based.

This is not a criticism of that organisation specifically. It is an observation about the industry. The data management systems most organisations have built for packaging compliance were designed for an era in which requirements were set at national level, compliance was largely voluntary in practice, and the penalty for a missed claim was reputational rather than legal.

That era ended when PPWR entered into force.

The challenge described — building a system capable of managing material-level compliance data across hundreds of thousands of SKUs, against a deadline already in sight — is the compliance alignment problem in its purest form. The intention exists. The awareness exists. The infrastructure to execute does not yet match the regulatory requirement.

That gap is one degree of misalignment. At that scale, one degree is thousands of potentially non-compliant packaging units.

Compliance Theatre

There is a specific form of activity that is particularly dangerous in a compliance context, because it produces the appearance of progress while leaving the underlying gap entirely untouched.

Compliance theatre looks like this. A regulation is published. The organisation convenes a cross-functional working group. The working group meets regularly. Minutes are taken. Actions are assigned. A project plan is built. Quarterly updates go to the executive team. The slide shows green.

Meanwhile, nobody has verified that the recycled content in the packaging is what the supplier claims. Nobody has checked whether the supplier's own supplier — the resin producer — has the chain of custody documentation that makes that claim legally defensible. Nobody has asked the converter whether their equipment can run the monomaterial structure that recyclability requires. Nobody has tested whether the label meets the harmonised format that applies from 2028.

The meeting happened. The compliance did not.

Activity is not evidence. A supplier questionnaire is not a verified claim. A slide showing green is not a Declaration of Conformity.

What Real Progress Looks Like

Real compliance progress has a specific character. It is slower at first than theatre, and faster in the end.

It starts with a complete, accurate inventory of every packaging unit in scope — not a sampling or a category summary, but a line-by-line audit of what is on the EU market. For a manufacturer with hundreds of thousands of SKUs, this is a significant undertaking. For a regional brand with a focused portfolio, it is manageable in weeks. Either way, it cannot be skipped. You cannot govern what you have not defined.

It continues with material composition data at component level — not just "recyclable packaging" but the specific polymer, the lamination structure, the ink system, the adhesive, the closure — because PPWR's recyclability grades will be determined at exactly that level of granularity when the delegated acts are published.

It includes verified supplier documentation — not self-declarations, but third-party certified chain of custody for recycled content, PFAS-free confirmation from the resin producer rather than just the converter, and declarations that are renewed when materials change rather than filed once and forgotten.

And it culminates in a Declaration of Conformity for each packaging type, maintained and updated as specifications evolve.

This is what a compliance-aligned organisation looks like. Not busy. Evidenced.

REFLECTION — Try This Now

- Can you produce a complete inventory of every packaging format your organisation places on the EU market?
- For each one, do you have material composition data at component level — polymer, inks, adhesives, coatings, closures?
- Are your supplier declarations third-party verified or self-declared? When were they last renewed?
- If a regulator asked for your Declaration of Conformity for any packaging type tomorrow, how long would it take to produce?

CHAPTER TWO

The Language Problem Is Now a Legal Problem

When teams define the same word differently, they used to waste time. Now they create liability.

Every time I give a talk — to packaging teams, sustainability leads, regulatory specialists, or procurement directors — I ask the same question: what does recyclable mean?

Without exception, every hand in the room offers a different answer.

Some say technically recyclable in the laboratory. Some say recyclable where collection infrastructure exists. Some say recyclable in the specific country of use. Some mean the substrate. Some mean the whole pack. Some include the closure. Some do not.

All of them are right within their own frame. None of them are aligned. And under PPWR, that misalignment is no longer just commercially inconvenient. It is potentially a false claim.

Recyclable Now Has a Legal Definition

Article 6 of PPWR and its associated delegated acts will establish, for the first time, a legally binding recyclability grading system for packaging on the EU market. Grades A through E will be defined by design-for-recycling criteria set by the European Commission. Packaging achieving only grades D or E will be prohibited from the EU market from 2030. Only grades A and B will be permitted from 2038.

This is not a target or a guideline. It is a graduated prohibition.

What this means for the language problem is stark. An organisation that has been telling its marketing team, its investors, its customers, and its own leadership that its packaging is "recyclable" — based on a technical test, a

supplier declaration, or a general industry understanding — may be about to discover that recyclable under PPWR means something specific, graded, and enforceable that their packaging does not yet meet.

The Recyclability Gap

Many organisations currently describe packaging as recyclable based on material type alone. PPWR will require recyclability to be demonstrated against specific design criteria, at scale, through certified testing. The distance between "we believe it is recyclable" and "we can prove it meets grade C or above" is, for many portfolios, significant.

When Polymer Confusion Has Consequences

In conversations with packaging technologists I keep returning to a situation that illustrates the material and equipment problem at the operational level. A major confectionery manufacturer transitions their primary wrapper from polypropylene to polyethylene — a technically sound move for recyclability, since monomaterial PE is more compatible with existing collection and sorting infrastructure in most European markets.

The transition looks smooth on paper. Material agreed. Supplier confirmed. Recycling compatibility tested.

But the brand uses multiple converters. And one of those converters is running the new PE film on BOPP equipment that was never calibrated for polyethylene. Polypropylene melts at a significantly higher temperature than polyethylene. The line is cooking the film before it reaches the sealing station. The converter says the material does not work. The brand says it has been tested and approved.

Both are right. Neither are aligned. And the project stalls — not because of the regulation, but because the language of material compatibility was never shared consistently between the brand, the converters, and the equipment specifications.

Under PPWR, this is not a production problem that can be resolved after the fact. If the packaging cannot be manufactured to the specification that achieves the recyclability grade, it cannot be placed on the market. The deadline does not move while the converter upgrades their equipment.

Claims Without Evidence

A situation facing a UK health and beauty retailer sits precisely in the gap between what is claimed and what can be proved — and it is more common than most organisations would be comfortable admitting.

The retailer makes post-consumer recycled content claims across their own-label packaging. Post-consumer recycled content claims are, under PPWR and under the EU's broader Green Claims framework, one of the most scrutinised categories of sustainability communication. The regulation requires that recycled content claims be substantiated with chain of custody documentation from the resin producer, not just a declaration from the converter.

The team can produce a list of claims. What they cannot yet produce, for all of them, is the verified documentation that makes those claims legally defensible under the incoming framework.

This is the language problem at its most commercially exposed point. The claim is on the pack. The documentation does not yet fully support it. And the Green Claims Directive, running alongside PPWR, will make unsubstantiated sustainability claims a specific enforcement target.

"We can tell you what we claim. We cannot yet tell you exactly what we can prove." — The compliance gap that most organisations will recognise, if they are honest about it.

Shared Definitions Are Now Non-Negotiable

In the first edition of this book I argued that shared definitions were the foundation of alignment — that before any strategy could begin, teams needed to agree on what their words meant. That argument was about efficiency and coherence.

It is now about legal exposure.

Under PPWR, the following terms have specific legal meanings that will be set in delegated and implementing acts: recyclable, recycled content, reusable, compostable, bio-based, and packaging minimisation. An organisation whose internal teams, suppliers, and communications use these words in ways that diverge from their legal definitions is not just misaligned — it is potentially making false claims.

The starting point is the same as it always was. You define before you decide. You agree on what the words mean before you use them on a label, in a supplier contract, in an investor report, or in a conversation with a regulator.

