



Implementation of Article 5 on the PFAS restrictions in food packaging

Online meeting 18 March 2026
European Commission, Directorate B
Unit B.1 Bioeconomy and sustainable materials

Packaging and Packaging Waste Regulation

2025/40 - Article 5(5) of PPWR

From 12 August 2026 food-contact packaging (FCP) shall not be placed on the market if it contains PFAS in a concentration equal to or above the following limit values:

- a) 25 ppb for any PFAS as measured with targeted PFAS analyses (polymeric PFAS excluded from the quantification)
- b) 250 ppb for the sum of PFAS measured as the sum of targeted PFAS analysis, where applicable with prior degradation of precursor
- c) 50 ppm for PFASs (including polymeric PFAS): if total fluorine exceeds 50mg/kg, the manufacturershall...proof of the quantity of fluorine measured as content of either PFAS or non-PFAS

Draft Guidance document for Regulation (EU) 2025/40

update March 2026

- **Market Surveillance authorities** as referred to in PPWR, based on Regulation (EU) 2019/1020 on market surveillance rules, are competent to verify compliance with the PFAS limits. MS design structure and approach of their market surveillance.
- In case of a risk to human health relating to FCP, the MSA shall alert the **authorities** referred to in Regulation (EU) 2017/625 on **official controls on feed and food** (includes food contact materials) for evaluation such risk.
- There is no harmonised methodology for PFAS in food contact packaging and laboratory capacities are limited, notably as regards PFAS analytics

=> stepwise approach

1. Total Fluorine (TF) quantification
2. If TF is above 50 ppm, methods such as pyrolysis-GC/MS can be used to confirm whether the fluorine is organic (PFAS) or inorganic
3. Direct TOP (total oxidizable precursors) analysis (*PFAS quantification*) is recommended to check compliance with the 25 ppb and 250 ppb concentration limits.

Based on the evidence currently available to the Commission, all samples compliant with the total Fluorine limit were also compliant with the 2 PFAS limits

State of play

- Close collaboration with DG SANTE, industrial stakeholders, researchers and the competent authorities in the Member States and the EU Reference Laboratory on Food Contact Material.
- COM engagement with Member States on laboratory testing of substances of concern .
- After the TAC meeting on 16 January – establishment of a PFAS task force
Role of the task force: To **draft a harmonised testing methodology for PFAS in food-contact material**
- European cooperation on market surveillance - ADCO - establishment of network between the MSAs for packaging

Thank you!