



PPWR: DE NIEUWE REALITEIT VOOR VERPAKKINGEN

QUALITY DAYS - VERPAKKING: VAN WET NAAR WERKVLOER

An Vermeulen & Brecht Van Der Hoeven

23/04/2026 Wevelgem



PACK4FOOD

MISSION & VISION

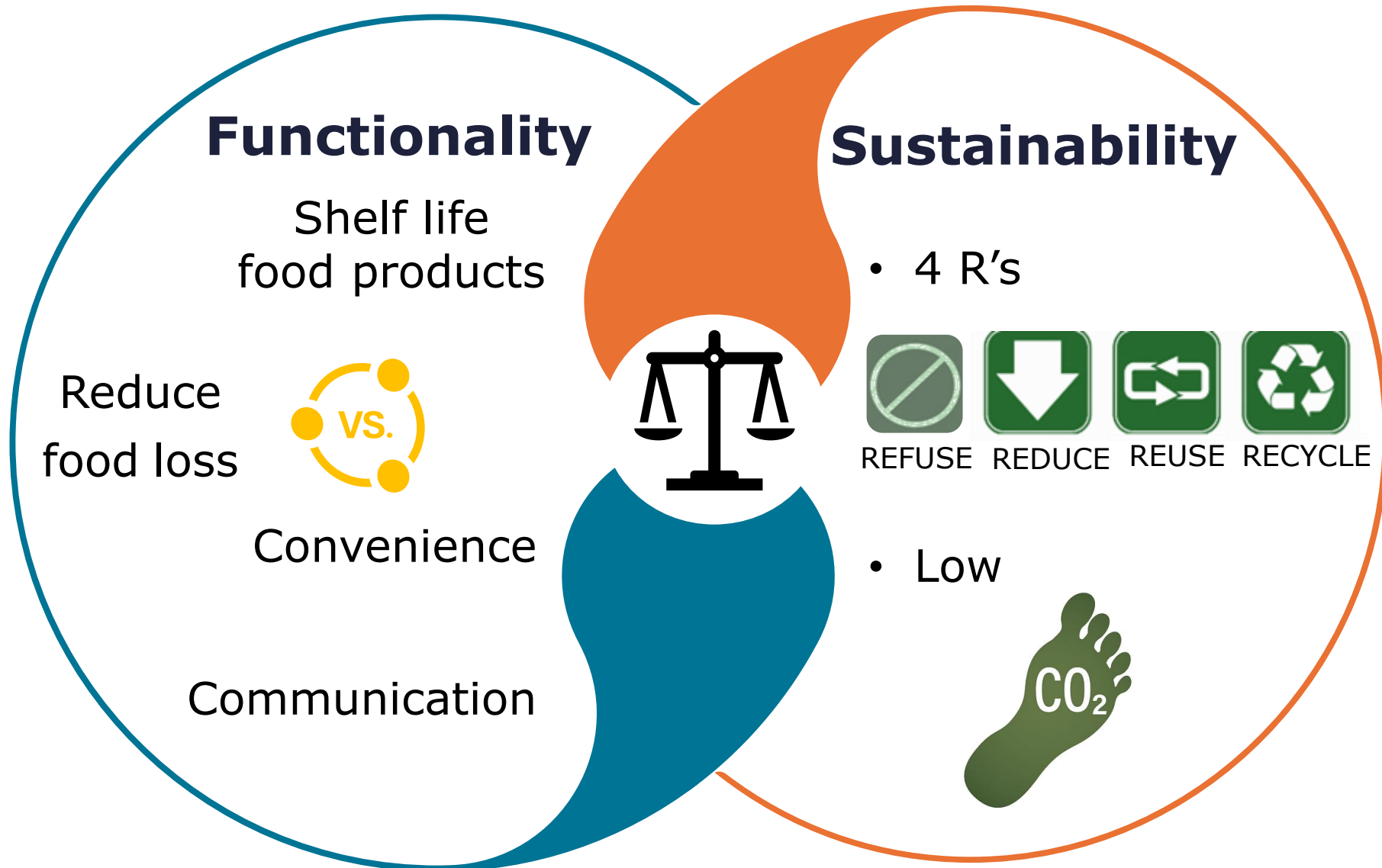


PACK4FOOD

OUR NETWORK



SUSTAINABLE FOOD PACKAGING

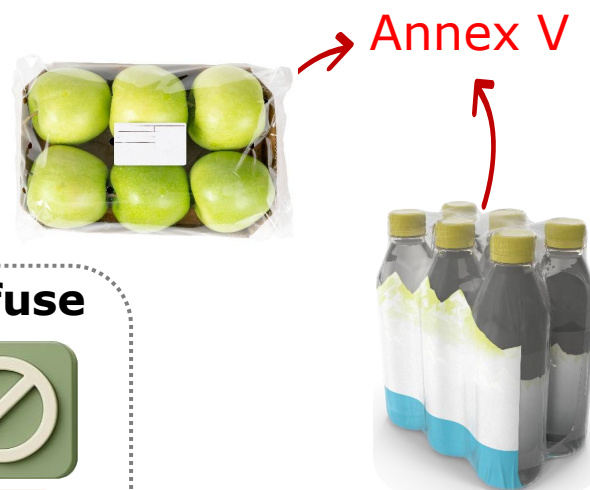


CHALLENGES RELATED TO LEGISLATION

PACKAGING & PACKAGING WASTE REGULATION

“All packaging that is placed on the market, shall be recyclable”

Minimum plastic recycled content, as of January 1st 2030



Annex V

12/08/2026



What? ✓
 When? ✓
 How?

Secondary legislation under development





PACKAGING & PACKAGING WASTE REGULATION

DISCLAIMER

This presentation is based on the current state of affairs regarding the Packaging and Packaging Waste Regulation (PPWR) and the understanding thereof at the time of preparation. The content is intended for informational purposes only and does not constitute legal or professional advice. Any use of the information presented is at the sole responsibility of the user.