The difference is that in 2026, the definitions are being set for you. Your job is to close the gap between how you currently use these words and how the law requires you to use them.

The Supplier Question

When the compliance team at a major global convenience retailer came to me with their question — what do we ask our suppliers to know if we are compliant — it was the most honest expression of the language problem I have encountered.

They were not asking because they had not tried. They were asking because the supplier conversations they had been having were producing answers that felt insufficient, but they could not identify precisely why.

The answer is that there is no alignment on what sufficient means. Without a defined standard for what a compliant supplier declaration looks like — what it must include, how it must be verified, how frequently it must be renewed, and

from whom it must come — any answer a supplier gives will seem plausible. And plausible is not compliant.

The framework for that supplier conversation appears in Chapter Ten. But the starting point was the same as it always is: agree on what the words mean before you ask the question.

REFLECTION — Try This Now

- Does your organisation have an agreed internal definition of recyclable that maps to PPWR's grading criteria?
- Are your current sustainability claims on pack supported by documentation that meets the chain-of-custody standard, not just supplier self-declaration?
- When your procurement team asks suppliers about recycled content, what standard are they using to assess the response?
- If the Green Claims Directive applies to your market, which of your current claims would survive scrutiny today?

CHAPTER THREE

The Packaging Paradox Meets the Regulation

The systems built to make packaging were not built for the compliance it now requires.

One of the most expensive lessons in packaging compliance is that a regulation can be technically correct, operationally understood, and commercially committed to — and still fail at the production line.

I have sat in meetings where a brand has spent eighteen months developing a recyclable monomaterial packaging solution. The material has been tested. The recyclability has been confirmed. The supplier has been briefed. The launch date is set. And then someone asks whether all converters can actually run the material on their current equipment.

The silence that follows that question is the packaging paradox.

Same Regulation, Different Realities

Consider what happened when a major confectionery business moved to a monomaterial BOPE film designed to achieve recyclability at store drop-off. Two converters ran the trial. Supplier A reported smooth running. Supplier B said it was, in their words, the worst material they had ever handled — a production disaster they refused to run commercially.

Same film. Same specification. Completely opposite results.

The investigation resolved quickly. Supplier A had dedicated BOPE equipment. Supplier B was attempting to run polyethylene on a line calibrated for polypropylene — a higher-melting material. The thermal mismatch was turning the film into a gelled mass around the rollers before it reached the sealing station.

The material was not the problem. The system was.

Months of development work, supplier alignment, cross-functional planning — undone because one converter's infrastructure did not match the new material reality. And under PPWR, this is not a production delay. If that converter cannot run the compliant material, their production is non-compliant packaging. It cannot be placed on the EU market.

The Material That Does Not Yet Exist

The packaging paradox reaches its most acute expression in situations where the regulation requires a material solution that the supply chain cannot yet reliably provide.

A global food company, mapping requirements against the recycled content targets under PPWR, encountered a problem that no amount of supplier management could immediately solve.

Recycled polypropylene approved for food contact applications — the material needed to meet recycled content requirements for certain categories of food packaging — does not exist at commercial scale in the volumes that global food manufacturers require. The regulatory pathway exists: EFSA must approve additional recycled PP for food contact use, and that process is underway. But approval timelines are outside any brand's control, and the volume available even after approval will need time to scale to commercial supply.

This is structural misalignment between the regulatory requirement and the operational reality of the supply chain. The food company is not non-compliant because of poor management. It is sitting at a junction where the law and the supply chain have not yet converged.

What the PPWR allows in this situation is a derogation — a temporary exemption from specific requirements where compliance is technically impossible. But derogations are not indefinite. They require documentation. They require active monitoring of when the supply pathway opens. And when it does, the pivot to compliance must happen fast — across every production site, every contract, every supplier relationship.

The organisations that will navigate this successfully are the ones that are already tracking the derogation pathway, building the supplier relationships for when the material becomes available, and designing their packaging systems to be ready to switch quickly. The ones that are waiting for the derogation to simply continue will be caught unprepared when it ends.

The Derogation Risk

PPWR derogations exist for situations where compliance is technically impossible. They are temporary, documented, and monitored. An organisation relying on a derogation without actively managing the transition to compliance is storing up a larger problem — a fast-mandatory pivot across a supply chain that has not been prepared for it.

The Alignment Chain Under Regulatory Pressure

In the first edition of this book I described the alignment chain for packaging: Material → Machine → Market → Message. Every link must reinforce the next. When any link breaks, the system fails.

PPWR adds a fifth link: Regulation. And it sits at the beginning of the chain, not the end.

The chain is now: Regulation → Material → Machine → Market → Message.

This matters because it changes the direction of design. In the pre-regulatory era, organisations started with the pack design they wanted and worked backwards to find materials and machines that could deliver it. Under PPWR, the starting point is the regulatory requirement — what recyclability grade is needed, what recycled content percentage is required, what restricted substance limits must be met — and every subsequent decision flows from that anchor.

Organisations that have not made this shift are still designing forwards into a regulatory framework that requires them to design backwards from it. That is the structural misalignment at the heart of the packaging paradox in 2026.

The Communication Layer

The fifth link in the chain — message — has its own regulatory dimension that is often underestimated.

PPWR Article 12 requires specific labelling. From August 2028, the European Commission will publish implementing acts defining harmonised labelling requirements for recyclability and sorting instructions. These will include QR code or digital label requirements for certain packaging categories, enabling consumers to access information about composition and disposal.

An organisation can have compliant materials, compliant machines, and compliant market documentation — and still have non-compliant labels. Because the message has its own requirements, its own timeline, and its own enforcement mechanism.

The organisations that will be ready are the ones that have started the conversation between their regulatory team, their packaging design function, and their marketing department now — while there is still time to align.

A practical addition to your planning horizon: the EU Ecodesign Regulation will also introduce Digital Product Passport requirements for certain packaging categories. This is not a 2030 problem — it is a 2025–2026 architecture decision. The materials database you are building now needs to be designed to feed that requirement, not retrofitted to it.

REFLECTION — Try This Now

- Do all your converters have the equipment capability to run the materials your compliance roadmap requires?
- Are there materials in your compliance plan that do not yet exist at commercial scale for your volume?
- Do you have a derogation monitoring process — tracking when supply constraints will resolve and when you will need to switch?
- Has your packaging design function been briefed on PPWR labelling requirements for 2028, and is a label audit scheduled?

CHAPTER FOUR

The Hidden Tax Has a New Invoice

Misalignment always had a cost. Under PPWR, that cost now has specific line items.

In the first edition of this book I described the hidden tax of misalignment — the invisible costs of friction, rework, duplication, and distrust that drain value from organisations operating without clarity. I estimated that a single misalignment event in a packaging project could cost hundreds of thousands in rework, delays, and lost market opportunity.

I underestimated the tax.

Under PPWR, the costs of non-compliance have a regulatory dimension that makes the previous financial calculations look modest. Market access restrictions. Product delisting by retailers conducting their own compliance audits. EPR financial contributions that increase when recycled content targets are not met. Reputational damage from enforcement action. And the internal cost of rapid remediation under pressure — which is always multiples more expensive than planned compliance.

The New Invoice

The Alignment Tax under PPWR breaks into four specific categories of cost, each with a different trigger and a different magnitude.

