

Regulation (EU) N. 2025/40 on packaging and packaging waste PPWR

Regulation (EU) n. 2025/40 of the European Parliament and of the council on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC was published on 19th December 2024.

In **Article 5 of the PPWR** the requirements for substances in packaging are listed and in particular, in **point 5** what the specifications for food-contact packaging are, starting from 12th August 2026.

All hubergroup products are compliant with the requirements laid out in PPWR, to the extent applicable to printing inks, varnishes and related products.

Considering that hubergroup offers a full range of inks, varnishes and related products intended to be used in the manufacture of food packaging (MGA®), and for standard non-food packaging applications (non-MGA®), we inform you about the following:

Toxic heavy metals

We confirm that, for **all hubergroup printing inks, varnishes and related products**, the total content of the toxic heavy metals lead (Pb), cadmium (Cd), mercury (Hg) and hexavalent chromium (Cr(VI)) in printing inks, varnishes and printing additives labelled with the hubergroup brand and supplied by European companies is below the CONEG limit of 100 mg/kg (ppm).

PFAS – MGA® products are compliant with PPWR

We confirm that, for **all hubergroup MGA® printing inks and overprint varnishes**, per- and polyfluoroalkyl substances (PFAS) are not intentionally used or known to be present¹ according to the information from our raw material suppliers. The chain of custody approach is applied².

PFAS – non-MGA® products are compliant to PPWR but not in scope of Article 5 (5)

We confirm that, in **hubergroup non-MGA® printing inks and overprint varnishes**, per- and polyfluoroalkyl substances (PFAS) are not intentionally used or known to be present¹ according to the information from our raw material suppliers. The chain of custody approach is applied².

Non-MGA® products are not intended by hubergroup for food packaging application, therefore not in scope of Article 5 (5) of PPWR. They are, however, compliant with PPWR requirements for non-food packaging applications.

Few special non-MGA products³ for specific applications contain PTFE. Since they are not intended by hubergroup for food packaging applications, they are not in scope of Article 5 (5) of PPWR. As of today, they are therefore compliant with the PPWR requirements for non-food packaging applications⁴, but being PTFE a polymeric PFAS, it may be subject to further regulatory measures in the future.

In all PTFE-free products the total fluorine (TF) content is below 50 ppm.

Substances of Concern

We confirm that Substances of Concern, as defined by the Ecodesign Regulation (EU) 2024/1781 – Article 2, point 27 – are minimized in **hubergroup printing inks, varnishes and related products**.

¹ However, the presence of trace amounts in the products coming from raw material impurities, from the process or as adventitious contaminant cannot be excluded

² Please consult the EuPIA [Customer Information Note on PFAS and Printing Inks in the Context of Article 5 \(5\) PPWR](#)

³ Please consult our declaration on PTFE [Decl_PTFE_SFUV](#) for details.

⁴ Please consult answer 10 in the [EU Commission FAQ document](#)

IMPORTANT NOTE: We want to emphasize that printing inks are not considered a barrier to recycling⁵. In any case, methodologies for assessing recyclability should be published by the Commission through delegated acts by 2028, as well as substances of concern (SoC), which are still being defined and will be precisely identified by ECHA by the end of 2026.

Nevertheless, the manufacturer of the final printed article has the legal responsibility that the food packaging placed in the market fulfills Regulation (EU) 2025/40 requirements proving this with analytical reports and any other relevant supporting documentation.

Disclaimer:

The information contained herein is based upon data believed to be up-to-date and correct at the time of writing. It is provided to our customers in order to enable them to answer specific customer requests. Since the application of the inks and the conditions of use are beyond our control, the information provided does not represent a guarantee of any kind for the final printed product.

Kirchheim, 15 May 2026

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⁵ <https://www.eupia.org/key-topics/recycling/>