

The background is a blurred image of a person in a blue suit sitting at a desk, writing on a document with a blue pen. A laptop is visible on the left. In the foreground, a wooden gavel rests on a dark base. The entire scene is overlaid with a semi-transparent blue rectangle containing the title and date. Various legal icons are scattered across the background, including a gavel, a checkmark, scales of justice, a building, a magnifying glass, a group of people, and a document labeled "LAW".

Role and Obligations of Packaging Adhesives under the PPWR

FEICA Webinar - 28 April 2026

Proceedings

- Please be advised that this webinar will be recorded. By joining, you are consenting to the recording
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- During the Q&A session following the presentations, you will be able to use the chat box to ask questions
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Agenda

11:00 - 11:05

Introduction

Maria Pulina, Public and Regulatory Affairs Manager, FEICA

11:05 - 11:15

Presentation of what the PPWR says related to obligations of suppliers.

Maria Pulina, Public and Regulatory Affairs Manager, FEICA

11:15 - 11:45

Discussion on the obligations of packaging adhesives companies as suppliers (i.e. what can or cannot be done for the conformity assessment by August 2026)

Elizabeth Staab, HHC Product Sustainability Director, H.B. Fuller, and **Christos Lecou**, Marketing Manager, Sector Industrial Adhesives, Printing & Packaging, Covestro

11:45 - 12:00

Q&A session moderated by **Maria Pulina**



Maria Pulina

Public and Regulatory Affairs Manager - Sustainability, FEICA

Introduction

**16 National Associations
representing 17 Countries
450+ members**



27 Direct Company Members



22 Affiliate Company Members



THE ADHESIVE AND SEALANT INDUSTRY IN EUROPE

A highly skilled workforce of over

50,000 
people

20.7 **billion** 

With a €20.7 billion contribution, the specialised know-how of the A&S industry enhances the EU's manufacturing capabilities

85% of adhesives and sealants companies are **SMEs**

430
adhesives and sealants companies 

650
manufacturing sites 

580 **million** **euros**
invested in Research and Development, advancing high-tech solutions with leading innovative sectors 




5-6%
spend of sales turnover on R&D for technologically advanced products

4.7 **million** **tonnes**
volume demand of adhesives and sealants 

250,000
Adhesives and sealants are essential for 250,000 products that shape everyday life 

Advanced Materials

Adhesives and sealants are designed for durable, application-specific performance that drives innovation across key industries 

drives **innovation** in crucial sectors, contributing to the strategic autonomy of the EU



