

# PFAS in food-contact packaging

## Article 5 restrictions — quick compliance guide

Regulation (EU) 2025/40 (PPWR), Article 5 · applicable from 12 August 2026

25 ppb · Individual

250 ppb · PFAS sum

50 ppm · Total fluorine

# 1. The applicable quantitative limits

Article 5 of the PPWR introduces strict restrictions on the presence of per- and polyfluoroalkyl substances (PFAS) in packaging intended for contact with food. The restrictions apply directly from **12 August 2026** and affect manufacturers and importers of flexible food-contact packaging.

|                                                                                      |                                                                                |                                                                      |
|--------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|----------------------------------------------------------------------|
| <p><b>25 ppb</b></p> <p>Individual PFAS (per substance), polymeric PFAS excluded</p> | <p><b>250 ppb</b></p> <p>Sum of all detected PFAS, polymeric PFAS excluded</p> | <p><b>50 ppm</b></p> <p>Total fluorine, including polymeric PFAS</p> |
|--------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|----------------------------------------------------------------------|

| Parameter                             | Limit           | Test method                                |
|---------------------------------------|-----------------|--------------------------------------------|
| Individual PFAS (per substance)       | 25 ppb (µg/kg)  | LC-MS/MS                                   |
| Sum of PFAS (all detected substances) | 250 ppb (µg/kg) | LC-MS/MS                                   |
| Total fluorine in packaging           | 50 ppm (mg/kg)  | Combustion ion chromatography (CIC) or XRF |

The 50 ppm total-fluorine limit is a fast screening step that rules out most PFAS if the value is below threshold. Above 50 ppm, individual LC-MS/MS testing is carried out to check compliance with the 25 ppb individual and 250 ppb sum limits.

## Scope and exceptions

Article 5 applies only to packaging intended for contact with food. Non-food packaging (industrial, cosmetics, detergents) is not covered by this specific restriction, but may be subject to other PFAS restrictions under REACH (Regulation (EC) No 1907/2006) or Regulation (EU) 2019/1021 (POPs).

## 2. What manufacturers need to do

- Request declarations from raw-material suppliers (films, inks, adhesives, lacquers, coatings) confirming the absence of PFAS or levels below the Article 5 limits;
- Run laboratory testing on finished products, especially for coated packaging (anti-grease for oily foods, anti-fog for chilled products, fluoropolymer-coated papers);
- Replace fluorinated inks and PFAS-based coatings with silicone-, wax- or polysaccharide-based alternatives where technically feasible;
- Document compliance in the DoC — the PPWR Declaration of Conformity must confirm compliance with Article 5 for food-contact packaging (see Module 4);
- Update technical specifications and supplier agreements with explicit PFAS criteria.

### Demonstrating compliance: two routes

|                         | Supplier declarations                                                                                                                        | Laboratory testing                                                                                                                      |
|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| <b>What it involves</b> | Collecting PFAS declarations from film, adhesive and ink suppliers, plus confirming that PFAS is not intentionally added in your own process | Analysis at an EN ISO/IEC 17025-accredited laboratory, 3-step methodology (total fluorine → total organic fluorine → targeted analysis) |
| <b>Indicative cost</b>  | Low — documentation and supplier correspondence effort                                                                                       | Significant — per structure tested                                                                                                      |
| <b>When it fits</b>     | Standard structures, no known PFAS sources and complete supplier documentation                                                               | On customer request, for uncertain structures or as periodic verification                                                               |

The two routes can be combined: supplier declarations as the documentary baseline, with targeted testing to validate the relevant product family.

### Sources

Regulation (EU) 2025/40, Article 5 · European Commission guidance C(2026) 3702 (5 June 2026, section dedicated to the PFAS testing methodology) · CEN/TS 15968 (reference methodology).

### Version log

| Version | Date      | Note                                                                                                                                     |
|---------|-----------|------------------------------------------------------------------------------------------------------------------------------------------|
| v1.0    | July 2026 | English translation of the RO PFAS module, mirroring the previously published EN quick-reference sheet. All figures confirmed unchanged. |

# VLM POLIPLAST

Flexible plastic packaging manufacturer

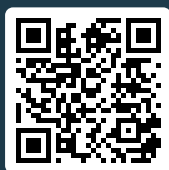
## Talk to the VLM Poliplast team

For PFAS testing and compliant ink/coating alternatives, contact the VLM Poliplast team.

[office@vmpoliplast.ro](mailto:office@vmpoliplast.ro) · +40 744 624 924 · [vmpoliplast.ro](https://vmpoliplast.ro)

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Author: Laura Ionescu — CFO, VLM Poliplast · writes on PPWR compliance



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