PPWR labelling: harmonization or rebranded fragmentation?

SCHC Annual Meeting 2026

Cassidy Spencer | 3E

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Learning objectives

What attendees should be able to do after this session

1. Article 12

- Separate Article 12 framework obligations from future label specifications.
- Explain which label duties are staged through 2028, 2029 and 2030.

2. Manage the delay

- Explain that the Commission missed the August 2026 deadline for detailed label rules.
- Use the JRC proposal as a preview only, not final legal artwork.

3. Triage symbols

- Distinguish legally required national labels, PRO/EPR marks and voluntary claims.
- Apply the Green Dot example without overstating that it will disappear.

4. Operationalize

- Turn label rules into packaging data, artwork, supplier evidence and EPR workflows.
- Build a risk register for the transition period.

Core framing: the PPWR label deadline is now a data-readiness and transition-management issue, not just a future artwork exercise.

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Why this conversation, why now?

The legal baseline is live; the label details are late

PPWR applies

- Regulation (EU) 2025/40 generally applies from 12 August 2026.
- It replaced the directive model with directly applicable packaging rules.

Article 12 is staged

- Material-composition labels do not become fully operational from the general application date.
- The visible label system depends on implementing acts and later triggers.

The act is missing

- The Commission missed the expected August 2026 timing for detailed harmonised label rules.
- This creates an implementation squeeze once final specs land.

What companies can do now

- Inventory packaging functions, materials and current marks.
- Build supplier evidence for material composition, components and substances of concern.
- Reserve artwork and system-change windows without printing guessed EU labels.

What companies cannot do yet

- Finalize the harmonized EU material-composition label artwork.
- Treat JRC figures as final legal specifications.
- Assume national/proprietary marks disappear automatically.

The practical question is: how do we prepare without locking in the wrong label?

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Today’s route

A labelling-focused version of the PPWR discussion

1. Article 12 architecture

What PPWR labelling covers and what it does not cover yet.

2. Status of the implementing acts

Why the missed deadline matters and how to talk about it.

3. JRC proposal preview

What the labels may look like, with actual JRC label images.

4. Symbols and Green Dot

Mandatory vs voluntary marks, national labels, EPR symbols and Article 12(9).

5. Operating model

How to manage label data, artwork changes, supplier evidence and transition risk.

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PPWR labelling architecture

What the regulation is trying to harmonize

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Article 12 baseline

The label is meant to support sorting by communicating material composition

Article 12(1): packaging labels

- Packaging must ultimately bear a harmonized label with information on material composition.
- The label is intended to facilitate consumer sorting and is expected to rely on pictograms.
- Transport packaging is excluded from this label, except e-commerce packaging; DRS packaging has separate logic.

Article 13: waste receptacles

- Waste receptacles are also expected to carry harmonized labels.
- The purpose is matching: the pack-level label should correspond to the bin/receptacle label.
- This is why the JRC proposal focuses heavily on visual matching.

The legal design choice

- The system is material-based, not destination-based.
- A label should tell the consumer what the packaging material is, not necessarily the local bin name.
- Local collection specifics may still need receptacle labels, digital info, or complementary instructions.

Why this matters for regulatory teams

- Material composition must be reliable at packaging-component level.
- Artwork becomes an output of packaging data and legal interpretation.
- Poor master data can become a label non-compliance issue.

Short version for stakeholders: Article 12 is not just a new icon; it is a packaging data rule that eventually becomes a visible label.

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Article 12: what it does and does not do

Avoid the most common overstatements

It does

- Create an EU framework for harmonized packaging and receptacle labels.
- Cover material composition, compostability, reusable packaging, DRS and EPR/digital identifiers.
- Create future digital-marking pathways for certain information.

It does not

- Create one universal “packaging DPP” for every package on the 2026 application date.
- Make the JRC proposal legally binding by itself.
- Automatically remove every voluntary or proprietary symbol on packaging.

It depends

- On implementing acts for specifications and methodologies.
- On whether the packaging is sales, e-commerce, transport, reusable, DRS or another format.
- On whether an existing mark is legally required, scheme-required or voluntary.

