

Implementation timeline and secondary legislation under PPWR

While the text of the Packaging and Packaging Waste Regulation (PPWR) establishes recyclability targets and harmonises rules on packaging, labels, and chemicals restrictions, the technical implementation relies heavily on forthcoming secondary legislation. The European Commission is thus tasked with rolling out an intensive series of delegated and implementing acts over the next two years.

While the general framework begins in August 2026, keep in mind that many market-facing obligations only kick in 24 to 30 months after the respective secondary act is formally adopted by the Commission.

I. Thematic pillars of secondary acts

To support implementation planning, the upcoming secondary legislation is structured around three main technical pathways:

1. Recyclability and material metrics

The Commission's delegated acts under this pillar will create uniform definitions of what packaging is genuinely "recyclable". It will transition the market away from theoretical metrics toward verified, scalable sorting and processing capabilities across European regional infrastructures.

2. Chemical integrity and recycled feedstock

Implementing legislation will detail the strict chain-of-custody models (such as mass balance allocation methodologies) permitted for demonstrating compliant post-consumer plastic contents. Crucially, it will couple these rules with robust testing standards for hazardous chemical restrictions (such as PFAS) to ensure absolute safety in food-contact applications.

3. Traceability, logistics and Single Market cohesion

Implementing acts on harmonised labels seek to eliminate operational friction and compliance costs caused by disparate national rules (e.g., French vs. Italian environmental labelling).

II. Chronological implementation timeline

The following timeline maps when specific secondary acts are to be adopted by the Commission and when their subsequent market requirements take effect.

Aug 12, 2026	PPWR general application and PFAS restrictions The overarching regulation officially enters into application. Immediate measures include: • PFAS and hazardous substance bans: strict restrictions on per- and polyfluoroalkyl substances (PFAS) in food-contact packaging take effect; compliance documentation must be readily available. • Harmonised labelling framework: Commission adopts foundational implementing acts establishing uniform material-sorting symbols and waste receptacle pictograms.
Dec 31, 2026	Recycled plastic calculations and tracing The Commission is scheduled to adopt implementing acts that define the precise methodologies for calculating, verifying, and tracing the exact percentages of post-consumer recycled (PCR) content in plastic packaging, establishing standard rules ahead of the 2030 targets. This includes implementing acts regarding: • The calculation of recycled content as set in article 7(3) • Sustainability criteria for plastic recycling technologies • Recycled content collected in a third country.
Feb 12, 2027	Reuse architecture and digital traceability Adoption of secondary legal frameworks focusing on: • Minimum rotations: delegated acts to establish the baseline number of loops/rotations required for a packaging format to qualify as "reusable". • Digital track and trace: technical specifications for QR codes and digital labels linking packaging data to formal Extended Producer Responsibility (EPR) systems. Member States should set the penalties for infringing the rules set by the Regulation (Article 68) and notify the Commission of the penalties that have been set up.
June 30, 2027	Rules on the calculation of the achievement of the re-use targets The Commission should adopt implementing acts to calculate the re-use targets set in Article 29.

Jan 1, 2028	Design for Recycling criteria (DfR) and recyclability performance A major milestone establishing strict packaging infrastructure requirements: • Design for Recycling (DfR) criteria for recyclable packaging (article 6): Delegated acts define clear A, B, and C performance grades based on the absolute recyclability of packaging materials. • The Commission should assess the need for derogations concerning some of the requirements set in Article 7 on minimum recycled content in plastic packaging.
Feb 12, 2028	Obligation related to excessive packaging The Commission should adopt implementing acts concerning the calculation of the empty space ratio in packaging and other requirements set in Article 24(2).
Aug 12, 2028	Mandatory sorting labels go live Exactly 24 months after the adoption of the initial labelling acts, it becomes legally non-compliant to place packaging on the EU Single Market without the harmonised material-sorting pictograms.
Jul 1, 2029	Financial EPR fee eco-modulation Eighteen months after the DfR parameters are finalised, all EU Member States must align their Extended Producer Responsibility (EPR) financial schemes. Fees paid by producers will be legally linked and "modulated" directly based on the packaging's A, B, or C recyclability grade.
Jan 1, 2030	The recyclability and content mandate The first deadline to assess the PPWR architecture: • Final implementing acts to establish the methodology for the recycled-at-scale assessment and other tracking mechanisms to verify whether packaging materials are collected, sorted, and processed at scale across the EU. • Implementing acts to incentivise environmentally sustainable packaging according to Article 63 on green public procurement. • Market bans: packaging formats failing to achieve at least a Grade C recyclability standard are officially banned from being distributed on the EU market.