

EN
P-002934/2026
Answer given by Ms Roswall
on behalf of the European Commission
(21.8.2026)

Packaging is placed on the EU-market when it is made available for the first time on the market by a manufacturer or importer of packaging. When the manufacturer or importer sells packaging or packaged product to a distributor, this operation is in legal terms considered as ‘placing on the market’ in line with the ‘Blue Guide’ on the implementation of EU product rules¹. Therefore, if packaging is held in a distributor’s warehouse, it will always be ‘placed on the market’.

Only packaging that has not been placed on the market by 12 August 2026 must comply with the requirements in the Packaging and Packaging Waste Regulation (PPWR)². Even packaging that has already been produced but not yet placed on the market before that date, must neither be destroyed, remanufactured or re-labelled. To meet the labelling requirements to be complied with as of the application date, which establishes that packaging must bear a unique identification as well as the manufacturer’s name and address, it is possible to provide this information by means of an accompanying document. The PPWR does not include a cut-off date by which stocks must be sold.

These clarifications will be included in an updated frequently asked question document for the PPWR, which is expected to be published in due course.

¹ Commission notice - The ‘Blue Guide’ on the implementation of EU product rules 2022, OJ C 247, 29.6.2022, pp. 1–152.

² Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, OJ L, 2025/40, 22.1.2025.