Phrase to use: “PPWR creates the label architecture now; the final label files and methods arrive through secondary rules.”

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Current status: the detailed label rules are late

This is the central update for today's meeting

PPWR is applicable
LIVE

Regulation (EU) 2025/40 generally applies from 12 August 2026. That does not mean every label artwork requirement is live on that date.

Commission did not issue the expected Article 12/13 label implementing acts by the deadline
MISSED

Public reporting states that the Commission missed the deadline to adopt detailed rules for harmonized labels, digital labelling and material-composition methodology.

JRC proposal is the best available preview, not the law
PENDING

The JRC proposal is a technical proposal to inform the Commission. It expressly says the Commission remains free to amend or depart from it.

Implication: companies should prepare data, inventory symbols and plan artwork changes, but avoid treating JRC labels as final production artwork.

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What “wait for the act” really means

Wait on final artwork; do not wait on the data foundation

Do not do yet

- Do not finalize EU harmonized pictograms for production based only on the JRC proposal.
- Do not assume the JRC colour scheme, text rules, QR layout or granularity will be adopted unchanged.
- Do not remove legacy/national marks unless the legal or scheme basis supports removal.
- Do not conflate Article 12 label timing with unrelated PPWR documentation/substance duties.

Do now

- Build packaging inventory by function, component and material.
- Map current marks: legal, scheme-required, DRS, EPR, retailer, voluntary claim.
- Collect supplier evidence for material composition, components, coatings, inks, adhesives and substances of concern.
- Reserve artwork, PLM and regulatory review capacity for final implementation.

Regulatory posture: prepare the system, but do not lock the symbol.

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The JRC proposal: useful, but not final

Treat it as the best available preview of the likely system

What it is

- A 2026 Joint Research Centre technical proposal for EU harmonised waste sorting labels.
- Prepared to inform implementing acts under PPWR Articles 12 and 13.
- Built from behavioural research, citizen input and stakeholder consultation.

What it is not

- Not a binding implementing act.
- Not final legal label artwork.
- Not a guarantee that every colour, pictogram, text rule or QR layout will survive unchanged.

Why it is still valuable

- Shows likely design logic: material-based labels, matching packaging/receptacle pictograms, minimal text and optional digital support.
- Gives companies a way to anticipate data needs and artwork complexity.
- Highlights practical pain points before the final act lands.

How to handle it

- Use it for readiness planning and scenario testing.
- Do not cite it as final compliance authority.
- Flag any slide with JRC label images as “technical proposal - not final act.”

Recommended wording: “The JRC proposal is the clearest preview of the likely EU label system, but final requirements may differ.”

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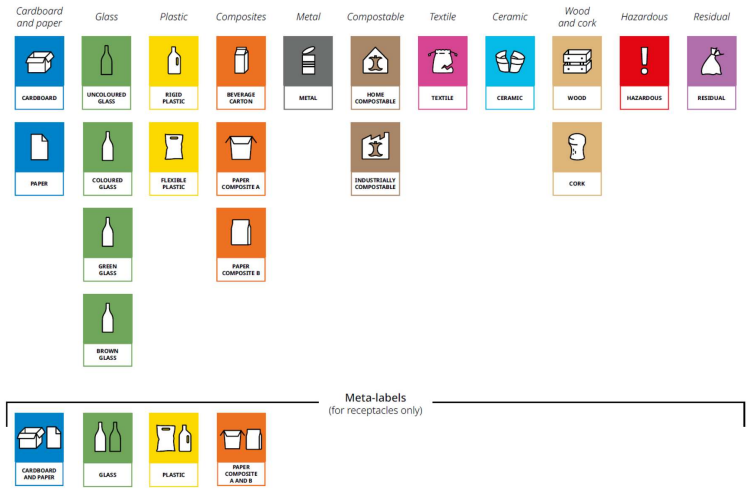
JRC proposal: candidate harmonised label set

Technical proposal only - final implementing act may differ

Figure 13. Pictograms and materials as used in the proposed EU harmonised waste sorting labelling scheme.



Source: Author's elaboration.

