

SCA Containerboard - Information on Packaging and Packaging Waste Regulation

Introduction

The Packaging and Packaging Waste Regulation (PPWR (EC) No 2025/40) entered into force in January 2025. The new regulation shall not be applied until 12 August 2026 (see Article 71). Therefore, the Packaging and Packaging Waste Directive (PPWD; 94/62/EEC) will be repealed only at this date and continue to apply until then.

Some features of PPWR are established from start, while others remain to be defined later through delegated acts from the commission. The status of some important features is summarized below:

Substance restrictions

Limits on metals and PFAS are included from start.

Article 5.4 defines a 100 ppm limit for the sum of the four heavy metals Lead, Cadmium, Mercury and Chromium(VI), which is identical to the corresponding limit in PPWD.

Article 5.5 sets requirements for PFAS, making a distinction between polymeric PFAS (50 ppm limit) and small non-polymeric PFAS (25 ppb each, 250 ppm for the sum of them). In a recently published guidance document, the commission recommends a stepwise approach for PFAS analysis starting with total fluorine. If this value is below 50 mg/kg, the sample can be considered to be compliant.

Article 5.6 adds the requirement of technical documentation to demonstrate compliance with Article 5.4 and 5.5. Other substances of concern may be added in the future, following the routes for identification outlined in Articles 5.2 and 5.3.

Bisphenol A (BPA) is mentioned in the preamble to PPWR, referring to a planned ban on BPA. No limit on BPA is defined in PPWR itself. The forward reference corresponds to regulation EU 2024/3190, which applies to food contact materials made of plastics, adhesives, rubber etc. but not paper and board. The exclusion of paper and board materials is clarified in the commission's guidance document C/2025/6721.

Information on recyclability.

Article 6 sets requirements that all packaging must be recyclable with respect to design for material recycling, compatible with a specific waste stream, and recyclable at scale. By Jan. 2030, all packaging must be approved recyclable according to a ranking system with three grades A-C. The assessment criteria will be developed in delegated acts by Jan 2028. At present there is no information available on how to assess recyclability.

Product composition and recycled content

Article 7 sets requirements on the minimum recycled content in plastic packaging to be met by 2030. Article 8 requires the commission to define targets for biobased feedstock in plastic packaging by Feb. 2028.

Note! Neither Article 7 nor Article 8 apply to paper and board.

Labelling requirements

Article 12 sets requirements on labels for waste sorting as well as labels for reusable packaging. Delegated acts defining the requirements will be published before 12 Aug 2026 though the requirements will apply later, from 12 August 2028 for waste sorting labels and from February 2029 for labels on reusable packaging.

Note! Labelling requirements apply to the final packaging.

6 April 2026

SCA Containerboard status

For the transition period we confirm compliance with the essential requirements of 94/62/ECC:

- The sum of the four heavy metals Lead, Cadmium, Mercury and Chromium(VI) is below 100 ppm, as verified by tests at an accredited laboratory.
- Noxious and other hazard substances are minimised in emissions, ash and leachate
- Requirements on the recoverable nature are fulfilled.

Compliance with PPWR can only be stated on certain specific requirements since:

Firstly, PPWR applies to the final packaging including glues, inks, tapes etc. and not for intermediate products such as paper and board.

Secondly, detailed guidance on certain requirements is not available yet. SCA Containerboard monitors the publication of amendments to PPWR through delegated acts and related guidance documents from the commission. Compliance will be verified for new amendments as they are published.

At present SCA Containerboard can confirm compliance with the following requirements of PPWR:

- Article 5.4. The sum of the four heavy metals Lead, Cadmium, Mercury and Chromium(VI) is below 100 ppm, as verified by tests at an accredited laboratory. (Same requirement as in PPWD)
- Article 5.5. No PFAS are intentionally added to our products. Our papers fulfil the limit for total fluorine content < 50 mg/kg, as verified by tests at an accredited laboratory.
- Article 5.6 requires technical documentation for demonstrating compliance with the Articles 5.4 and 5.5. The commission has not yet provided any guidance on how to demonstrate compliance. At present we provide statements on the content of heavy metals and total fluorine as presented above.

In addition, we can confirm compliance with the German BfR recommendation XXXVI on paper and board for food contact, which includes requirements on bisphenols:

- The release of BPA is below the migration limit defined in BfR XXXVI, 0.01 mg/kg food.

We can also confirm compliance with the requirements on Substances of Very High Concern (SVHC) according to the REACH regulation ((EC) No 1907/2006) i.e.

- No Substances of Very High Concern listed on the official candidate list are intentionally added in concentrations > 0,1% in our products.

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