

Packaging Types and Substances in Packaging and Packaging Waste

Fields marked with * are mandatory.

Call for evidence to inform a study on substances of concern in packaging and packaging waste

The Packaging and Packaging Waste Regulation (PPWR)^[1] in force since February 2025 contains provisions to minimise the quantities of packaging and waste generated while lowering the use of primary raw materials and fostering the transition to a circular, sustainable and competitive economy. One of the key aims of the PPWR is to restrict the use of substances of concern (SoC) in packaging.

ECHA's role under PPWR is to prepare restriction proposals on substances in packaging upon request from the Commission and to provide opinions via RAC and SEAC to the proposed restrictions. In addition, ECHA is requested to support the European Commission in the preparation of a study report on the presence of SoC in packaging and packaging components and indication on follow up measures. The report must be completed by 31 December 2026. SoC are identified on the basis of their chemical hazard and on the capacity to hamper the recycling of the packaging materials.

Scope

The purpose of this call for evidence is to collect information on packaging and packaging components that fall within the scope of the PPWR as well as on substances:

- present in packaging materials;
- used in their manufacture; and
- used in the treatment and recycling of waste packaging.

The information will be used by ECHA to support the Commission in the preparation of the study report on packaging.

An indicative (non-exhaustive) list of substances already identified for use in packaging is provided for information, however the call for evidence invites participants to further supplement this list.

Evidence and information to be collected

The present call for evidence, contains questions on the following three key aspects:

- The type and amount of packaging and packaging components being manufactured, imported, exported and used in the EU for different types of packaging materials (plastic, paper/cardboard, metal, glass, wood, ceramic) as well as information to better understand the supply chain and end uses/users of these packaging types.
- The identity, concentrations and technical function/uses of the chemical substances^[2] that are used in the manufacturing process of packaging, present in the packaging itself and used in the downstream processing of packaging waste (e.g. in recycling).
- The disposal and management of packaging waste^[3], including information on the volumes of waste generated, the collection process, the waste management routes (e.g. landfill, incineration, recycling), the efficacy or limitations of recycling technologies, and factors that hinder recycling of waste packaging.

The target of this survey are substances, mixtures and polymers and intermediates (e.g. resins) as defined in REACH.

As well as providing responses to specific questions in this survey, participants are invited to provide any written submissions and/or additional published information sources that relate to these points.

The responses should be based on the current use and/or packaging produced / placed on the market in the past 5 years.

Who should participate in the call for evidence?

The call for evidence questions are addressed to companies (or trade associations) across the whole supply chain for packaging, including manufacturers, importers, distributors, formulators, and downstream users of packaging and components of packaging, as well as chemicals manufacturers, suppliers of raw materials, waste management practitioners and recyclers. Other stakeholders (e.g. scientific organisations and academic experts, NGOs, Member State Authorities and international organisations) are also invited to participate by uploading any written submissions or documents with relevant information. Information can be submitted confidentially and will be treated as such by all contracted parties.

The study is being conducted by WSP on behalf of ECHA. A confidentiality agreement between WSP and ECHA is in place to ensure any data shared by ECHA with the contractor is protected.

Note: individual company information will never be disclosed in any public report. The information from all companies will only be used in an aggregated way to protect individual company data. If there is specific information that you wish to keep confidential, please indicate this in the text box below and the information will be protected as confidential business information (CBI).

Why should you participate in the call for evidence?

The current study aims to inform the European Commission and ECHA on the most important substances of concern in packaging. Substances in packaging may be subject to future regulatory measures – e.g. restrictions. It is therefore essential that the information used to inform such decision making is accurate and representative of the current situation regarding the current production, use and waste management of packaging materials in the EU to avoid a situation where the EU authorities, due to a lack of information, take decisions based on the precautionary principle.

How to complete this survey

This survey consists of five sections.

Part A: Participant Information

Part B: Packaging and packaging components in the EU

Part C: Chemical Substances used in Packaging in the EU

Part D: Disposal and waste management of packaging in the EU

Part E: Final questions (additional information)

Depending on which stakeholder type indicated in Part A, users will be automatically directed to sections that are most relevant for them.

A glossary of terms can be found in the Annex - Glossary (link at the bottom of the page) and provides specific definitions or further information related to specific questions. Participants are also invited to submit additional attachments of supplementary information or resources as part of the submission. Please indicate in the survey responses if relevant information to that question is provided in external attachments (e.g. including page/section numbers).