Market Access Loss

From 12 August 2026, packaging that does not comply with PPWR requirements cannot legally be placed on the EU market. This is not a fine or a warning — it is a prohibition. For a brand with significant EU revenue, the cost of non-compliant packaging is not a legal fee. It is lost sales while remediation is completed.

The remediation timeline for a non-compliant packaging format typically runs three to nine months, depending on the extent of the change required. That is three to nine months of lost shelf presence in the EU market. For any meaningful brand, the commercial cost of that absence dwarfs any investment in proactive compliance.

EPR Financial Liability

Extended Producer Responsibility under PPWR requires producers to make financial contributions to packaging waste collection and recycling systems. The amount of those contributions is modulated — meaning it is higher for packaging that does not meet recyclability standards and lower for packaging that does.

An organisation running non-recyclable or low-grade packaging will pay a higher EPR contribution than one running packaging that achieves grade A or B recyclability. Over a large portfolio, the differential compounds significantly. And because EPR contributions will be calculated at national level, with different rates in different member states, the financial exposure for an organisation that has not mapped its portfolio against PPWR recyclability grades is both real and currently invisible.

Claims Liability

The EU Green Claims Directive, moving through the legislative process alongside PPWR, will make unsubstantiated sustainability claims an active enforcement target. Member state authorities will have powers to require removal of claims, issue fines, and — in cases of systematic misleading — refer matters for criminal prosecution.

An organisation with post-consumer recycled content claims on pack that are not backed by verified chain of custody documentation is carrying a claims liability that is currently deferred. The deference ends when the Green Claims Directive applies.

Remediation Cost Multiplier

The most reliably expensive outcome in packaging compliance is reactive remediation. When a non-compliance is discovered under time pressure — because a retailer has requested documentation, because a regulator has initiated an inquiry, because a competitor has challenged a claim — the cost of fixing it is always a multiple of the cost of having addressed it proactively.

A compliance gap that costs fifty thousand to address in a planned programme costs three hundred thousand to address reactively — because the planning time has gone, the supplier relationships need to be renegotiated under pressure, the production schedule must be disrupted, and the legal and communications costs are higher when responding to external scrutiny than when acting on internal initiative.

The question is not whether compliance costs money. It is whether you pay for it now on your terms, or later on the regulator's.

Making the Hidden Tax Visible

When a leading consumer health company — whose brands are among the most scrutinised over-the-counter products in the world — asked whether there is a gold standard framework for packaging compliance readiness, what they were describing was the need to make the hidden tax visible.

That company manages brands that operate in heavily regulated environments. Pharmaceuticals and consumer health products have always required rigorous documentation. But packaging compliance — as distinct from product compliance — has historically been managed less systematically, because the consequences of packaging non-compliance were less acute than the consequences of product non-compliance.

That asymmetry is closing. Rapidly.

The gold standard framework they were asking about is the one I have developed through exactly these conversations: a four-layer architecture that starts with data definition, moves through governance, continues through process, and ends with evidence. It appears in full in Chapter Ten. But the question itself illustrates where most sophisticated organisations currently sit — aware that a framework is needed, not yet certain what it should contain.

The Compound Effect

What makes the hidden tax particularly insidious in a regulatory context is that it compounds across all four cost categories simultaneously.

An organisation that has not mapped its portfolio against PPWR recyclability grades is carrying both a market access risk and an EPR financial exposure it cannot yet quantify. One that has claims on pack without verified documentation is carrying both a claims liability and a reputational risk. One that has not built a change control process for packaging materials is accumulating compliance drift with every specification change that goes through without a compliance check.

Each gap compounds the others. The organisation that closes all four simultaneously does not just reduce four separate costs — it eliminates the compounding effect that makes the tax grow.

REFLECTION — Try This Now

- Have you modelled the financial impact of a three to six month market access disruption in your EU business?
- Do you know your EPR contribution rate under PPWR, and have you modelled the difference between your current packaging portfolio and a compliant one?
- Which sustainability claims on your current packaging could not be defended with documentation if challenged today?
- What is your current cost of reactive compliance versus planned compliance — and how has that ratio changed in the last two years?

CHAPTER FIVE

The Law of Clarity

If you cannot state your compliance position simply, you do not yet understand it.

There is a test I run at the start of every compliance diagnostic engagement. I ask a simple question: can you describe your organisation's current compliance position against PPWR in three sentences?

Very few can.

This is not because the people I am speaking with are unintelligent. It is because their organisations have not yet done the work of reducing their compliance position to clarity. They have documentation, spreadsheets, supplier correspondence, consultant reports, and regulatory briefings. What they do not have is a clear, shared, current understanding of where they stand.

Clarity is not simplification. It is the compression of everything you know into the form most useful for decision-making. And in a compliance context, decisions need to be made fast, by the right people, with accurate information.

The Clarity Chain in a Compliance Context

In the first edition I described the clarity chain as: Clarity → Confidence → Commitment → Consistency. The chain holds. But each link now has a regulatory test attached.

Clarity without compliance mapping is not clarity. If your team is confident but not evidenced, that confidence is a liability. If your organisation is committed but not systematically verified, that commitment will not survive regulatory scrutiny. And if consistency is not built into your change control processes, the next packaging specification change will quietly undo the compliance you have spent months building.

The Compliance Clarity Compass

The Clarity Compass from the first edition — four questions applied before any project starts — maps directly onto the compliance challenge.

Purpose: do we all agree on what compliance means for this organisation in this market at this time? Not generally. Specifically.

Process: do we have a defined method for achieving, maintaining, and evidencing compliance across our full portfolio?

People: do we know who owns each element of compliance — not "the sustainability team" or "regulatory" as a department, but named individuals with defined accountability for specific layers?

Performance: do we have agreed metrics for compliance readiness — not activity metrics like "supplier questionnaires sent" but outcome metrics like "percentage of portfolio with verified documentation"?

If any of these four answers is vague, the compliance work has not yet begun. It has the appearance of having begun, which is the illusion of progress in its most dangerous form.

The Clarity Compass Applied

Purpose — What does compliance mean for our specific portfolio, in our specific markets, against specific PPWR articles? Process — What is our end-to-end process from material specification to Declaration of Conformity? People — Who is accountable for each layer of the Packaging Compliance Readiness Framework? Performance — What metrics show us our compliance position is accurate and current?

Why Organisations Resist Compliance Clarity

There is a specific reason why compliance clarity is resisted in most organisations, and it is worth naming directly.

Clarity makes the gap visible. And visible gaps require action, resources, and executive attention.

An organisation that has not done a rigorous compliance assessment can maintain a comfortable ambiguity — things are probably fine, we are working on it, the regulation is not fully in force yet. The moment a clear assessment is completed, the gap is no longer ambiguous. It is a number. A list. A set of specific items that need to be addressed by a specific date.

This is not a failure of leadership. It is a natural human tendency to avoid the discomfort of precise bad news. But in a regulatory context, the avoidance of clarity does not delay the problem. It accelerates the consequence.

The organisation that does not know its compliance gap cannot close it. The organisation that knows it, and addresses it, has converted a risk into a managed programme. That conversion is the work of clarity.

