

CONAI information note to companies: publication of the Joint Research Centre (JRC) technical proposal on harmonised labelling in Europe

On **13 January 2026**, the **Joint Research Centre (JRC)** of the European Commission published the technical document “**JRC technical proposal on EU harmonised waste sorting labels under the PPWR**”¹.

This work represents a **technical and scientific input** developed by the JRC on the basis of consultations with experts and citizens, behavioural experiments, and analyses of national best practices. **It does not constitute nor anticipate the final labelling criteria**, which will be defined only through the European Commission’s implementing acts. The document outlines hypotheses on a modular structure, pictograms, colours and variants (colour + text, etc.), but it remains subject to revisions based on the ongoing institutional discussion (comitology).

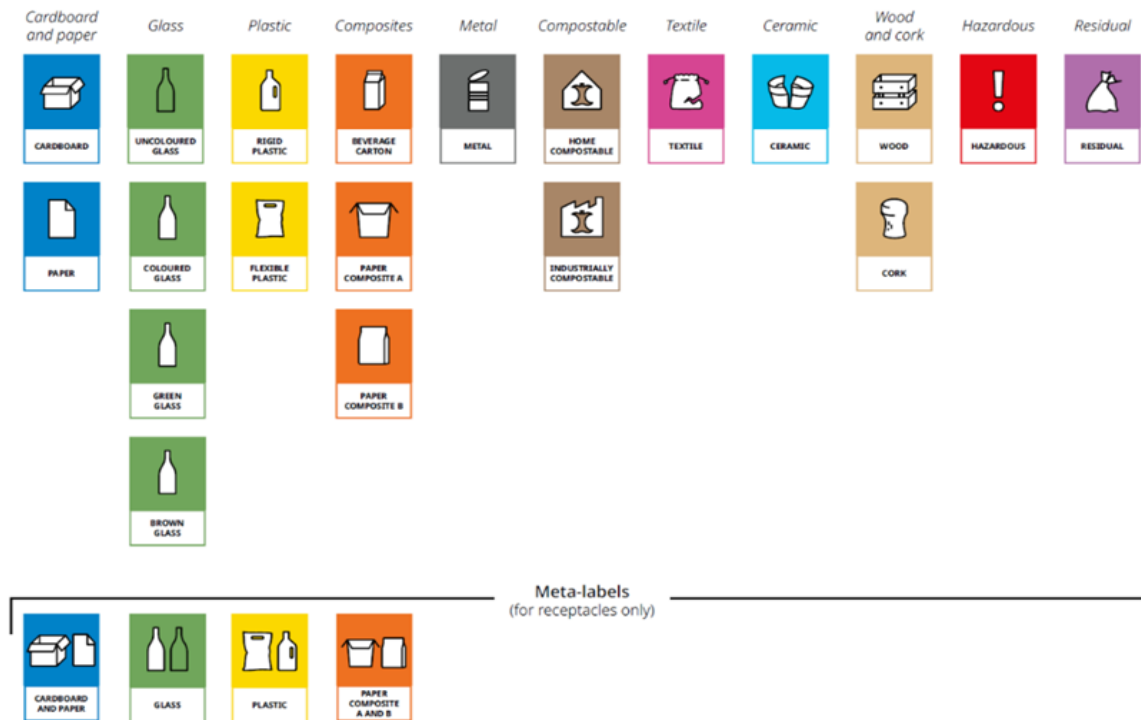


Warning: this is **not binding or final criteria**, but a **proposal by the JRC to the European Commission**. For this reason, **it does not constitute nor anticipate the final labelling requirements**, and **only with the adoption of EU implementing acts and the repeal of Decision 97/129/EC will the transition to harmonised labelling take place.**



¹ <https://publications.jrc.ec.europa.eu/repository/handle/JRC141706>

JRC proposal for harmonised labelling



Source: JRC technical proposal on EU harmonised waste sorting labels under the PPWR

Legislative process underway

Articles **12(6)** and **13(2)** of **Regulation (EU) 2025/40 (PPWR)** provide that by **12 August 2026** the European Commission shall adopt **implementing acts** defining:

- a harmonised label for packaging;
- a harmonised label for waste collection containers.

These acts must be approved through the **examination procedure (comitology)** with the committee of Member States, with possible involvement of the European Parliament and the Council.

The obligation to apply the harmonised labelling will commence on **12 August 2028** (or 24 months after the entry into force of the implementing acts), with a transitional period for adaptation. **At present, there aren't confirmed timelines for the conclusion of the process.**

Pending the entry into force of the labelling obligation under **Regulation (EU) 2025/40 (PPWR)**, **the current national legislation continues to apply in Italy**. This means that **no immediate changes are expected for Italian companies**.

The obligation for environmental labelling of packaging laid down by **Legislative Decree 116/2020** (in force since **1 January 2023**) therefore remains applicable, namely:

- alphanumeric material identification according to **Decision 129/97/EC** (e.g. “PET 01”, “PAP 20”, etc.);
- for B2C packaging, instructions for separate waste collection (e.g. “Separate collection – paper”, “Separate collection – plastic”, etc.).

All the information on the current Italian packaging labelling requirements is available at: <https://www.etichetta-conai.com/>

CONAI guidelines remain the operational reference; **only with the adoption of the EU implementing acts and the repeal of Decision 97/129/EC will the transition to harmonised labelling begin**.

Stock management

Reference is made to **Recital 187 of Regulation (EU) 2025/40**, which currently represents the main available legal reference concerning stock management.

“(187) It is appropriate to repeal Directive 94/62/EC as from the date of application of this Regulation. However, in order to ensure a smooth transition and continuity until the adoption by the Commission of new provisions pursuant to this Regulation, as well as continuity in the application of the Union’s own resources system as regards the own resource based on non-recycled plastic packaging waste, it is appropriate that certain obligations laid down in that Directive concerning labelling, recycling targets and transmission of data to the Commission remain in force for a certain period of time.”

In the **PPWR FAQs²** published on **30 March 2026**, the issue of warehouse stocks is addressed in the context of the transitional regime. This provides that **packaging already placed on the EU market before the date of application of specific requirements** (generally **12 August 2026**), including packaging in stock, **does not need to comply with the new sustainability, labelling or recyclability obligations**, nor is any withdrawal or recall required

² https://environment.ec.europa.eu/publications/faq-packaging-and-packaging-waste-regulation-ppwr_en

(Recital 14 PPWR, cited in Section IV. Recyclability, FAQ 8, and Section XV. Assessment of the conformity of packaging, FAQ 9).

One of the key criteria relates to the definition of **“placing on the market”** (Article 3(10) PPWR: *the first making available of packaging, whether empty or containing a product, on the Union market*).

For **packaging containing PFAS**, the PPWR **does not provide for any transitional period for the exhaustion of stocks**, even if the products were manufactured before 12 August 2026. This means that stocks already stored, if placed on the market after that date, must comply with the PFAS limits; packaging sold before that date may continue to circulate freely without withdrawal obligations. The decisive criterion remains the moment of placing on the market.

Recycled content obligations apply only to packaging placed on the market from **1 January 2030**, or three years after the entry into force of the implementing act referred to in **Article 7(8)**, whichever is later. However, **no stock exhaustion is foreseen for packaging already supplied to producers but not yet placed on the market by them before the deadline** (Section V. Recycled content, FAQ 6).

Recommendation to companies



Companies are advised **to follow regulatory developments closely** through official channels of **CONAI, MASE** and the **European Union**. It is recommended to **maintain current packaging layouts unchanged pending the adoption of the relevant implementing acts**, while at the same time starting **internal planning for compliance in the 2026–2028 timeframe**.