JRC Figure 13: Proposed pictograms and materials for EU harmonised waste sorting labels.

The proposal is material-based: consumers match the material label on packaging to corresponding labels on waste receptacles.

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How the proposed system works

Material focus + matching + flexibility

1. Material focus

- Labels identify material composition rather than local bin names.
- This supports a common EU visual language even where collection systems differ.

2. Matching

- Packaging labels and receptacle labels should correspond visually.
- The consumer matches the pack symbol to the bin symbol.

3. Modularity

- Multiple-component packaging may need multiple labels or component-specific cues.
- Meta-labels may group materials on receptacles, not packaging.

4. Accessibility and usability

- Pictograms, minimal text, contrast, label size, language and digital access all matter.
- The system must be understandable, including for persons with disabilities.

5. National specificity still exists

- Collection systems, language choices and DRS/EPR infrastructure are not identical across Member States.
- This is where harmonization can still feel fragmented operationally.

The label is simple for consumers only if the back-end data model is sophisticated enough.

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JRC proposal: colour, text and black-and-white variants

Why the final act matters for artwork teams

implementation of the harmonised labelling system throughout the EU.

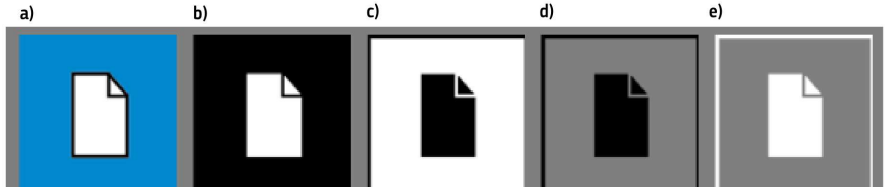
Figure 15. Proposed colour scheme for the EU harmonised waste sorting labels.

JRC Figure 15: Proposed colour scheme.

Why this matters

- Colour supports recognition, but may create print, accessibility and national-colour conflicts.
- Text improves comprehension, but creates space and translation burdens.
- Achromatic variants add flexibility but reduce visual consistency.

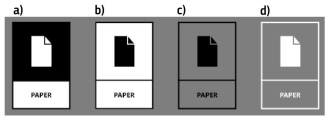
Figure 22. Examples of text-free label alternatives: (a) coloured, (b) opaque white, (c) opaque black, (d) transparent black, and (e) transparent white.



JRC Figure 22: Text-free variants.

:onomic, or accessibility-related considerations.

Figure 17. Examples of achromatic label alternatives: (a) opaque white, (b) opaque black, (c) transparent black, and (d) transparent white.



Source: Author's elaboration.

JRC Figure 17: Achromatic variants.

Do not treat these visual choices as final until the Commission publishes the implementing act.

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Label scope is not one-size-fits-all

Start with packaging function and market

Sales packaging

- Material-composition label is front-and-center once the harmonized label obligation applies.
- Component-level material data is critical.

E-commerce packaging

- Not excluded from the material-composition label obligation in the same way as transport packaging.
- Important for online direct-to-consumer shipments.

Transport packaging

- Generally excluded from Article 12(1) material-composition label requirements, subject to exceptions.
- Still relevant for other PPWR duties and EPR/reporting.

DRS and reusable packaging

- DRS packaging has separate deposit-return labelling logic.
- Reusable packaging has its own label + QR/digital-data-carrier pathway.

Implementation rule: determine packaging function first, then material, then market, then label path.

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Multiple-component packaging

One package can need more than one material decision

Why it is difficult

- Packaging may include a body, lid, label, sleeve, coating, liner, adhesive, insert and closure.
- Components may be integrated or separate; disposal routes may differ.
- The label must be clear enough for consumers without creating impossible artwork.

JRC proposal options

- Group all relevant material labels together on the main body.
- Use complementary pictograms to show which component each label refers to.
- Apply labels directly on each component where technically feasible.

Operational takeaway

- Companies need component-level material data and a rule for when to separate, group or digitally supplement label information.
- This is a packaging engineering, regulatory and artwork decision - not just a graphic design decision.

