



Position on Compliance with the PPWR

AMCOR POSITION STATEMENT: COMPLIANCE WITH THE PACKAGING AND PACKAGING WASTE REGULATION

Last updated: March 2026

Regulation (EU) 2025/40 on packaging and packaging waste (PPWR) establishes requirements for the entire life cycle of packaging with regards to environmental sustainability and labelling, in order for packaging to be placed on the EU market. The Regulation also establishes requirements for extended producer responsibility, packaging waste prevention, such as the reduction of certain types of packaging, and requirements relating to reuse or refill, as well as the collection, sorting and recycling of packaging waste.

Under the PPWR, responsibility for ensuring that packaging placed on the market complies with the Regulation generally lies with the economic operator placing the packaging on the EU market, typically the packer/filler or brand owner placing packaged products on the market, but potentially also an importer or distributor, depending on the specific supply chain.

As a supplier of packaging materials and packaging components, Amcor supports its customers in meeting these obligations by designing packaging solutions intended to comply with applicable regulatory requirements and by providing relevant technical and compliance information. However, the final responsibility for ensuring that packaging complies with the PPWR remains with the economic operator placing the packaged product on the market, taking into account the final packaging configuration and use.

The PPWR establishes the core framework governing packaging on the EU market. However, a number of technical elements required to fully assess compliance will be specified through future delegated acts, implementing acts, and harmonized standards to be adopted by the European Commission or European standardization organizations in the coming years.

Key examples include:

- **Article 5 - Requirements for substances in packaging:**
The European Commission will prepare a report on substances of concern in packaging (other than heavy metals and PFAS) by end of 2026. Possible regulatory actions may subsequently follow, including potential restrictions under the EU chemicals framework or requirements linked to recyclability criteria. For PFAS and heavy metals, Amcor already provides relevant compliance documentation for food-contact packaging materials where applicable.
- **Article 6 - Recyclable packaging:**
Delegated acts and implementing acts establishing design for recycling criteria and the methodology to assess recyclability are expected to be adopted by the European Commission by the beginning of 2028.



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- **Article 7 - Minimum recycled content in plastic packaging:**
By the end of 2026, the European Commission is expected to adopt implementing acts establishing the methodology for the calculation and verification of the recycled content as well as the format for the related technical documentation.
- **Article 10 - Packaging minimisation:**
By Feb. 2027, the Commission is expected to mandate European standardisation organisations to develop harmonised standards supporting the assessment of compliance with packaging minimization requirements. These standards may become available around 2028.
- **Article 12 - Labelling of packaging:**
By Aug. 2026, the European Commission plans to adopt implementing acts to establish a harmonised label and specifications for the labelling requirements and formats.

As a result, while the regulatory framework of the PPWR is now established, several technical aspects relevant to compliance assessment will continue to be clarified over the coming years.

Accordingly, any assessment of PPWR compliance may need to evolve as further implementing measures and technical standards are adopted.

However, even though some details remain to be specified, the overall regulatory direction is clear and early action can help ensure that packaging portfolios remain aligned with future requirements.

Recommended actions include:

- **Transition to PFAS-compliant materials ahead of the applicable deadline of 12 August 2026.**
- **Transition to recyclability-ready packaging solutions in line with anticipated design-for-recycling criteria.**
- **Increase the use of post-consumer recycled (PCR) plastics, where technically and legally feasible.**

To discuss any of these topics, please contact your Amcor Account Manager.

Finally, it should be noted that the existing requirements under Directive 94/62/EC on packaging and packaging waste will gradually be replaced by the PPWR as the Regulation becomes fully applicable between 2026 and 2030, depending on the specific provisions.

Dalina Gjunksi
General Counsel
Amcor Flexibles EMEA & ASC

Jens Bavendiek
General Counsel
Amcor Rigids EMEA

Gerald Rebitzer
Vice President
Sustainability Operations &
Advocacy Europe & Asia



PFAS Declaration

We refer to your request concerning the ban on PFAS in certain American states, and to the new European regulation PPWR 2025/40, which stipulates that from August 12, 2026, packaging intended to come into contact with foodstuffs may no longer be placed on the market if it contains a concentration of PFAS equal to or greater than the limits defined in this same regulation. We would like to confirm that we are fully aware of the entry into force of these new regulations, and that we have been working for several months on what is needed to adapt to this new regulatory constraint.

These substances are authorized for food contact materials under the applicable laws and regulations, comply with European regulations according to the Echa list of June 14, 2023, and do not contain the type of perfluoroalkyl carboxylic and sulfonic acids that are of greatest concern to the authorities.

We have carried out extensive work and to date validated PFAS NIA (Non-Intentionally Added) solutions for all our raw materials and all the packaging we use for our products.

Based on the information available to us, Amcor Capsules can confirm that PFAS substances are Not Intentionally Added in our raw materials purchased nor added during manufacturing process.

Based on **testing of relevant samples our product is in compliance** with the limit of **Article 5 of the European regulation PPWR 2025/40** point 5(c); a method to test for the limits in points 5 (a) and (b) does not yet exist.

We cannot exclude the presence of traces of impurities at insignificant levels resulting from accidental contamination or impurities in the precursors of our raw materials.

We remain at your disposal.

Sincerely,

Saint Seurin sur L'Isle, 30th January 2026

Christophe GOBINAUD
Capsules Quality & ETS Manager

A handwritten signature in blue ink, appearing to read "C. Gobinaud", is written over a horizontal line.

Amcor Flexibles Capsules France

Siège social :

1 Rue de Mantes – 92700 Colombes – France – Tel : +33 (0)1 57 00 36 00 – Fax : +33 (0)1 57 00 36 41

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