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PPWR & SoC A shift beyond packaging

From product compliance
to supply chain accountability

What the Commission clarified

The PPWR redefines how SoC are identified:

- Alignment with REACH, CLP, POP, ESPR
- Broader scope of substances
- PFAS and heavy metals specifically targeted

👉 **Not cumulative criteria**

👉 **One trigger is enough**

This is not a product issue

**Compliance no longer sits at
product level. It now depends on:**

- supplier data
- traceability across the value chain
- consistency across multiple EU frameworks

👉 **The centre of gravity is shifting**

Where the risk now lies

The challenge is no longer:

→ complying with one regulation

But:

→ managing intersections between
several regimes

**👉 Fragmentation becomes the
key risk**

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Pascal Michaux
Managing Partner

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