

Question	Answer
1. My company produces instant pho noodles; the noodle block is placed directly into the cup and comes into direct contact with the outer surface of the seasoning sachets. In this case, do I need to test the entire seasoning sachet (made of laminated films), or only the layer in direct contact with the seasoning? But if so, the outermost layer would then be in direct contact with the noodle block.	1. All final packaging items that come into contact with food (the pho and its accompanying seasoning) must be tested for PFAS. In this case, the paper cup and the seasoning sachet must be tested for PFAS.
2. For indirect-contact bags that contain plastic, do I need to test for PFAS?	2. Packaging items that are not in contact with food do not need PFAS testing.
My company exports to the EU for customers (B2B), including PE bags (food contact) and auxiliary packaging: labels, shrink film, wooden pallets. I have two questions: 1. Are all of these packaging items within the scope of the PPWR? 2. Regarding regulated chemical content (BPA / heavy metals / PFAS): is the supplier required to demonstrate compliance with a test report? If the supplier declares that these substances are NOT ADDED during the manufacturing process, or that there is NO RISK, is that acceptable?	1. Correct. Under the PPWR, the regulation applies to all packaging placed on the EU market, whether it is used for B2B or B2C. The PPWR covers the entire life cycle of the packaging. 2. The PPWR requires businesses to hold technical documentation demonstrating compliance. A test report is the strongest form of evidence, especially for risk-bearing materials or when the customer requests it. If the supplier merely declares that a substance is not added but has no technical basis to prove compliance, the business is potentially exposed to risk.
I would like to obtain the Swiss regulation on printing inks.	Please refer to the source: Regulation SR 817.023.21
Do printing inks and adhesives in food-contact packaging need to comply with GMP 2023/2006? If the manufacturer does not comply, how is this handled?	Printing inks used in food-contact materials fall within the scope of EU 1935/2004 and GMP 2023/2006. If the printing ink does not meet the framework regulation, it is not permitted for use.
Test reports are supporting documents for the DoC, but are they mandatory to demonstrate compliance?	The PPWR does not require a test report to be held in every case; however, the business must hold technical documentation sufficient to demonstrate compliance. If a customer or authority requests it and the business does not have it, a test report may be required.
If the raw material components of the packaging have a DoC confirming REACH compliance, does the packaging still need REACH testing?	REACH does not mandate testing of substances; testing is based on the business's risk assessment and may be required by the customer.
My company is a subsidiary that ships goods (cables, connectors), both semi-finished and finished products, to our parent company (in Germany) and to customers in the EU. Is there any difference between shipping to the parent company and shipping to customers?	If the subsidiary ships goods to the parent company, the parent company may bear primary responsibility for PPWR compliance if it is the entity that first places the product on the EU market. When the subsidiary ships goods to another EU customer, if that customer is the one who first places the product on the EU market, they bear responsibility in the same way as the parent company. If you (the subsidiary) place the product on the EU market yourself (e.g., selling directly to end customers), you may become the "producer" and must comply with the PPWR.
1. My company has an essential-oil product exported to the EU. What should the Production Department pay attention to, from the new regulations to chemical management, recycled materials, and supply-chain safety? 2. Essential oils can dissolve certain types of plastic; does the EU recommend any particular packaging material as most suitable? 3. Is there a list of materials or coatings that are not recommended for use with essential oils? 4. Does the business need to perform a compatibility test between the essential oil and the packaging before exporting? 5. When exporting in steel drums, fibreboard drums, HDPE plastic cans, or IBCs, what risks must be controlled to avoid complaints from EU customers?	The choice of material is not governed by the PPWR or other EU regulations. The business must assess and validate the compatibility between the packaging material and the food product, and ensure it meets the food-safety requirements under EU 1935/2004 and the PPWR requirements such as PFAS content, heavy metals, design for recycling, recycled plastic content, etc.
1. My company produces acid (H3PO4) for the EU. With EU/PPWR by August 2026, what should we pay attention to for HDPE (plastic drums) and IBCs? Do we need a recyclability test, heavy-metal (HM) concentration test, and fluorine test? 2. For red phosphorus (in powder form), packed in a plastic (nylon) bag and then placed in an iron drum, which packaging needs testing here — the iron drum or the plastic bag? Do we need a recyclability test, HM concentration test, and fluorine test?	The business should check whether H3PO4 and phosphorus fall within the list of dangerous goods (Directive 2008/68/EC); if so, the transport packaging is exempted from Article 6 of the PPWR (design for recycling) and Article 7 (recycled content). Chemical packaging must be tested for the 4 heavy metals and does not require PFAS testing under the PPWR.
