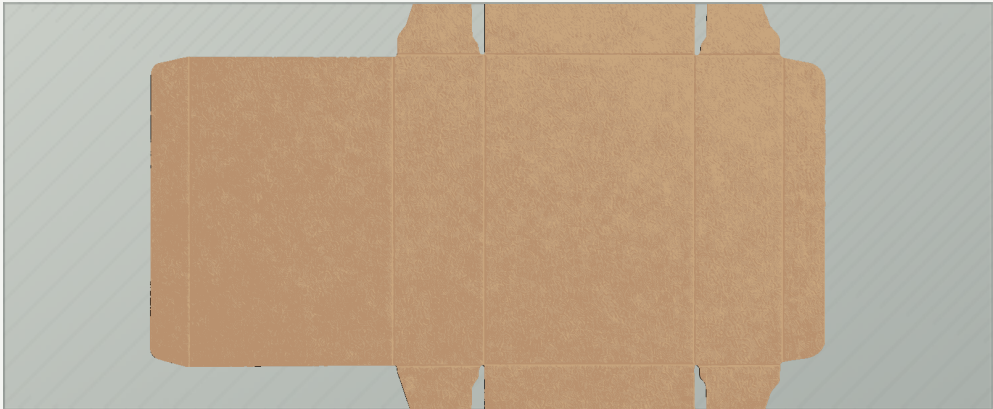


The PPWR labelling act is late. What that changes for your packaging artwork

The implementing act defining the EU sorting label was due on 12 August 2026 and has not been adopted. Because Article 12 applies 24 months after that act at the earliest, the 2028 date is now a floor. Here is what is already in force, what can wait, and what to prepare.

PUBLISHED 16 OCT 2026 · 4 MIN READ · ART. 12 · ART. 14 · ART. 15(5)-(6)

ACT DEADLINE	2026-08-12
STATUS	Not adopted
SORTING LABEL	2028-08-12+
REUSABLE LABEL	2029-02-12+
MISLEADING MARKS	Banned now



SHORT ANSWER

The harmonised sorting label becomes mandatory from **12 August 2028 or 24 months after the implementing act enters into force, whichever is later**. That act was due by 12 August 2026 and, as of mid-October 2026, has not been adopted — so every month of delay pushes the obligation back. What does *not* wait: the ban on misleading labels and marks, and the manufacturer identification and contact details on every pack, which have applied since 12 August 2026.

Who this applies to: manufacturers of sales and grouped packaging and of e-commerce packaging. **Who it does not:** transport packaging other than e-commerce packaging, and packaging in a deposit and return system, are outside the sorting-label obligation in Article 12(1).

Why the date moves with the act

Article 12(1) does not set a fixed date. It sets two and takes the later one:

“From 12 August 2028 or 24 months from the date of entry into force of the implementing acts ... whichever is the latest, packaging placed on the market shall be marked with a harmonised label containing information on its material composition...”

REGULATION (EU) 2025/40, ARTICLE 12(1)

SOURCES

- [Regulation \(EU\) 2025/40, Articles 12, 14 and 15 — EUR-Lex](#)
- [Commission guidance document C\(2026\) 3702, section 13](#)
- [European Commission — packaging waste policy page](#)

Interpretation current as of 16 Oct 2026. Commission guidance is not legally binding; the Court of Justice has the final word.

[ALL ARTICLES →](#)

An implementing act adopted in, say, early 2027 would enter into force shortly afterwards, and the label would become mandatory roughly two years later — in 2029 rather than August 2028. The exact date depends entirely on when the act is adopted and published. We will log it on [Updates](#) the day it appears.

Four label regimes, four timelines

LABEL	MANDATORY?	APPLIES FROM	ARTICLE
Material-composition sorting label	Yes	12 Aug 2028 or 24 months after the implementing act, if later	12(1)
Reusable packaging label	Yes, for reusable packaging	12 Feb 2029 or 30 months after its implementing act, if later	12(2)
Recycled content / bio-based content	No — voluntary, but harmonised if used	12 Aug 2028 or 24 months after its implementing act, if later	12(4)
Deposit and return colour label	Where the Member State requires it	Linked to the DRS implementing act	12(1)

The Commission’s guidance adds two points worth planning around. Once the harmonised label applies, Member States may not keep national sorting labels alongside it, and EPR information may only be given digitally, not as a physical mark (Article 12(9)). And the material abbreviations of Decision 97/129/EC (such as PAP 21) remain usable, voluntarily, until 12 August 2028 but are no longer allowed after that.

What already applies

No misleading labels or marks

Article 12(8) prohibits labels, marks, symbols or inscriptions likely to mislead or confuse consumers about the sustainability requirements, other packaging characteristics or waste management options for which harmonised labelling has been laid down. It needs no implementing act.

Environmental claims must exceed the minimum

Under Article 14, a claim about a property the PPWR regulates — recycled content, for instance — may only be made if the pack exceeds the legal minimum, using the regulation’s methods, and must say whether it covers the unit, a part of it, or all of the operator’s packaging. The evidence belongs in the technical documentation.

Identification and contact details

Since 12 August 2026, manufacturers must put a type, batch or serial number (or other identifying element) on the packaging, plus their name or trademark and postal address — on the pack, via a QR code or data carrier, or in an accompanying document where neither is possible (Article 15(5)–(6)). Importers add their own details (Article 18(3)). This is the label work that is already enforceable.

How to plan artwork now

1. **Do not print draft pictograms.** Designs circulated during preparation are not law until

- the act is adopted.
2. **Fix the data, not the design.** The label will be based on material composition, so a per-SKU bill of materials — every component, its material and weight — is the input you will need whatever the final pictograms look like.
 3. **Reserve the space.** Leave room on dielines for a pictogram block and a data carrier so the switch is an artwork edit, not a redesign.
 4. **Check today's pack for identifiers and contact details,** and remove any sustainability mark you cannot substantiate under Articles 12(8) and 14.
 5. **Plan one print cycle, not two.** If design-for-recycling changes are coming for the same SKU before 2030, align them with the label switch.

Frequently asked

Can I keep using national sorting labels such as Triman or the Italian environmental label?

Until the harmonised label applies, national rules continue. After that, the guidance is clear that national sorting labels cannot sit alongside the EU label, and Member States are expected to repeal or adapt their measures in time.

Does the label apply to transport packaging?

No, except e-commerce packaging, which is covered.

Is a QR code mandatory?

Not for the sorting label itself — a data carrier is optional for additional sorting information. A digital marking is required for packaging containing substances of concern, under the methodology to be set in the implementing act.

Next: see every label-related date on the [timeline](#), or check which marking duties apply to your role on the [obligations page](#).

KEEP READING

16 OCT 2026 · 4 MIN READ

The six PPWR packaging format bans from 1 January 2030 (Annex V)

From 1 January 2030, Article 25 bars six packaging formats for specific uses: plastic multipack wraps, plastic for small fresh-produce packs, single-use plastic for dine-in HORECA, HORECA portion packs, hotel miniatures and very lightweight plastic bags. Here is each point, its exceptions, and the 5 % plastic rule from the Commission's guidance.

ART. 25

ANNEX V

ART. 70(4)

16 OCT 2026 · 4 MIN READ

Empty space in sales packaging from 12 February 2028: PPWR Article 24(4) explained

From 12 February 2028, whoever fills sales packaging must keep empty space to the minimum needed for function and product protection. There is no fixed percentage for sales packs, void fill counts as empty space, and settling products are judged at filling. Here is how Article 24(4) differs from the 50 % rule for transport and e-commerce packaging.

ART. 24

ART. 10

ANNEX IV