

Customer Information Note on PFAS and Printing Inks in the Context of Article 5 (5) PPWR

Background

Article 5 (5) of the Packaging and Packaging Waste Regulation (PPWR) stipulates that, as from 12 August 2026, food-contact packaging shall not be placed on the market if it contains per- and polyfluorinated alkyl substances (PFAS) in a concentration equal to or above certain limit values:

- a) 25 ppb for any PFAS as measured with targeted PFAS analysis (polymeric PFAS excluded from quantification);
- b) 250 ppb for the sum of PFAS measured as the sum of targeted PFAS analysis, where applicable with prior degradation of precursors (polymeric PFAS excluded from quantification); and
- c) 50 ppm for PFASs (including polymeric PFAS).

To be noted: By 12 August 2030, the Commission shall carry out an evaluation to assess the need to amend or repeal this paragraph in order to avoid overlaps with restrictions or prohibitions on the use of PFAS laid down in accordance with Regulations (EC) No 1935/2004, (EC) No 1907/2006, or (EU) 2019/1021.

These provisions currently have led to considerable uncertainty along the value chain. As a result, printing ink manufacturers are receiving many requests regarding the PFAS content of printing inks. This information note aims to clarify the requirements for compliance for printing inks¹ in this context.

What does the printing ink manufacturer has to provide you with?

It should be noted that these provisions apply to the (printed) **food-contact packaging and not to the inks themselves**. Consequently, the declaration of compliance has to be issued for the packaging material and not for the components (such as the printing ink which typically represent a small portion by weight of the printed article). However, for the printed packaging to be compliant, any potential PFAS residues in its components need to be assessed. This has to be communicated in the value chain and then be included in the technical documentation.

It is important to distinguish between intentionally and non-intentionally use of PFAS. Where PFAS are not intentionally used, compliance may be demonstrated via a chain of custody approach, and no additional analytical testing is required.

Inks for food contact materials are manufactured without the intentional use of PFAS. Since PTFE (polytetrafluoroethylene) is a relevant material in the production facilities of many chemical raw materials (e.g. for linings of containers, seals, gaskets and O-rings) certain PFAS are to an extent ubiquitous and residual traces can occur either via residual amounts or also via water intake. These traces are however not expected to exceed the applicable threshold levels mentioned in the PPWR.

In 2025, the Swedish laboratory RI.SE, commissioned by the European Commission, carried out total fluorine (TF) analyses followed by targeted PFAS analysis on a range of paper/cardboard and plastic samples. The results showed that if PFAS are not intentionally added, the likelihood of exceeding any of the three concentration limits in Article 5 (5) of the

¹ According to the EuPIA definition, see here for more details: https://www.eupia.org/wp-content/uploads/2023/06/2023-05-18_EuPIA-Guideline-on-Printing-Inks-applied-to-Food-Contact-Materials.pdf

PPWR is extremely low. These results are referenced in the recent Q&A issued by the EU commission on March 30th 2026 under question No. 14.²

Consequently, it can generally be stated that the 50 ppm limit for the total fluorine (TF) content is not reached or exceeded by unintentional use of PFAS.

Additionally, it should be mentioned that **inks for food contact materials supplied by EuPIA members are produced in strictly GMP-controlled conditions.** Thus, the management of impurities and residues e.g. via the collection of information from suppliers and a careful assessment of any potential sources of contamination are a part of the standard procedure in the production of inks for food contact materials - not just for PFAS but to all type of potential residues.³

Therefore, for printing inks for food contact materials, it is recommended to confirm through appropriate supplier declarations that PFAS are not intentionally used. Whereas such documentation demonstrates the absence of intentional PFAS use, the printing inks can be used to manufacture packaging compliant within the meaning of Article 5(5) of the PPWR and no analytical testing is required.

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² https://environment.ec.europa.eu/publications/faq-packaging-and-packaging-waste-regulation-ppwr_en
[Skedung L.1 and Bjarnemark F.1: A Harmonized Workflow for PFAS Compliance Testing under EU Packaging and Packaging Waste Regulation and Emerging Universal Restrictions: A Food Contact Packaging Case Study. 1RISE Research Institutes of Sweden](#)

³ For more information please refer to the EuPIA GMP: https://www.eupia.org/wp-content/uploads/2025/11/2025-11-05_EuPIA_GMP_5th_version.pdf