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Minimum plastic recycled content, as of January 1st 2030

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Recycle



Refuse



4 R strategy

Reuse



Reduce



REFUSE & REDUCE

BAN ON CERTAIN PACKAGING FORMATS



REFUSE

BAN ON PFAS IN FOOD PACKAGING

When?

12/08/2026

Food-contact packaging shall not be placed on the market if it contains PFAS in a concentration equal to or above the specified limit values

> 25 ppb

> for any PFAS, as measured with PFAS analysis

> polymeric PFAS excluded from quantification

> 250 ppb

> For the the sum of PFAS measured as the sum of targeted PFAS analysis

> Where applicable with prior degradation of precursors (polymeric PFAS excluded from quantification)

> 50 ppm

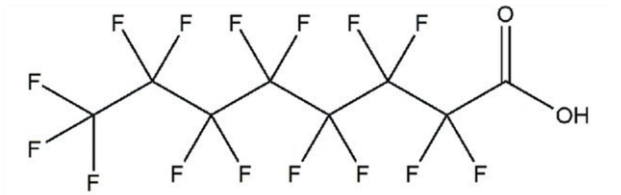
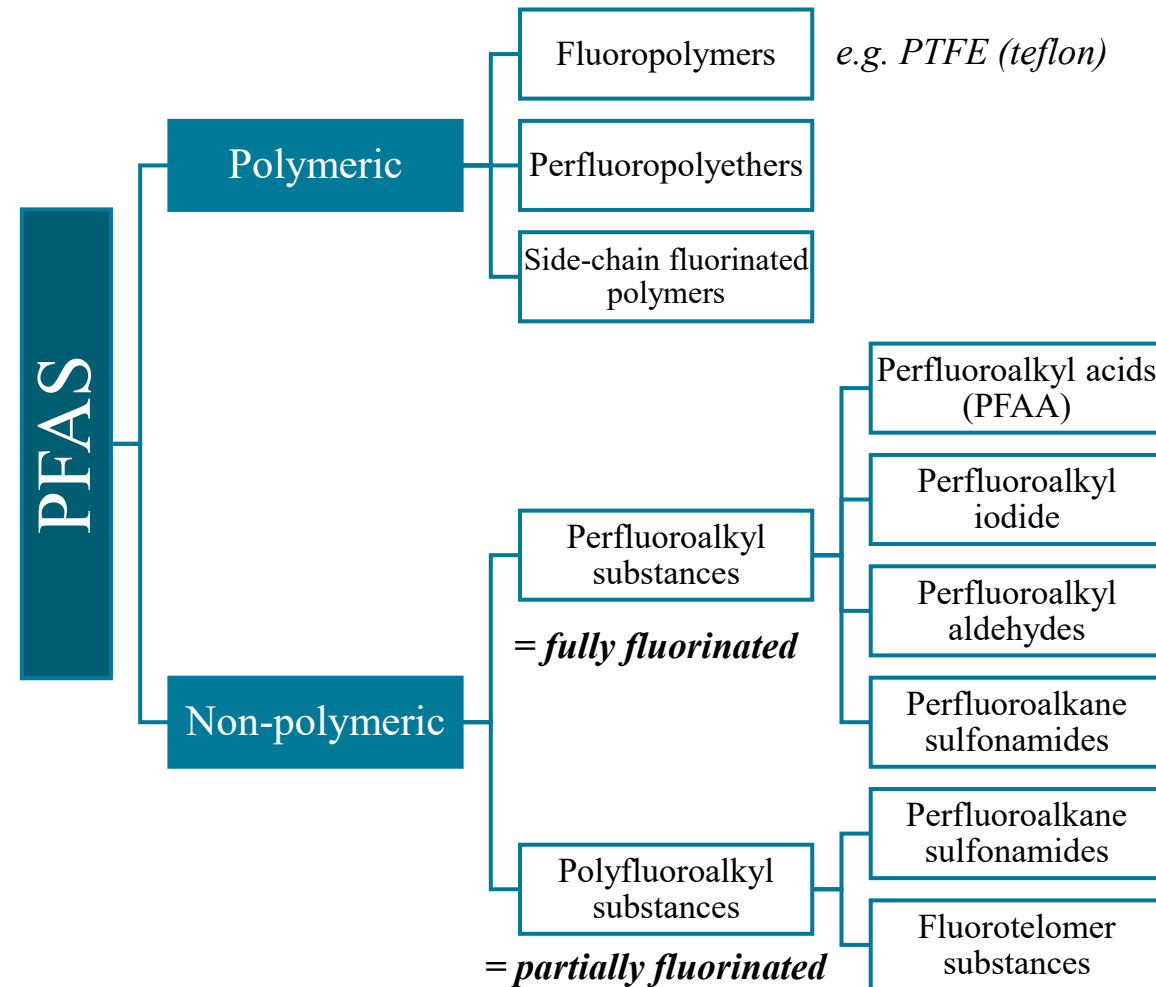
> For PFASs, including polymeric PFAS



