

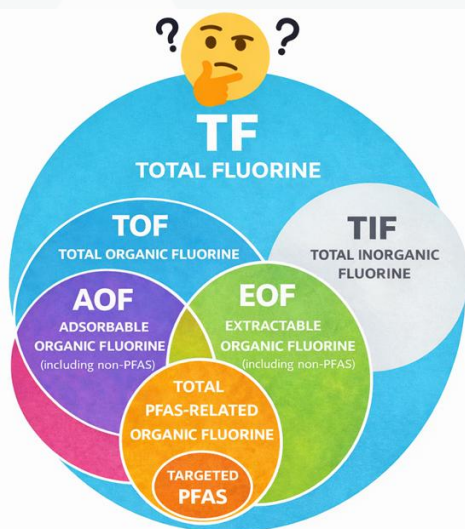
PFAS under the PPWR: A Pragmatic, Defensible Testing Pathway

Food Contact Center (FCC) and Food Contact Services (FCS)

Version: 25 August 2026

Premise: PPWR & PFAS: clarity in a fast-moving landscape

Across the packaging value chain, many companies are struggling to interpret what is *actually required* to demonstrate PPWR conformity on PFAS. In the **absence of harmonized methodology** and an official compound list, uncertainty around screening, verification, and documentation is slowing decisions. We are actively contributing to the current guidance discussion and supporting pragmatic refinements, such as a phased approach to secure legal certainty and practical implementability, fully consistent with the PPWR framework.



Our Position on the Draft of Commission Notice

Interpreting some provisions of Regulation 2025/40 (EU)

Some comments:

After a Step 0 related to Information Collection...

Step 1 Total Fluorine (TF) test: by Combustion Ion Chromatography (CIC) or ISE (50 mg/kg); TF is only a screening and a bulk elemental measure; it cannot distinguish inorganic vs organic fluorine or identify single PFAS.

Step 2& Step 3

- **Total Organic Fluorine (TOF) by pyrolysis.** Food Contact Center acquired the instrumentation in May 2026 and, through direct collaboration with leading experts in pyrolysis, is fully prepared to perform this analysis. As the organic fluorinated compounds detected by this technique may not necessarily be PFAS, and considering that an official method on Py-GC MS is missing, the following tests are required:
- **Direct TOP Assay (250 µg/kg).** Use the Direct TOP only to verify the 250 µg/kg limit.
- If any single PFAS is > 25 µg/kg, **we note that this approach requires reconfirming** the value with a validated **targeted method** without TOP pre-treatment.

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Practical Workflow that We Operate (and Advise)

1. Analysis of **TF by CIC or ISE (screening)**. Flag potentially fluorinated materials; do not infer per-analyte compliance from TF. Be prudent with “non-use” declarations, as process inputs, such as paper process water, may introduce PFAS.
2. In parallel, qualitative **TOF evaluation by Py-GC/MS**, supported by targeted and suspect analysis after **Direct TOP Assay** pretreatment and by **targeted and suspect HRMS quantification** without TOP Assay pretreatment.

Quantify regulated PFAS with validated, accredited methods and fit-for-purpose LOQs.

What Companies Should Do

- Treat supplier declarations prudently and plan analytical verification when risk is non-negligible.
- Implement the multiple-step flow that we suggest to minimize false assurance



Food Contact Center is already fully equipped with the advanced analytical capabilities needed to meet European Commission requirements.

How FCC & FCS Can support You

- Consultancy on Suppliers DOC evaluation and DOC release
- Support with the risk assessment for grouping products into families
- End-to-end PFAS testing programs (paper, plastics, coatings, multilayers):
 - TF screening - TOF screening - Targeted & suspect analysis and direct TOP Assay , direct HRMS only where justified (single > 25 µg/kg)

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