Question for customers: do you have a packaging bill of materials, or only a finished artwork file?

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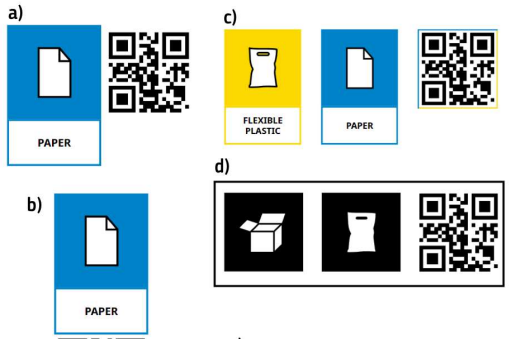
QR codes and digital data carriers

Digital can supplement the label, but it does not automatically replace it

30. Suggestions to use QR codes providing further sorting relevant information for packaging next to the physical label (a, b) or labels (c, d, e)..



JRC Figure 30: QR examples next to physical labels.

Where QR can help

- Small packaging or grouped packaging scenarios.
- Multi-component sorting instructions.
- Multilingual or market-specific supporting information.

Where QR is risky

- Consumers may not scan in ordinary disposal moments.
- Accessibility is not solved by QR alone.
- Digital content must remain accurate by package version and market.

Governance point

- The URL/page behind the QR code becomes a controlled compliance artifact.

Do not sell QR codes as a shortcut. Sell them as a governed information channel.

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Not every QR code is a DPP

PPWR creates digital labelling layers, not a universal packaging passport on day one

QR / data carrier

- A machine-readable entry point to required or supporting information.
- Can sit next to a physical label or support information where physical labels are not feasible.

PPWR digital labelling

- Reusable packaging systems.
- Sorting / destination information.
- Substances-of-concern digital marking once methodology details apply.

Formal DPP architecture

- Defined data fields, identifiers, access rights, persistence and registry/governance layers.
- More comparable to ESPR-style product passport architecture.

Phrase to use: “A QR code is a delivery method; a product passport is a governed record.”

Why this matters: Customers may say “packaging passport” when they really mean a structured compliance record. Clarify whether they mean a formal legal DPP, a QR-linked label page, or an internal data file supporting PPWR/EPR/DoC.

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Reusable packaging has the clearest QR/data-carrier path

But timing is staged and tied to implementing rules

What Article 12 does

- Reusable packaging must bear a label informing users that it is reusable.
- It must also provide a QR code or other standardized, open digital data carrier.
- The data carrier should provide information on reuse systems, collection points and related reuse information.

Timing

- The reusable packaging label/QR requirement is later than the 2026 general application date.
- It is tied to 12 February 2029 or a later trigger based on the relevant implementing act.
- Do not describe it as an August 2026 universal QR requirement.

Implementation questions

- Who operates the reuse system and maintains collection point information?
- How is the packaging version linked to the correct digital page?
- What happens if reuse-system rules or markets change after packaging is printed?

Key nuance: PPWR does not currently require a QR code on every package. Reusable packaging is the clearest mandatory data-carrier example.

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Substances of concern: the hidden digital-labelling issue

Chemical data must connect to packaging components

What Article 12 points toward

- Packaging containing substances of concern will use standardized, open digital-marking technologies once the methodology applies.
- The methodology is expected to identify substances of concern and related concentration information.
- This is separate from the consumer sorting label but may interact with the same data carrier strategy.

What regulatory teams need

- Substance name and identifiers.
- Concentration and material location within the packaging unit.
- Supplier evidence for coatings, inks, adhesives, layers and additives.
- Rules for confidential vs public information.

HazCom link

- SDS and chemical compliance data can support the evidence layer, but SDSs are not a complete packaging BOM.
- The implementation challenge is connecting chemical data to the specific packaging component or material layer.

PPWR labelling is packaging-focused, but some of the hard data work will look familiar to chemical regulatory teams.

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Compostable packaging: additional label complexity

Compostability is not the same as “throw anywhere”

Figure 31 Proposed complementary ‘do not throw in nature’ labels for compostable packaging a) with and b) without text.