The One-Page Compliance Charter

One of the most effective tools I use in compliance alignment work is what I call the Compliance Charter — a single page that captures, in plain language, the organisation's compliance position, its programme to close any gaps, and the accountable owners for each element.

It is not a legal document. It is a communication tool. Its function is to make the compliance position and programme legible to everyone who needs to act on it — from the procurement manager negotiating supplier contracts to the marketing lead reviewing label copy to the finance director approving the remediation budget.

The organisations that have this document, and keep it current, make faster decisions about compliance. Not because they have better data. Because the data they have is in a form that everyone can use.

REFLECTION — Try This Now

- Can you describe your organisation's PPWR compliance position in three sentences? If not, that is your first task.
- Who owns compliance for each article of PPWR that applies to your portfolio — by name, not by department?
- What metrics are you using to measure compliance progress — and are they outcome metrics or activity metrics?
- Does a single document exist that your CEO, your procurement lead, and your marketing director could each read and understand your compliance position from?

CHAPTER SIX

The Alignment Equation

Shared truth times shared direction times shared timing. Under PPWR, any zero means non-compliance.

There is a packaging supplier I worked with who prided themselves on precision. They were not reckless. They were close.

The brief was clear. The material was approved. The timeline was agreed. The project had been through multiple alignment sessions.

Then the packaging reached the retailer's shelf. The label artwork did not match the specification sent for approval. A single digit in a twelve-digit material code had been transposed. Nobody had done anything wrong. They were simply nearly aligned.

The cost of nearly was six figures — relabelling, reprinting, a delayed market entry, and the less quantifiable cost of a retailer relationship tested.

Under PPWR, nearly aligned is not a cost. It is a prohibition.

The Equation

Shared Truth × Shared Direction × Shared Timing = Alignment

The equation is multiplicative, not additive. If any factor is zero, the total is zero. If each factor is ninety percent, the total is seventy-three percent. Twenty-seven percent of potential alignment lost — for being nearly there.

In a compliance context, this mathematics is not theoretical. It is the distance between a compliant pack and a non-compliant one.

Shared Truth — Operating From the Same Facts

In a compliance context, shared truth means that every person involved in a packaging decision — the brand team, the packaging developer, the

procurement lead, the supplier, the converter — is working from the same verified material data.

This is harder than it sounds. In most organisations, packaging data lives in multiple places. The brand team has the marketing brief. Packaging development has the technical specification. Procurement has the supplier contracts. The converter has the job specification. And the regulatory team has the compliance documentation.

These four sources often contain different information about the same pack. Different material descriptions. Different recycled content percentages. Different claims. Different versions of the specification, updated at different times.

Shared truth is a single, verified, current record of what every packaging component is made of, what it claims, what its compliance status is, and who last verified it. Not four records that approximate the same reality. One record.

The challenge facing a global spirits manufacturer — building a system capable of maintaining shared truth across hundreds of thousands of SKUs — is the shared truth problem at its most complex. But the principle applies at any scale. And without it, every compliance decision downstream is made from a potentially incorrect foundation.

Shared Direction — Facing the Same Regulatory North

Shared direction in a compliance context means that sustainability, procurement, packaging development, marketing, and legal are all working towards the same interpretation of what compliance requires.

This sounds obvious. It is not common.

Marketing wants to make claims. Procurement wants to minimise cost. Packaging development wants to preserve performance. Sustainability wants to hit targets. Legal wants to minimise liability. Regulatory wants to meet the specific requirements of specific articles.

In an aligned organisation, these functions have worked through the tension between these objectives and arrived at a shared position — a North Star Statement for compliance that everyone is navigating from. Something like: by August 2026, every packaging format we place on the EU market will have a valid Declaration of Conformity supported by verified documentation at component level.

That sentence, agreed and visible, is shared direction. It tells procurement what the supplier documentation standard is. It tells marketing which claims are defensible and which are not. It tells packaging development which material choices are in scope and which are not. It tells the executive team what success looks like.

Shared Timing — Moving in Compliance Rhythm

The third variable — timing — is where compliance programmes most commonly fail. Not because the direction is wrong, but because different functions are moving on different timescales.

The regulatory deadline is fixed: 12 August 2026 for core PPWR obligations. January 2030 for recyclability grades. January 2035 for demonstrated recyclability at scale. January 2038 for grades A and B only.

These dates apply to the packaging on the shelf. They do not move to accommodate the pace at which an organisation's internal processes are running.

The organisations that will be compliant on 12 August 2026 are the ones that mapped those dates backwards to their own operational timelines twelve to eighteen months in advance — identifying when packaging specifications needed to be changed, when supplier contracts needed to be renegotiated, when equipment upgrades needed to be commissioned, when documentation needed to be in place.

The ones that began that reverse timeline mapping in 2026 are not compliant on 12 August 2026. They are compliant on a date that does not exist in the regulation.

The Reverse Timeline Test

Take your August 2026 compliance obligations. Work backwards: when must documentation be complete? When must supplier contracts reflect new requirements? When must materials be changed? When must production trials be run? When must those trials be commissioned? If any of those dates has already passed, you have a timing gap.

REFLECTION — Try This Now

- Is there a single, current, verified record of what every EU-market packaging component is made of — accessible to everyone who needs it?
- Is there a single agreed statement of what compliance means for your organisation that all relevant functions have signed off on?
- Have you reverse-mapped your compliance deadlines to your operational and supplier timelines to identify timing gaps?
- Where is the largest misalignment in your organisation between truth, direction, and timing on compliance?

CHAPTER SEVEN

The So What Test in a Regulatory World

Every compliance activity must be connected to a proof. If it doesn't produce evidence, ask what it's for.

When I worked as an editor, every story that landed in my inbox faced the same question: so what?

You have reduced your packaging weight by fifteen percent. So what?

Your film is technically recyclable. So what?

You have engaged a hundred suppliers in a sustainability questionnaire programme. So what?

It was not cynicism. It was the most important editorial discipline I owned. If the story could not connect what had been done to why it mattered — to someone other than the person who did it — it was not a story. It was noise.

In 2026, the so what test has a specific regulatory application. Every compliance activity your organisation undertakes must be connected to a proof. If it cannot be, it has not produced compliance. It has produced the appearance of compliance. And the appearance of compliance is, as we have established, one of the most expensive things a packaging organisation can carry.

The EU Green Claims Directive and the So What Shift

The EU Green Claims Directive — adopted in 2024 and entering into national application on a staggered basis from 2026 — makes the so what test legally mandatory for sustainability communications.

The directive prohibits environmental claims that are not supported by recognised, scientific evidence — meaning that a claim on pack, in an advertisement, on a website, or in an investor report must be verifiable,

accurate, and not misleading. Claims must be substantiated before they are made, not after they are challenged.

This is the so what test institutionalised as law. The claim is the what. The substantiation is the so what. If the substantiation does not exist, the claim should not exist.

For organisations carrying claims based on aspirational targets, supplier self-declarations, or general industry benchmarks rather than verified data, this is not a future problem. It is a current liability that will become enforceable as the directive applies.

The Compostable Problem, Updated

In the first edition I described a snack brand that launched packaging described as fully compostable, with the critical detail buried in fine print: to compost, return to manufacturer's special facility. The claim was technically true. Practically useless. And when consumers discovered the gap between the claim and the reality, trust eroded.

In 2026, this story has a legal sequel.

