

European Chemicals Agency

August 24, 2026

Feedback on the Draft PPWR Substances of Concern List

Dear Madam or Sir,

Thank you for the opportunity to provide feedback on the draft list of substances of concern (SoC) in packaging and packaging waste. The Food Packaging Forum Foundation welcomes the substantial effort invested in developing this important resource and appreciates the European Chemicals Agency's (ECHA) work to support the implementation of the Packaging and Packaging Waste Regulation (PPWR) to better protect the health of European consumers and the natural environment.

Given the potentially central role of this list in informing subsequent PPWR implementation measures and related policy processes, the Food Packaging Forum Foundation would like to offer the following comments and suggestions to support ECHA and the Commission's ongoing efforts.

Scope of the substances of concern definition

The current definition used to identify substances of concern within the list focuses on substances meeting one of the following criteria, as defined within the corresponding European regulation:

- SVHC status
- Harmonized classification for selected chronic health effects
- POP status

While these criteria provide a useful starting point and applying them would increase protection for European citizens, they are still limited considering the available evidence and do not capture the broader range of known hazardous chemicals in packaging applications, including food packaging. Relevant hazard information from other jurisdictions and regulatory systems could help inform the assessment of these hazard endpoints and support an even more comprehensive identification of substances of concern. Additional hazardous chemicals based on this reliable scientific evidence could be considered to strengthen this list and better protect health. For example, hazard-based prioritization approaches using publicly available data applied in the Food

Packaging Forum's [FCCprio List](#) supports identification of chemicals of concern that are not captured by ECHA's current criteria. Importantly, the Food Packaging Forum submitted a total of 458 chemicals to the call for substances of concern for packaging and packaging waste regulation. Of these 147 were hazardous according to at least one source in the FCCprio List. At present, 42 of these hazardous chemicals are not included as they are not present in any of the European regulations used for the present list of substances of concern.

Furthermore, there are examples of substances already subject to restrictions in specific food contact applications, such as bisphenol A, that may merit further consideration in the context of other non-food contact packaging uses.

Recyclability considerations

We note that a considerable number of substances are identified within the SoC list as having a negative impact on recyclability. It would be useful to further clarify how conclusions from the underlying [JRC work](#) were translated into the draft list and how updates to this methodology in the future would be considered to maintain the SoC list up to date with the latest scientific evidence. While an important step forward, we understand that the cited JRC report was intended to serve as a starting point for development of a future methodology and does not represent a finalized methodology itself.

Future maintenance of the list

It is important to recognize that the SoC list is a current snapshot of known hazardous chemicals present in packaging. This is especially the case considering the many chemicals for which no or incomplete hazard information is currently available. The REACH, CLP, and POP classifications that are being applied as criteria to identify substances for this list will continue to be updated in the future and will include newly tested chemicals. Consequently, it would be important to outline how such additional relevant information will be incorporated through future updates of the SoC list.

To adequately protect European's health and given the rapidly evolving evidence base for chemicals used in packaging, we emphasize the importance of treating the SoC list as a living document that will be periodically updated to reflect new scientific, regulatory, and technical information as it becomes available. The current version can be viewed as an important starting point rather than a definitive long-term endpoint.

We again appreciate the opportunity to contribute to ECHA's work within this space and would be pleased to provide any further scientific information or support related to these comments and other topics as they arise in the future.

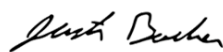
Kind regards,



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