My factory only produces cartons according to the customer's design; its function is solely as secondary packaging. Under EU 2025/40 (PPWR), what documentation do we need to provide to the customer when they ask about compliance with this regulation?	This product is still within the scope of the PPWR, because the PPWR applies to all types of packaging placed on the EU market, including secondary and transport packaging. However, as a non-EU packaging supplier, the EU customer will generally not require you to fulfil all PPWR obligations on their behalf, but will instead ask you to provide the data and technical documentation they need to compile their compliance file and Declaration of Conformity (DoC).
I have a question regarding the DoC from a supplier for controlling bisphenols. The supplier declares that they comply with (EU) 10/2011 as amended, but does not make a separate declaration for bisphenol. Is that valid?	Regulation (EU) 2024/3190 requires that all materials within its scope have a Declaration of Compliance (DoC) consistent with EU 2024/3190, and the DoC must state the name of the bisphenol used; even where no bisphenol is used, the absence of use must be declared.
My company manufactures food products exported to the EU at retail level — do we need to make a DoC? If a DoC must be submitted, is it submitted under my company's name or under the name of the packaging company that supplies our packaging?	A company producing packaged food for export to the EU must require its packaging supplier to provide the DoC. The packaging company is the party that draws up the DoC and provides evidence of conformity.
Packaging that was already received into the warehouse in Vietnam (before 20 July 2026) — is it permitted to be used to pack products exported to Europe for up to one year, under the case that applies to the deadline for using up existing packaging stock?	Packaging received into the warehouse before 20 July 2026 is permitted to be used up (existing stock) within one year.
My company uses tin cans (secondary packaging). Does the raw-material file require the supplier to provide a DoC on bisphenol and PPWR? Thank you.	Tin cans (secondary packaging) that are not in contact with food do not need bisphenol testing. The tin cans must comply with the PPWR requirements.
Which body certifies recycling grades A, B, and C?	As of now, the detailed technical guidance on the A/B/C scoring method and the official assessment mechanism is still being finalised by the EU.
For PET plastic that is a component of composite (multi-layer) packaging, is the 30% (2030) requirement considered?	If the plastic accounts for more than 5% of the weight, the mandatory recycled-content rate must be applied in 2030.
1. Can biodegradable packaging be used for food products (e.g., frozen seafood, processed products, dried fruit, etc.)? 2. And what is the testing standard for biodegradable packaging? ISO, ASTM, etc.?	Packaging for frozen seafood, etc., is not subject to the requirement if it does not fall within the group for which biodegradable packaging is mandatory.
If a company exports goods in the children's toy category (colouring books, colouring book + component sets), is it affected by the PPWR?	For children's toys, packaging such as paper boxes, blisters, and plastic trays all fall within the scope of the PPWR.
I would like to clarify the step of preparing and standardising the technical data sheet and Declaration of Compliance: is it the brand (Nike/Adidas) or the packaging supplier (polybag) that must provide and be responsible for these two documents?	The manufacturer is the party that must draw up the Technical Documentation and the Declaration of Compliance. The manufacturer is the polybag supplier if it designs and produces the item itself; or the brand if the item is ordered to the brand's own design.
For an e-commerce dropshipping model into the EU, the seller does not import or pack the goods themselves but only receives orders from customers. For example: a customer places an order on my website, then I place the order on seller A's store on SHEIN, and seller A ships directly to the customer in the EU (not through my warehouse). In this case, who is the entity that must register packaging EPR? As the direct seller through a Shopify website, do I have to register and declare EPR, or does the responsibility belong to seller A on SHEIN because they are the party that packs and ships?	For the most accurate advice, please contact a Bureau Veritas office directly to discuss the specifics.
My company exports garments to the EU. The auxiliary items — sewn labels, stickers, cartons, poly bags, moisture-barrier bags — are items that are not in direct contact with the skin. Do these materials need to comply with the requirement that the materials used to produce these products must be free of BPA and hazardous BPA?	Packaging materials that are not in contact with food do not need bisphenol testing. The packaging materials must comply with the PPWR requirements.
My company produces plastic preforms, but the customer exports the product as a plastic bottle. Are the BPA analysis results recognised?	A company producing plastic preforms may provide the BPA results and DoC to the bottle manufacturer or the food-packaging company. The results are recognised as conforming if no other substance within the scope of EU 2024/3190 is added during the bottle manufacturing process.
My company produces PE/PE bag packaging and sells it to a food factory that sells into the EU. Does the PCR PE recycled plastic need to comply with EU 2022/1616, or does it only need to meet the PPWR?	Recycled plastic in contact with food must comply with EU 2022/1616 and be authorised by EFSA.

For PFAS, can we test only TOF and TF, or must we test against the PFAS list?	Under the PPWR, food-contact materials are tested for Total Fluorine or Total Organic Fluorine with a permitted limit of 50 mg/kg. If TF/TOF exceeds 50 mg/kg, then additional testing against the EU list of PFAS substances is required.