Healthcare



Transport



Defence




Digital Technologies



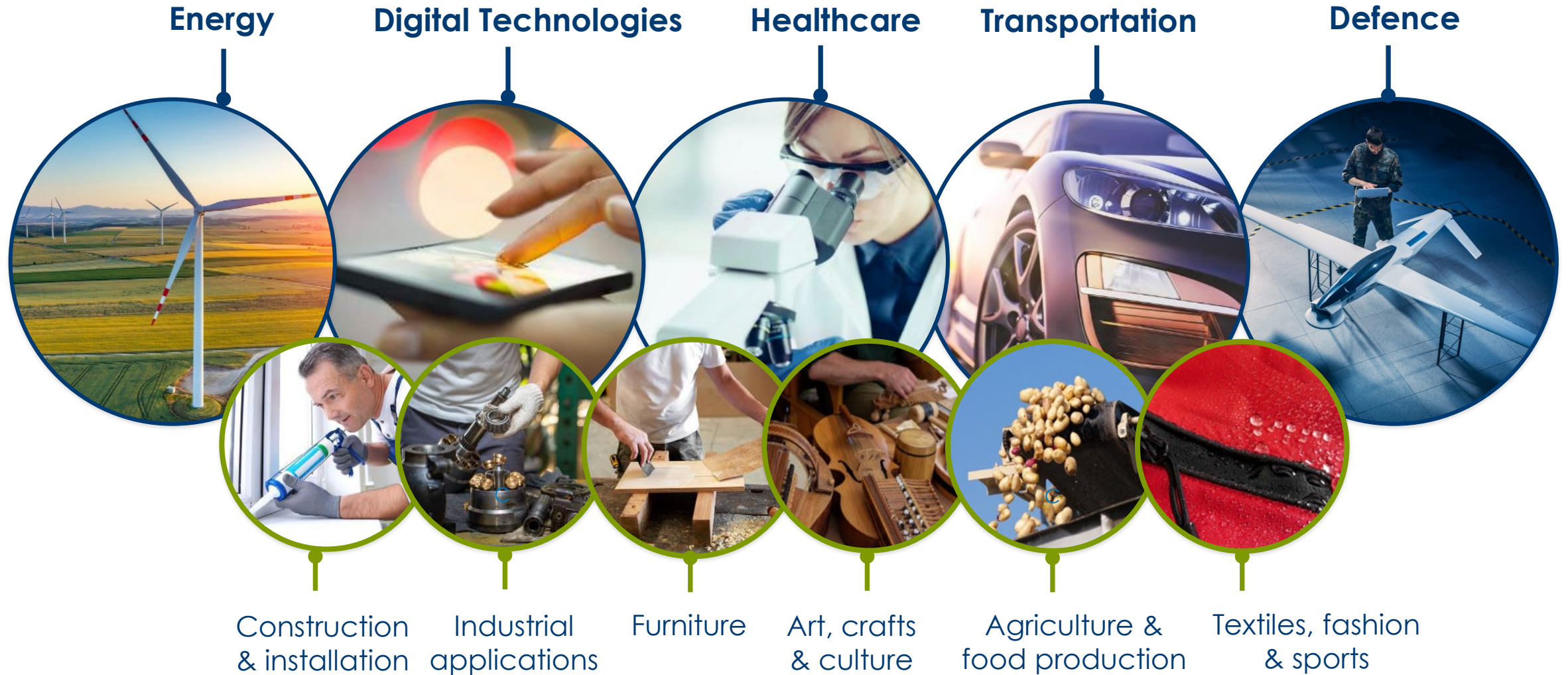
Energy

accelerates the transition to the

Circular Economy

across key consumer and industrial markets 

A&S Contributions to EU Strategic Sectors and Applications



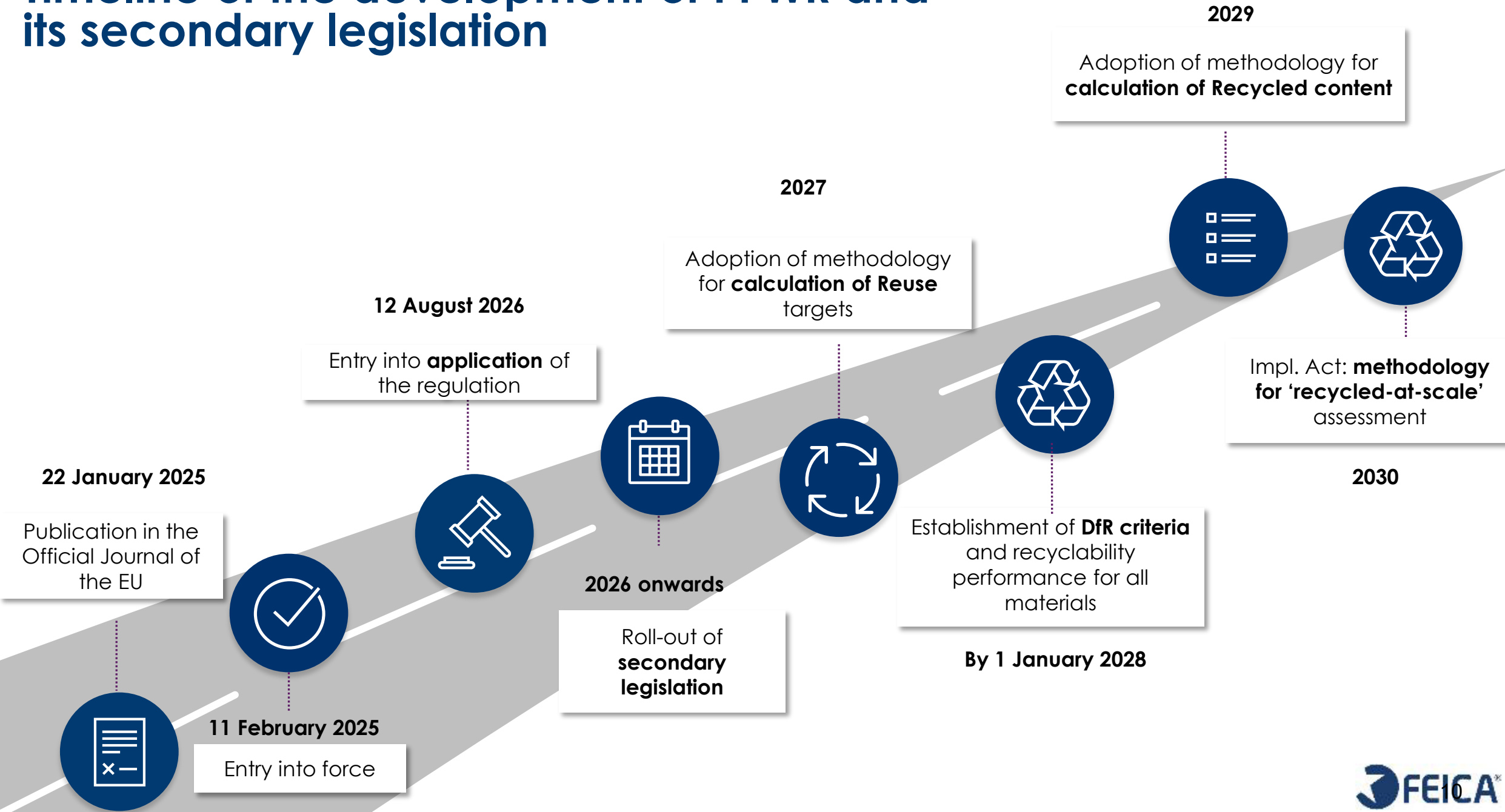


Maria Pulina

Public and Regulatory Affairs Manager - Sustainability, FEICA

**Presentation of what the PPWR says related
to obligations of suppliers**

Timeline of the development of PPWR and its secondary legislation





Elizabeth Staab

HHC Product Sustainability Director, H.B. Fuller



Christos Lecou

Marketing Manager, Sector Industrial Adhesives, Printing & Packaging, Covestro


Discussion on the obligations of packaging adhesives companies as suppliers (i.e. what can or cannot be done for the conformity assessment by August 2026).

How well prepared are you to provide your customers with the information needed when PPWR enters into application in August 2026?

- A) My company is ready to go
- B) Not ready yet, but we know what to do
- C) Max. 50% prepared
- D) We have not really started

Requirements based on PPWR are getting clearer

REGULATION (EU) 2025/40



Official Journal of the European Union

EN L series

2025/40 22.1.2025

REGULATION (EU) 2025/40 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

of 19 December 2024

on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC

(Text with EEA relevance)

THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union, and in particular Article 114 thereof,

Having regard to the proposal from the European Commission,

After transmission of the draft legislative act to the national parliaments,

Having regard to the opinion of the European Economic and Social Committee^(*),

Acting in accordance with the ordinary legislative procedure^(*),

Whereas:

- Products need appropriate packaging in order to be protected and easy to transport from where they are produced to where they are used or consumed. Prevention of barriers on the internal market for packaging is key for the functioning of the internal market for products. Fragmented rules and vague requirements cause uncertainty and additional cost to economic operators.
