

# BPA-Free and Food-Contact Safe: Why Paper Packaging Is Winning the QSR Trust Game in 2026

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The global QSR packaging landscape has entered a period of serious regulatory reckoning. After years of incremental change, 2025 and 2026 have brought a cascade of landmark legislation, BPA bans, stricter food-contact material (FCM) standards, PFAS restrictions, and expanded polystyrene prohibitions, that are reshaping how procurement teams, supply chain managers, and QSR operators think about the packaging they put food into.

For paper-based packaging manufacturers that have invested in export-grade quality and food-safety compliance, this moment represents a significant competitive advantage. For buyers still sourcing from non-compliant suppliers, it represents a ticking clock.

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## The Regulatory Wave Is No Longer Coming — It's Here

### The EU's BPA Ban: A Line in the Sand

In December 2024, the European Commission adopted **Commission Regulation (EU) 2024/3190**, officially banning the use of Bisphenol A (BPA) and other hazardous bisphenols in food contact materials. The regulation came into effect on January 20, 2025, with phased transition periods: most single-use FCMs must comply by **July 2026**, reusable FCMs by July 2027, and select categories by January 2029.

BPA, a chemical historically used in plastic coatings, food can linings, and certain packaging laminates, has been classified as an endocrine disruptor with links to hormonal disruption and developmental harm. The EU's move is the most sweeping global action taken against it to date, and it is already triggering regulatory alignment in Switzerland, the UK, and other markets.

Critically, paper and cardboard packaging are **not subject to the BPA ban**, unless combined with plastic-based coatings or linings that contain regulated substances. This distinction matters enormously: manufacturers producing plain, food-contact safe paper packaging are, by default, operating well inside the regulatory boundary.

## The 19th Amendment to EU Plastics Regulation: Tightening the Screws on FCMs

In February 2025, the European Commission released **Regulation (EU) 2025/351** informally referred to as the 19th Amendment to the EU Plastics Regulation. It came into force on March 16, 2025, and introduces:

- **Stricter purity standards** for substances used in the manufacture of plastic food contact materials, including a new "high degree of purity" requirement for additives
- **Enhanced migration limits** on non-intentionally added substances (NIAS)
- **New labelling and declaration-of-compliance obligations** for supply chain actors
- A full compliance deadline of **September 16, 2026** after which all plastic FCMs placed on the EU market must meet the new requirements

For QSR procurement teams and distributors like those operating in the UK, EU, and across export markets, this means supplier audits and declarations of compliance are no longer optional niceties they are supply chain prerequisites.

## PFAS and Polystyrene: The Chemicals Running Out of Time

The pressure is not limited to BPA. **Per- and polyfluoroalkyl substances (PFAS)** sometimes called "forever chemicals" are being eliminated from food-contact packaging across multiple jurisdictions:

- The EU's **Packaging and Packaging Waste Regulation (EU 2025/40)** introduces PFAS limits for food-contact packaging applicable from **August 12, 2026**
- The US state of **Maine** has banned PFAS in plant-fibre-derived food packaging (paper, paperboard, pizza boxes, food boats, and wraps), effective May 2026
- **Illinois** disallowed intentionally added PFAS in food packaging from January 2026

Polystyrene long used in foam food containers and cups continues to lose ground legislatively. Virginia's expanded polystyrene container ban applies to all food vendors from **July 1, 2026**. Multiple other US states, EU member states, and markets across Asia-Pacific have either enacted or are advancing similar restrictions.

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## What "Food-Contact Safe" Actually Means for Your Procurement Team

For QSR procurement managers and food service distributors evaluating packaging suppliers, "food-contact safe" has evolved from a general assurance into a specific, documented, and auditable standard. Here's what it now covers in practice:

**1. Material Composition** Food-contact safe paper packaging uses virgin or certified food-grade fibre. It contains no wax coatings, no BPA-containing linings, no PFAS based grease barriers, and no recycled content that could introduce contaminants. This is the baseline expectation in the EU, UK, and increasingly in markets like the UAE, Australia, and Southeast Asia.

