

Royal LC Packaging International BV
Otto Matseweg 9
2742 JW Waddinxveen
The Netherlands

t +31 180 39 38 37
info@lcpackaging.com
www.lcpackaging.com

Statement – Compliance to Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR)

Waddinxveen, 16-06-2026

We hereby provide the following declaration regarding compliance with Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR):

The PPWR, published on 22 January 2025, replaces Directive 94/62/EC and sets new requirements to ensure that packaging placed on the EU market is safe, sustainable, and recyclable.

The first obligations of the regulation become applicable on 12 August 2026, with further requirements entering into force gradually thereafter.

Heavy Metals

We confirm that the sum of concentration levels of lead, cadmium, mercury, and hexavalent chromium in our packaging and packaging components does not exceed 100 ppm by weight, in accordance with PPWR requirements.

PFAS (Per- and Polyfluoroalkyl Substances)

We confirm that PFAS are not intentionally added at any stage of the manufacturing process of our packaging materials.

This statement is based on information provided by our production partners and the material composition of the packaging. PFAS-containing substances are not used in our processes, and based on the available documentation, no PFAS-containing raw materials are used.

According to the European Commission PPWR Guidance Document, PFAS testing follows a risk-based approach:

- If PFAS are intentionally added → analytical testing is required.
- If PFAS are not intentionally added and supplier documentation confirms this → analytical testing is not required.

Recent analytical research supports this approach. In 2025, the Swedish laboratory RI.SE, on behalf of the European Commission, conducted total fluorine (TF) and PFAS analyses on a broad set of paper, cardboard, and plastic samples. The study concluded that:

“As a rule, the 50 ppm threshold for total fluorine is not reached or exceeded through unintentional use of PFAS.”

All plastic samples tested—virgin and recycled—were fully compliant with Article 5(5) PPWR.

Based on this evidence and the absence of intentionally added PFAS in our materials and processes, we do not conduct broad PFAS or total fluorine testing. Instead, we rely on material composition and supplier information to confirm that the total fluorine content of our packaging materials remains below 50 mg/kg, consistent with the threshold used in EU guidance to demonstrate the absence of PFAS.

Substances of Concern (REACH Reference)

In accordance with the PPWR and the REACH Regulation (EC) No 1907/2006, we confirm that our products:

- do not contain substances of very high concern (SVHCs) above 0.1% w/w
- do not contain substances restricted under REACH Annex XVII

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Amela Hamzic'.

Amela Hamzic
International Quality Manager
Email: ahamzic@lcpackaging.com