



This document contains a written adaptation of the questions raised during the Q&A session of the FEICA webinar on the role and obligations of packaging adhesives under the PPWR.

Adhesives in packaging

1. **Q:** On adhesives used with the label itself on a packaging: is this also a part of the packaging?

A: Yes. Adhesives used for labels on the package are considered an integral part of the packaging. Any element that ends up on the final packaging placed on the market—including labels, label adhesives, tapes, promotional materials or late-stage additions—must all be considered. For regulatory purposes, the packaging must be assessed as a whole, as it is assumed that consumers dispose of it in its entirety.

2. **Q:** Does the adhesive supplier have to prove compliance for the *liquid adhesive* or the *dried film* in the final laminate?

A: This is not explicitly specified by the EU documents. However, adhesive suppliers can only provide information on areas of own control, i.e. with regards to not yet defined testing activities Substances of Concern (SoC) and PFAS are measuring the dried film in the final laminate (as packaging unit). The PPWR and its guidance consistently assess compliance at the level of the final packaging unit as placed on the market, therefore when considering recyclability assessments, composting and the like the dried film in the final laminate will be assessed.

Bio-based content of packaging

1. **Q:** How about the potential creation of targets on bio-based content of packaging (art. 8 of the PPWR) - would that apply to adhesives?

A: Article 8 of the PPWR is not yet operative and refers to bio-based feedstock in plastic packaging. As adhesives are not plastics, this article does not apply to them. However, on a voluntary basis this is of course a possibility.

Substances of Concern

1. **Q:** Is there a common method to determine the heavy metal and PFAS content?

A: There is no fully harmonised testing methodology applicable across the EU for determining heavy metal and PFAS content in packaging. This is recognised as an important gap at regulatory level. Work is ongoing at European Commission level, including the involvement of expert task forces, to develop common methodologies—particularly regarding PFAS testing. In the meantime, compliance relies primarily on information passed along the supply chain, based on knowledge of raw materials and formulations. Further clarification and standardisation are expected through future guidance documents and updates to the Commission's FAQs.

2. **Q:** Do adhesive manufacturers aim to provide a value of PFAS (e.g. as TF) in the technical documentation to be incorporated downstream and ultimately for the packaging manufacturer to prepare their DoC?

A: Adhesive manufacturers do not generally aim to provide quantified PFAS values, such as total fluorine content, in their technical documentation at this stage. PFAS are not intentionally added to adhesives, and requiring numerical values for every formulation would imply extensive testing that is neither clearly mandated nor currently feasible. Instead, suppliers are expected to provide relevant compliance information to their customers, while clarification on testing requirements and responsibilities is still evolving at EU level.

3. **Q:** Given that, according to general industry practice, PFAS are not intentionally used in adhesive manufacturing, is the manufacturer nevertheless required to assess the risk of unintentional PFAS cross-contamination (for example from water used in production or from equipment and machinery)? Are there specific regulatory obligations to prove or document this?

A: Manufacturers are expected to exercise due diligence. While PFAS are not intentionally used in adhesive manufacturing, companies should be able to demonstrate that appropriate controls are in place to prevent unintentional contamination, for example through raw materials or production processes. If a risk of cross-contamination exists, documentation showing how this risk is mitigated should be available upon request.

4. **Q:** Is it the expectation that adhesive formulators will test their adhesives to establish levels of PFAS present even if they are not intentionally added? And if testing is required is one off testing acceptable or are repeated monitoring checks required?

A: PPWR FAQ, Section III, Question 14 (Page 13) states:" The PFAS restriction adopted by the PPWR does not differentiate between intentionally added and unintentionally present PFAS. Therefore, the provisions in Article 5(5) apply to both. To be noted, preliminary PFAS laboratory analyses results on a number of selected packaging showed that in practice only packaging where PFAS have been intentionally added would give results above the PFAS limit values."

Therefore, unintentionally present PFAS are unlikely to exceed the limit values in practice.

Of addition relevance is PPWR FAQ, Section III, Question 5 (Page 11):

"Obligations of packaging suppliers are detailed in Article 16 PPWR. Accordingly, suppliers must provide the manufacturer with all the information and documentation necessary for the manufacturer to demonstrate the conformity of packaging and the packaging materials with this Regulation. Manufacturers need this information from suppliers of packaging materials or converters in order to identify PFAS or other SoC present in packaging and draft the declaration of conformity demonstrating compliance with Article 5 PPWR."

In this context, testing is not explicitly mentioned. This means adhesive formulators are not required to proactively test and publish PFAS data, but they must provide upon request relevant information to enable the packaging manufacturer to demonstrate compliance.