PPWR Article 9 addresses compostable packaging specifically. It restricts compostable packaging to specific use cases — primarily where food waste is unavoidably present and where industrial composting infrastructure is available. Outside those cases, compostable packaging is not a permitted compliance pathway. A claim of compostability that is not connected to an approved use case under PPWR is not a sustainability claim. It is a false one.

The so what test applied here: you have compostable packaging. So what? Can it be composted by the consumer in the market where it is sold, through infrastructure that currently exists? If not, what does the claim actually mean — and can you defend it when the Green Claims Directive applies?

The Three Layers of So What in Compliance

In the first edition I described three layers of the so what test: personal, organisational, and systemic. In a compliance context, each layer has a specific question.

Personal so what: why does this compliance activity matter to the person doing it? If the answer is "because I have been asked to do it" rather than "because I understand what it produces and why it matters for the organisation's compliance position," the activity will be done to a minimum standard rather than a complete one.

Organisational so what: why does this compliance activity matter for the business? If the answer cannot be connected to a specific PPWR article, a specific deadline, or a specific consequence of non-compliance, the activity may not be the most important use of the organisation's compliance resource.

Systemic so what: why does this compliance activity matter beyond the organisation? In a compliance context, the systemic answer is the one that connects individual packaging decisions to the collective goal the regulation is designed to achieve — reducing packaging waste, increasing recycled content, building genuine circularity. Organisations that can connect their compliance programme to the systemic purpose tend to build more durable compliance cultures. They are not just avoiding penalties. They are building towards something.

The So What Canvas for Compliance

Every compliance workstream in your organisation should be able to complete the following:

Activity: what are we doing?

Evidence produced: what documented output does this activity create?

Regulation addressed: which specific article or requirement does this evidence satisfy?

Gap closed: what was the compliance gap before this activity, and what is the compliance position after it?

If a compliance workstream cannot complete this canvas, it is consuming resource without producing compliance. It should be redesigned or stopped.

REFLECTION — Try This Now

- For each active compliance workstream in your organisation, can you state which specific PPWR article it addresses and what evidence it produces?
- Which of your current sustainability claims could not be substantiated under the Green Claims Directive standard today?
- Is there compliance activity in your organisation that is being done because it was done last year, rather than because it produces a specific, necessary outcome?
- What would your compliance programme look like if every workstream had to pass the so what canvas before resources were allocated?

CHAPTER EIGHT

The Time Trap: August 2026 Is Not Negotiable

The regulation does not move for organisations that were not ready. The question is whether you are designing for the deadline or hoping it moves.

There is a pattern in how organisations relate to regulatory deadlines that I have watched play out across every major piece of packaging legislation for the past fifteen years. It has four stages.

Stage one: the regulation is published and the general view is that there is plenty of time.

Stage two: the regulation is approaching and the general view is that the requirements will probably be softened or delayed.

Stage three: the regulation is imminent and the general view is that enforcement will be light in the first year.

Stage four: the regulation applies and the organisations that planned from stage one are compliant. The ones that planned from stage three are not.

PPWR is at stage three for most organisations right now.

Why Stage Three Is Dangerous

The stage three assumption — that enforcement will be light in the first year — has a specific cost that is not immediately visible. It is the cost of the decisions not taken during the planning window.

Packaging specifications take three to twelve months to change, depending on complexity. Supplier contracts take time to renegotiate. Equipment upgrades

require capital approval and lead times. Documentation frameworks take time to build and populate. Testing and certification of new materials takes time.

None of these activities can be compressed past a certain point. A six-month material qualification process does not become a six-week one because the deadline is urgent. It becomes a risk that a non-compliant material reaches the shelf because the timeline was compressed.

The organisations that will be genuinely compliant on 12 August 2026 began their planning in 2024. Not because they are more diligent than their competitors. Because they understood that the operational timeline for compliance is longer than the distance between the deadline and the present.

The PPWR Timeline — What Actually Applies When

One of the most persistent misunderstandings about PPWR is that it is a single deadline. It is not. It is a cascade of requirements on a graduated timeline running from 2026 to 2038.

From 12 August 2026: core packaging design requirements apply, EPR registration obligations apply, PFAS restrictions in food packaging apply — and critically, no harmonised EU testing methodology for PFAS has yet been published, meaning organisations must act now using best available standards such as ISO 21948 and EN 17681 and document their approach, because the ban applies regardless of whether the method has been formally adopted — and declarations of conformity must be available for all packaging placed on the EU market.

From 2028: harmonised labelling requirements apply, including QR code or digital label requirements for certain packaging categories. Recycled content targets for plastic packaging begin to apply as implementing acts are published.

From January 2030: design-for-recycling criteria apply — only packaging achieving recyclability grades A through C may be placed on the EU market. Reuse targets for beverage and food service packaging apply. Single-use plastic bans for certain HORECA formats apply.

From January 2038: only grades A and B permitted. The full recyclability standard is in force.

The organisations planning only for August 2026 are planning for one threshold of a twelve-year regulatory programme. Those planning for 2030 and beyond are building infrastructure that is compliant not just on day one but across the full regulatory horizon.

The 2030 Cliff

If your current packaging portfolio has not been assessed against recyclability grades A through C, you do not yet know which formats will be prohibited from the EU market from January 2030. That assessment needs to begin now — because the packaging development, supplier change, and equipment investment needed to address low-grade formats takes two to four years minimum.

The Film Deadline Lesson

In the first edition I described a production crisis caused by a deadline-driven rush — a promised delivery date, a manufacturing problem that was not communicated, a compressed timeline that turned a manageable issue into an unrecoverable one. The lesson was: artificial urgency replaces genuine alignment, and the replacement is always more expensive.

The PPWR deadline is not artificial. It is fixed. It cannot be moved by better project management or a more insistent phone call. It moves only in one direction: forward.

What this means operationally is that the organisations managing compliance well are not treating August 2026 as a finish line. They are treating it as a checkpoint in a longer programme — the first formal verification that their

compliance architecture is functioning, before the harder requirements of 2028, 2030, and 2038 arrive.

Slow is smooth. Smooth is fast. The organisations that started compliance planning deliberately and early, without the pressure of imminent enforcement, will be moving faster in 2028 than the ones who sprinted to August 2026 and need to immediately sprint again.

Rhythm in a Regulatory Context

The compliance rhythm I recommend to organisations I work with has four beats.

Monthly: a compliance pulse check — has anything changed in the portfolio, in supplier documentation, in regulatory interpretation, or in the organisation's operational capability that affects the compliance position?

Quarterly: a compliance review — a structured assessment of progress against the framework, gaps identified and actioned, documentation renewed where needed, regulatory developments monitored and assessed for impact.

Annual: a full compliance audit — a systematic assessment of the entire portfolio against current requirements, producing an updated compliance position statement and a refreshed programme for the year ahead.

Event-triggered: a change control check — every time a packaging specification changes, a supplier changes, a material changes, or a market requirement changes, a compliance check is completed before the change is implemented.

The organisations running this rhythm will not be surprised by August 2026. They will not be surprised by 2028 or 2030. Because they will have been tracking their position against the cascade all along.