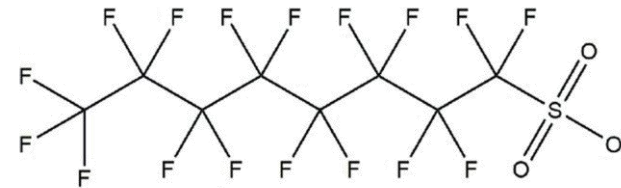
How?

REFUSE BAN ON PFAS

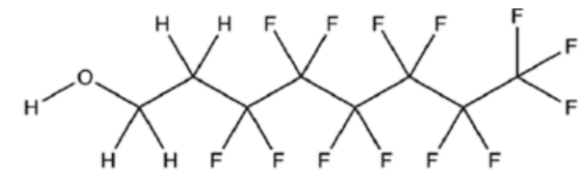
- > Alkyl chains with fluorine substitutions and functional groups (e.g. sulfonic acids)
- > Very large group > 4700 man-made substances



Perfluorooctanoic acid (PFOA)



Perfluorooctane sulfonate (PFOS)

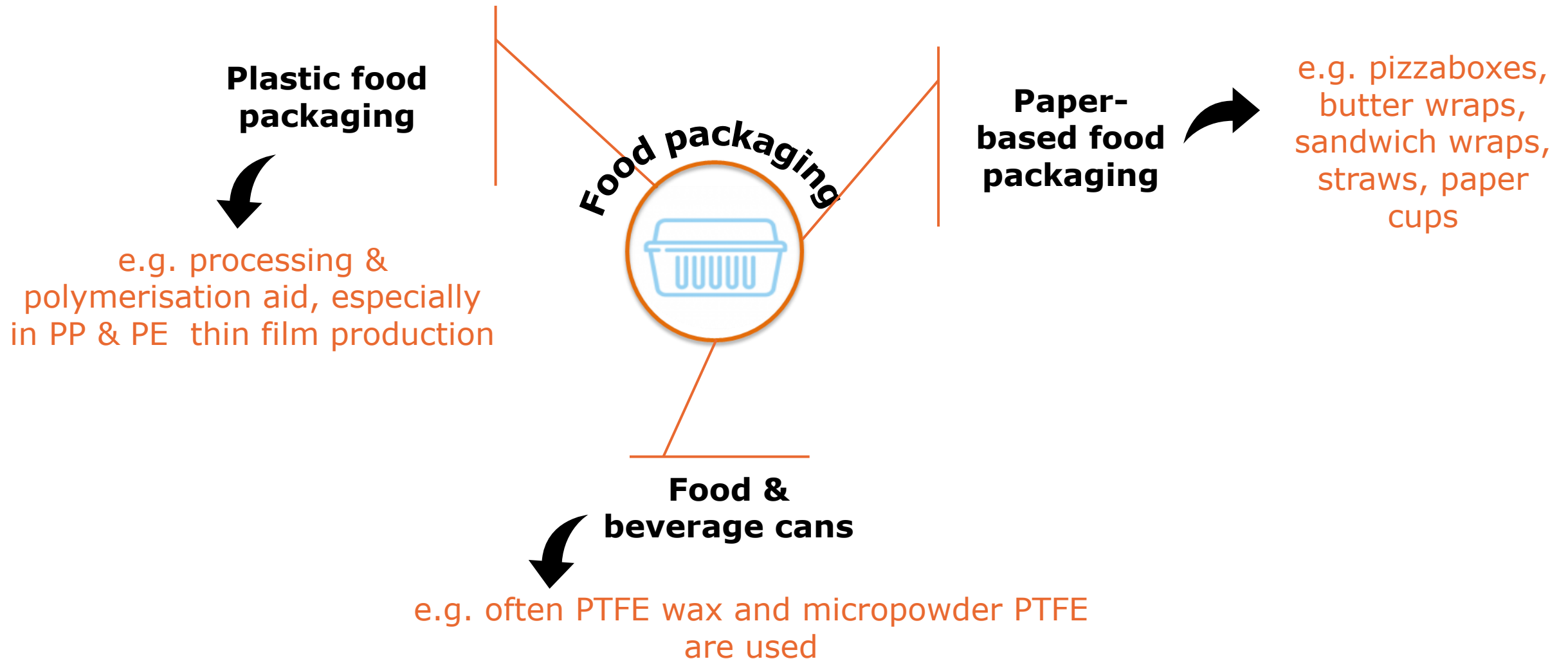


6:2 FTOH

(Buck et al., 2011)

REFUSE

BAN ON PFAS IN FOOD PACKAGING





REFUSE

METHODOLOGY FOR PFASE MEASUREMENTS

- › No harmonised methodology for FCM at EU level
- › Recommended stepwise approach
 - › STEP 1: Total fluorine quantification (TF). If TF < 50 ppm sample should be considered as compliant
 - › STEP 2: If TF > 50 ppm, confirm whether the fluorine is organic (PFAS) or inorganic (Pyrolysis-GC/MS)
 - › If the organic fluorine < 50 ppm, sample should be considered as compliant
 - › STEP 3: Direct TOP (total oxidizable precursors) to check compliance with 25 ppb and 250 ppb limits

Current available data show that all samples compliant with step 1 are also compliant with 2 & 3



PFAS

TIMING & STOCKS

- › No distinction between intentional and unintentional presence of PFAS
- › No transitional period for the exhaustion of stock
- › All food packaging placed on the market after 12/8/26 must comply with PFAS limits
