
Packaging and Packing Waste Regulation (PPWR)

Scoping Declaration

PPWR regulation defines the requirements for the entire life cycle of packaging in terms of environmental sustainability and labelling to enable it to be placed on the market, as well as for extended producer responsibility.

The Regulation (EU) 2025/40 (PPWR) sets targets for 2030 and 2040, including limits on substances of very high concern, recyclability and reusability of packaging, reduction targets, and labelling requirements for sharing information with users. It concerns both B2B and B2C packaging.

The PPWR was adopted by the European Parliament and the Council on 19 December 2024 and published on 22 January 2025. It shall apply from 12 August 2026 regarding Article 5(5).

The definition of a "packaging" is given in Article 3.1.(1): "packaging" means an item, irrespective of the materials from which it is made, that is intended to be used by an economic operator for the containment, protection, handling, delivery or presentation of products to another economic operator or to an end user, and that can be differentiated by packaging format based on its function, material and design, (...)

According to recital (13): An item which is an integral part of a product and is necessary to contain, support or preserve that product throughout its lifetime and where all elements of that item are intended to be used, consumed or disposed of together should not be considered to be packaging given that its functionality is intrinsically linked to it being part of the product. (...) Paints, **inks***, varnishes, lacquers and **adhesives** that have been applied directly on a product **should not be considered to be packaging**.

Our understanding is that CILS International's thermal transfer inks are not in the scope of the PPWR. However, compliance of CILS thermal transfer inks regarding substances of concern such as PFAS, Heavy metals and SVCH's are available upon request. In addition, the Thermal Transfer Ribbons components once used become waste and should be managed accordingly but they are not considered as packaging waste.

Outside of this exemption, CILS will aim to provide all necessary documentation regarding the provision of packaging compliant with PPWR's requirements, including relevant information on our facestocks and where appropriate, liners. Despite technically being out of scope, we will provide information on adhesive composition to support supplier sustainability efforts.

CILS is committed to monitoring the requirements of PPWR relating to packaging components and will continue working with our network of suppliers to meet necessary obligations for August 2026, as well as supplementary deadlines in 2030 and 2040.

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Declaration of Conformity - PFAS and Heavy Metals

This statement confirms that all products supplied by CILS International are not manufactured by intentionally adding:

- Hazardous metal belonging to the group of cadmium (Cd), lead (Pb), mercury (Hg) and hexavalent chromium (Cr VI) or raw materials known to contain them. These metals might be present as industrial impurities. The total concentration will not exceed 100 ppm (based on supplier's declarations).

The content meets also the limit defined in TPCH (Toxics in Packaging Clearing House – previously CONEG) Regulations in the United States.

This statement also confirms that all packaging components supplied by CILS International are designed for non-food industrial/life-science applications. However, we can confirm that products are manufactured without the intentional addition of:

- Fluorinated substances or raw materials known to contain them - with limits not exceeding 50 ppm for PFASs (including polymeric PFAS).

The aim of regulatory documents is to inform and advise our customers. The information provided herein is correct as to the best of CILS International's knowledge as of this date. Recognize that traces of ubiquitously occurring impurities cannot be excluded. Data collected through supplier engagement on PPWR compliance has been used to evaluate the statements made in this document; however specific analysis may not have been conducted.

This statement applies to all materials stated within our supplementary materials composition declaration attached to our original correspondence.

Signed: 

Director of Operations | CILS International

The following declaration references the following passages of legislation extracted from The EU Packaging and Packaging Waste Regulation (Regulation (EU) 2025/40).

In addition to the restrictions on heavy metals (lead (Pb), cadmium (Cd), mercury (Hg) and hexavalent chromium (CrVI) already existing in Directive 94/62/EC2, limit for the concentration of PFAS must now be observed from 12 August 2026.

The sum of the concentrations of lead, cadmium, mercury and hexavalent chromium resulting from substances present in packaging or packaging components shall not exceed 100 mg/kg. From 12 August 2026, food packaging shall not contain per- and polyfluoroalkyl substances (PFAS) in a concentration exceeding the following limits:

- a) 25 ppb for any PFAS as measured with targeted PFAS analysis (polymeric PFAS excluded from quantification);*
- b) 250 ppb for the sum of PFAS measured as the sum of targeted PFAS analysis, where applicable with prior degradation of precursors (polymeric PFAS excluded from quantification); and*
- c) 50 ppm for PFASs (including polymeric PFAS).*