

Customer Information Note: Information on printing inks and related products PPWR obligation 12 August 2026

Background

The Packaging and Packaging Waste Regulation (EU) 2025/40 (PPWR) is the EU legislative framework regulating all packaging and all packaging waste across all sectors ranging from industrial to households packaging applications.

It entered into force on 11 February 2025 and applies from 12 August 2026.

Over the coming years, a number of delegated and implementing acts are expected to specify and clarify how the PPWR will apply in practice. As a result, several information requirements can only be addressed at a later stage.

This information note specifies which information your printing ink manufacturer has to provide.

What is a Declaration of Conformity under PPWR?

It needs to be noted that a “Declaration of Conformity” (DoC) under PPWR is not the same as a “Declaration of Compliance” for Food Contact Materials (FCM).

A PPWR DoC¹

- is a formal statement by the packaging manufacturer that the packaging complies with the applicable PPWR requirements. It is part of the conformity assessment and is supported by the technical documentation of the packaging placed on the EU market.
- must confirm that the final packaging complies with the applicable PPWR requirements and must be made available to authorities upon their request within 10 days.
- is not required to be made public and, as a general rule, is not required to be provided to customers.

Relevant scenarios

For printing inks and related products manufacturers, the following two scenarios apply:

1. Printing inks or related products used by customers of the printing ink manufacturers to print on packaging.

Printing ink manufacturers are not the packaging manufacturer within the meaning of the PPWR.

Therefore, they are not obliged to draw up PPWR DoCs. Instead, they should provide relevant supporting information to enable their customers to prepare their own technical documentation and Declaration of Conformity, such as information on substances of concern, restricted substances, information relevant for recyclability assessments, compostability where relevant, food contact compliance aspects where applicable, and available supporting documents where required.

2. Printing ink manufacturers use packaging placing their packaged products on the EU market.

Only where an ink manufacturer acts as the packaging manufacturer does a PPWR DoC need to be drawn up. The packaging manufacturer is solely responsible for preparing and keeping the DoC and must make it available to competent authorities in Member States when required. These DoCs are not intended for customers and are not proactively forwarded to them.

¹ Under Article 39 of PPWR, it is the packaging manufacturer’s obligation to prepare a Declaration of Conformity, supported by technical documentation under Annex VII and covering the requirements in Articles 5–12.

PPWR Supporting Information for Printing Inks as of 12 August 2026 as Part of the Customer's Technical Documentation

As stated, the printing ink supplier should provide information that is relevant to the customer's specific packaging application and enable the drafting of a PPWR DoC.

The customer should identify which PPWR requirements apply to the final packaging, and the ink supplier will then provide available product-related information needed to support the assessment. This may include information on substances, restrictions, recyclability, compostability, reuse or food contact, where relevant.

Not all requirements will apply from 12 August 2026, as several delegated acts relating to the content of the DoC, such as recyclability and Substances of Concern (SoC) under the PPWR, will only be available at a later stage. Until then the requirements from the previous directive apply.²

This means that, by 12 August 2026, the ink manufacturer will only need to supply information on heavy metals, as already required under the previous legislation (PPWD), and on PFAS for food contact material applications.

- Article 5(4) PPWR updates the limits on lead, cadmium, mercury and hexavalent chromium in packaging compared to the Packaging and Packaging Waste Directive. The sum of these four heavy metals must not exceed 100 mg/kg in the overall packaging.
- Article 5(5) PPWR stipulates that food-contact packaging placed on the EU market must comply with the set PFAS concentration limits. PFAS are not intentionally added to printing inks, so it is highly unlikely that the PFAS concentration limits set in Article 5(5) would be reached or exceeded due to unintentional presence of PFAS. EuPIA has issued a dedicated customer information note on PFAS.³

In other words, at this stage the printing ink manufacturer only needs to provide customers with information on the absence of heavy metals and PFAS, in line with the considerations outlined above, to enable customers to fulfil their technical documentation obligations.

Any information on SOCs are available in the Safety Data Sheet.

Additional consideration: Recital 22 of the PPWR refers to the restriction on the use of BPA. In the meantime, the European Commission has published Commission Regulation (EU) 2024/3190 banning bisphenol A (BPA, CAS No. 80-05-7) and other bisphenols in food contact materials. Therefore, for food contact materials, ink manufacturers may issue additional information, if requested, on the non-use of BPA or derivatives in inks. EuPIA has already issued a dedicated customer information note on BPA.⁴

² See Point 6 in the EU Commission Guidance document for Regulation (EU) 2025/40 on packaging and packaging waste from 5 June 2026 - [EUR-Lex - C\(2026\)3702 - EN - EUR-Lex](#)

³ [2026-04-08-EuPIA-Information-Note-on-PFAS-and-Printing-Inks-in-the-context-of-PPWR.pdf](#)

⁴ [2026-05-15 EuPIA-Statement-on-BPA-and-Printing-Inks-for-Food-Contact-Materials.pdf](#)