

PPWR Compliance: 2026 Quick Reference

Regulation (EU) 2025/40 (PPWR), RecyClass v3.1 · Edition I — April 2026 · PPWR compliance quick reference, 2 pages

17 essential compliance terms for brand owners, QA specialists and sustainability managers. The complete version with around 60 legal terms, a detailed timeline and a PPWR 2030 preparation checklist is available at vlmpoliplast.ro/en/resources/ppwr-glossary/.

REGULATORY FRAMEWORK	SUBSTANCES & CONTENT	RECYCLING & EPR
PPWR (Regulation (EU) 2025/40) The EU regulation on packaging and packaging waste, in force since 11 February 2025. Replaces Directive 94/62/EC. Applicable in all EU member states from 12 August 2026, with phased requirements through 2038. Annex II PPWR (recyclability classes) Official 3-class system: A ≥95%, B ≥80%, C ≥70%, plus a non-recyclable category (under 70%). RecyClass v3.1 subdivides "non-recyclable" further into classes D and E. PPWR Declaration of Conformity (DoC) Mandatory document by which the manufacturer attests the packaging's compliance with the PPWR. Records kept for 5 years (single-use) or 10 years (reusable) (Art. 39 PPWR). Contact-sensitive packaging (Art. 3) Packaging in direct contact with food, cosmetics, medicines or medical devices, and baby food. Differentiated PCR thresholds vs. standard packaging. Annex VII PPWR (technical documentation) Mandatory documentation structure: packaging description, material specifications, test reports, supplier declarations, recyclability assessment. Substances of Concern (SoC) Substances with a negative impact on health or recyclability. PFAS is the main targeted category. European Commission report due by 31 December 2026.	PFAS (Art. 5 PPWR) Ban on PFAS in food-contact packaging from 12 August 2026. Limits: 25 ppb per substance, 250 ppb total PFAS, 50 ppm total organic fluorine. Post-consumer recycled content, PCR (Art. 7) Minimum 10% from 2030 for contact-sensitive non-PET (rising to 25% in 2040), 35% from 2030 for other plastics (65% in 2040). Pre-consumer content does not qualify. Packaging minimisation (Art. 10, Art. 24) Empty-space ratio under 50% for grouped, transport and e-commerce packaging, from 1 January 2030. Double walls, false bottoms and unnecessary layers are prohibited. Mass balance, ISCC PLUS Chemical allocation methodology for recycled content through the production chain. ISCC PLUS is the industry-accepted standard for demonstrating chemical PCR.	Eco-modulated EPR (Art. 47) Differentiated EPR fees by recyclability class. Difference between Class A and non-recyclable: 3x to 8x. Mandatory in the EU from July 2029. Design for Recycling (DfR) Designing packaging for compatibility with recycling streams. PPWR criteria to become mandatory through delegated acts by January 2028. RecyClass v3.1 Non-profit methodology coordinated by Plastics Recyclers Europe (August 2025). 5 classes, A to E. Industry reference tool pending publication of official PPWR criteria in 2028. CEFLEX D4ACE Phase 2 guidelines (September 2025) based on over 600 samples. Compatibility thresholds for adhesives, EVOH, carbon black, PET, PVDC. Recycled at scale (2035) PPWR requirement: packaging must actually be recycled industrially, not just "recyclable by design". Assessment methodology via Commission acts. Recycling stream (PE4, PP5) Material sorting categories: PE4 for polyethylene, PP5 for polypropylene. RecyClass assesses recyclability against a specific stream. EPR Implementation Body (national) Each EU member state designates its own body (e.g. Eco-Rom Ambalaje in Romania) under national EPR legislation implementing the PPWR.

PPWR timeline & obligations

Regulation (EU) 2025/40 · Applicable from 12 August 2026

PPWR timeline: key dates

11 Feb 2025	PPWR enters into force. Regulation (EU) 2025/40 published in the EU Official Journal.
12 Aug 2026	General applicability. Mandatory Declaration of Conformity, PFAS restrictions, Annex VII documentation archiving.
1 Jan 2028	Publication of the Commission's delegated acts. Official Design for Recycling and recyclability-class criteria.
Jul 2029	Eco-modulated EPR mandatory in all EU member states. Fees differentiated by recyclability class.
1 Jan 2030	Mandatory recyclability, minimum 10% PCR threshold, packaging-minimisation category.
2035	Recycled at scale. Packaging must actually be recycled industrially, not just recyclable by design.
1 Jan 2038	Class C banned (70-79% recyclability). Only Class A and Class B remain permitted on the EU market.

Recyclability class matrix

CLASS	THRESHOLD	2030 STATUS	EPR
A	≥95% by weight	ALLOWED	Reduced
B	80-94% by weight	ALLOWED	Standard
C	70-79% by weight	ALLOWED (transitional)	Increased
X	under 70% by weight	BANNED	N/A

RecyClass v3.1 subdivides the non-recyclable category into classes D (50-69%) and E (under 50%). Class C is permitted transitionally on the EU market, banned outright from 1 January 2038.

Obligations by article

ARTICLE	OBLIGATION	DEADLINE
Art. 5	Food-contact PFAS restrictions	12 Aug 2026
Art. 6	Mandatory recyclability	1 Jan 2030
Art. 7	Minimum recycled content (PCR)	1 Jan 2030
Art. 10	Packaging minimisation	1 Jan 2030
Art. 11	Reusable packaging	Phased, 2030+
Art. 12, 13	Harmonised labelling	Delegated acts
Art. 24	Empty-space ratio under 50%	1 Jan 2030
Art. 39	Documentation archiving, 5/10 years	Ongoing
Art. 47	EPR eco-modulation	Jul 2029

PPWR compliance support

For customers using structures from the VLM Polioplast portfolio: assessment of existing structures, mono-material transitions, Annex VII documentation preparation, and Declaration of Conformity support.

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The complete PPWR glossary

This quick reference sheet summarises 17 essential terms. The complete version includes around 60 legal terms with extended definitions, practical examples, cross-references to complementary regulations 1935/2004, 10/2011, 2022/1616, 2023/2006, and a PPWR 2030 preparation checklist.

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