- › Packaging placed on the market before 12/8/26 may remain on the market and does not need to be withdrawn

CHALLENGES RELATED TO LEGISLATION

PACKAGING & PACKAGING WASTE REGULATION

“All packaging that is placed on the market, shall be recyclable **by 1st of January 2030**”

Minimum plastic recycled content, as of 01/01/2030

Recycle



Refuse



4 R strategy

Reuse



Reduce



→ Annex V



12/08/2026



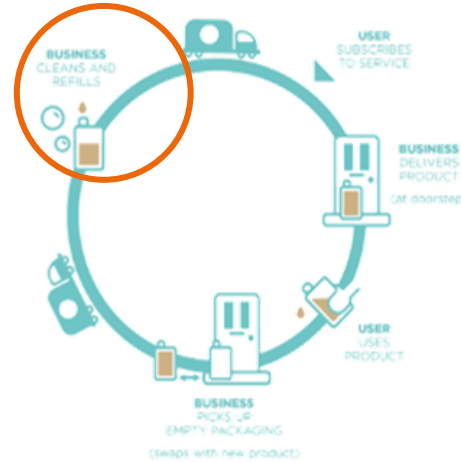
REUSE



Join **HERPAK!**
info@pack4food.be



Source: Ellen MacArthur foundation



Microbial safety

- Optimizing washing process
- Validating ATP methods

Chemical safety and quality

- Migration risks
- Residual cleaning agents
- Consumer mis-use
- Odour transfer

Packaging integrity

- Release of microplastics



samen voor #sterkgroeien



REUSE

NEW BUSINESS MODELS & CONSUMER ENGAGEMENT



Subcontractors



In kind contribution



<https://www.repasys.be/>

CHALLENGES RELATED TO LEGISLATION

PACKAGING & PACKAGING WASTE REGULATION

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12/08/2026





RECYCLE

All packaging that is placed on the market, shall be recyclable

- From 12/08/2026: according to the current requirements mentioned in the PPWD (94/62 EC)
- From 1/1/2030 or 24 months after delegated act: according to requirements of PPWR