REFLECTION — Try This Now

- Are you planning for August 2026 only, or have you mapped your compliance programme against the full PPWR cascade to 2038?
- Have you assessed your portfolio against 2030 recyclability grade requirements — and do you know which formats will need to change before 2030?
- Does your organisation have a compliance rhythm — monthly pulse, quarterly review, annual audit, and change control trigger?
- What decisions has the organisation been deferring on compliance, and what is the real cost of that deferral?

CHAPTER NINE

Align to Lead

Compliance is a leadership problem dressed as a technical one.

We were in a funding meeting. The stakes were significant. Every senior leader in the room wanted to demonstrate their importance.

The question from the investor was simple: why do you need the investment?

What followed was fifteen minutes of competing answers — regional market share statistics, production capacity numbers, team headcounts, margin comparisons. Every answer was correct. None of them answered the question. The room was performing expertise while the investor was trying to understand the opportunity.

Then one leader — the Commercial Officer — quietly cut through the noise.

"We need the investment to upgrade our manufacturing lines and increase our output from two to fifteen thousand tons. That is how we meet the market demand for recyclable monomaterial films — an untapped sector worth two thousand kilotons within three years. We already have contracts under NDA with major brands. We are offering investors a first-to-market advantage in a field with no real competition."

Five sentences. One clear answer. The meeting ended with a handshake.

That is what aligned leadership looks like. Not the loudest voice. Not the most data. The clearest signal.

Compliance Is a Leadership Problem

In every organisation I work with on compliance readiness, the technical challenge is not usually the hardest part. The technical challenge — what materials to use, what documentation to produce, what systems to build — is difficult, but it is solvable with expertise and resource.

The hard part is leadership alignment.

Compliance that is owned by the regulatory team and treated as a technical programme by everyone else will fail. Not because the regulatory team is not capable, but because compliance requires decisions and resource and trade-offs that only leadership can authorise.

The procurement director who does not understand why a supplier contract needs a new clause about material change notification will not approve it. The marketing lead who does not understand why a claim on pack needs to be removed will not remove it. The finance director who does not understand why a remediation investment is necessary will not fund it.

Compliance is a leadership problem because it requires leaders to understand it, not just to delegate it.

The Three Dimensions of Aligned Compliance Leadership

See It — Vision Alignment

The aligned compliance leader can describe their organisation's compliance position and programme clearly to any audience — the board, the executive team, the procurement function, the marketing team, or a regulator. They can articulate what compliance requires, where the organisation currently stands, what the programme to close the gap looks like, and what is needed from each function to execute it.

This does not require technical expertise in regulatory law. It requires clarity about what the organisation needs to do and why it matters.

Feel It — Cultural Alignment

The aligned compliance leader has created an environment in which compliance is understood as a shared responsibility rather than a regulatory team problem. When a packaging developer is considering a specification change, they automatically ask whether it has a compliance implication. When

a procurement manager is evaluating a new supplier, they automatically ask about the documentation standard. When a marketing lead is reviewing label copy, they automatically ask whether the claims are substantiated.

This culture does not emerge from a compliance policy document. It emerges from leaders who consistently model compliance thinking in their own decisions and conversations.

Do It — Operational Alignment

The aligned compliance leader has ensured that the systems, processes, and accountabilities needed to execute the compliance programme are in place. The Packaging Compliance Readiness Framework is not a concept they are aware of. It is a document they have worked through, with clear owners assigned to each layer and clear metrics for each element.

The difference between compliance as aspiration and compliance as programme is operational alignment. It is the difference between knowing what needs to happen and having built the conditions in which it can.

The Leadership Compliance Checklist

At the end of each month, the leaders of organisations I work with run through five questions about their compliance programme.

One: do I know the current compliance status of our portfolio against the PPWR requirements that apply this year?

Two: do I know who owns each layer of our compliance programme — by name, not by function?

Three: has anything changed in our packaging, our suppliers, or our market position that requires a compliance check?

Four: is the resource committed to compliance proportionate to the regulatory exposure we are carrying?

Five: is the compliance programme visible to the executive team in a form they can act on?

If any answer is no, that is the compliance work for the coming month.

REFLECTION — Try This Now

- Can you describe your organisation's PPWR compliance programme to your CEO in five sentences?
- Does every function that touches packaging — procurement, development, marketing, legal — understand their compliance responsibility?
- Is compliance visible at executive level, with a programme owner, clear milestones, and a current status report?
- What is the single most important leadership decision required to advance your compliance programme right now?

CHAPTER TEN

The Compliance Alignment Gap

Four layers. Twenty-four questions. The framework that closes the distance between where you are and where the regulation requires you to be.

The conversations in this book — across organisations of vastly different sizes, sectors, and starting points — all converge on the same moment. The moment when awareness meets architecture. When understanding what the regulation requires collides with the question of whether the organisation can actually do it.

That moment is the compliance alignment gap.

It is not a failure of knowledge. The organisations described in these pages are not ignorant of PPWR. It is a gap between what is understood and what is built — between the regulatory requirement and the operational system that must meet it.

The Packaging Compliance Readiness Framework was built to close that gap. Not as a technology recommendation or a software specification, but as a sequenced set of questions that must be answered — in order — before any compliance system, process, or tool can work reliably.

Why Sequence Matters

Most organisations approach packaging compliance by selecting technology first. A compliance database, a sustainability management platform, a supplier portal. The technology is implemented. The data is migrated. The system launches.

And then it replicates the fragmentation it was meant to solve.

This happens for a consistent reason: the system was built around the wrong architecture, before the right questions were answered. The data that went in was incomplete because nobody had defined what complete meant. The governance that was supposed to maintain it was not established because nobody had agreed who owned it. The evidence it was supposed to produce was inadequate because nobody had specified what adequate looked like.

The framework defines four sequential layers of questions that must be worked through before any system decision is made. Each layer depends on the one above it.

You cannot govern what you have not defined. You cannot evidence what you have not governed.

Layer One — What Do We Need to Know?

The first layer defines the scope and depth of data required. It sounds obvious. It is not done.

Most organisations have some version of a packaging inventory. Very few have a complete one — a single authoritative list of every primary, secondary, and tertiary packaging format placed on every market in scope. Not a category summary. Not a sampling. Every format.

The six questions in this layer address: the completeness of the inventory; the level of material detail required (substrate only, or full structure including inks, coatings, adhesives, and closures); which regulations apply in which markets on which timelines; what claims are currently on pack and what evidence supports them; where PFAS may exist in the packaging chain; and what recycled content is being claimed or targeted and whether it can be traced to supplier level with documentation.

These questions are not complex. But the answers, in most organisations, reveal significant gaps. The gaps in Layer One are the foundation of every compliance problem that appears later.

Layer Two — Who Owns It?

The second layer establishes governance. Data without ownership degrades the moment it is created.

The organisations that have done the work of Layer One — built a complete, detailed packaging inventory with claim substantiation — and then failed to assign clear ownership for maintaining it, find themselves within months with a record that is already inaccurate. Because packaging changes. Materials change. Suppliers change. Claims evolve. If no one is accountable for updating the record when those changes happen, the record becomes a historical document rather than a live compliance tool.

The six questions in this layer address: who is accountable for packaging material data; what the process is when a specification changes; who assesses the portfolio impact of a new regulation; whether the people making sustainability commitments are in the same conversation as those who understand operational delivery; who verifies supplier declarations and against what standard; and how compliance requirements are communicated to suppliers consistently across all procurement relationships.

