ODYSSEY
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Gdańsk, 2026.04

# STATEMENT

**SUBJECT OF THE STATEMENT**
GC2 Diamond

**CONTENT OF THE STATEMENT**
Odyssey Sp. z o.o. hereby confirms that the aforementioned raw material complies with the following requirements, standards, guidelines, and regulations, is the subject of the listed certification, or is manufactured in accordance with the specified standards:

On January 22, 2025, the European Union officially published Regulation (EU) 2025/40, the "Packaging and Packaging Waste Regulation" (PPWR), which will fully repeal and replace the existing Directive 94/62/EC as of August 12, 2026, becoming the primary legislation governing packaging and packaging waste management within the EU. To protect our customers' interests and ensure clear regulatory compliance, the manufacturer hereby provides the following official explanation:

**I. Definitions**

i. Total Fluorine
Total fluorine refers to the total amount of all fluorine elements contained in a sample, including various fluorine-containing forms such as organic fluorine and inorganic fluorine compounds. It encompasses all fluorine-containing forms including organic fluorine, fluoride salts dissolved in the sample, and other fluorine compounds (including PFAS).

ii. Inorganic Fluorine
Inorganic fluorine consists of compounds formed by fluorine and inorganic groups, containing no organic carbon-fluorine chemical bonds. It represents the inorganic part of total fluorine. Potential sources of inorganic fluorine in paper mainly include raw materials (e.g., trace fluorine naturally present in plant fibers, fluoride impurities in mineral fillers), etc. Common inorganic fluorine compounds include sodium fluoride, calcium fluoride, fluorosilicic acid, etc. Such substances do not fall under the scope of PFAS.

iii. Organic Fluorine Compounds
Organic fluorine compounds are substances formed by the combination of fluorine with organic compounds via carbon-fluorine chemical bonds, representing the organic portion of total fluorine. This category covers a wide range, with PFAS being a significant subclass of organic fluorine compounds.
Organic fluorine that may be present in paper includes PFAS (e.g., perfluorooctanoic acid, perfluorooctane sulfonate and their salts and related substances) and non-PFAS organic fluorine compounds (e.g., certain fluoropolymers that do not exhibit the long-term persistence or bioaccumulation characteristics of PFAS). Among these, PFAS are a key focus of global regulations due to their environmental persistence and bioaccumulation.

**II. Specific Requirements**

The primary regulatory framework for all types of packaging paper, including food contact packaging, in the EU is the Packaging and Packaging Waste Regulation (EU) 2025/40 (PPWR). The regulation entered into force on February 11, 2025, and will become mandatory from August 12, 2026. The core requirements are as follows:

i. Heavy Metal Limits
The total content of lead, cadmium, mercury, and hexavalent chromium in packaging shall not exceed 100 mg/kg.

ii. PFAS (Per- and Polyfluoroalkyl Substances) Control From August 12, 2026, all food contact packaging placed on the EU market must comply with the relevant PFAS limits.
1) Limit for individual PFAS substances: ≤ 25 ppb.
2) Sum of PFAS substances following precursor degradation: ≤ 250 ppb.
3) Total PFAS content (including polymeric PFAS): ≤ 50 ppm. If the total fluorine content exceeds 50 mg/kg, a supporting document regarding the fluorine content (as PFAS or non-PFAS) must be provided.
The official implementation guide for the PPWR recommends a stepwise testing approach: first, test for total fluorine (TF). If the threshold is exceeded, further analyze for organic fluorine content, and if necessary, conduct specific PFAS testing. If the total fluorine or organic fluorine content is below 50 mg/kg, the product is considered compliant with the PFAS requirements.
Applicable testing standards: Total fluorine screening shall be performed using EN 14582:2016; testing for individual PFAS substances shall be performed using the new EN 17681-1:2025 standard, which can accurately capture various PFAS forms, ensuring comprehensive and reliable test results.

iii. Recyclability Requirement
The PPWR explicitly requires that, from August 12, 2026, all packaging placed on the EU market must be recyclable.

## III. Testing and Compliance Statement for Our Products

The manufacturer, as a responsible paper manufacturer, is committed to producing safe, environmentally friendly, and compliant paper products, and places great importance on the impact of our products on health and the environment. During production, the manufacturer does not intentionally add any per- and polyfluoroalkyl substances (PFAS) as functional ingredients or processing aids. Only trace amounts of inorganic fluorine may be introduced from natural mineral fillers. All our paper products have been tested by accredited third-party laboratories, and the test results for the final paper demonstrate compliance with the heavy metal and PFAS limit requirements of the PPWR, ensuring production activities strictly adhere to all applicable standards and regulations.

Furthermore, our paper products can be recycled after disposal through existing waste paper recycling systems. The manufacturer does not use any coatings or additives that would hinder recyclability, thereby fully complying with the PPWR's recyclability requirements and supporting the EU's circular economy goals.

Upon request, relevant test reports are available for your review to verify product compliance.

The manufacturer consistently adheres to the fundamental principles of product quality and regulatory compliance, strictly following relevant global industry regulations and standards in production processes, and continues to provide you with safe, compliant food contact packaging products.

This statement has been prepared on the basis of documentation provided by the manufacturer of the raw material.

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