

PPWR UPDATE

EU SORTING LABEL DELAYED

PPWR Article 12
New planning dates
Actions by role

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WHAT'S INSIDE

WHAT CHANGED

Adoption now planned Q2 2027 (was Q4 2026)

LIKELY START

Around mid-2029 (estimate, not law)

NOT MOVED

EPR QR-only rule from 12 Feb 2027

SECTION 1

Brand owners and exporters

SECTION 2

Artwork, production and purchasing

How to use this checklist

On 19 October 2026 the European Commission moved the planned adoption of its harmonised labels implementing decision from Q4 2026 to Q2 2027. The EU sorting label applies 24 months after that act, so it is now likely to start around mid-2029. Work through the actions below for each role in your business.

Need help? Talk to the Positive ID Labels team: [01332 864895](tel:01332864895) sales@pid-labelling.co.uk

Key compliance dates

DATE	REGULATION	REQUIREMENT
12 Aug 2026	PPWR	Regulation applies; implementing act deadline missed
12 Feb 2027	PPWR Art 12(9)	EPR identification, if shown, by QR code or digital marking only
Apr to Jun 2027	Implementing act	Planned adoption of harmonised labels decision (was Q4 2026)
12 Aug 2028	PPWR Art 12(1)	Earliest legal date for the sorting label; 97/129/EC codes end (per guidance)
~Apr to Jul 2029	PPWR Art 12(1)	Estimated start of sorting label (24 months after act). Not law
~Oct 2029 to Jan 2030	PPWR Art 12(2)	Estimated start of reusable packaging label and QR (30 months). Not law
+3 years	PPWR Art 12(12)	Sell-through for packaging made before each start date

Brand owners and exporters

The EU sorting label is later than planned. Use the time to get organised, not to redesign.

■ KNOW YOUR EXPOSURE

1. List every product sold in the EU or Northern Ireland

- ☐ Note the markets, the pack formats and the marks each pack carries today, such as Triman or other national sorting marks.

2. Check where you show EPR information on pack

- ☐ From 12 February 2027, Article 12(9) says EPR identification, if shown, must be through a QR code or other open digital marking. This date has not moved.

CRITICAL

3. Confirm deposit return and transport packaging

- ☐ DRS packaging and transport packaging (except e-commerce) are exempt from the EU sorting label. Record which of your packs fall into these groups.

4. Talk to your EU importer

- ☐ Ask how they plan to handle the switch, and who will sign off EU artwork when the pictogram is published.

■ DON'T JUMP TOO EARLY

5. Hold off on new sorting pictogram artwork

- ☐ The implementing act is planned for April to June 2027. The design has not been published, so any "PPWR-ready" pictogram today is a guess.

URGENT

6. Keep national marks where they are required

- ☐ National sorting marks stay in place until the EU label applies. Don't remove them early.

Artwork, production and purchasing

Small steps now make the eventual change quick and cheap.

■ ARTWORK

7. Split GB and EU artwork files

- ☐ Hold a separate EU version of each label, so a future pictogram change touches one file only.

8. Reserve space for QR codes

- ☐ Plan room for an EPR QR code from 2027 if you show EPR details, an optional sorting QR code and, for reusable packs, a reuse QR code later.

9. Note old material codes

- ☐ Flag any 97/129/EC codes such as "PP 5". Current guidance says they are allowed voluntarily until 12 August 2028. Whether that date moves with the label is unconfirmed.

■ PRODUCTION AND PURCHASING

10. Don't scrap or over-order label stock

- ☐ Article 12(12) allows packaging made before each start date to be sold for three years afterwards.

11. Plan run-down of stock with national marks

- ☐ Order steadily so old stock is used up before the EU label applies. A reorder reminder can help.

12. Watch for the draft act

- ☐ When the draft opens for public feedback, the pictogram appears for the first time. Treat that as the trigger to start design work.

■ WHAT WE CAN DO

13. Short digital runs for EU versions

- ☐ Our Xeikon (1200dpi) and Screen (600dpi) presses make separate EU and GB label versions practical, so you reprint only what you need.

14. QR codes and extra label space

- ☐ We print QR codes as part of your artwork. Multipage and peel-and-reveal labels give room for multi-language sorting information on small packs.

Sources

Correct as of 20 October 2026. Dates after Q2 2027 are estimates from the Commission's planning record, not law.

■ PRIMARY SOURCES

15. European Commission, Have Your Say initiative 19243

- ☐ Planning record for the harmonised labels implementing decision, read 20 October 2026. [ec.europa.eu/info/law/better-regulation \(initiative 19243\)](https://ec.europa.eu/info/law/better-regulation/initiative-19243).

16. Regulation (EU) 2025/40 (PPWR), Article 12

- ☐ eur-lex.europa.eu/eli/reg/2025/40/oj/eng

17. Commission guidance C(2026) 3702 and annex C(2026) 2151

- ☐ Guidance on PPWR labelling, including the end date for 97/129/EC codes.

NEXT STEPS

Which packs are affected?

Let's talk it through.

Labels printed in-house on digital and flexo presses in South Derbyshire.

We'll help you list your EU and NI products, split your GB and EU artwork, and plan space for QR codes.

Short digital runs mean you only reprint what you need when the EU pictogram is finally published.

Call 01332 864895. The price we quote is the price you pay.

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