**2. Migration Testing and Declarations of Compliance** Under both EU and UK frameworks, suppliers placing packaging on those markets are expected to provide declarations of compliance confirming that the packaging does not transfer substances to food in unsafe quantities. For distributors like Bunzl and Bidfood UK, this documentation is a standard part of onboarding a new packaging supplier.

**3. FSSAI Compliance for India-Sourced Packaging** India's Food Safety and Standards Authority (FSSAI) regulates food contact materials under FSS (Packaging) Regulations. FSSAI-compliant manufacturing ensures that paper packaging produced in India and exported internationally meets the minimum safety standards for food-contact use. For QSR chains and cloud kitchen operators sourcing domestically, this is a non-negotiable.

**4. Audit-Ready Facilities** Major QSR chains and large-format distributors do not simply accept declarations they conduct supplier audits. An audit-ready manufacturing facility maintains documented quality management processes, traceability records, and material certification on demand.

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## Why Paper Is Winning

Regulatory pressure is only one side of the story. The shift to paper packaging is also being driven by consumer sentiment and brand strategy.

A 2026 global analysis by Innova Market Insights found that **43% of consumers** are actively choosing recyclable packaging to reduce their environmental impact. Mentions of paper packaging in food and beverage social listening data are growing, with sustainability, convenience, and eco-friendliness as the primary drivers. Major international brands including QSRs are publicly committing to plastic reduction targets.

Paper packaging delivers on multiple fronts simultaneously:

- **Regulatory compliance** inherently outside the BPA ban scope; no PFAS required for standard food-contact applications
- **Consumer perception** widely understood as recyclable and responsible
- **Operational performance** advances in paper coatings now deliver moisture and grease resistance without plastic laminates, maintaining food quality throughout delivery and service
- **Brand trust** clean, food-safe packaging reinforces the quality signal at the point of consumption

For QSR chains that have invested heavily in brand integrity and food safety culture, the packaging sitting around their burger, fries, and pizza is part of the promise made to the customer.

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## What QSR Operators and Distributors Should Be Asking Their Packaging Suppliers

Given where regulation is heading, procurement teams in 2026 should be asking the following questions when evaluating or renewing a packaging supplier relationship:

1. **Are your products BPA-free and free from hazardous bisphenols?** If the supplier is offering plastic-coated or laminated products, request documentary evidence.
  2. **Do you hold a current Declaration of Compliance for EU and/or UK food contact material regulations?** This should be specific to the product SKU, not a blanket company statement.
  3. **Is your facility FSSAI-compliant (for India-sourced products)?** And can you demonstrate compliance through audit documentation?
  4. **Is your manufacturing facility open to third-party audits?** The willingness to be audited is itself a signal of supply chain maturity.
  5. **Are your paper products manufactured without foam, PFAS coatings, or recycled-content materials that could introduce contaminants?** Eco positioning is valuable but not at the cost of food safety.
  6. **What are your lead times and MOQ terms?** For large QSR chains operating across multiple geographies, supply continuity and flexibility are as important as unit cost.
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## The Competitive Edge Belongs to Suppliers Who Got There First

The regulatory direction of travel has been visible for several years. Manufacturers who responded early building audit-ready facilities, investing in FSSAI and international food-safety compliance, eliminating foam and non-compliant materials from their product range are now positioned at exactly the right moment.

For international QSR chains and distribution companies managing supplier risk, the calculus is increasingly simple: the cost of switching to a compliant supplier today is far lower than the cost of a supply chain disruption, a failed audit, or a regulatory market restriction in 2026 and beyond.

Paper is not winning by default. It is winning because the suppliers who manufacture it to the right standard built their businesses around what the market would eventually require not what it used to accept.

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*Cambay Technopack Pvt. Ltd. is a Surat-based manufacturer of export-grade paper disposable products for the QSR and food service industry, supplying leading international distributors and QSR chains across Europe, the UK, and beyond. All products are manufactured without foam, in an FSSAI-compliant, food-contact safe, audit-ready facility.*

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**Tags:** Food Contact Materials | BPA Ban | EU Packaging Regulations | QSR Packaging | Paper Packaging | FSSAI Compliance | Food Safety | Sustainable Packaging | Export-Grade Packaging