JRC Figure 31: Proposed “do not throw in nature” labels.

Why it matters

- Compostable packaging can be misunderstood by consumers.
- PPWR aims to distinguish home composting, industrial composting and incorrect disposal in nature.

JRC proposal

- Proposes complementary “do not throw in nature” indications for compostable packaging.
- Potential use of text, pictograms and language-specific information.

Implementation risk

- Space, translation, consumer understanding and local composting infrastructure remain difficult.

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Symbols, Green Dot and fragmentation

Mandatory vs voluntary marks

Current symbols: first identify the legal source

Do not treat every mark as if it has the same status

Legally imposed

- National or regional sorting labels, DRS marks or other labels required by law. Article 12 transition/removal rules are most relevant here.

Scheme-required

- Marks required through PRO/EPR or DRS participation rules, contracts or national implementation practice. They may survive if compatible.

Voluntary

- Company-designed recycling icons, environmental claims or optional material ID symbols. Removal or retention is a company decision, subject to misleading-claims risk.

Technical ID

- Material-identification codes such as those under Decision 97/129/EC may identify material rather than provide sorting instructions.

Example: PET resin-identification mark

Image source: Packaging Symbol part 5 (user-provided article)

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Green Dot: likely more complicated than “keep” or “remove”

It is an EPR participation/financing signal, not a consumer sorting instruction

What the Green Dot does

- It signals that the producer participates in and/or finances a recovery/EPR system in relevant markets.
- For consumers, it can look like a recycling instruction even though that is not its core meaning.

Article 12(9) direction

- PPWR points toward a digital EPR identification route from 12 February 2027.
- This aligns with the concept of proving EPR participation digitally, for example through QR/data-carrier logic.

Why it may survive

- A new Green Dot / QR-style symbol aims at the same proof-of-EPR-participation function.
- If the symbol is scheme-required or compatible with Article 12(9), it may remain relevant.
- Do not assume Article 12 eliminates it automatically.

How to advise companies

- Check whether the mark is required by national law, PRO rules or contract.
- Check whether it conflicts with future harmonised labels or misleads consumers.
- Track market-by-market requirements; one answer may not fit all Member States.

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National labels and old symbols: where transition risk lives

Harmonization does not make the old world vanish overnight

Article 12 transition logic

- Existing national/regional waste-sorting labels required by legislation are the main target of EU harmonization.
- The JRC proposal notes withdrawal timing tied to 12 August 2028 or 24 months after implementing acts, whichever is later.
- Packaging manufactured/imported before deadlines may have sell-through periods.

Voluntary symbols are different

- PPWR does not automatically force removal of every company-selected symbol.
- Voluntary marks still need review against confusion, green-claims and future harmonized-label consistency.
- Removal is often a business/legal risk decision.

Practical triage question for every mark on pack

- Why is it there? Legal requirement, national rule, PRO requirement, DRS scheme, retailer contract, technical material ID, voluntary claim, or legacy artwork?
- If the team cannot answer, the mark should go into the PPWR label risk register.

This is where PPWR can feel like rebranded fragmentation: harmonized EU labels plus old marks, local schemes and transition inventory.

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EPR and DRS symbols are not side issues

They can remain relevant even under a harmonized EU label system

EPR symbols

- Article 12(9) creates a pathway for EPR-compliance identification in digital form.
- EPR marks connect to producer registration, fee payment and scheme participation.
- They are not necessarily consumer sorting instructions.

DRS symbols

- Deposit-return packaging can have separate deposit-return labels.
- Article 12 transition language includes DRS-specific treatment and possible colour labels.
- Do not assume DRS labels disappear when sorting labels are harmonized.

Why customers ask

- They need to know which mark supports which obligation: consumer sorting, EPR proof, DRS participation, recycled-content claim or material ID.

What to operationalize

- Packaging master data must support labels and EPR reporting: material, weight, market, producer role, scheme membership and DRS status.

One dataset can feed multiple outputs, but the outputs are not interchangeable.