[1] Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC

[2] The term ‘substance’ and other terms related terms (mixture, monomer, polymer) should be understood within in the context of REACH with reference to the relevant guidance (Link: <https://echa.europa.eu/support/substance-identification/what-is-a-substance>)

[3] The term ‘packaging waste’ and other terms related to packaging should be understood as defined in Article 3(1) of PPWR

If you have any questions related to the call for evidence, please contact [**restriction-PPWR@echa.europa.eu**](mailto:restriction-PPWR@echa.europa.eu)

Annex - Glossary

[Annex - Glossary.pdf](#)

Summary of the main questions of the Call for Evidence

Summary of the main questions of the CfE dedicated to chemicals manufactures, packaging suppliers, packaging manufacturers and trade associations

[CfE PPWR summary of the CfE dedicated to chemicals manufactures packaging suppliers and packagi](#)

Summary of the main questions of the CfE dedicated to waste management / treatment practitioner

[CfE PPWR summary of the CfE dedicated to waste management or treatment practitioner.pdf](#)

Summary of the main questions of the CfE dedicated to Other Actors (Academic / Research / NGO / National Authority / Agency / International Organisation)

[CfE PPWR summary of the CfE dedicated to Other Actors Academic Research NGO National Autho](#)

(All stakeholders) Excel you will find in Part C: Chemical Substances used in Packaging and packaging components in the EU

[Call for Evidence Part C Excel Template Chemical Substances used in Packaging and packaging corr](#)

Part A: Participant Information

In this section, participants are invited to provide details of their organisation name and type, their contact details, location and also to indicate if they are willing to participate in follow up discussions to inform this study, based on their responses to this survey.

*** This field is required.**

*** Please indicate your company/organisation name.**

European Panel Federation

Please indicate your name and your contact details.

Name

Alexis Kuhl

Email

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Telephone number

*** Please indicate the country in which your company / organisation is established within the EEA (European Economic Area).**

- AT - Austria
- BE - Belgium
- BG - Bulgaria
- HR - Croatia
- CY - Cyprus
- CZ - Czechia
- DK - Denmark
- EE - Estonia
- FI - Finland
- FR - France
- DE - Germany
- EL - Greece
- HU - Hungary
- IE - Ireland
- IT - Italy
- LV - Latvia
- LT - Lithuania
- MT - Malta
- NL - Netherlands
- PL - Poland
- PT - Portugal
- RO - Romania
- SK - Slovak Republic
- ES - Spain
- SE - Sweden
- NO - Norway
- IS - Iceland
- LI - Liechtenstein
- Non-EEA country

Please add any further information on your company / organisation location(s)

*** Please indicate the category that best describes your organisation in relation to the packaging value chain (or as a stakeholder organisation):** *(multiple responses allowed)*

Explanatory note:

For the purpose of this call for evidence, a “**chemicals manufacturer**” should be understood in the context of REACH as an actor producing or extracting chemical substance(s). “**Suppliers of packaging**” should be understood as the economic operators who actually produce the packaging (i.e. converters), typically under contract with a manufacturer, while “**packaging manufacturers**” should be understood as the economic operators who have packaging designed on their behalf and are therefore, in most cases, the brand-owners and users of packaging as defined in Art. 3(16) and 3(13) of PPWR respectively.

- Upstream material manufacturer (e.g. chemicals manufacturer / primary or secondary raw materials supplier / polymer producer)
- Suppliers of packaging (polymer converter/packaging converter)
- Packaging manufacturer (brand-owner and/or user of the packaging)
- Waste management / treatment practitioner
- Trade body or association
- Other Actors (Academic / Research / NGO / National Authority / Agency / International Organisation)

As a trade association please describe the sector that you represent.

EU wood-based panels manufacturers.

As an association (national or EU level), please indicate the percentage of market coverage represented by your members, specifying whether this is based on financial market share, tonnage, quantity of packaging, or another metric.

95% based on membership.

*** Do we have your consent to contact you with an invitation to a future stakeholder consultation (e.g. a one-to-one discussion and/or a workshop)?**

Please bear in mind that this does not guarantee that you will receive an invitation, nor does it oblige you to accept one should you receive it.

- Yes
- No

Part B: Packaging and packaging components in the EU/EEA

In this section, participants are invited to provide information on the types and volumes/quantities of packaging or packaging components being produced, imported/exported, used and disposed of in the EU, as well as further details of the specific use(s) of that packaging types in the EU.

Please indicate whether you (or your member companies) are involved in the manufacture, use /consumption, import, export, or disposal of the following packaging types: *[you may select more than one option]*

- Plastic – PET (rigid)

- Plastic – PE / PP / HDPE (rigid)
- Plastic – others (rigid)
- Plastic – PS / XPS / EPS
- Plastic – Biodegradable (rigid and flexible)
- Plastic – Films/flexible
- Paper/cardboard – Except liquid packaging board
- Paper/cardboard – Liquid packaging board
- Metal – Aluminium
- Metal – Steel
- Glass
- Wood / Cork
- Other packaging type not listed (you will be asked to specify later) - option 1
- Other packaging type not listed (you will be asked to specify later) - option 2

You have indicated that you manufacture, use, import, export, or dispose of one or more packaging types. For each of the packaging types you identified, you will be asked two questions: one on the annual volumes /quantities, and one on their main uses.

To answer these questions, you may either complete the survey questionnaire and/or upload any file(s) you consider relevant. An upload space is provided below and again at the end of this section.

If you prefer to provide information only through uploaded files and not by filling in the questionnaire, you may simply upload the file(s) and continue without completing the questions.

Please use this link to upload any non-confidential attachment (either written submission or further documents) to inform this study or complement any of the previous responses.

