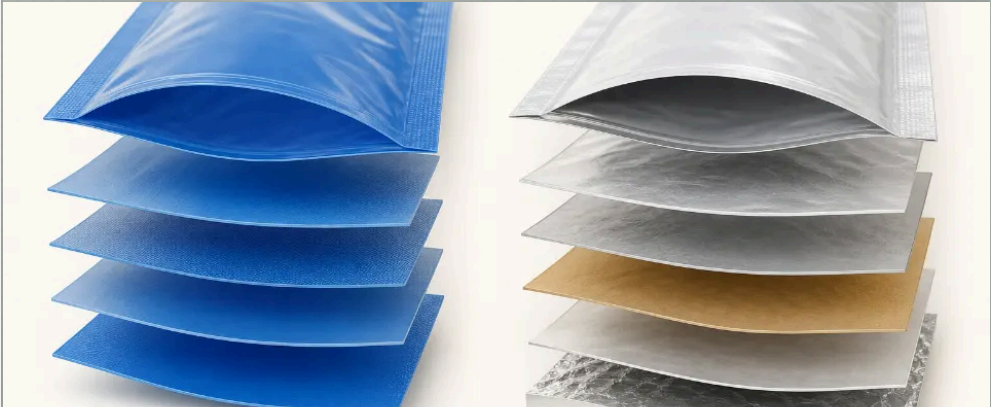


Does packaging have to be recyclable now? What PPWR Article 6 requires since August 2026

Article 6(1) has applied since 12 August 2026, but the A/B/C grading has not started. The Commission's guidance explains which test you are held to today, when grading begins, and when the conformity assessment for recyclability becomes due.

ART. 6(1) APPLIES
2026-08-12
YARDSTICK TODAY
EN 13430
DFR ACT DUE
2028-01-01
GRADE C FLOOR
2030*
GRADE B FLOOR
2038



SHORT ANSWER

Yes, in a limited sense. Article 6(1) — “all packaging placed on the market shall be recyclable” — has no deadline of its own, so the Commission reads it as applying from **12 August 2026**. Until the design-for-recycling criteria apply, you are held to the old Directive's recyclability requirement and the harmonised standard **EN 13430:2004**. The A/B/C grades and the recyclability conformity assessment come later.

Who this applies to: every manufacturer placing packaging on the EU market, for every material. **What it does not mean:** that your pack needs a grade today. No grade can be awarded until the delegated act on design-for-recycling criteria exists.

Why Article 6(1) applies now

Most of Article 6 carries its own dates. Paragraph 1 does not. The Commission's guidance concludes that a provision with no specific deadline applies from the regulation's general date of application, 12 August 2026.

The guidance also explains what that means in practice. Article 6(1) resembles the old essential requirement in Annex II, point 3(a), of Directive 94/62/EC (“packaging recoverable in the form of material recycling”), which was vague and hard to enforce. So, until the design-for-recycling rules apply:

SOURCES

- [Regulation \(EU\) 2025/40, Article 6 and Annex II — EUR-Lex](#)
- [Commission guidance document C\(2026\) 3702, section 6](#)
- [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 →](#)

“... manufacturers must comply only with the recyclability requirement in accordance with the PPWD and the related harmonised standard EN 13430:2004.”

COMMISSION GUIDANCE ON REGULATION (EU) 2025/40, SECTION 6

If you already met the Directive's essential requirements, nothing new is demanded of the pack today. What has changed is the legal footing: it is now a directly applicable regulation, enforced the same way in every Member State.

The dates that follow

DATE	WHAT HAPPENS	SOURCE
12 Aug 2026	Article 6(1) applies; assessed against the Directive requirement and EN 13430	Art. 6(1); guidance §6
1 Jan 2028	Deadline for the delegated act setting design-for-recycling criteria and grades per packaging category	Art. 6(4)
1 Jan 2030 <i>or</i> 24 months after that act, whichever is later	Design-for-recycling condition applies; packaging below grade C (70%) cannot be placed on the market	Art. 6(2)(a); Annex II
1 Jan 2035 <i>or</i> later	Recycled-at-scale condition applies (or five years after the implementing act on the method, if later)	Art. 6(2)(b), 6(5)
1 Jan 2038	Grade C packaging is no longer considered recyclable; grade B (80%) becomes the floor	Art. 6

The “whichever is later” wording matters. If the delegated act enters into force after 1 January 2028, the 2030 date moves with it — manufacturers always get 24 months from that act.

No recyclability conformity assessment yet

The guidance states that manufacturers do not need to perform the Article 38 / Annex VII conformity assessment for recyclability until the delegated act under Article 6(4) enters into force. Your technical documentation today covers the obligations already in application, such as the substance limits in Article 5.

What the grades will measure

Annex II grades packaging by how much of it, by weight, is recyclable under the coming criteria:

- **Grade A:** 95% or more
- **Grade B:** 80% or more
- **Grade C:** 70% or more
- **Below 70%:** not recyclable — cannot be placed on the market once the condition applies

The criteria themselves are not written yet. Anyone quoting you a definitive grade today is quoting a forecast.

What to do with this window

1. **Keep your EN 13430 file current.** It is the yardstick an authority will use until the criteria apply.
2. **Find the structural risks now.** Multilayer laminates, mixed-material closures and dark pigments that defeat sorting are the cases most likely to struggle against any design-for-recycling criteria.
3. **Plan on 2030 as the earliest date, not the certain one.** Packaging specified in 2026 will very likely still be on the market then.
4. **Watch the delegated act.** Its entry into force starts the 24-month clock. We log it on [Updates](#) the day it appears.

Frequently asked

Can I market packaging as “recyclable” today?

Be careful. Under Article 14, an environmental claim about a property the PPWR regulates may only be made where the pack *exceeds* the legal minimum, using the regulation’s methods, and the evidence must sit in the technical documentation. Since every pack must already be recyclable, a bare “recyclable” claim says little. Article 12(8) also bans marks likely to mislead about waste handling.

Does Article 6 apply to packaging placed on the market before 12 August 2026?

No obligation applies retroactively to packaging already placed on the market before the regulation applied.

Does it apply to all materials?

Yes — plastic, paper and board, glass, metal and composites. Limited exemptions exist, for example for some medical and hazardous-goods packaging; check Article 6 for your category.

Next: see how recyclability fits alongside the other seven requirement families on the [requirements page](#), or check a pack in the [PPWR checker](#).

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](#)