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Timeline and transition

What changed after 12 August 2026

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PPWR labelling timeline: staged and now uncertain

Dates should be explained with “or later” triggers

Date	Milestone	What it means
11 Feb 2025	Entry into force	Regulation (EU) 2025/40 enters into force.
12 Aug 2026	General application + missed label-act deadline	Commission was expected to adopt Article 12/13 label specifications/methodologies; detailed label acts were not adopted by the reported deadline.
12 Feb 2027	EPR identification pathway	Article 12(9) digital EPR-symbol pathway becomes relevant.
12 Aug 2028 or later	Material-composition label	Harmonized material label applies 12 Aug 2028 or 24 months after relevant acts enter into force, whichever is later.
12 Feb 2029 or later	Reusable label + QR/data carrier	Reusable packaging label and QR/data carrier applies 12 Feb 2029 or 30 months after relevant act, whichever is later.
2030	SoC digital marking methodology and circularity gates	Substances-of-concern digital-marking methodology and broader recyclability/recycled-content expectations continue to mature.

> The later-trigger structure means the Commission delay can shift practical label application timing, while still compressing planning time once the act is issued.

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Why industry is concerned about the delay

The final graphic may look simple; the rollout is not

Artwork lead time

- Packaging redesign, supplier proofs, customer approvals and print runs can take months across a portfolio.

SKU and market complexity

- Multiple markets, languages, DRS/EPR schemes and packaging formats can split one global artwork into multiple versions.

Data readiness

- Material composition, component logic and current-symbol inventory may not exist in one reliable system.

Transition stock

- Old stock, sell-through, import timing and printed packaging inventory must be controlled against trigger dates.

Implementation challenge: once the final act lands, companies may have about 24 months to apply the harmonized labels - but the data foundation must already exist.

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After 12 August 2026: what is actually “now” for labels?

Keep immediate obligations separate from future harmonized pictograms

Now: Article 15 traceability-style basics

- Packaging must carry type, batch, serial number or equivalent identification where required.
- Manufacturer name/trade name, postal address and electronic contact details should be available as applicable.
- This is not the same as the future harmonized material-composition pictogram.

Future: Article 12 harmonized labels

- Material-composition label: 2028 or later trigger.
- Reusable packaging QR/data carrier: 2029 or later trigger.
- SoC digital marking methodology: separate future milestone.

Why this distinction matters

- Customers may confuse August 2026 documentation/traceability/substance obligations with the future EU pictogram label deadline.
- Regulatory teams should stop premature reprinting while still building the Article 12 data model.

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HazCom operating model

From label rule to controlled workflow

3E

PPWR label data model

The same core data supports labels, EPR reports and technical documentation

Packaging identity

- Package ID
- SKU links
- format/function
- EU markets

Material composition

- components
- layers
- weights
- composite logic

Market logic

- Member State
- language
- EPR/PRO
- DRS status

Evidence

- supplier declarations
- test reports
- SDSs
- SoC screening

Output

- pictogram
- QR/data carrier
- EPR/DRS mark
- DoC/technical file link

One governed packaging data model should feed Article 12 labels, Green Dot/EPR proof, DRS marks, supplier evidence and authority-response files.

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Evidence chain: from supplier to label

A label is only as defensible as the data behind it

Supplier

Material specs, declarations, SDSs, test reports

→

Packaging owner

Component list, weights, function and market mapping

→

Regulatory review

Article 12 applicability, exceptions and mark review

→

Artwork / PLM

Template, version control and implementation date

→

Market surveillance

Technical file, DoC link and authority response

Control points to document

- Supplier change, material change, new market, new PRO/DRS requirement, new implementing act, label-spec revision, artwork version, old-stock/sell-through decision.

