POSITIVE ID LABELS

EU PPWR ARTICLE 12

EU PACKAGING LABELLING CHECKLIST

Harmonised sorting label
EPR marks go digital: 12 Feb 2027
Reusable packaging label
Existing stock and sell-through
Correct as of 20 October 2026

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How to use this checklist

The EU Packaging and Packaging Waste Regulation (PPWR) has applied since 12 August 2026. Its labelling rules in Article 12 arrive in stages and depend on a Commission implementing act, now planned for Q2 2027. Use this checklist to plan EU artwork, EPR marks and label stock. It covers products sold in the EU and, in part, Northern Ireland. GB-only products are not affected. This is general information, not legal advice.

Questions about your labels? Call Positive ID Labels: **01332 864895 sales@pid-labelling.co.uk**

Key compliance dates

DATE	REGULATION	REQUIREMENT
12 Aug 2026	PPWR applies	Regulation applies; label implementing act deadline missed
12 Feb 2027	**Art 12(9)**	**EPR identification on pack by QR or digital means only**
Q2 2027	**Implementing act**	**Planned adoption of sorting label rules (was Q4 2026)**
12 Aug 2028	Art 12(1), (4)	Earliest legal date: sorting label; 97/129/EC codes end
c. mid-2029	Calculated	Likely sorting label start, 24 months after act (not law)
c. late 2029	Art 12(2)	Reusable label + QR, 30 months after act (calculated)
+3 years	Art 12(12)	Sell-through limit for older packaging after each start

Actions by role

Work through the items for your role. Nothing has to change on EU packs today, but two jobs have a real date: EPR marks (12 February 2027) and artwork planning for the sorting label. Calculated dates are our estimate from the Commission's planning, not law.

■ BRAND OWNER

- [ ] **1. List every product sold in the EU or Northern Ireland**
  Note which packs are sales packaging or e-commerce packaging. Transport packaging, deposit return packaging and professional-use medicinal and medical device packaging are exempt from the sorting label.
  URGENT

- [ ] **2. Check any EPR marks on pack before 12 February 2027**
  From that date, any extended producer responsibility (EPR) identification shown on pack must be in a QR code or other digital marking, not a printed symbol such as the Green Dot. This date is not affected by the delay.
  CRITICAL

- [ ] **3. Decide on separate GB and EU artwork**
  GB-only products are not covered by the PPWR. Separate versions let you update EU packs without touching UK stock.

- [ ] **4. Review recycled-content and bio-based claims**
  These stay voluntary. If you use them, they must follow the EU format once it applies (from 12 August 2028 at the earliest).

■ ARTWORK AND DESIGN

- [ ] **5. Do not print a draft sorting pictogram**
  The design is not yet published. The Commission now plans to adopt it in Q2 2027 (moved from Q4 2026 on 19 October 2026).

- [ ] **6. Leave space for a pictogram and a QR code**
  Plan room on EU artwork for the material composition pictogram. A QR code with sorting information is optional; reusable packaging will need one.

- [ ] **7. Keep national sorting marks where the country requires them**
  Triman and similar marks still apply until the EU label takes over. After that, Member States cannot keep national sorting labels alongside it.

- [ ] **8. Plan to drop 97/129/EC material codes**
Codes such as "PP 5" stay voluntary until 12 August 2028 and are not allowed after that. Whether that date moves with the delay is unconfirmed.

- [ ] **9. Compostable packs: add the home-composting statement**
Compostable packaging must say that it is not suitable for home composting.

■ PRODUCTION AND QUALITY

- [ ] **10. Check the label stays legible for the life of the pack**
Article 12 requires labels to be visible, clearly legible and indelible. Chilled, wet or heavily handled products may need a plastic face material or a laminate.

- [ ] **11. Test QR codes on the finished pack**
Scan printed codes on the real container, in the real lighting, before a full run.

- [ ] **12. Small packs: plan where the information goes**
Very small packs can carry the information on grouped packaging or through a single electronic code.

■ PURCHASING AND STOCK

- [ ] **13. Do not scrap or over-order label stock**
Packaging made or imported before each deadline can be sold for up to three years after the rule applies (Article 12(12)).

- [ ] **14. Set reorder points to run down old stock**
Time the last orders of labels with national marks so stock runs out close to the switch, not long after it.

- [ ] **15. Northern Ireland: confirm scope before printing**
PPWR applies in NI to the extent it is in scope. DRS labelling does not apply there; other Article 12 parts are unconfirmed. Treat the sorting label as likely relevant.

What we can do

Positive ID Labels prints in Melbourne, South Derbyshire. We do not certify compliance: you stay responsible for what your label says. We help you print it well.

■ HOW WE HELP

- [ ] **16. Separate EU and GB versions on short digital runs**
Our digital presses handle version changes without printing plates. Published target for digital work: 3 to 5 working days.

- [ ] **17. QR codes printed as part of your artwork**
For EPR identification, optional sorting information or reuse details. We recommend you test scanning on the finished pack.

- [ ] **18. More room for multi-language information**
Multipage and peel-and-reveal labels give extra space on small packs.

- [ ] **19. Durable labels for indelible marking**
Polypropylene on our Screen UV inkjet press is water resistant by nature; gloss or matt laminate adds scuff protection. Premium papers on our Xeikon at 1200dpi.

- [ ] **20. Reorder reminders**
When your job completes, we can set a reminder based on your usage so you do not run out, or over-stock, before the switch.

■ SOURCES (CHECKED 20 OCTOBER 2026)

- [ ] **21. Regulation (EU) 2025/40 (PPWR), Article 12, and Commission guidance**
eur-lex.europa.eu/eli/reg/2025/40/oj/eng. Guidance C(2026) 3702 (5 June 2026) and annex C(2026) 2151 (30 March 2026). Defra Explanatory Memorandum for NI scope (niassembly.gov.uk).

- [ ] **22. Have Your Say initiative 19243, harmonised labels**
ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/19243. Planned adoption Q2 2027 (record changed 19 October 2026).

NEXT STEPS

Planning EU artwork?

Let's talk it through.

Labels printed in Melbourne, South Derbyshire, on digital and flexo presses.

Tell us which products you sell into the EU and NI. We will help you plan versions, space for the new pictogram, QR codes and label stock.

We give you a quote, not an estimate: the price we quote is the price you pay.

Tell us your labelling challenge on 01332 864895.

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