



# EU Issues PPWR Draft Guidance and Q&A on Key Implementation Points

On 30 March 2026, the EU published a draft guidance document and a set of frequently asked questions on the Packaging and Packaging Waste Regulation (PPWR) (EU) 2025/40. The draft guidance focuses on key requirements such as hazardous substance control, recyclability implementation, and harmonised labelling, further clarifying the enforcement standards following the Regulation's entry into force on 12 August 2026.

## PFAS Control Requirements for Food Contact Packaging

1. The draft guidance recommends a three-step testing approach for compliance assessment:

- (1) Conduct total fluorine (TF) quantification; results below 50 mg/kg are considered compliant;
- (2) If total fluorine exceeds 50 mg/kg, use methods such as pyrolysis-GC/MS to determine whether fluorine is organic (PFAS) or inorganic; if organic fluorine is below 50 mg/kg, the sample is still considered compliant;
- (3) Apply the total oxidisable precursor (TOP) assay for direct measurement of the sample to verify compliance with the 25 µg/kg and 250 µg/kg concentration limits.

The Commission states that, based on the current available evidence, samples meeting the total fluorine requirements are expected to comply with PFAS limit values. The EU is also working towards the development of a harmonised PFAS testing approach.

2. PFAS control does not distinguish between intentionally added and unintentionally present substances; the same limit values apply. The EU currently has no plans to publish a specific restricted PFAS list, and the control covers all PFAS falling within the definition.

3. The draft guidance clarifies that packaging placed on the market before 12 August 2026 may continue to be sold without recall. Food contact packaging placed on the market from 12 August 2026 onwards must comply with PFAS limits. "Placing on the market" is defined as the transfer of ownership or possession; for imported packaging, it refers to completion of customs release for free circulation.





## Substances of Concern (SoC)-Related Arrangements

The European Commission plans to complete a targeted assessment by 2033 to review whether the current rules effectively reduce the level of substances of concern in packaging. The results of this assessment will serve as an important basis for determining whether additional concentration limits should be introduced.

## Phased Implementation of Packaging Recyclability Requirements

According to the Regulation, all packaging placed on the market from 12 August 2026 must meet basic recyclability requirements. Before 1 January 2030, manufacturers are only required to comply with the Packaging Waste Directive (PPWD) and the harmonised standard EN 13430:2004 on recyclability. After this date, the requirements set out in the EU implementing acts will apply.

## Harmonised Packaging Labelling Requirements

The draft guidance proposes that once the EU harmonised packaging material composition labelling system is introduced, Member States will no longer be allowed to maintain national labels alongside the harmonised label. This is intended to safeguard the functioning of the single market, avoid consumer confusion, and reduce cross-border compliance costs for companies.

It is recommended that companies refer to the draft guidance and official Q&A to initiate PPWR compliance preparations at an early stage, with a focus on key requirements such as PFAS and recyclability, while closely monitoring subsequent developments. As further implementing measures of the PPWR are expected to be released over the coming years, final compliance requirements remain subject to the officially adopted EU legislation and related implementing acts.