RECYCLE

DESIGN FOR RECYCLING

“All packaging that is placed on the market, shall be recyclable”
Packaging will be considered recyclable in Europe if it:



Complies with the design for recycling performance grades



Effectively and efficiently separately collected



Sorted into defined waste streams without affecting recyclability of other waste streams



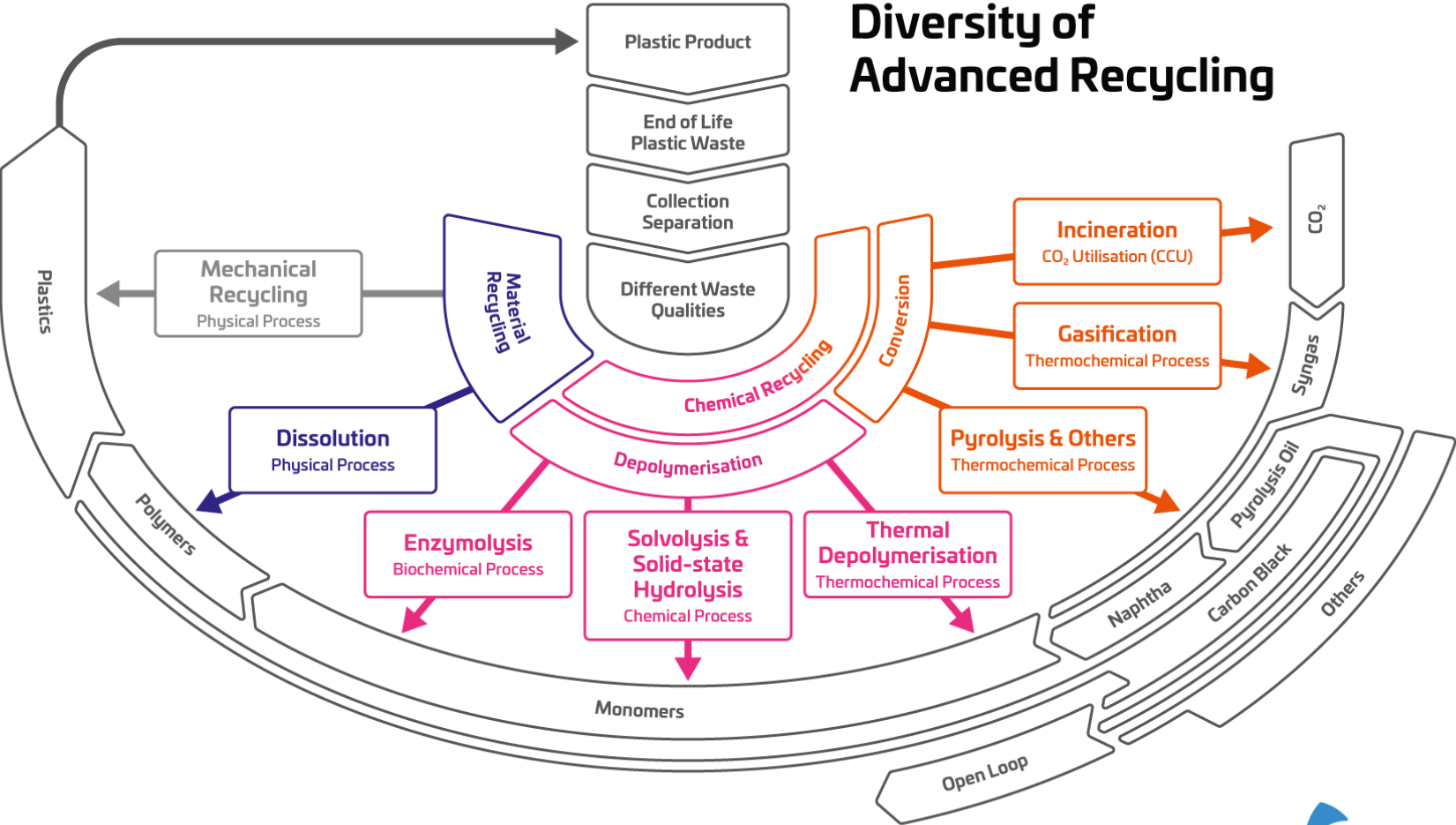
Can be recycled so that the resulting secondary raw materials are of sufficient quality to substitute the primary raw materials