As of now, for selling clothing and print-on-demand (POD) products into the EU, is packaging EPR already mandatory, or does this regulation only apply to food packaging?	The PPWR entered into force on 18 February 2025 and applies to all packaging, not just food. Packaging EPR has existed in most EU countries for many years. The PPWR simply harmonises the existing EPR rules to make them more uniform across the EU.
Regarding the method for bisphenol A in food-contact plastic packaging under 2024/3190, I am currently uncertain because advisory labs recommend testing by migration or by extraction. Please, BV, guide me on how to choose the test method suitable for food packaging.	For food-contact packaging, BV has built a testing programme compliant with 2024/3190 consisting of Total BPA with a permitted limit of < 0.02 mg/kg and Migration BPA with a permitted limit of < 0.001 mg/kg.
My company uses PP bag packaging with a PE bag lined inside (the layer in direct contact with the food). So, under the PFAS regulation, does the company only need to provide PFAS testing for the inner PE bag (the layer in direct contact with the product), and not test the outer PP bag? And if we only test PFAS for the inner PE bag, can that test be used across different packaging products that have different outer PP bag designs?	The company only needs to test PFAS for the item in contact with the food, which is the PE bag.
My company is a trader; we buy frozen food products from factories in China, Thailand, Vietnam, etc., and import them into Belgium, selling to customers in Belgium and other EU countries, and our company name is printed on the packaging. So is my company in the role of an importer, correct?	PRIMARY ROLE: IMPORTER (because you import from abroad into Belgium) + PRODUCER (because you are the party that first places the packaged product on the EU market).
Is the factory that produces and packs the goods for my company a manufacturer or a producer?	The factory that produces and packs the goods plays the role of Manufacturer.
How many days does PFAS and heavy-metals testing take?	PFAS and heavy-metals testing takes 5–7 days.
My company is not a packaging manufacturer and uses food-grade packaging to hold goods exported to the European market. Can my company make the DoC, or must it be the packaging manufacturer who issues the DoC?	Under EU 1935/2004, the DoC must be provided by the manufacturer of the packaging material.
Regarding the recycled-content rate: is it encouraging a higher proportion of recycled plastic than virgin plastic, or encouraging a higher proportion of virgin plastic so that the packaging can be recycled or reused more times? My company produces jumbo bags for transport.	Only the use of post-consumer recycled plastic at a proportion that meets the PPWR minimum is recognised as conforming. At the same time, the packaging product must meet the design requirements to be recyclable at grade A, B, or C and reusable (if applicable). Note: recycled plastic from pre-consumer industrial sources is not recognised.
If the supplier only provides the company with a DoC, but no technical documentation (TD) or EPR registration, is it valid for use (cartons and adhesive labels, thermal-print labels)?	The supplier must provide the DoC together with other technical documentation to demonstrate conformity with the PPWR requirements, such as design, recycled content, etc., for it to be complete and valid.
A food company exporting to the EU market using aluminium cans — is the DoC provided by the can supplier, or does my company do it itself?	Under EU 1935/2004, the DoC must be provided by the manufacturer of the packaging material.
I would like to look up the updated PPWR regulations — which website can I access?	https://eur-lex.europa.eu ; https://environment.ec.europa.eu
If my company subcontract-manufactures plastic food bags and garbage bags sold to an EU distributor, and the distributor resells them to supermarkets, how does PPWR compliance apply?	Your company is generally regarded as the Manufacturer. The distributor in the EU is generally the Importer and Producer under EPR, and will be responsible for EPR registration and fulfilling the PPWR obligations in the EU.
On 12 August 2026, do I only need to meet the PPWR, or must I meet the PPWR, REACH, and EC simultaneously?	12 August 2026 is the application deadline for the chemical-safety requirements of PPWR 2025/40; other relevant regulations must still be complied with if they are already in force.
Hello organising committee, does BV offer a guidance service to implement PPWR compliance for a company producing retail food products sold into the EU market?	For the most accurate advice, please contact a Bureau Veritas office directly to discuss the specifics.
My company does subcontract manufacturing to customer specifications — for example, producing bags for consumers to hold frozen food, or bags to hold food distributed in supermarkets. So these still count as food-contact packaging, correct? Example: Company A has an EU customer who wants to order bags to hold supermarket food, and Company A subcontracts the production to my company. My company produces and sells to the EU to Company A, who then distributes to their customers. So does my company need to declare and bear EPR obligations?	Bags for consumers to hold frozen food, or bags used to distribute food in supermarkets, count as food-contact packaging under the PPWR. In the case where your company sells packaging to Company A in the EU, Company A is the packaging importer responsible for placing the product on the market and may bear the EPR obligation in the country of sale. Your company, as the packaging manufacturer / subcontract supplier in Vietnam, does not bear the EPR responsibility.