THE DECLARANT BRIEF

ISSUE 36 | 29 October 2026 | A five-minute EU border briefing

Bio-based packaging may be next in the EU rulebook

A new PPWR consultation, renewed sanctions, the steel evidence check and the border deadlines that still need work.

A five-minute briefing for European importers, customs teams and trade leaders.

THE CRITICAL DEVELOPMENT

The Commission is testing demand rules for bio-based plastic packaging

> The Commission has opened a consultation on whether the EU should encourage more bio-based feedstock in plastic packaging. It closes on 13 January 2027.

This is evidence gathering, not a new importer obligation. No bio-based content target has been adopted. The consultation sits inside the review required by Article 8 of the Packaging and Packaging Waste Regulation, and the Commission says the results may support a future legislative proposal.

The questions are still operationally important. The Commission wants evidence on feedstock availability, technical performance, environmental effects, sustainable sourcing, recycling and possible demand measures. Those are the same facts that buyers will need if future targets or sustainability conditions are introduced.

Importers should not ask only whether packaging is described as bio-based. They need to know which component contains the feedstock, its share, its origin, the method used to support the claim and whether the format works with the relevant recycling stream.

What to do this week

1. Identify EU-bound products that use plastic sales, grouped or transport packaging.
2. Record the polymer, packaging component, supplier and current fossil, recycled or bio-based feedstock claim.
3. Ask suppliers which evidence supports the feedstock share and sourcing statement.
4. Separate a bio-based claim from compostability, recyclability and recycled-content claims. They are not interchangeable.
5. Flag formats where a material change could affect food-contact, product protection, shelf life or recycling.
6. Consider responding to the consultation when your business has cost, availability, performance or sourcing evidence that the Commission should see.

The immediate task is not to redesign every package. It is to build a packaging record that can survive a policy change without starting from zero.

Primary source: Commission consultation on bio-based feedstock in plastic packaging, 21 October 2026

THREE CHECKS TO MAKE

1. A sanctions renewal still requires a current screening list

Status: Council renewal adopted on 26 October 2026

> The Council renewed the EU autonomous restrictive measures against ISIL, Da'esh and Al-Qaeda, and associated listed parties, until 31 October 2027. The current autonomous list covers 15 people and 8 groups.

Listed parties remain subject to an asset freeze. Listed individuals also face an EU travel ban, and EU persons and entities may not make funds, financial assets or economic resources available to listed parties.

This is a continuation of the regime, not a new listing of every party on 26 October. The practical control is to make sure screening uses the current consolidated EU list and still covers ownership, control, payment routes and intermediaries.

Action: Confirm the list version used by your screening provider, then rescreen open higher-risk transactions when a counterparty, owner, payee or route has changed.

Primary source: Council renewal of the ISIL, Da'esh and Al-Qaeda sanctions regime

2. Steel importers should test the melt-and-pour file now

Status: Evidence requirement applies from 1 October 2026

> Steel covered by the EU Steel Regulation now needs the country of melt and pour declared at import. A Mill Test Certificate should contain that country and the heat number.

Until 30 September 2027, customs may also consider specified commercial or production records as complementary or standalone evidence when the Mill Test Certificate is missing information or unavailable. From 1 October 2027, those records can only complement the Mill Test Certificate.

Action: Pick one October steel entry. Match the customs declaration, CN code, quota treatment, melt-and-pour country, heat number and supporting certificate. Resolve any break before the same supplier ships again.

Primary source: Commission explanation of steel melt-and-pour evidence

3. A quiet CBAM week is time to reconcile the data

Status: No material Commission CBAM update identified from 21 to 28 October

> The latest Commission CBAM news remains the Q3 certificate price publication on 5 October, followed by an updated Questions and Answers document on 15 October. No new legal deadline or certificate price was announced in this issue's monitoring window.

That does not make the week empty. Importers are already creating the 2026 import and emissions record that will feed the first annual declaration and certificate surrender by 30 September 2027.

Action: Reconcile one month of CBAM customs entries to authorised declarant status, quantities, CN codes, installation data, actual or default emissions and any carbon price evidence held by the supplier.

Primary source: European Commission CBAM communication and news

DEADLINE AND RISK RADAR

1 November 2026: E-commerce item data and fee logic

> For imported distance sales, make sure the mandatory product identifier reaches the customs declaration and the EUR 2 Union handling fee is calculated per item. Test orders above and below EUR 150.

Commission customs reform page

30 December 2026: EUDR application for the first operator group

> Large and medium operators, plus small and micro operators already covered by the EU Timber Regulation, are due to enter application on 30 December. Other small and micro operators follow on 30 June 2027. Run one real product through classification, geolocation, supplier evidence and the due-diligence statement process.

Commission EUDR implementation update

13 January 2027: Bio-based packaging consultation closes

Packaging suppliers, importers, brand owners and buyers can submit evidence on availability, performance, sourcing, recycling and possible demand measures.

Commission consultation

Origin and tariff measures: keep the legal basis beside the claim

No material new customs, tariff, origin or trade-defence measure was identified in the official sources monitored from 21 to 28 October. Continue to check TARIC on the declaration date and retain the CN code, origin rule, proof and any producer-specific additional code together.

EU TARIC consultation

WORTH READING ELSEWHERE

The following pieces are third-party commentary, not primary legal sources. They reflect their authors' analysis and should be checked against the regulation and current Commission guidance.

- What EU Buyers Should Verify Before Importing Molded Fiber Food Packaging Under PPWR, Sophie Liu on Medium. A buyer-focused checklist that usefully separates packaging classification, food-contact evidence, PFAS, claims and future PPWR dates.
- The PPWR is reshaping packaging: bio-based materials are part of the answer, Bio4Pack on Substack. An industry perspective on bio-based feedstock and the policy direction. Treat its market claims as commentary and use the Commission consultation for the current legal position.

ONE QUESTION FOR YOUR CUSTOMS FILE

Can you identify the material, feedstock claim, supplier evidence and responsible economic operator for the least visible piece of plastic packaging in one EU-bound product?

> If the answer depends on a supplier description alone, the packaging file is not ready for the next PPWR change.

Check one declaration free with The Declarant

ABOUT THE DECLARANT

> The Declarant helps European importers and customs teams check classification, origin, trade measures, CBAM, missing evidence and possible financial exposure before filing or review.

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