

Quick reference: PFAS compliance for food-contact packaging

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

1. The three PFAS limits under Article 5(5)

25 ppb Any individual PFAS <i>polymeric PFAS excluded</i>	250 ppb Sum of all PFAS <i>polymeric PFAS excluded</i>	50 ppm All PFAS combined <i>polymeric PFAS included</i>
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Food-contact packaging exceeding any of these limits cannot be placed on the EU market from 12 August 2026.

2. Demonstrating compliance: two routes

	Supplier declarations	Laboratory testing
What it involves	Collecting PFAS statements from suppliers of films, adhesives and inks, plus confirming that no PFAS is intentionally added in your own process.	Analysis at a laboratory accredited to EN ISO/IEC 17025, following the 3-step methodology (total fluorine → total organic fluorine → targeted analysis).
Indicative cost	Low — documentation effort and supplier correspondence.	Significant — per structure tested; the worst-case representative of each product family is tested.
Timeline	Days to weeks, depending on supplier responsiveness.	Weeks, depending on laboratory and method.
When it fits	Standard structures with no known PFAS sources and complete supplier documentation. A legitimate and sufficient route for Article 5 in most cases.	On customer request, for uncertain structures, incomplete supplier documentation, or as periodic verification of product families.
Limitations	Depends on the quality and coverage of the statements received; must be refreshed on any change of supplier or formulation.	Results are valid for the structure tested; composition changes require retesting.

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

3. The 3-step testing methodology (European Commission Guidance C(2026) 3702)

Step 1	Total fluorine (TF) screening. If the result is below 50 mg/kg fluorine, the packaging is considered compliant — no further analysis is needed.
Step 2	Total organic fluorine (TOF). Performed if TF exceeds the threshold, to separate the contribution of inorganic fluorine.
Step 3	Targeted PFAS analysis. Quantification of individual substances against the 25 ppb / 250 ppb limits.

A harmonised CEN/ISO standard for PFAS testing in food packaging has not yet been published; until its adoption, Guidance C(2026) 3702 provides the recommended operational methodology. Reference PFAS methodology: CEN/TS 15968.

4. Checklist: what to request from your raw material suppliers

- Technical data sheet (TDS) for each raw material — film, adhesive, ink, varnish.
- Safety data sheet (SDS), where applicable.
- PFAS statement under Article 5(5) — free editable template available on vlmpoliplast.ro.
- Applicable certificates of conformity (food contact, REACH).
- PPWR contract clauses: compliance warranties, documentation on request, notification of formulation changes.

5. Key deadlines

12 August 2026 — the PFAS limits of Article 5(5) become mandatory; from the same date, the EU Declaration of Conformity (Article 39, Annex VIII) is mandatory for all packaging placed on the EU market. The declaration and technical documentation are kept for 5 years (single-use packaging) or 10 years (reusable packaging), in accordance with Article 15(3).

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