1. **Q:** We would like to know how much data is required to demonstrate conformity with heavy metals and PFAS restrictions as these substances are not intentionally added. Are test reports required for each type of adhesive sold? Is testing for "adhesive groups" allowed?

A: At this stage, testing every individual adhesive formulation is neither explicitly required nor realistically feasible. Given the absence of intentional PFAS use and the cost and capacity implications of testing, the current expectation is that compliance will primarily rely on supply chain documentation rather than systematic product-by-product testing. Further clarification from the Commission is anticipated.

2. **Q:** As a manufacturer that does not intentionally add PFAS, what level of upstream raw material testing (e.g., of resins or solvents) is considered 'due diligence' under the new law?

A: According to EU Regulation 2025/40, Article 5(5) and (6), "Compliance with the requirements set out in paragraphs 4 and 5 of this Article shall be demonstrated in the technical documentation drawn up in accordance with Annex VII."

"If total fluorine exceeds 50 mg/kg the manufacturer, importer or downstream user... shall, upon request, provide to the manufacturer or the importer... proof of the quantity of fluorine measured as content of either PFAS or non-PFAS in order for them to draw up the technical documentation."

A specific standard of 'due diligence' for upstream raw material testing is, as of today, not defined.

Recycling

1. **Q:** What recommended actions should companies take to ensure regulatory readiness with Article 6?

A: Companies are advised to begin by familiarising themselves with existing recyclability schemes and assessment methods that already apply to certain materials, such as paper and board. In addition, they should consult the guidance documents produced by FEICA working groups, which analyse the behaviour of different adhesive technologies in recycling processes. Perhaps most importantly, companies should engage early with supply chain partners to ensure that packaging designs and material choices—including adhesives—support recyclability objectives foreseen under the PPWR.

2. **Q:** Do adhesives ensure recyclability? If yes, how? Choosing for example raw materials by R&D process? if is not possible change this, adhesives are banned from the market?

A: Adhesives themselves are not recycled and are not required to meet recyclability targets as standalone materials. Instead, their role is to be compatible with the recycling process of the packaging as a whole. When the appropriate adhesive technology is selected, adhesives do not hinder recycling. Regulatory consequences apply to the entire packaging unit: if a final packaging design fails to meet recyclability thresholds, that packaging may be restricted or banned from the market, but this would not constitute a blanket ban on adhesives.

3. **Q:** Do the 70% perform degree of recyclability refer to a single packaging item or to packaging on the company, national, or EU level?

A: Recyclability thresholds apply at the level of the individual packaging item or SKU placed on the market. Each final packaging configuration must meet the applicable recyclability requirements on its own, rather than being averaged across a company's portfolio or assessed at national or EU level.

4. **Q:** How to take into consideration potential changes / improvement of recycling capabilities in 2030 (and beyond) when assessing design for recyclability?

A: According to EU Regulation 2025/40, Recital (28), Page 6: "Packaging recyclability should be expressed in recyclability performance grades established on the basis of design for recycling criteria from 2030 and on the basis of both design for recycling and recycled-at-scale criteria from 2035 for packaging categories... Packaging of those grades should be considered to be recyclable and, consequently, be allowed to be

placed on the market." This means the 2035 assessment will be based on actual recycling performance data collected between 2030 and 2035 — directly incorporating improvements in recycling capabilities that materialise during that period. In addition, improvements in recycling infrastructure in any Member State contribute to meeting the 55% EU level recycling target, and packaging that may not be recyclable at scale today could qualify in the future as infrastructure improves.

There is also a future-proofing mechanism described in EU Regulation 2025/40, Recital (33), Page 6–7: "Packaging which presents innovative features resulting in significant improvement in the core function of packaging and that has demonstrable environmental benefits should be given an additional time to comply with the recyclability requirements. The innovative features should be justified... and the planned establishment of a recycling path should be explained in the technical documentation accompanying the packaging." This allows packaging with a documented recycling roadmap to enter market early. In the end, the Commission can revise DfR criteria as new recycling technologies emerge.

Declaration of Conformity

1. **Q:** If you are a label/ adhesive manufacturer, you don't need to provide DoC, correct? This is just for the company that puts the entire packaging in the market, correct?

A: This concerns a policy area where regulatory interpretation is still evolving. The obligation to issue a Declaration of Conformity depends on whether a company is considered the 'packaging manufacturer' under the PPWR. In some scenarios, adhesive or label manufacturers may fall within this definition, while in others they may not. The speakers noted that further clarity is expected through Commission guidance and FAQs.

