Assent

Faster Intelligence. Stronger Supply Chains.



Persistent Organic Pollutants:

Your Compliance Checklist

What Are POPs?

Persistent organic pollutants (POPs) are toxic chemicals that resist breakdown in the environment. Once released, they can remain in soil, water, and air for decades, or even centuries. They can also travel long distances and accumulate in living organisms. Because POPs build up in the food chain and pose serious risks to human health and the environment, they are subject to strict global regulations and monitoring requirements, per the Stockholm Convention.

See the full POPs list here.

New POPs Rules in the EU

The bar for POPs compliance is now higher than it's ever been for companies manufacturing, importing, or selling products in the EU.

- New reporting expectations under the Ecodesign for Sustainability Products Regulation (ESPR)
- POPs restrictions are being enforced on different schedules worldwide, making region-specific tracking essential
- Stricter PFOS limits under EU POPs
- New substances added to the EU POPs list:
  - UV-328
  - Dechlorane Plus
  - Perfluorohexanesulfonic acid (PFHxS)
  - Long-chain perfluorocarboxylic acids (LC-PFCAs)
  - Medium-chain chlorinated paraffins (MCCPs)
- Certain EU POPs exemptions have been eliminated because safer alternatives are now available

The Product Sustainability Handbook

The goal of ESPR is to improve the sustainability of virtually all products placed on the EU market, from textiles to electronics, by increasing their circularity, recyclability, and more.



Learn more in our eBook.

Get the eBook

What This Means for Your Business

Increasing requirements means you'll spend more time tracking down data, validating it, generating reports, and keeping on top of future obligations. Here are a few things to consider when preparing your compliance program:

Broader substance scope

More POPs are regulated at lower concentration limits, reducing tolerance for trace contamination and legacy materials. Even small amounts of POPs must be reported in DPPs, so thorough supply chain due diligence is key to staying compliant.

Stronger enforcement timelines

New thresholds and restrictions took effect in late 2025, leaving less time to gather data, test products, and update documentation. Additionally, new substances are quickly being added to EU POPs, making it hard for companies to stay on top of changes.

Greater supply chain transparency

Manufacturers must track POPs at the product and component level and maintain clear, supplier-backed records.

Expanded material risk

Plastics, textiles, electronics, coatings, and recycled materials face increased scrutiny under updated requirements.

Your EU POPs Compliance Checklist

If you're selling into the EU and there are POPs in your products, you have a lot of disparate requirements to keep up with, from EU POPs, to ESPR, to PPWR, to the DPP. But there are key, concrete steps you can take to understand your requirements and streamline your compliance program.

EU POPs

- [ ] Update chemical inventories to include newly added POPs and revised PFOS thresholds
- [ ] Identify high-risk materials and prioritize targeted testing
- [ ] Engage suppliers early to collect current, regulation-ready evidence
- [ ] Review existing exemptions and confirm ongoing applicability
- [ ] Plan redesigns or material substitutions where limits can't be met
- [ ] Establish audit-ready documentation before enforcement deadlines
- [ ] Invest in an AI-native supply chain sustainability management solution to automate data management at scale

ESPR/DPP

- [ ] Confirm whether you're placing products on the EU market and identify your role manufacturer/importer/distributor)
- [ ] Track delegated acts to understand when your product categories come into scope
- [ ] Design for sustainability and ensure your products can meet future requirements on durability, repairability, recyclability, energy/material efficiency
- [ ] Collect life cycle and supply chain data at the design and sourcing stages
- [ ] Ensure you have structured product data on hand, as well as traceability across the supply chain, to create your DPPs
- [ ] Get ready to justify destruction of unsold goods (esp. textiles/footwear) and maintain documentation for market surveillance authorities

PPWR

- [ ] Confirm scope: PPWR applies to all packaging placed on the EU market, regardless of material or sector
- [ ] Identify whether you are the producer/importer/distributor for each packaging type
- [ ] Ensure packaging is minimal and recyclable, and meets recycled-content targets where applicable
- [ ] Prepare technical file and EU Declaration of Conformity
- [ ] Align with labeling and information requirements and prepare for digital identifiers
- [ ] Fulfill EPR obligations by registering with national EPR schemes, reporting on packaging volumes, and paying required fees
- [ ] Retain compliance documentation for market surveillance checks

Confident POPs Compliance for Global Supply Chains

Identifying POPs across complex, multi-tier supply chains is challenging, especially for products with thousands of components. Assent's supply chain sustainability software streamlines POPs compliance by automating supplier data collection, centralizing risk visibility, and aligning programs with regulatory and customer requirements. With clear, audit-ready insights, manufacturers can confidently meet their regulatory requirements and protect their brand.

See how Assent's AI-native platform streamlines your POPs compliance.

Book Your Demo

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