

PPWR Compliance Checklist for European Food Brands

Regulation (EU) 2025/40 applies from **12 August 2026** — directly, in all 27 member states, with no grace period for new stock. This checklist covers the engineering side: what to verify, what to ask suppliers, and what can wait until 2030.

PFAS limits (food contact)	Heavy metals	Proof standard
25 ppb individual · 250 ppb sum (non-polymeric) · 50 ppm total fluorine. TF below 50 ppm = compliant.	Pb + Cd + Hg + Cr(VI) combined: max 100 mg/kg per packaging unit.	Accredited-lab Certificates of Analysis, per packaging type. Self-declarations are not proof.

A

Materials — verify before 12 August 2026

PFAS testing turnaround at accredited labs is 4–8 weeks. This block is a this-month job.

- ☐ List every food-contact packaging type you place on the EU market
Per structure (material + coating + grammage), not per SKU. One test report does not cover a different structure.
- ☐ Flag Tier 1 PFAS risks: grease-resistant papers, barrier coatings, laminates
Fluorochemistry was the industry default for grease resistance. Recycled fiber is a known non-intentional carrier.
- ☐ Request total fluorine (TF) data from suppliers of every flagged structure
Accredited laboratory, per packaging type. TF below 50 ppm = compliant, no further testing needed.
- ☐ Where TF exceeds 50 ppm: request PFAS vs non-PFAS origin evidence — or qualify an alternative material now
- ☐ Confirm inks, varnishes and adhesives are covered by the data
Compliance is assessed for the packaging unit as a whole, not the substrate alone.
- ☐ Verify heavy metals documentation (max 100 mg/kg Pb+Cd+Hg+CrVI)

B

Documentation — build the file

From 12 August 2026, EN 13428:2004 no longer gives presumption of conformity. Files must stand on their own.

- ☐ Determine your economic operator role per packaging type
Manufacturer, producer, importer or distributor — the role defines who issues the Declaration of Conformity. If your brand name is on the packaging, the obligation may sit with you.
- ☐ Collect or issue Declarations of Conformity for every packaging type
- ☐ Assemble technical documentation behind each DoC; remove reliance on EN 13428
- ☐ Check operator identification on packaging: name, trade name, postal address
- ☐ Confirm EPR registration in every member state where you first place packaging on the market
Registration complexity and lead time vary by country. Start with your largest markets.

C

Horizon — decide now, execute later

These are 2028–2030 obligations. Plan them into material decisions you are making anyway.

- ☐ Map your portfolio against 2030 recyclability grades
Grade A means 95%+ recyclability, B 80%+, C 70%+. Below 70% cannot be placed on the market from 2030. Grades will drive EPR fee modulation.

- ☐ For plastic packaging: note 2030 recycled content targets
Plastic parts under 5% of unit weight are exempt. Inks, paints and adhesives do not count as plastic.
 - ☐ Wait for final harmonized labelling pictograms before reprinting artwork
 - ☐ If replacing a structure anyway: qualify once for both 2026 PFAS and 2030 grades — not twice
A recyclable mono-material with PFAS-free barrier chemistry closes both requirements in one material decision.
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The 48-hour answer

Email us your current packaging structure — material, grammage, what it packs, your line type (HFFS / VFFS / other) — and we will tell you within 48 hours whether a PFAS-free, recyclable paper structure is realistic for your application. If it is not, we will tell you that too.

info@leoprint.eu · subject line "PPWR check" · leoprint.eu

Leoprint UAB is a European converter of printed sustainable packaging: PAP 22 mono-material flexible packaging, heat-sealable barrier papers with water-based coatings, banderoles, labels and paper bags. ISO 9001 · EN 15593 · FSC C132885 · PTS-tested recyclability · OK Compost (TÜV Austria).