PFAS Compliance Self-Assessment Checklist for Packaging Buyers

EU PPWR - Regulation (EU) 2025/40, Article 5(5) - effective 12 August 2026

1. Scope and economic-operator roles

[ ] Is the packaging food-contact? (paper bags, food boxes, bakeware wrap, frozen-food
[ ] film, labels with adhesives or inks that touch food).
[ ] Identify the PPWR manufacturer, the EU importer, and the material supplier for this SKU.
[ ] Confirm who controls design, coating, and the final art seal (affects legal responsibility).

2. Material screening

[ ] Request a PFAS substance statement covering coatings, additives, processing aids,
[ ] and every food-contact layer.
[ ] Confirm no intentionally added PFAS; request a fluorine-source declaration where
[ ] recycled or unknown-history fibre is used.
[ ] Flag fluorinated grease-/water-resistant treatments for non-fluorinated replacement.

3. Testing approach (stepwise, per EC June 2026 guidance)

[ ] Screen total fluorine first (TF under 50 mg/kg generally indicates compliance).
[ ] If TF exceeds the threshold, commission targeted PFAS and sum analysis at an
[ ] accredited laboratory.
[ ] Request method, LOD/LOQ, analytes, precursor treatment, and sample/batch ID.

4. Documentation and Declaration of Conformity

[ ] Obtain a product-specific compliance declaration referencing (EU) 2025/40.
[ ] Compile the EU Declaration of Conformity and the Annex VII technical file.
[ ] Retain records 5 years for single-use packaging, 10 years for reusable packaging.

5. Supply-chain change control

[ ] Require supplier notification before any coating, material, or production-site change.
[ ] Keep batch traceability: product code, production date, and manufacturing site.

Illustrative checklist only. Verify thresholds, definitions, and deadlines against the official regulatory text and qualified legal or regulatory counsel. Prepared by Gervin Printing.