

## Information and Documentation Provided by Supplier Pursuant to Article 16 of Regulation (EU) 2025/40 on Packaging and Packaging Waste

Dear customer,

Mondi Paper Sales GmbH (Marxergasse 4A, A-1030 Vienna) supplies your company with uncoated fine paper which is produced by Mondi Neusiedler GmbH & Co KG (Theresienthalstraße 50, 3363 Ulmerfeld-Hausmening, Austria). Both companies are part of the Mondi Group (hereinafter “Mondi”). Please find a statement regarding your inquiry below.

Mondi, acting in its capacity as supplier of packaging materials within the meaning of Article 3(1)(16) of Regulation (EU) 2025/40 on packaging and packaging waste (hereinafter “PPWR”), hereby provides the following information and documentation:

This document concerns the requirements for substances in packaging laid down in Article 5 PPWR applicable from 12 August 2026, namely:

1. Article 5(1) PPWR minimisation of substances of concern, applicable to all packaging placed on the Union market;
2. Article 5(4) PPWR restriction on heavy metals; and
3. Article 5(5) PPWR restriction on per- and polyfluoroalkyl substances (PFAS)<sup>(1)</sup> in food-contact packaging, i.e. packaging within the meaning of Article 1 of Regulation (EC) No 1935/2004 intended to come into contact with food

**Minimisation of substances of concern (Article 5(1) PPWR):** The packaging materials listed above are manufactured in such a way to minimise the presence and concentration of substances of concern within the meaning of Article 3(1), fourth subparagraph, PPWR in conjunction with Article 2(27), of Regulation (EU) 2024/1781 establishing a framework for the setting of ecodesign requirements for sustainable products (ESPR), as constituents of the packaging material supplied.

In order to support compliance with this obligation, Mondi has implemented the following measures:

- systematic and sample-based screening of input raw materials, such as process chemicals, inks<sup>(2)</sup>, varnishes<sup>(2)</sup>, glues<sup>(2)</sup> and adhesives<sup>(2)</sup>,

Mondi monitors regulatory developments, in particular the report on substances of concern in packaging and packaging components to be prepared by the Commission, assisted by the European Chemicals Agency, as well as any harmonised standard or common specification adopted under PPWR, and will adapt this declaration where required.

**Heavy metals (Article 5(4) PPWR):** Mondi can confirm that the sum of the concentrations of lead (Pb), cadmium (Cd), mercury (Hg) and hexavalent chromium (Cr(VI)) in the supplied packaging materials, assessed per packaging material/component as supplied, is below the threshold of 100 mg/kg.

Mondi's conclusion is supported by the following evidence:

1. Analytical verification:
  1. the four heavy metals are quantified by atomic absorption spectrometry (AAS), inductively coupled plasma optical emission spectrometry (ICP-OES) and/or inductively coupled plasma mass spectrometry (ICP-MS) after microwave-assisted total digestion of the sample;
  2. the analyses are applied, in accordance with the recognised analytical methods applied to the packaging material as supplied, including all auxiliaries;
2. Supply-chain controls: Mondi obtains from its raw-material suppliers, through the yearly supplier notification, confirmations that the materials they supply do not exceed the 100 mg/kg sum limit of Article 5(4) PPWR, together with corresponding heavy-metals data where available, and verifies the consistency of those confirmations with its own analytical results.

**PFAS (Article 5(5) PPWR):** In line with the European Commission's operational guidance, a stepwise approach is recommended for compliance verification:

- *Step 1: Information collection and risk assessment: a structured review of supply-chain information and a documented risk assessment establish whether there is any indication of PFAS use or of a risk of PFAS contamination.*
- *Step 2: Total fluorine (TF): TF is quantified, and if its content is below 50 mg/kg, the packaging material can be considered compliant with Article 5(5) PPWR, and no further testing of the other two limits is required.*
- *Step 3: Source attribution: where TF exceeds 50 mg/kg, pyrolysis-GC/MS and/or the selective determination of organically bound fluorine is applied to establish whether the fluorine is attributable to PFAS or to inorganic or other non-PFAS sources. Where the fluorine is demonstrated not to originate from PFAS, compliance with Article 5(5) PPWR is demonstrated, and the risk of exceeding any of the PFAS limit values is low.*

Mondi confirms that the total and/or organic fluorine content of the supplied packaging materials, determined per homogeneous material/component, is below the threshold of 50 mg/kg (50 ppm).