Can be recycled at scale

Image source:
https://www.circpack.veolia.com/sites/g/files/dvc4656/files/document/2024/07/PPWR%20infographic%20%28EN%29_0.pdf

Diversity of Advanced Recycling



available at www.renewable-carbon.eu/graphics

nova-Institute.eu | 2024

RECYCLE

DESIGN FOR RECYCLING

01/01/2030

2035

2038

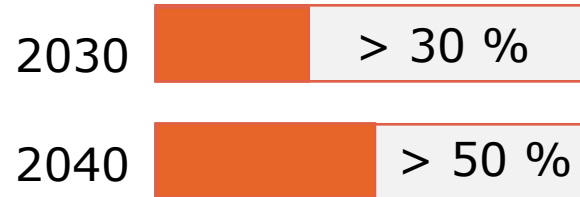
Grade	Weight recyclable	Recycled at scale	Allowed on market
A	→ 95 %		✓
B	→ 80 %		✓
C	→ 70 %		✓
<div style="border: 1px solid red; border-radius: 15px; padding: 5px; display: inline-block;"> Considered non-recyclable </div>		< 70 %	✗

Grade	Weight recyclable	Recycled at scale	Allowed on market
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<div style="border: 1px solid red; border-radius: 15px; padding: 5px; display: inline-block;"> Considered non-recyclable </div>		< 70 %	<div style="border: 1px solid red; border-radius: 15px; padding: 5px; display: inline-block;"> Recycling at scale not met </div> ✗

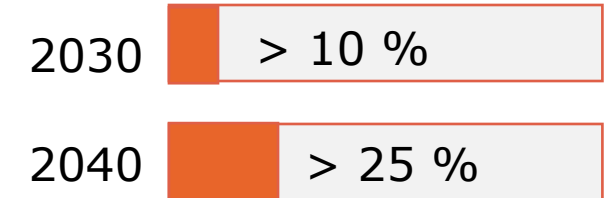
Link to PLAYBOOK No Regrets – Fost Plus

RECYCLE

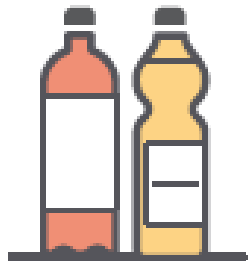
RECYCLED CONTENT – MINIMUM TARGETS



Contact sensitive plastic packaging (PET as major component)



Contact sensitive plastic packaging (all other than PET)



Single use plastic beverage bottles



Other plastic packaging

Image source: https://www.circpack.veolia.com/sites/g/files/dvc4656/files/document/2024/07/PPWR%20infographic%20%28EN%29_0.pdf



RECYCLE

RECYCLED CONTENT – EXEMPTIONS

- FCM where the quantity of recycled content poses a threat to human health (non-compliance with 1935/2004)
 - No suitable recycling technology for that polymer (2022/1616)
 - No recycling technology available at industrial scale
- Plastic parts representing less than 5% of the total weight of packaging unit



PPWR

DECLARATION OF CONFORMITY (DOC)

- > When? 12/08/2026

- > What?
 - > Document that proves compliance of packaging of a product with the requirements of PPWR → requirements in Article 5 to 12
 - > Documentation of conformity assessment & DoC must **be stored**
 - > 5 years for single-use packaging
 - > 10 years for reusable packaging
 - > Documentation of conformity assessment & DoC must **be updated**

DECLARATION OF CONFORMITY



Reference to Union legislation

A statement that the packaging is in **conformity with Regulation (EU) 2025/40** on packaging and packaging waste. Where relevant, a list of other applicable Union acts for which this DoC also applies (e.g. food-contact, batteries, etc.).

Art. 5	Requirements for substances
Art. 6	Recyclable packaging
Art. 7	Minimum recycled content targets
Art. 8	Biobased feedstock in plastic packaging
Art. 9	Compostable packaging
Art. 10	Packaging minimisation
Art. 11	Reusable packaging
Art. 12	Labeling of packaging



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