This last question is the supplier question from Chapter Two. It is the question that sits behind every compliance programme that has been built from the brand side but not yet communicated as a coherent, consistent requirement to the supply chain.

Layer Three — How Do We Capture and Maintain It?

The third layer defines the process architecture. A compliance record that is not maintained is worse than no record — it creates false confidence.

The organisations that have completed Layers One and Two — a complete inventory, with clear ownership — still need a process for keeping that inventory current as the portfolio and the regulation evolve. This is where most compliance programmes quietly fail. Not at the start, when the inventory is built and the governance is established, but in month six, when the first specification change goes through without triggering a compliance check.

The six questions in this layer address: the onboarding process for new materials and formats; the frequency of supplier declaration review and renewal; the escalation process when a supplier cannot provide sufficient documentation; the change control process that includes a compliance check before any packaging change is implemented; the management of market-specific requirements where regulation differs; and the process for retiring discontinued packaging formats from the compliance record.

The change control question is the most operationally critical. A packaging specification change that does not trigger a compliance check is a compliance gap being introduced silently into an otherwise maintained system. Over time, in a portfolio of any meaningful size, these silent gaps accumulate into a material non-compliance exposure.

Layer Four — How Do We Evidence and Report It?

The fourth layer defines the end state. The output of the compliance system is not a database. It is the ability to produce a defensible compliance declaration for any packaging format, on request, within a defined timeframe.

When a consumer health company asked whether there is a gold standard, what they were describing was the ability to answer Layer Four questions with confidence — to produce, on request, audit-ready documentation for any recyclability claim on any pack, to demonstrate recycled content with chain of custody documentation to supplier level using recognised certification schemes such as ISCC, REDcert, or RecyClass, to provide current restricted substance declarations in a format acceptable to a regulator or a major retailer.

The six questions in this layer address: the time required to produce a compliance declaration for any packaging format; the audit-readiness of documentation for recyclability claims; the chain of custody evidence for recycled content claims — including whether certification references a named scheme such as ISCC, REDcert, or RecyClass, and whether it is linked to a specific batch rather than a general material type; the currency and comprehensiveness of restricted substance declarations; the time and

confidence level for producing a full material transparency report on request; and whether internal and external sustainability performance reporting is based on verified data or estimates.

That fifth question — if a regulator or major retailer requested a full material transparency report for your portfolio tomorrow, how long would it take and how confident would you be in its accuracy — is the question that most clearly reveals the compliance alignment gap in any organisation that answers it honestly.

The Compliance Alignment Gap Self-Assessment

For each of the four layers, rate your organisation 1 to 5: 1 = not started, 3 = in progress, 5 = complete and current. Multiply the four scores. A result above 400 (out of 625) indicates a functioning compliance architecture. Below 200 indicates significant gaps. Below 100 indicates the framework has not yet begun in a meaningful sense.

Where to Start

The starting point is always Layer One. Not the technology. Not the governance. The inventory.

Work through each layer in sequence with the cross-functional team that owns packaging decisions — packaging, procurement, sustainability, regulatory, and marketing. The gaps that emerge between layers are where your compliance risk is sitting.

The gaps that emerge between Layer Two and Layer Three are the most common, and the most costly. The data exists. The ownership exists. The process for maintaining it does not.

Fix that process, and the compliance alignment gap begins to close.

REFLECTION — Try This Now

- Rate your organisation 1-5 on each of the four framework layers. What does your total score tell you?
- Which layer has the lowest score — and what is the single most important action to advance it?
- Who in your organisation needs to be in the room when you work through this framework — and have they been?
- What would it take to complete a full framework assessment for your organisation in the next thirty days?

CHAPTER ELEVEN

The Alignment Advantage

Compliance is not the cost of doing business. It is the entry ticket to the next decade of it.

A client came to me in the middle of a compliance crisis. They were battling to meet the recycled content requirements that their largest retail customer had imposed ahead of PPWR — a retailer that had decided not to wait for legislation and had built compliance requirements into its supplier contracts directly.

Every day was another fire. Procurement scrambling for recycled material with insufficient chain of custody documentation. Production lines stopping because the recycled PE resin was performing differently from the virgin equivalent. Compliance team chasing declarations while sales tried to manage the customer relationship.

I asked the question I always ask when I arrive in the middle of this pattern: what does the end state look like?

They described meeting the current recycled content threshold. Seventy percent. Sufficient for the retailer's current requirement.

"And what happens when the retailer moves to eighty percent? Or when PPWR sets its 2030 targets?"

They had not planned for that. Every decision they were making was optimised for the current threshold, not for the trajectory.

We reframed the programme around the full PPWR cascade — not the current requirement but the destination. One hundred percent compliant, graded A or B recyclability, fully evidenced across the portfolio, across all markets.

Within six weeks, more progress had been made than in the previous six months. Not because the work was easier. Because the direction was clear.

When you align to the destination, not the nearest deadline, everything becomes simpler. The decisions that used to require debate make themselves.

From Compliance to Competitive Advantage

Every era of business has a structural advantage that separates the organisations that lead from the ones that follow.

In the industrial era, it was scale. In the digital era, it was data. In this era — the era of regulatory complexity, material transparency, and circular economy transition — it is alignment.

Specifically, it is the alignment between what a regulation requires and what an organisation can demonstrate. Between the claim on the pack and the documentation that supports it. Between the sustainability commitment made to investors and the operational reality that can be verified.

Organisations that have built this alignment are not just compliant. They are competitively advantaged. They can respond to retailer compliance audits without disruption. They can answer regulator inquiries without legal preparation. They can make sustainability claims without the qualification "where infrastructure exists" or "subject to availability." They can onboard new markets and new products without starting a compliance programme from scratch.

They have built the infrastructure. Everyone else is still building it.

The First Mover Reality

In situations where supply constraints are limiting compliance — food-contact recycled materials being the most visible current example — there are two types of organisations in the same position.

The first type is waiting. Monitoring the EFSA process. Ready to start planning once the approval is confirmed.

The second type is already building. Mapping which production lines will need to change. Identifying which supplier relationships will need to evolve. Running trials with the limited volumes currently available. Building the internal expertise to manage the material at scale. So that when the approval comes and the commercial supply opens, the transition is a managed programme rather than an emergency.

The second type has the alignment advantage. Not because the regulation favours them. Because when the regulatory window opens, they can move through it immediately while everyone else is still assembling the programme.

The Compounding Dividend

Aligned organisations generate what I call the compounding compliance dividend.

Every compliance decision made correctly the first time saves the cost of making it again. Every supplier contract that includes the right documentation clause saves the cost of renegotiating it under pressure. Every packaging specification that is assessed for compliance before it is signed off saves the cost of changing it after it is in production. Every claim that is verified before it goes on pack saves the cost of removing it under regulatory challenge.

These savings are individually modest. Cumulatively, across a portfolio of any meaningful size and over a compliance programme of the length that PPWR demands, they compound into a material financial advantage.

The organisation that builds the Packaging Compliance Readiness Framework correctly — once, thoroughly, with clear ownership — will spend a fraction of what the organisation that builds it reactively, repeatedly, under pressure, will spend.

Alignment is self-funding once you start.

The Choice

At the end of the first edition of this book, I offered a simple summary: align or decline. The choice was always yours.

In the second edition, the choice has a third dimension.