This conclusion is based on one of the following pieces of evidence:

1. Analytical verification:
  1. untargeted PFAS are quantified by the determination of total fluorine (TF) and/or organic fluorine by combustion ion chromatography (CIC);
  2. targeted PFAS are quantified, on a risk basis, according to the in-house method of the Mondi Group Food Safety Laboratory, applied to the packaging material as supplied, including all auxiliaries (LC-MS/MS);

3. sampling, analysis and reporting are performed per homogeneous material/component; multilayer structures that cannot be physically separated (e.g. coated or printed paper and board) are analysed as a single homogeneous fraction;
2. Supply chain controls: Mondi obtains corresponding PFAS data and confirmations from its raw-material suppliers that the total fluorine content of the supplied material does not exceed 50 mg/kg and verifies consistency on a risk basis through its own analytical testing, applying the methods for total fluorine and organic fluorine described under 'Method details' below; the selection, scope and frequency of such verification testing are determined by the internal risk-assessment procedure, taking into account the material-intrinsic likelihood of PFAS occurrence.

#### Method details:

1. Total fluorine: a representative sample is analysed using a combustion ion chromatography (CIC) instrument. The sample is automatically introduced into a quartz combustion tube and combusted under an oxygen–argon atmosphere. The resulting combustion gases are passed through a frit into an absorption solution consisting of ultrapure water. An aliquot of the absorption solution is subsequently analysed for fluoride ions by ion chromatography (IC).
2. Organic fluorine: the sample undergoes a dedicated preparation procedure to selectively determine inorganically and/or organically bound fluorine. The prepared sample is subsequently transferred into a quartz tube and combusted under an oxygen–argon atmosphere. The resulting combustion gases are absorbed in ultrapure water, and the fluoride ions formed are determined by ion chromatography (IC).

In accordance with its information obligations under Article 16 PPWR, Mondi will, upon request, provide the manufacturer with updated information and documentation, and will inform the manufacturer of any change affecting the information provided herein. This PPWR Information has a validity of 1 year from its issue date, unless changes occur that may affect its validity.

#### **Risk assessment: Process-level confirmations:**

To support the customer's analysis and assessment of the risks of non-conformity required as part of the technical documentation, Mondi provides the following information on its risk-based testing and monitoring regime, together with the following process-level confirmations regarding the packaging materials it supplies:

#### **Testing and monitoring regime:**

1. Mondi's verification of the heavy metals and PFAS parameters rests on a structured, risk-based control system operated at the material level, under which testing is carried out regularly;
2. The relevant analyses are performed or organised by the Mondi Group Food Safety Laboratory.

**Heavy metals:** Mondi's raw-material suppliers confirm, through the yearly supplier notification, that the materials they supply do not exceed the 100 mg/kg sum limit of Article 5(4) PPWR; Mondi verifies the consistency of these confirmations with its own analytical results.

**PFAS:** Verification of unintentional use: To the best of Mondi's knowledge and efforts, supplier declarations confirming the absence of intentionally added PFAS have been obtained for input materials. The coverage of these declarations across the value chain, including any gaps, is documented.

### **Scope and Limitations of Information Provided:**

The information and documentation provided herein relate solely to the packaging materials supplied by Mondi to the customer in their unprocessed or intermediate state, and do not extend to, nor constitute any representation regarding, the final packaged product or the packaging as ultimately placed on the market by the customer.

This information and documentation are provided to assist the customer in fulfilling its obligations under PPWR, including the preparation of technical documentation and the demonstration of compliance with the requirements established by PPWR.

The analytical data referenced herein reflect testing conducted on the packaging materials as supplied by Mondi. Any subsequent processing, conversion, filling, or other modifications performed by the customer or other economic operators in the supply chain may affect the composition and characteristics of the final packaging.

The customer, by applying the final processing steps to the supplied packaging material and making the packaging, under his name or trademark, available for distribution, consumption or use, bears exclusive responsibility for ensuring that the packaging as placed on the market complies with all applicable legal requirements.

By providing this information and documentation, Mondi does not assume, and expressly disclaims, any manufacturer obligations under PPWR or any responsibility for the conformity of packaging as ultimately placed on the market or for the completeness, adequacy or sufficiency of the customer's technical documentation or conformity assessment.

The information and documentation provided herein constitute commercially sensitive information disclosed in confidence solely to enable the customer to demonstrate conformity and to draw up the Annex VII technical documentation and may not be used for any other purpose or disclosed to third parties, except where required by law.

(1) 'PFAS' means any substance that contains at least one fully fluorinated methyl (CF<sub>3</sub>-) or methylene (-CF<sub>2</sub>-) carbon atom (without any H/Cl/Br/I attached to it), except substances that only contain the following structural elements: CF<sub>3</sub>-X or X-CF<sub>2</sub>-X', where X = -OR or -NRR' and X' = methyl (-CH<sub>3</sub>), methylene (-CH<sub>2</sub>-), an aromatic group, a carbonyl group (-C(O)-), -OR'', -SR'' or -NR''R'''; and where R/R'/R''/R''' is a hydrogen (-H), methyl (-CH<sub>3</sub>), methylene (-CH<sub>2</sub>-), an aromatic group or a carbonyl group (-C(O)-).

(2) if used in our converting operations

This statement is valid for one year from the date of delivery.



Florian Döbl  
Managing Director



Quality, Continuous Improvement & Quality Manager