

Detailed PPWR Timeline

What changes, when it changes, and what it means for cosmetic packaging projects

Regulation (EU) 2025/40 | Prepared by UAB "Global Packaging" | August 2026

CLIENT SUMMARY The main transition period is 2030. Packaging development should increasingly consider recyclability, recycled content, material combinations and minimisation before the legal deadlines arrive. Later milestones progressively tighten the recyclability and recycled-content framework.

THE TIMELINE

DATE	REQUIREMENT	WHAT CHANGES	WHAT IT MEANS FOR A CLIENT
11 FEB 2025	ENTRY INTO FORCE	Regulation (EU) 2025/40 entered into force.	PPWR became EU law, starting the transition to the new packaging framework.
12 AUG 2026	GENERAL APPLICATION	PPWR generally applies from this date.	Companies should understand their actual PPWR role — manufacturer, supplier, importer, distributor or producer for EPR — because obligations depend on the role performed in the supply chain.
2030*	DESIGN FOR RECYCLING	Packaging enters the EU Design for Recycling framework and recyclability performance grading.	The complete packaging construction can matter: bottle or jar, closure, pump, label, sleeve, adhesive, ink, coating and metallisation. Grade A is $\geq 95\%$, B $\geq 80\%$, C $\geq 70\%$.
2030*	MINIMUM RECYCLED CONTENT	Article 7 introduces minimum post-consumer recycled plastic content for relevant plastic packaging.	For contact-sensitive packaging: PET as the major component — 30%; plastics other than PET — 10%. Calculation methodology, exemptions and the applicable legal trigger must be checked.
1 JAN 2030	PACKAGING MINIMISATION	Packaging weight and volume must be reduced to the minimum necessary to ensure functionality, taking Annex IV performance criteria into account.	Unnecessary layers, false bottoms or design features used only to increase perceived product volume require particular attention. Functional justification remains important.

*** IMPORTANT ABOUT 2030** Design for Recycling applies from 1 January 2030 or 24 months after the relevant delegated act enters into force, whichever is later. Article 7 recycled-content requirements apply from 1 January 2030 or three years after the relevant implementing act establishing the methodology enters into force, whichever is later.

2035–2040 | THE NEXT STAGE

After 2030, the PPWR framework progressively becomes more demanding.

DATE	REQUIREMENT	WHAT CHANGES	WHAT IT MEANS FOR A CLIENT
2035*	RECYCLED AT SCALE	The recyclability framework expands beyond design: packaging must also be recycled at scale according to Article 6 and the applicable methodology.	A technically recyclable design alone will not be the whole assessment; real collection, sorting and recycling performance becomes relevant.
1 JAN 2038	GRADE B MINIMUM	Packaging may no longer rely on Grade C. It must meet at least Grade B (≥80%), subject to the applicable Article 6 provisions.	Packaging formats with lower recyclability performance may need redesign, component simplification or material changes before this stage.
1 JAN 2040	HIGHER RECYCLED-CONTENT TARGETS	Article 7 recycled-content targets increase. For contact-sensitive plastic packaging: PET as the major component — 50%; plastics other than PET — 25%, subject to rules and exemptions.	Long-term packaging strategies should consider future PCR availability, technical feasibility, product compatibility and supply security.

WHAT SHOULD BE REVIEWED IN A COSMETIC PACKAGING PROJECT?

1 MATERIALS Main polymer, PCR content, material combinations and compatibility with the intended product.	2 COMPONENTS Container, closure, pump or dispenser, labels, sleeves and ancillary components should be considered together.	3 DECORATION Printing, coatings, metallisation, adhesives and decorative finishes may influence sorting and recycling.
4 WEIGHT & VOLUME Review whether material, layers or empty volume can be reduced without compromising functionality.	5 DOCUMENTATION Keep technical specifications, drawings, material declarations, calculations and available test information organised.	6 SUPPLY-CHAIN ROLE Determine who is the manufacturer, supplier, importer, distributor and producer for EPR in the actual transaction.

RECYCLABILITY GRADES

GRADE A ≥95% Highest performance	GRADE B ≥80% Minimum from 2038	GRADE C ≥70% Initial minimum technical threshold	BELOW C <70% Technically non-recyclable under the grading framework
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REGULATORY NOTE This document is a client-oriented summary of selected PPWR milestones. Exact obligations may depend on delegated and implementing acts, calculation methodologies, exemptions, packaging type, intended use, market and the economic operator’s role. It is provided for general information only and does not constitute legal or regulatory advice.

Official EU sources: [Regulation \(EU\) 2025/40 \(EUR-Lex, CELEX 32025R0040\)](#) | [European Commission Guidance document, OJ C/2026/3084, 10 June 2026](#)