- The Commission's (Eurostat's) packaging waste statistics for the period 2010-2021 indicate that packaging uses large quantities of primary raw material (virgin materials). 40 % of plastics and 50 % of paper used in the Union is used for packaging, and packaging represents 36 % of municipal solid waste. High and constantly increasing quantities of packaging generated, as well as low levels of re-use and collection and poor recycling, present significant barriers to achieving a low-carbon circular economy. This Regulation should therefore establish rules covering the entire life-cycle of packaging, contributing to the efficient functioning of the internal market by harmonising national measures, while preventing and reducing the adverse impacts of packaging and packaging waste on the environment and human health. By laying down measures in line with the waste hierarchy set out in Directive 2008/98/EC of the European Parliament and of the Council⁽²⁾ (waste hierarchy), this Regulation should contribute to the transition to a circular economy.
- European Parliament and Council Directive 94/62/EC⁽³⁾ lays down requirements for packaging, which relate to the composition of packaging and its reusable and recoverable nature (essential requirements for packaging), and sets recovery and recycling targets for Member States.
- In 2014, in its Fitness check relating to Directive 94/62/EC, the Commission recommended adaptations to the essential requirements for packaging, which were seen as a key tool to achieve better environmental performance of packaging, to make those requirements more concrete and more easily enforceable and to strengthen them.
- In line with the European Green Deal, set out in the communication of the Commission of 11 December 2019, the new Circular Economy Action Plan for a cleaner and more competitive Europe (CEAP), set out in the communication of the Commission of 11 March 2020, commits to reinforcing the essential requirements for packaging with a view to making all packaging reusable or recyclable by 2030, and to considering other measures to reduce (over)

