

PPWR Compliance Checklist for European Food Brands

Regulation (EU) 2025/40 has applied since 12 August 2026 — directly, in all 27 member states, with no grace period for stock placed on the market after that date. Anything not yet checked against it is a live compliance gap, not a deadline. This checklist covers the engineering side: what to verify, what to ask your suppliers, and what comes next in 2027–2030.

PFAS limits (food contact)	Heavy metals	Proof standard
25 ppb individual · 250 ppb sum (non-polymeric) · 50 ppm total PFAS, screened via total fluorine. TF below 50 ppm meets the 50 ppm limit; the 25 and 250 ppb limits are confirmed by targeted PFAS analysis.	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 now

PFAS testing turnaround at accredited labs is 4–8 weeks. If this block is not done yet, it is overdue — start this week.

- ☐ 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 fibre is a known non-intentional carrier.
- ☐ Request total fluorine (TF) data from suppliers of every flagged structure, plus targeted PFAS analysis for the 25 and 250 ppb limits
Accredited laboratory, per packaging type. TF below 50 ppm closes the 50 ppm limit.
- ☐ 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

Every packaging type on the EU market needs a Declaration of Conformity backed by technical documentation.

- ☐ 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
EN 13428 remains usable as a stopgap; plan to update the file against the PPWR's own minimisation criteria (Annex IV) before 2030.
- ☐ 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 2027–2030 obligations. Plan them into material decisions you are making anyway.

- ☐ If you pack tea or coffee: permeable tea and coffee bags and soft single-serve pods must be compostable from February 2028 — start material qualification now
- ☐ 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; from 2038 grade B is the minimum. 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 the final harmonised sorting labels before reprinting artwork (they apply August 2028 at the earliest)
- ☐ If replacing a structure anyway: qualify once — for the PFAS limits and the 2030 grades together, not twice
A recyclable mono-material with PFAS-free barrier chemistry closes both requirements in one material decision.

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 (99/100 unprinted, 94/100 printed) · OK Compost (TÜV Austria).