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Sappi Information on Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR)

Products: Sappi Paper and Packaging grades
Date: 10.08.2026

Dear Customer

As PPWR enters into application on 12 August 2026, we would like to share a brief update on Sappi's readiness activities.
As a material supplier, we will provide the relevant information and documentation to support manufacturers in meeting the PPWR obligations to assess and declare conformity. In this first phase of PPWR implementation, we confirm that we have been actively preparing for the requirements set out in:

- Article 5(4) (minimization of substances of concern – heavy metals)
- Article 5(5) (substances of concern in packaging – PFAS restrictions and analytical limits), • Article 6 (recyclability of packaging) of Regulation (EU) 2025/40.

We have been consistently testing our papers against Article 5(4) requirements on heavy metals, as this was already part of the Packaging and Packaging Waste Directive (PPWD) framework 94/62/EC as amended by directive (EU) 2018/852. In addition, Article 6 requirement, recyclability in accordance with EN 13430:2004 (requirements for packaging recoverable by material recycling) has been assessed on an ongoing basis, both internally and/or externally, in line with established industry methodologies. For Article 5(5), we apply the stepwise Total Fluorine (TF) testing methodology as set out in the official PPWR guidance. We have been analyzing representative samples with a method based on this approach.

Our assessments and document preparation are progressing in line with the regulatory timeline, and we do not foresee any issues with demonstrating compliance with the applicable requirements set out in Article 5(4), Article 5(5), and Article 6. We have updated our relevant product documentation (Declarations of Compliance) accordingly, to incorporate these clauses.

For the transport packaging used to ship our products, we have the role of the manufacturer under the PPWR and are currently preparing the corresponding Declaration of Conformity. We are ensuring compliance with the applicable PPWR requirements and expect to have all supporting technical documentation in place before 12 August 2026. To the best of our knowledge, the PPWR does not require manufacturers to provide the Declaration of Conformity to customers or other stakeholders. The Declaration of Conformity must be made available to the competent authorities upon request. We have general information on Sappi's transport packaging available for your information.

With respect to our responsibilities as a producer of transport packaging, we are ensuring compliance with the relevant obligations set in Article 44 and Article 45.

We remain committed to working together as we transition into this new packaging regulation, and subsequent obligations come into effect.
Should you require any further information, please do not hesitate to contact us.

Sappi Europe Sustainability Department