Packaging material: **Wood / Cork**

Please provide data (quantitative or qualitative) on the volumes (in tonnes) of packaging manufactured, imported, exported, used (e.g. for packaging articles), or disposed of by you (or your member companies). **Report annual information** (e.g. the average tonnage over the last three years).

- If you are not sure about the exact quantity/volume, please provide an **order-of-magnitude estimate**, which will still be very valuable for us.
- If no quantity applies, please enter **“0”** (e.g. if you do not export, write “0” in the export row).
- If you do not know, please enter **“dk”** (don't know).

Share of EU total (%):

In this column, please report your estimate of the share of your activity compared to the total EU quantity. For example, if you report 5 tonnes and the EU total is 1000 tonnes, then your share is 0.5%

	Volume (in tonnes - annual)	Share of EU total (%)
Packaging manufactured (in the EU)	1300000	95%
Packaging imported (from outside EU)	DK	
Packaging exported (to outside EU)	DK	
Packaging used (e.g. to package articles)	DK	
Packaging disposed	DK	

If relevant, include here any additional information to complement your response.

These production figures represent the volume of wood-based panels (particleboard, MDF, OSB, plywodd & hardboard) in Europe that are used in packaging applications. EPF represents 95% of EU wood-based panels industry.

Please indicate the main use(s) of the packaging material **Wood / Cork** that you manufacture, use, import, or export in the table below.

	Please indicate the main use(s)
Cosmetics and beauty products	<input checked="" type="checkbox"/>
Pharmaceutical and hygiene products	<input checked="" type="checkbox"/>
Food and beverage	<input checked="" type="checkbox"/>
Animal Feed	<input checked="" type="checkbox"/>
Medical products and equipment	<input checked="" type="checkbox"/>
Household products (e.g. detergents, cleaning products)	<input checked="" type="checkbox"/>
Household goods and appliances	<input checked="" type="checkbox"/>
Transport packaging (road, rail, sea)	<input checked="" type="checkbox"/>
Chemical products (incl. pesticides, fertilisers)	<input checked="" type="checkbox"/>
Oil / Petroleum products	<input checked="" type="checkbox"/>
Others	<input checked="" type="checkbox"/>

Others - Please specify

If relevant, please include any additional information to complement your response. You may also provide further details or indicate the order of the main uses listed in the table (e.g. by tonnage). This space can also be used to indicate whether the primary use(s) of this packaging type are consumer, commercial, or industrial.

Cosmetics and beauty products → protective boxes/crates for bulk shipments. Pharmaceutical and hygiene products → export crates, pallets, protective transport packaging. Food and beverage → crates for fruits, vegetables, wine, beer, spirits; intermediate dividers. Animal feed → bulk transport pallets, crates. Medical products and equipment → protective crates for sensitive devices. Household products (detergents, cleaning products) → pallets, bulk packaging. Household goods and appliances → crates for white goods (washing machines, fridges, ovens, furniture transport). Transport packaging (road, rail, sea) → export crates, sea-worthy packaging, heavy-duty pallets. Chemical products (pesticides, fertilisers, paints, adhesives) → pallets, reinforced crates. Oil / petroleum products → specialty crates and pallets for drums and containers. Other relevant uses: Electronics & high-tech equipment → protective packaging for computers, screens, machinery parts. Automotive & aerospace components → heavy parts, engines, spare parts shipped in plywood/OSB crates. Military and defence equipment → robust crates and cases. Art & cultural goods → museum and gallery. Furniture & DIY → knock-down kits often transported on wood-based pallets/panel crates.

Please use this link to upload any non-confidential attachment (either written submission or further documents) to inform this study or complement any of the previous responses.

Part C: Chemical Substances used in Packaging and packaging components in the EU/EEA

In this section, participants are invited to provide information on the specific chemical substances (or groups of substances) that are either:

- present in packaging materials (C1);
- used in the manufacture of packaging but not end up in packaging (C2); and/or
- used in downstream treatment of packaging (e.g. for recycling) (C3).

For each of the three types of use detailed above, participants are invited first to select from a defined list of chemical substances (see Excel file) and then provide information on the type(s) of packaging in which the chemicals are used, their the working concentrations (%), and technical function in packaging.

Please provide information for as many chemical substances you know to be used in packaging or in the manufacture of downstream processing of packaging.

For this section, you can choose one of the following options:

- Download the Excel template that we have prepared, fill it in with the requested information, and upload it again. And/or
- Upload any file that contains information you consider relevant.

Download Excel Template: [Chemical Substances used in Packaging and packaging components in the EU Call for Evidence Part C Excel Template Chemical Substances used in Packaging and packaging cor](#)

Upload Excel Template: Chemical Substances used in Packaging and packaging components in the EU

Please use this link to upload any non-confidential attachment (either written submission or further documents) to inform this study regarding chemical substances used in packaging or packaging components or complement any of the previous responses.

Part E: Final questions

Please use this link to upload any **non-confidential** attachment (either written submission or further documents) to inform this study or complement any of the previous responses.

Please add any additional comments or information that is relevant to this study.

Thank you for your contribution!

Contact

restriction-ppwr@echa.europa.eu