Regulation (EU) 2025/40: EU PPWR Compliance Timeline

Key Requirements & Verification Focus Areas compiled by FSP

PPWR compliance is a phased marathon, not a sprint requiring 100% execution tomorrow. It is about steady, step-by-step progress aligned with the regulatory timeline.

Timeline	Legal Basis	Core Requirement	Specific Verification Focus Areas
August 12, 2026	Article 5	**Requirements for substances in packaging (Heavy Metals & PFAS)**	1. **Heavy Metals Limit:** Sum of concentration levels of Lead (Pb), Cadmium (Cd), Mercury (Hg), and Hexavalent Chromium (Cr VI) shall not exceed **100 ppm** by weight. 2. **PFAS Restriction:** Intentional use of Per- and polyfluoroalkyl substances (PFAS) in **food contact packaging** is restricted/prohibited above defined thresholds (e.g., 25 ppb for any individual PFAS).
August 12, 2026	Article 38, 39 & Annex VII, VIII	**Declaration of Conformity (DoC)**	1. **EU Declaration of Conformity** (Article 39, Annex VIII) 2. Technical Documentation (Article 38, Annex VII) (retained for 5–10 years)
From August 12, 2028	Article 12(1)	Marking of packaging and material composition	Packaging placed on the market must carry a harmonized label with pictograms indicating **material composition** to facilitate consumer sorting. Labels must be easily legible, clear, and compatible with digital marking technologies. **(Note: EU unified specification has not yet been published ,implementing acts pending).**
From February 12, 2029	Article 12(2)	Marking of reusable packaging and QR code / Digital data carriers	Reusable packaging must bear a label informing users of its reusability. It shall incorporate a QR code or other digital data carrier providing access to system information (reuse system details, collection points, tracking rotation cycles).
2029 / Early 2030	Article 13(3)	Digital Product Passport (DPP)	Packaging data and material traceability will be integrated into the **EU Digital Product Passport (DPP)** framework.

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January 1, 2030	Article 6	Recyclable packaging & Design for Recycling (DfR)	1. Packaging must comply with Design for Recycling (DfR) criteria (Article 6 & Annex X). 2. Packaging performance will be graded from Grade A to Grade E. 3. Packaging assessed as Grade E (recyclability < 70%) shall be prohibited from being placed on the market (Article 6(2)).
January 1, 2030	Article 7	Minimum recycled content in plastic packaging	For non-food contact plastic packaging (e.g., anti-static bags, stretch films, protective shells for electronics factories), PCR content ≥ 35%. (Article 7(1))
January 1, 2030	Article 24	Packaging minimization & **Maximum void ratio**	1. Maximum Void Ratio: The void ratio in grouped packaging, transport packaging, and e-commerce packaging shall not exceed 50% 2. Unnecessary over-sizing purely for marketing, visual presentation, or excessive shock padding is prohibited.
January 1, 2030	Article 26	Reuse and refill targets (Transport and sales packaging)	Transport and industrial packaging (e.g., pallets, plastic crates, boxes, strapping bands): **At least 40%** must be reusable packaging within a reuse system.
January 1, 2035	Article 6 & 7	Recycled at scale	1. Packaging must not only be recyclable by design (DfR), but must also be proven to be **Recycled at Scale** (collected, sorted, and recycled in practice at scale within the EU) 2. Further increase the PCR plastic content ratio.