

The 2026 Regulatory Shifts: What Is Changing and How to Prepare



Two EU frameworks, Regulation (EU) 2022/1616 and Packaging and Packaging Waste Regulation (EU) 2025/40 (PPWR), are about to reshape how every producer, recycler, and converter in Europe proves the safety, traceability, and recycled content of their materials.

The rules are already in place. The question is how ready your systems are to meet them by 2026.

Why 2026 Matters

Starting in August and September 2026, both regulations move from development to enforcement. Their combined effect: producers, recyclers, and converters will need stronger control over testing data, sourcing, and documentation for recycled materials.

Regulation	Applies To	Enforcement	Core Focus
2022/1616 (Food-contact recycled plastics)	Recyclers and producers using recycled plastics in food-contact materials	16 Sept 2026	Authorized recycling processes, validated NIAS and purity testing, digital documentation
2025/40 (PPWR) (Packaging and Packaging Waste)	Packaging producers, converters, recyclers placing packaging on the EU market	12 Aug 2026	Recyclability and reuse design criteria, minimum recycled content, digital traceability and labeling

What These Changes Mean for Your Operations

- Testing expectations are tightening. Functional barrier validation and NIAS analysis must follow harmonized EU protocols through accredited laboratories.
- Packaging design must be evidence-based. Recyclability, purity, and content thresholds will need to be supported by verifiable data, not declarations.
- **Digital traceability becomes mandatory.** Regulators and brand owners will expect an electronic record that connects recycling process, material composition, and packaging output.

Where Most Companies Are Struggling Today



Inconsistent laboratory methods.
Different partners use varying parameters or detection limits, making results difficult to compare or defend.



Fragmented documentation.
Test results and certificates are stored in emails or local files, with limited version control or accessibility during audits.



Unclear accountability.
Responsibility for testing scope, supplier data, and reporting is often divided across departments, slowing action.

How Leading Producers Are Preparing

- ✓ **Map current exposure.** Identify all products, materials, and recycling processes that fall under the new frameworks.
- ✓ **Standardize testing protocols.** Align NIAS and purity methods with EU-validated parameters.
- ✓ **Consolidate laboratory data.** Centralize results from multiple labs and sites in a single, auditable system.
- ✓ **Run a pre-audit simulation.** Confirm whether reports can be produced instantly and defended.
- ✓ **Benchmark performance before enforcement.** Compare laboratory results, cost, and data completeness now to avoid last-minute corrections once the 2026 audits begin.

Timeline

Both frameworks are already law. What changes in 2026 is enforcement, along with the expectation that every data point, test, and authorization can be verified instantly.

→ The transition window is closing fast. Those who use 2025 to validate and centralize their data will be the ones who meet 2026 with confidence.

From Adoption to Enforcement: The Road to 2026

🚩 2022	📅 2025	🛡️ 2026
Foundation set for: Food-contact recycling rules and NIAS testing frameworks <ul style="list-style-type: none">• Reg. 2022/1616. adopted (Recycles plastic for food-contact materials)	Transition phase: Finalising protocols & validate data <ul style="list-style-type: none">• 2025/40 (PPWR) adopted (Packaging & Packaging Waste Regulation)	Enforcement phase: <ul style="list-style-type: none">• Both frameworks fully binding across EU• Audit-readiness required• 12 Aug 2026: PPWR applies across EU• 16 Sept 2026: Reg. 2022/1616 enforced for food-contact recycling

Where You Can Start Now

KÖR Group helps producers and recyclers align testing, documentation, and traceability systems with the upcoming EU regulations.

The transition window is closing fast. Those who use 2025 to validate and centralize their data will be the ones who meet 2026 with confidence.

A short conversation is often enough to map your current position and pinpoint the fastest route to full readiness.



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