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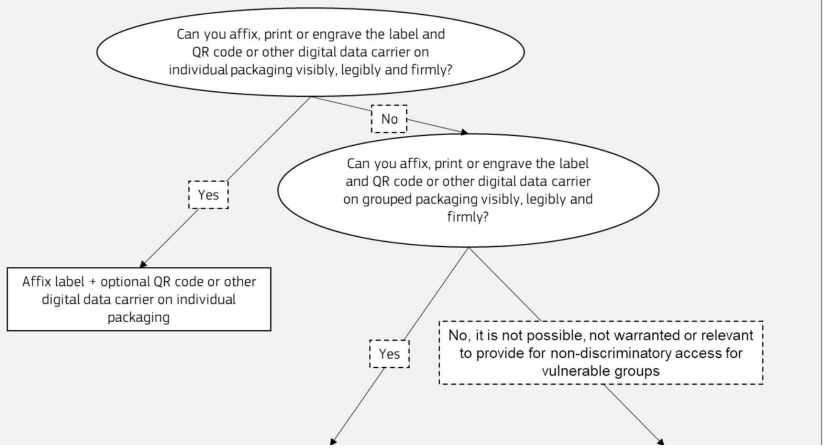
Decision tree: physical label, grouped packaging or digital-only?

JRC proposal illustrates the kind of decision logic companies may need

code or other open data carrier).

Both for individual and grouped packaging, digital data carriers may complement physical labels by providing additional or more detailed information, but should not replace them where physical labelling is feasible.

Figure 26. Decision tree to decide if labels must be attached to individual packaging, grouped packaging, or only via QR codes or other digital data carrier only.



JRC Figure 26: physical label / grouped packaging / digital-only decision tree.

Use it as a concept

- Start with whether the label can be visibly, legibly and firmly applied to individual packaging.
- If not, assess grouped packaging.
- If neither works, digital access may become the fallback.

Do not overstate it

- The exact decision logic may change in the final act.
- Digital-only should not be treated as the default when physical labelling is feasible.
- Accessibility remains a constraint.

Business question: which SKUs are too small, too crowded, or too technically difficult to label physically?

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Risk register for the labelling transition

Track uncertainty explicitly instead of burying it in artwork comments

Risk	What can go wrong	Control
Implementing act status	Final label specs not adopted or recently changed	Regulatory watch owner
JRC variance	Final act differs from JRC proposal	Scenario plan and avoid early printing
National mark conflict	Local mark coexists with EU pictogram or creates confusion	Market-by-market review
Green Dot/EPR proof	Scheme-required mark changes to QR or digital proof	PRO rule monitoring
Data gap	Material/component evidence incomplete	Supplier campaign and evidence scoring
Old stock	Printed packaging crosses transition dates	Inventory and sell-through controls

Transition uncertainty should have owners, triggers and controls - not just notes in a slide deck.

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First 90 days: stabilize the foundation

Do not wait for final pictograms to build the label system

1

Build packaging inventory

Format, function, components, materials, weights, EU markets and operator roles.

2

Inventory current marks

Triman, Green Dot, material ID codes, DRS marks, voluntary claims, recycling icons and retailer marks.

3

Map Article 12 applicability

Material label, reuse label, QR/data carrier, DRS, EPR identification, SoC digital marking and exclusions.

4

Set change controls

Artwork owner, regulatory owner, final-act trigger, sell-through rule and authority-response pathway.

Output: a portfolio map showing which packaging families are label-ready, data-gap, or high-risk once the act is published.

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Next 3–18 months: move from triage to program

Goal: repeatable label governance, not one-time cleanup

Standardize label determinations

- Create a template for Article 12 scope, exclusions, market rules and evidence basis.

Embed supplier controls

- Use declaration templates for material composition, layers, SoC, coatings, adhesives and change notifications.

Connect systems

- Link PLM, artwork management, SDS repository, supplier data, EPR reporting and regulatory watch.

Scenario plan

- Plan for final act variations: label design, colour/text rules, QR requirements, national mark treatment and Green Dot/PRO guidance.

The final implementing act should trigger execution, not the start of data discovery.

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Case study: filled food product sold in three EU markets

One package can trigger multiple label workstreams

Package facts

- Plastic-coated paper cup + plastic lid + printed sleeve.
- Sold online and in retail.
- Food-contact; EU markets: France, Belgium and Netherlands.

Immediate data checks

- Material composition by component, weights, coatings/inks/adhesives.
- Current marks: Green Dot/PRO, Triman/Info-tri, DRS?, claims?
- EPR producer role and market registrations.