⁽¹⁾ OJ C 228, 29.6.2023, p. 114.

⁽²⁾ Position of the European Parliament of 24 April 2024 (not yet published in the Official Journal) and decision of the Council of 16 December 2024.

⁽³⁾ Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (OJ L 312, 22.11.2008, p. 3).

⁽⁴⁾ European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste (OJ L 365, 31.12.1994, p. 10).

EEI: <http://data.europa.eu/eli/reg/2025/40/oj> 1/124

PPWR FAQs



European Commission

Packaging and Packaging Waste Regulation (PPWR)

Frequently Asked Questions

DG ENV, Unit BB1
March 2026

CEN EN18120-series: Design for Recycling

[EN 18120-1:2026](#) (WI=00261514) Packaging - Design for recycling of plastic packaging - Part 1: Definitions and principles for design-for-recycling of plastic packaging

[EN 18120-3:2026](#) (WI=00261510) Packaging - Design for recycling of plastic packaging - Part 3: Evaluation processes for the sortability of plastic packaging

[EN 18120-4:2026](#) (WI=00261513) Packaging - Design for recycling of plastic packaging - Part 4: Guideline for PET bottles

[EN 18120-5:2026](#) (WI=00261511) Packaging - Design for recycling of plastic packaging - Part 5: Guideline for PET rigid packaging (except bottles)

[EN 18120-6:2026](#) (WI=00261512) Packaging - Design for recycling for plastic packaging - Part 6: Guideline for PE and PP rigid packaging

[EN 18120-7:2026](#) (WI=00261507) Packaging - Design for recycling of plastic packaging - Part 7: Guideline for PE and PP flexible packaging

[EN 18120-8:2026](#) (WI=00261508) Packaging - Design for recycling of plastic packaging - Part 8: Guideline for PS and XPS rigid packaging

[EN 18120-9:2026](#) (WI=00261509) Packaging - Design for recycling of plastic packaging - Part 9: Guideline for EPS packaging

[EN 18120-10:2026](#) (WI=00261517) Packaging - Design for recycling of plastic packaging - Part 10: Recyclability evaluation process for plastic packaging - Protocols for PET bottles

[EN 18120-11:2026](#) (WI=00261515) Packaging - Design for recycling of plastic packaging - Part 11: Recyclability evaluation process for plastic packaging - Protocols for PET rigid packaging (except bottles)

[EN 18120-12:2026](#) (WI=00261516) Packaging - Design for recycling of plastic packaging - Part 12: Recyclability evaluation process for plastic packaging - Protocols for PE and PP rigid packaging

And more

Adhesives typically make up less than 3% of packaging by weight.



Do packaging adhesive applicators really need more than the current standard information from their adhesive suppliers?

Companies placing packaging or packed goods on the EU market need to declare compliance to PPWR for the complete packaging

Information needed from each supplier



Consolidation



Declaration of Conformity

Potential content:

1. Identification number of declaration
2. Identification code of the packaging
3. Description of packaging
4. Information about issuer
5. Statement of responsibility
6. References to EU legislation
7. Standards & technical specification
8. Signature & date

Adhesive formulators' reporting obligations

- Information for each packaging component supplied to packaging manufacturer for declaration of conformity
- Technical documentation is essential for all players along supply chain
- Adhesive suppliers need to fulfil their obligations
- Company placing packaging or packaged goods on the EU market responsible for declaration of conformity

What is the specific impact of the PPWR on the Adhesives Value Chain starting from 12th August 2026?

