EU PPWR Kitchenware Packaging Compliance Checklist

Practical checklist for suppliers, manufacturers, importers and brand owners reviewing food-contact packaging under Regulation (EU) 2025/40

How to Use This Checklist

Use this document to organize the evidence needed for an EU PPWR packaging review. It is designed for food-contact packaging used with kitchenware products. Product compliance and packaging compliance should be assessed separately.

Important: A Total Fluorine (TF) result is not the same as a PFAS concentration. If a laboratory report states TF = 23.9 ppm, do not describe this result as PFAS = 23.9 ppm.

1. Packaging Identification

Checklist item	Done	Notes / evidence
Packaging component identified	☐	Record every packaging component: box, bag, label, coating, tape, insert, tray, etc.
Material identified	☐	Record paper/cardboard, plastic, metal, glass, wood, composite or other material.
Food-contact status confirmed	☐	Determine whether the packaging is intended to contact food or is already in contact with food for that purpose.
Packaging supplier identified	☐	Keep supplier name, specification and relevant declarations/test reports.

2. PFAS / Total Fluorine Review

Checklist item	Done	Notes / evidence
Test scope confirmed	☐	Confirm that the test sample is the actual packaging component being placed on the EU market.
Total Fluorine (TF) result available	☐	Record the laboratory method, result, unit and detection/quantification limit.
TF below 50 mg/kg (50 ppm)	☐	Under the Commission's 2026 guidance, a sample below 50 mg/kg TF could be considered compliant at Step 1.
TF above 50 mg/kg	☐	Further assessment may be needed to determine whether fluorine is organic/PFAS or inorganic.
Targeted PFAS / TOP testing reviewed where needed	☐	The Commission guidance recommends direct TOP analysis for the 25 µg/kg and 250 µg/kg concentration limits at Step 3.
PFAS result correctly described	☐	Do not convert a TF result into a PFAS concentration unless the laboratory specifically reports PFAS.

3. PPWR Chemical Requirements

Checklist item	Done	Notes / evidence
Lead (Pb) checked	☐	Part of the combined heavy-metal limit for packaging and packaging components.
Cadmium (Cd) checked	☐	Part of the combined heavy-metal limit.
Mercury (Hg) checked	☐	Part of the combined heavy-metal limit.
Hexavalent chromium (Cr VI) checked	☐	Part of the combined heavy-metal limit.
Combined Pb + Cd + Hg + Cr VI ≤ 100 mg/kg	☐	Check the applicable test report or supplier declaration.
Other chemical restrictions reviewed	☐	Check REACH and applicable food-contact-material restrictions in addition to PPWR.

4. Food-Contact Material Documentation

Checklist item	Done	Notes / evidence
Applicable food-contact legislation identified	☐	PPWR does not replace the separate EU food-contact-material framework.
Declaration of Compliance / relevant declaration available	☐	Keep applicable declarations from packaging/material suppliers.
Migration testing reviewed where applicable	☐	Check overall and/or specific migration requirements according to the material and intended use.
Intended food-contact conditions documented	☐	Record food type, temperature, contact time and other relevant conditions.

5. Packaging Sustainability Review

Checklist item	Done	Notes / evidence
Packaging material composition documented	☐	Record material and percentage where relevant.
Packaging minimization reviewed	☐	Document why the packaging format and material amount are appropriate.
Recyclability requirements reviewed	☐	Assess applicable PPWR recyclability requirements and implementation timing.
Recycled-content requirements reviewed	☐	Check whether future or current requirements apply to the packaging material.
Packaging labeling / information requirements reviewed	☐	Confirm applicable marking, sorting and information requirements.

6. Technical Documentation

Checklist item	Done	Notes / evidence
Product/packaging specification	☐	Keep current drawings, material specifications and component lists.
Test reports	☐	Keep PFAS/TF, heavy-metal and other relevant reports.
Supplier declarations	☐	Keep signed declarations and supporting evidence.
Risk assessment / compliance assessment	☐	Document the basis for the compliance conclusion.
Traceability information	☐	Record supplier, batch/lot and relevant production information.
Technical file maintained	☐	Chemical compliance should be supported by technical documentation under the PPWR requirements.

Quick PFAS Decision Guide

Question	Action
Is the tested item food-contact packaging?	If yes, review PPWR Article 5(5) PFAS requirements. If it is the kitchenware product itself, assess the product under the applicable food-contact-material rules instead.
Does the report say Total Fluorine (TF) = 23.9 ppm?	23.9 ppm = 23.9 mg/kg and is below 50 mg/kg. Under the Commission's current stepwise guidance, a sample below 50 mg/kg TF could be considered compliant at Step 1.
Does TF exceed 50 mg/kg?	Further investigation may be needed to determine whether the fluorine is PFAS or non-PFAS. The Commission guidance describes additional analytical steps.
Does the laboratory specifically report PFAS?	Compare the reported PFAS concentration with the applicable PPWR limits: 25 ppb for any targeted PFAS, 250 ppb for the applicable sum of targeted PFAS, and 50 ppm for PFAS including polymeric PFAS.

Key PPWR PFAS Values

Requirement	Value	Meaning
Any PFAS – targeted analysis	25 ppb	Limit from PPWR Article 5(5)(a); polymeric PFAS excluded from quantification.
Sum of PFAS – targeted analysis	250 ppb	Applicable where relevant, with prior degradation of precursors; polymeric PFAS excluded from quantification.
PFAS including polymeric PFAS	50 ppm	PPWR Article 5(5)(c). If TF exceeds 50 mg/kg, evidence may be requested to distinguish PFAS from non-PFAS fluorine.
Combined Pb + Cd + Hg + Cr VI	100 mg/kg	Packaging and packaging components under Article 5(4).

Official EU References

1. Regulation (EU) 2025/40 on packaging and packaging waste — Article 5, especially paragraphs 4 and 5.

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32025R0040

2. European Commission Guidance C/2026/3702 — guidance for Regulation (EU) 2025/40, including the stepwise approach for PFAS in food-contact packaging.

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=intcom:C(2026)3702

Disclaimer: This checklist is for general compliance-planning and supplier-documentation purposes. It does not constitute legal advice and does not replace an assessment of the specific packaging, intended use, applicable food-contact legislation, national enforcement practice, or the latest EU guidance.