You can decline — continue operating as you are, hoping that enforcement will be light, that the deadline will move, that a competitor's non-compliance will attract attention before yours does. This path leads, eventually, to a reactive compliance programme executed under pressure with costs that are multiples of what planned compliance would have required.

You can comply — build the minimum compliance architecture needed to meet the requirements of each deadline as it arrives, without building for the next one. This path is sustainable in the short term and increasingly expensive as the regulatory cascade continues.

Or you can lead — build the Packaging Compliance Readiness Framework properly, align your organisation around it, and use it not just to meet regulatory requirements but to build a competitive position in a market where transparency, evidenced claims, and documented compliance are becoming the price of market access.

The organisations that choose the third path will be the ones that lead their sectors over the next decade. Not because regulation favours them. Because alignment does.

One degree off, and you don't land where you planned.

Matthew

CLOSING

The Packaging Compliance Readiness Framework

Four questions every organisation must answer before building a compliance system.

Most organisations approach packaging compliance by selecting technology first. The result is almost always a more sophisticated version of the same fragmentation they were trying to solve — because the system gets built around the wrong architecture, before the right questions have been answered.

The organisations that build compliance systems that actually work start here. Work through each layer in sequence with the cross-functional team that owns packaging decisions. The gaps that emerge between layers are where your compliance risk is currently sitting.

Layer 1 — What Do We Need to Know?

Define the scope and depth of data required before any system is built.

- Q1 What is our complete inventory of packaging formats — primary, secondary, tertiary — and do we have a single authoritative list?
- Q2 At what level of material detail do we need visibility — substrate only, or full structure including inks, coatings, adhesives, and closures?
- Q3 Which regulations are we building compliance against, in which markets, and on what timeline?
- Q4 What claims are currently on our packaging across all markets, and what evidence exists today to substantiate each one?

- Q5 Where does PFAS potentially exist in our packaging chain — and do we know with confidence or are we working from assumptions?
- Q6 What recycled content are we claiming or targeting, and can we trace it to supplier level with documentation?

Layer 2 — Who Owns It?

Establish governance before building. Data without ownership degrades the moment it is created.

- Q1 Who is accountable for packaging material data — packaging, procurement, sustainability, regulatory, or a combination?
- Q2 When a packaging specification changes, what is the process for updating compliance records and who triggers it?
- Q3 When a new regulation emerges, who assesses its portfolio impact and how quickly does that reach decision-makers?
- Q4 How are sustainability commitments made — and are the people making them in the same conversation as those who understand operational delivery?
- Q5 When a supplier provides a declaration or certification, who verifies it is sufficient and against what standard?
- Q6 How are compliance requirements communicated to suppliers — and is that consistent globally across all procurement relationships?

Layer 3 — How Do We Capture and Maintain It?

Define the process architecture. A compliance record that is not maintained is worse than no record — it creates false confidence.

- Q1 What is the process for onboarding a new packaging material or format into the compliance system?
- Q2 How frequently are supplier declarations reviewed and renewed — and is that cadence aligned with regulatory change cycles?
- Q3 What happens when a supplier cannot provide sufficient documentation — is there an escalation process?
- Q4 Is there a formal change control process that includes a compliance check before any packaging change is implemented?
- Q5 How do we manage market-specific requirements where regulation differs — EU, UK post-Brexit, US, APAC?
- Q6 What is the process for retiring a packaging format from the compliance record when it is discontinued?

Layer 4 — How Do We Evidence and Report It?

The end state is not a database. It is the ability to produce a defensible compliance declaration for any packaging format, on request, within a defined timeframe.

- Q1 Can we produce a compliance declaration for any packaging format in our portfolio within a defined timeframe — and what is that timeframe today?

- Q2 Do we have audit-ready documentation for every recyclability claim currently on pack?
- Q3 Can we demonstrate recycled content percentages with chain of custody documentation to supplier level — including named certification scheme (e.g. ISCC, REDcert, RecyClass) and batch-level traceability?
- Q4 Are our restricted substance declarations current, comprehensive, and in a format that can be produced on request?
- Q5 If a regulator or major retailer requested a full material transparency report for our portfolio tomorrow, how long would it take and how confident would we be in its accuracy?
- Q6 How do we report packaging sustainability performance internally and externally — and is it based on verified data or estimates?

The system question is downstream of these four layers. Organisations that answer these questions first — and build governance before technology — build systems that work, evidence compliance credibly, and turn regulation from a risk into a competitive advantage.

Your Next Step

If working through this framework surfaces gaps — in your inventory, your governance, your process, or your evidence — the Compliance Readiness Diagnostic is designed to address exactly that.

Four hours. We work through your organisation's compliance position across all four layers of the framework above. You receive a written gap analysis and prioritised action plan within 48 hours — concrete, specific to your portfolio, and actionable immediately.

It is the most efficient way to convert the questions in this framework into a programme your organisation can execute.

matthew@thepackscout.com | www.thepackscout.com

About The Pack Scout

Matthew Rogerson helps brands, converters, retailers, and suppliers translate external regulatory and market signals into internal operational clarity — answering not just what is changing, but what that change means specifically for each organisation and what they need to do about it.

The Pack Scout works with brands, retailers, converters, and suppliers across the food, beverage, beauty, consumer health, and convenience sectors.

PPWR QUICK REFERENCE

Key Dates

12 August 2026

Core PPWR requirements apply. EPR registration mandatory. PFAS ban in food contact packaging active — no harmonised testing methodology yet; use best available standard and document it. Declarations of Conformity must exist for all EU market packaging.

2028

Harmonised labelling requirements apply, including QR/digital label requirements for certain categories. Recycled content targets for plastic packaging begin to apply as implementing acts are published.

January 2030

Design-for-recycling grades apply. Only grades A through C permitted on EU market. Reuse targets for beverage and food service packaging. Single-use plastic bans for certain HORECA formats.

January 2035

Demonstrated recyclability at scale required.

January 2038

Only grades A and B permitted. Full recyclability standard in force.

Key Terms

Declaration of Conformity (DoC)

Document by which the producer (brand/retailer) declares that packaging meets PPWR requirements. Must exist before packaging is placed on the EU market. Cannot be created retrospectively.

Recyclability Grade

A–E scale to be defined by delegated acts. A and B = highest recyclability. D and E prohibited from 2030. Only A and B from 2038.

Post-Consumer Recycled (PCR) Content

Recycled material sourced from end-of-use products. Claims must be substantiated with third-party chain of custody documentation — not supplier self-declaration.

PFAS

Per- and polyfluoroalkyl substances. Banned in food contact packaging from 12 August 2026. No harmonised EU testing methodology yet published. Act using ISO 21948 or EN 17681 and document the approach.

Extended Producer Responsibility (EPR)

Financial contributions by producers to packaging waste collection and recycling. Fee-modulated — lower for higher-grade recyclable packaging.

Green Claims Directive

EU directive applying alongside PPWR. Requires sustainability claims to be substantiated before they are made. Self-declarations not sufficient — chain of custody evidence required.

Derogation

Temporary exemption where compliance is technically impossible. Must be documented. Not indefinite — requires active monitoring of when the supply pathway opens.

This quick reference is for orientation only and does not constitute legal advice. Always verify against current regulatory text and seek qualified legal counsel for your specific situation.