2. **Q:** What about industrial packaging? Will our suppliers (be required to) provide a DoC with the packaging that is purchased? And then do we require to do anything else for the packaged adhesives that we bring to market (for industrial and for consumer adhesives)?

A: PPWR applies to all kinds of packaging, including industrial and transport packaging. Suppliers of packaging to adhesive suppliers for the packaging of adhesives will in some cases need to provide a DoC to authorities, in others merely the information needed to draw up a DoC, see Q1 DoC. The DoC needs to be kept on file in case it is requested by authorities as part of an audit. It is not a document to be sent along with every product delivery.

3. **Q:** If you put packaging in the market that is not food contact (e.g. pallets), do you need a DoC? And if yes, what should be indicated? That the packaging is not food contact and the PFAS is not applicable?

A: Yes, every packaging unit placed on the EU market for the first time after the 12th August 2026 needs a DoC. See also PPWR FAQ, Section XV, Question 12 (Page 43): "There is no exemption for transport packaging. Indeed, completely different packaging types, such as pallets, pallet collars, wrappings and straps, must undergo separate assessments and must have separate declarations of conformity."

With regards to PFAS and non-food contact use, best practice is to document the inapplicability of Article 5(5) in the technical file, confirming the packaging is not intended for food-contact.

4. **Q:** Do we have to list identification codes on each part of the packaging, such as cardboard packaging with a plastic inliner inside the carton? Or is it sufficient to list it only on the cardboard if one DoC is provided for the entire packaging unit?

A: The labelling obligation under Article 12(1) is about material composition labels for consumer sorting, not identification codes per se. The key distinction is between integrated and separate components. The DoC is drawn up for the entire packaging unit and must include all integrated and separate components. If the inliner is a separate component (discarded separately by the consumer), it needs its own sorting label; if it is an integrated component (discarded together with the cardboard), it is assessed as part of the whole unit.

5. **Q:** Will FEICA provide a **harmonised template** for adhesive-specific Declarations of Conformity to ensure we give our customers exactly what they need for their technical files?

A: FEICA is currently working on a guidance document on Declaration of Conformity and will share it with its members once it is finalised.

6. **Q:** Would an adhesive bottle and lid in a blister card be covered under the same declaration of conformity?

A: If this is considered to be one packaging unit, then the DoC would cover all listed components, i.e. adhesive bottle with lid in a blister. Otherwise, separate DoCs would need to be created.

7. **Q:** Do you need a DoC for every packaging e.g. all types of cardboard boxes in our portfolio, or can you use one DoC for all boxes? If a tin is packed in a box, do you need a DoC for the tin, the label on the tin, or just one declaration for 1 cardboard box, with 6 tins, 6 labels, tape on box, label on box?

A: A separate DoC for each type of box is not necessarily needed. However, the DoC must be drawn up at the level where packaging shares the same characteristics in view of applicable requirements. The DoC is drawn up for the entire packaging unit, but each distinct packaging type/format requires its own separate assessment and DoC.

According to PPWR FAQ, Section XV, Question 4 and 5 (Page 41): "The assessment of conformity must be performed, and the declaration of conformity must be drawn up, for the entire packaging unit. The assessment should include all integrated and separate components." "A single EU declaration of conformity may be drawn up for all Union acts... it must clearly distinguish the packaging from the packaged products. The manufacturer may decide whether the single declaration of conformity is presented as a dossier with different declarations of conformity or as a single document. If they are presented as a single document, the conformity assessment for the packaged product and the packaging should still be done and presented separately."

Miscellaneous

1. **Q:** What is the status of stretch film, strapping bands, air bubble wraps?

A: Those materials for transport packaging are specifically mentioned in Article 29(1): "From 1 January 2030, economic operators that use transport packaging... in the form of pallets, foldable-plastic boxes, boxes, trays, plastic crates, intermediate bulk containers, pails, drums and canisters of any size or material, including flexible formats or pallet wrappings or straps for stabilisation and protection of products put on pallets during transport, shall ensure that at least 40 % of such packaging in total is reusable packaging within a re-use system."

PPWR FAQ, Section XIII, Question 7 (Page 36): "Pallet wrappings and straps are different packaging formats, but they may be part of the same transport unit for the purpose of calculating compliance with reuse targets under Article 29. This will be further clarified in the implementing act under Article 30."

PPWR FAQ, Section XV, Question 12 (Page 43): "There is no exemption for transport packaging. Indeed, completely different packaging types, such as pallets, pallet collars, wrappings and straps, must undergo separate assessments and must have separate declarations of conformity."