

**VLM POLIPLAST**

Flexible plastic packaging manufacturer

# PPWR Calendar 2026 – 2038

**Quick guide for manufacturers, importers and suppliers of flexible packaging**

Compliance with Regulation (EU) 2025/40 (PPWR)

12 AUG 2026 • DoC + PFAS

1 JAN 2030 • Recyclability

1 JAN 2038 • A/B only

## Why PPWR matters now, not in 2030

Regulation (EU) 2025/40 (PPWR) becomes directly applicable on **12 August 2026** across all EU member states. The major recyclability deadline (1 January 2030) and the Class C restriction (1 January 2038) may look distant, but real pressure on the supply chain starts much earlier, through three concurrent forces: large retail chains already require recyclability documentation as part of their own ESG strategies; CSRD reporting (Directive (EU) 2022/2464) folds packaging recyclability into sustainability scoring visible to investors; and EPR schemes (producer responsibility organisations) are already introducing fee differentiation for non-recyclable packaging from 2026-2027, ahead of mandatory eco-modulation.

### The 5 key deadlines

| Deadline                            | Main obligations                                                                                                                                                                                                                                                                                      |
|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>12 August 2026</b>               | Declaration of Conformity (DoC) becomes mandatory (Art. 38-39). PFAS restrictions for food-contact packaging (Art. 5). General packaging minimisation requirements (Art. 10).                                                                                                                         |
| <b>By 1 January 2028</b>            | Deadline for the European Commission to adopt the delegated acts setting the technical Design for Recycling criteria (Art. 6(4)). Digital QR labelling.                                                                                                                                               |
| <b>By 1 July 2029 at the latest</b> | EPR fee eco-modulation becomes mandatory (18 months after the delegated acts).                                                                                                                                                                                                                        |
| <b>1 January 2030</b>               | Not Recyclable packaging banned from the EU market (Art. 6). Maximum 50% empty-space ratio for grouped/transport/e-commerce packaging (Art. 24). Minimum recycled-content thresholds (Art. 7): 30% contact-sensitive PET, 10% contact-sensitive non-PET, 30% single-use bottles, 35% other packaging. |
| <b>1 January 2038</b>               | Class C banned. Only Class A (≥95%) or Class B (≥80%) packaging permitted, per EN 18120-1:2026 and RecyClass v3.1.                                                                                                                                                                                    |

European Commission guidance C(2026) 3702 (5 June 2026) clarifies the interpretation of these terms, replacing the earlier draft C(2026) 2151 (30 March 2026). The delegated acts are still under preparation; the calendar may be adjusted — check each module's version log for the latest update.

## The rest of the series: 5 dedicated modules

This calendar is the starting point of a series of 6 independent modules. Each module covers a single topic, with its own version log and review cadence — so a legislative change on one topic does not require withdrawing the entire series.

**Module 2 — Recyclability classes + Design for Recycling**

Art. 6 · A/B/C/Not Recyclable

**Module 3 — PFAS, Article 5**

Limits for food-contact packaging

**Module 4 — Declaration of Conformity (DoC)**

Art. 38-39 · template + checklist

**Module 5 — Eco-modulated EPR fees**

Financial impact by class

**Module 6 — Mono-material transition + Recycled content**

Art. 7 · technical R&D guide

## Sources

Regulation (EU) 2025/40 — EUR-Lex, CELEX 32025R0040 · European Commission guidance C(2026) 3702 (5 June 2026), which replaces the draft C(2026) 2151 · RecyClass v3.1 (Plastics Recyclers Europe, August 2025) · EN 18120-1:2026 (CEN).

## Version log

| Version | Date      | Note                                                                                                                                                                                         |
|---------|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| v1.0    | July 2026 | First version as a standalone hub, split from the PPWR 2026 Guide v1.0.2 (archived).                                                                                                         |
| v1.1    | July 2026 | Corrected Commission guidance citation: C(2026) 3702 (5 June 2026) is the final guidance in force; C(2026) 2151 (30 March 2026) was only the internal draft-approval memo, since superseded. |

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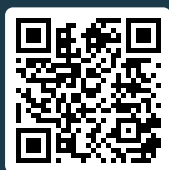
## Talk to the VLM Poliplast team

For a technical review of your packaging portfolio and your PPWR transition plan, contact the VLM Poliplast team.

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Module 1 of 6 (hub) · PPWR 2026 Guide Series · Version 1.1, July 2026

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