Future Article 12 questions

- Which harmonized material labels will apply?
- Will label be grouped, component-specific or digitally supplemented?
- Will any current national mark need removal or coexistence planning?

Decision point

- Do not design the final label yet; design the data and decision workflow now.
- Flag any nonfinal JRC-based artwork as scenario only.

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Implementation traps to catch early

Small label assumptions can create portfolio-scale rework

- Assuming the JRC proposal is final label artwork.
- Calling every QR code a digital product passport.
- Treating voluntary symbols and legally mandated national labels the same way.
- Assuming Green Dot must disappear instead of checking its EPR/PRO basis and Article 12(9) digital path.
- Printing final-looking EU labels before the implementing acts are adopted.
- Using SDS data as the whole packaging data source.
- Ignoring old-stock, import-date and sell-through controls.
- Forgetting that language, DRS and EPR scheme layers may persist.

> The main risk is not “wrong icon.” It is a mismatch between legal trigger, data source, mark source, label output and market timing.

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Does PPWR deliver harmonization?

Probably more harmonized, but not frictionless

Factor	Verdict	Why
Harmonized EU pictograms	High opportunity	Can reduce inconsistent consumer sorting labels once final acts apply.
Implementing-act delay	Current risk	Final rules are late, so companies face uncertainty and planning compression.
National/EPR/DRS layers	Persistent risk	Scheme and Member State operations can continue to drive differences.
Voluntary symbols	Company decision	PPWR does not automatically remove all voluntary marks; review for confusion and claims risk.
Data readiness	Critical dependency	Without material and supplier data, harmonized labels can still be wrong.

Balanced answer: PPWR creates a harmonized label architecture, but companies will experience it through delayed secondary rules, national scheme layers and existing mark inventories.

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Five takeaways for regulatory professionals

What to remember after the session

- ☐ Article 12 labelling is staged; the harmonized material-composition label is not a finished August 2026 artwork requirement.
- ☐ The Commission missed the expected deadline for detailed label implementing acts, so the JRC proposal is the best preview but not final law.
- ☐ The JRC label images are useful for explaining likely direction, but final colours, pictograms, text rules and QR logic may differ.
- ☐ Green Dot and other symbols need source-based triage: legal mandate, scheme requirement, DRS/EPR proof, technical ID or voluntary claim.
- ☐ The practical work now is data and governance: packaging inventory, mark inventory, supplier evidence, Article 12 decision rules and artwork change control.

Bottom line: wait for the final act before printing the EU label, but start building the label evidence system now.

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Q&A

Suggested discussion prompts

- Which existing packaging marks are legally required, scheme-required or voluntary in your organization?
- Who owns the Article 12 label determination: regulatory, packaging, sustainability, EPR, artwork or legal?
- Where does your company store component-level packaging material data?
- What would break if the final implementing act differs from the JRC proposal?
- How will you manage Green Dot / EPR proof if schemes move toward QR or digital identification?

Use Q&A to identify where the audience is already struggling: mark source, final-act uncertainty, packaging data, or artwork governance.

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Reference sources to keep close

Primary and supporting materials for final validation

- Regulation (EU) 2025/40 on packaging and packaging waste: Articles 12, 13, 15, 44-45, 68, 71 and Annex VII.
- Directive 94/62/EC and Commission Decision 97/129/EC: transition context for legacy packaging/material-identification systems.
- Directive (EU) 2019/904 and Regulation (EU) 2019/1020: instruments amended by PPWR.
- Directive 2008/98/EC (Waste Framework Directive): waste hierarchy and waste-management context.
- JRC technical proposal on EU harmonised waste sorting labels under PPWR, 2026: technical preview only; not final implementing act.
- Packaging Europe / Envirotec, August 2026 reporting: Commission missed deadline for PPWR labelling implementing acts and industry concerns about timeline.
- Packaging Symbol part 5: material-identification codes, Green Dot and symbol-confusion framing.
- Regulation (EU) 2024/1781 (ESPR): DPP comparison only, not a PPWR passport source.

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