PPWR Implications for the ADH industry

Aspect	Implication for Adhesives
SoC*/PFAS restrictions	Adhesives in packaging must comply from Aug 12 th 2026
Supply chain documentation	Must provide SoC/PFAS data to the next value chain step
Recyclability (DfR)	Adhesive layers must not hinder recyclability from 2030
Recycled content	!Exempt! — adhesives not classified as plastic
Conformity assessment	Adhesives are part of the packaging unit assessment

*Substances of Concern (SoC) currently limited to heavy metals and PFAS and further related to regulatory frameworks (e.g. REACH (Article 57), CLP Regulation (Annex VI))

What specific information needs to be provided by adhesive formulators to adhesive applicators?

ADH formulators to packaging ADH applicators

Responsibilities as a supplier

Future PPWR compliance (verification) work for packaging adhesives will most likely involve:

- Article 5 - **Requirements for substances in packaging**
- Article 6 – **Recyclable packaging**
- Article 9 – **Compostable packaging**
- Article 11 – **Reusable packaging**
- Suppliers also must **provide packaging manufacturer with all the information and documentation** necessary for the manufacturer **to demonstrate the conformity** of the packaging and the packaging materials with PPWR (Article 16)

Article 5 - Requirements for substances in packaging



Updated limits for certain **heavy metals** in packaging

New strict limit for per- and polyfluorinated alkyl substances (**PFAS**)



Apply **to the overall packaging**. Therefore, packaging adhesives need to comply



These substances are **not intentionally added** to adhesives

Article 6 – Recyclable packaging



Packaging placed on the market to be recyclable from 2030 onwards



Exact requirements and verification process to be introduced with delegated act by Jan 2028



Need to consider packaging adhesive's impact on packaging recyclability

Article 9 – Compostable packaging



Self-adhesive labels for fruits and vegetables, to be industrially compostable from 12 February 2028



Countries may require **home compostability** at the national level



Revised version of standard EN 13432 and a potential new EN standard on **home compostable** packaging



Biodegradability of packaging adhesives, as well as their potential impacts on **ecotoxicity**, expect to be **part of the verification**

Article 11 – Reuseable packaging



Verification of packaging reusability may include **attachment of labels** and **removal of ‘non-reusable components** of packaging’



The **ability of labelling adhesives to release the label** may become part of the **assessment** of reusable packaging



No specific guidance or requirements, hence it will be negotiated along the value chain

Suppliers to packaging manufacturers

Responsibilities as a supplier

Future PPWR compliance (verification) work for packaging adhesives will most likely involve:

- Article 5 - **Requirements for substances in packaging**
- Article 6 – **Recyclable packaging**
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- Article 11 – **Reusable packaging**
- Suppliers also must **provide packaging manufacturer with all the information and documentation** necessary for the manufacturer **to demonstrate the conformity** of the packaging and the packaging materials with PPWR (Article 16)

How do I know if a specific adhesive is impacting recyclability of a packaging?

If so, what is the consequence?

Recyclable Packaging – Performance Grades

PPWR, Annex II, Table 3

Recyclability Performance Grades	DfR – Degree of Recyclability, Assessment per unit
Grade A	$\geq 95\%$
Grade B	$\geq 80\%$
Grade C	$\geq 70\%$
Grade D	$\leq 70\%$

 Market ban from 2030

 Market ban from 2038

Summary

- PPWR Declaration of Conformity will be required and issued starting Aug 12th, 2026
- Players along the supply chain need to supply technical information
- Adhesive formulators need to give information regarding
 - **Substances of Concern, i.e. heavy metals**
 - **PFAS for food packaging**
- Adhesive formulators may be packaging manufacturer in some scenarios
 - **Collect information from packaging suppliers**
 - **Issue Declaration of Conformity**
- Design for recyclability criteria and assessment method is being developed

Q&A

- Please use the chat box if you have a question
- Questions in the chat box will be covered as we go along
- In case we don't have sufficient time during the Q&A session to address your question, please feel free to send your question to info@feica.eu

THANK YOU

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