

PPWR Substance Evidence: Test Plan

For quality assurance and purchasing: which limit values apply, how deep the testing goes and what belongs in the technical documentation. Basis: Regulation (EU) 2025/40, Article 5 and Annex VII, Commission guidance C(2026) 3702, Commission FAQ 2nd edition, Section III. As at September 2026.

1. The limit values

REQUIREMENT	LIMIT VALUE	APPLIES TO
Heavy metals: sum of lead, cadmium, mercury and chromium VI (Art. 5(4))	100 mg/kg	All packaging, related to the unit including printing inks, varnishes and adhesives
PFAS per individual substance, targeted analysis (Art. 5(5)(a))	25 ppb	Only packaging with food contact, since 12 August 2026, no sell-through period
PFAS as the sum of the targeted analysis (Art. 5(5)(b))	250 ppb	as above
PFAS in total, including polymeric PFAS (Art. 5(5)(c))	50 ppm	as above
Duty of upstream suppliers to provide information where total fluorine exceeds 50 mg/kg (Art. 5(5)(c))	Evidence of which share of the fluorine is attributable to PFAS	Manufacturers, importers and downstream users within the meaning of the REACH Regulation
Minimisation of substances of concern (Art. 5(1))	No numerical value	All packaging; qualitative description in the documentation

2. Testing route for PFAS (food contact)

STEP	METHOD	RESULT
1 Total fluorine content	e.g. combustion ion chromatography	Below 50 mg/kg: compliant with all three limit values. Above that: step 2.
2 Organic fluorine	e.g. pyrolysis GC/MS	Organic fluorine below 50 mg/kg: compliant. Above that: step 3.
3 Targeted analysis	direct TOP analysis	Check against the values 25 ppb and 250 ppb.

According to the evidence available to the Commission, all samples that pass step 1 also meet the requirements of steps 2 and 3. A value above 50 mg/kg is not a non-conformity but the trigger for the next step. A harmonised test methodology is still being developed.

3. Risk classification per component

LEVEL	TYPICAL COMPONENTS	DEPTH OF EVIDENCE
Low	Unprinted corrugated board, uncoated papers, glass without recycled content, standard plastics without a barrier and without food contact	Supplier declaration with value, method and date
Medium	Multi-colour printed packaging, materials with recycled content, metal closures, coatings without food contact	Supplier declaration with basis of evidence; test report on a change of material, ink or supplier
Elevated	Food contact with a grease or moisture barrier, fluorinated coatings, recycled glass with conspicuous values, supply chains without a robust data basis	Test report; where there is food contact, total fluorine as the entry point

The reasons for the chosen depth of testing are part of the risk analysis under Annex VII and must be recorded in writing.

4. Documentation per component

COMPONENT, PART NO.	FOOD CONTACT	HEAVY METALS (MG/KG)	EVIDENCE AND METHOD	TOTAL FLUORINE (MG/KG)	EVIDENCE AND METHOD	RISK LEVEL

5. Text module for the supplier enquiry

For the packaging components supplied by you we require, under Article 16 of Regulation (EU) 2025/40, the following information per component: the sum of the concentrations of lead, cadmium, mercury and hexavalent chromium in mg/kg, stating the basis of evidence (test report or declaration), the measurement method and the date. Please include printing inks, varnishes, adhesives and coatings, as the limit value applies to the packaging unit as a whole.

For components with food contact we additionally require the total fluorine content in mg/kg. If this exceeds 50 mg/kg, we ask you under Article 5(5)(c) for evidence of which share of the measured fluorine is attributable to PFAS and which to non-PFAS. Please also confirm that your information covers both intentionally added and unintentionally present PFAS.

6. What belongs in the technical documentation

ITEM	NOTE
Measured value with unit per component	Heavy metals as a sum, PFAS separately by individual value, sum and total fluorine
Basis of evidence	Test report or supplier declaration; both are valid under Art. 16, including from suppliers outside the EU
Method or standard	e.g. CEN/CR 13695-1 for heavy metals, combustion ion chromatography for total fluorine
Date of the evidence	and a statement of the batch or the period for which it applies
Risk analysis	Why which depth of evidence was chosen for which component (Annex VII No. 2)
Minimisation under Art. 5(1)	Qualitative description: REACH candidate list, selection of printing inks, avoidance of additives
Changes	Test again in the event of a new material, new ink, new supplier or new coating (Art. 15(4))

7. Exceptions

CASE	RULE
Recycled glass	Exceeding the 100 mg/kg is permitted where it results from the use of recycled glass (Decision 2001/171/EC, FAQ III.14). Intentional introduction remains prohibited.
Plastic crates and pallets made of recycleate	Permitted in closed and controlled loops with an inventory and control system, a return rate of at least 90 per cent as well as their own declaration of conformity and annual report (Sections 14 to 18 VerpackDG).
Precedence of other legal acts	The limit value applies without prejudice to the restrictions under Annex XVII REACH and the rules for food contact materials under Reg. (EC) No 1935/2004.

Sources: Reg. (EU) 2025/40, Art. 5, Art. 15(4), Art. 16, Annex VII; Commission guidance C(2026) 3702; Commission FAQ 2nd edition, Section III, questions 14 and 16 to 20; VerpackDG Sections 14 to 18; Decision 2001/171/EC.