



Mondi Świecie Sp. z o.o.
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www.mondigroup.com

2026-04-20

Dear Sir/Madam,

Mondi Świecie Sp. z o.o. (ul. Bydgoska 1, 86-100, Świecie, Poland, hereinafter "Mondi") supplies their customers with the following paper grades:

- **ProVantage Kraftliner**
Application (BfR XXXVI): direct contact with dry, non-fatty and such foods which are peeled, shelled or washed before consumption and may also be used as secondary packaging. Dry, non-fatty foods with large surfaces may be packed by additionally using an appropriate intermediate packaging.
- **ProVantage SmartKraft Brown**
Application (BfR XXXVI): The listed paper grade can come in direct contact with dry, non-fatty and such foods which are peeled, shelled or washed before consumption and may also be used as secondary packaging. Dry, non-fatty foods with large surfaces may be packed by additionally using an appropriate intermediate packaging.
- **ProVantage Testliner 3**
Application (BfR XXXVI): The listed paper grade can come in direct contact with dry, non-fatty and such foods which are peeled, shelled or washed before consumption and may also be used as secondary packaging. Dry, non-fatty foods with large surfaces may be packed by additionally using an appropriate intermediate packaging.
- **ProVantage Fluting WB**
Application (BfR XXXVI): The corrugated boards manufactured with it can come in direct contact with dry, non-fatty and such foods which are peeled, shelled or washed before consumption and may also be used as secondary packaging. Dry, non-fatty foods with large surfaces may be packed by additionally using an appropriate intermediate packaging.
- **ProVantage Aquaflute**
Application (BfR XXXVI): direct contact with dry, non-fatty and such foods which are peeled, shelled or washed before consumption and may also be used as secondary packaging. Besides, a contact of corrugated boards manufactured with the fluting in an internal layer with dry, moist and fatty foods is approved, as far as ProVantage Aquaflute is concerned and provided that no direct interaction with the food results from this.
- **ProVantage Frescoflute**
Application (BfR XXXVI): direct contact with dry, non-fatty and such foods which are peeled, shelled or washed before consumption and may also be used as secondary packaging. Besides, a contact of corrugated boards manufactured with the fluting in an internal layer with dry, moist and fatty foods is approved, as far as ProVantage Frescoflute is concerned and provided that no direct interaction with the food results from this.
- **ProVantage Kraftliner Aqua**
Application (BfR XXXVI): direct contact with dry, non-fatty and such foods which are peeled, shelled or washed before consumption and may also be used as secondary packaging. Dry, non-fatty foods with large surfaces may be packed by additionally using an appropriate intermediate packaging.



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Please find a statement regarding your inquiry below:

Product Description

The above listed paper grades are corrugated base paper grades. The fibre sources include recycled paper (paper for recycling qualities).

PPWR

Please see the general Mondi statement on PPWR below. You can also find statements on PFAS and heavy metals further below.

"As you may be aware, the PPWR entered into force in 2025 and will become applicable from 12 August 2026. While the regulation sets ambitious targets for packaging sustainability, many of its key provisions, such as design for recycling criteria (due by 1 January 2028), recycled content

calculation methods in plastic packaging (due by 31 December 2026), and labelling requirements, are still under development through delegated and implementing acts. These technical specifications are essential for determining how compliance will be assessed in practice.

Given this evolving regulatory landscape, it is currently not possible for any company to issue a formal declaration of compliance with the PPWR. Providing such confirmations at this stage could risk being considered misleading under EU legislation on fair commercial practices.

It is also important to note that under the PPWR, the entity placing packaging on the market under its own name or trademark is considered the 'manufacturer' and holds the primary responsibility for demonstrating compliance. In cases where Mondi supplies packaging materials or products to you, we act as a supplier, supporting your compliance efforts by providing relevant technical information and product data to support your assessments once the regulatory framework is fully defined.

We encourage you to reach out with any specific questions or requests for technical information.

We are happy to support your preparations and will continue to keep you informed as the regulatory details become clearer."

Odour / Sensory

In accordance with Regulation (EC) No. 1935/2004 (Article 3), the packaging materials must be manufactured so that they do not transfer substances to the packed food in quantities that could cause " [...] a deterioration in the organoleptic characteristics thereof". In the absence of EU-wide specific measures for paper and board-based food contact materials, the compliance with Reg (EC) 1935/2004 of the paper grades listed above is demonstrated through meeting the requirements of the German Recommendation XXXVI "paper and board for food contact" for the defined food contact applications. Therefore, the given requirement is seen as fulfilled for the above-stated application.



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MIBI

The production of food contact materials at Mondi follows the requirements of the GMP/GHP standard (externally certified), which underlines the required GMP activities according to Reg (EC) 2023/2006. According to the GMP regulation, all possible risks have to be managed accordingly.

Due to the stringent production conditions of the supplied paper grade, intensive heating operations and the lack of water in the final product there are no biological discussions on living matters known in our industrial sector.

Heavy Metals

The paper grades listed above and produced by Mondi fulfil the requirements of heavy metals (the sum of concentration levels of lead, cadmium, mercury and hexavalent chromium present in packaging and packaging components shall not exceed 100 ppm by weight) of the PPWD 94/62/EC and PPWR 2025/40 "on packaging and packaging waste."

Comment: Reg(EU) 2025/40 "on packaging and packaging waste, amending Reg(EU) 2019/1020 and Dir(EU) 2019/904, and repealing Dir 94/62/EC" (PPWR). On the Dec 19th 2024 the European Commission has signed-off the PPWR proposal, which has been published on 22th Jan 2025 and shall apply from Aug 12th 2026 (except Article 67(5) shall apply from Feb 12th 2029).

Radioactivity

Incorporated radioactivity will be typically found in the tree bark and not in the wood itself. Due to the debarking process in the paper production there is no discussion on a possible Cesium 134/137 contamination in paper based products.

Comment: In forest areas contaminated with radioactive cesium the transfer of cesium 137 from the soil into the wood of trees is relatively low. The levels of cesium 137 in wood products are in general not significant from a radiation protection point of view and are seen biologically harmless to humans.

Pb, As

Please refer to our statement regarding Heavy metals as well as our REACH statement below.

The products listed above and produced by Mondi are regarded as "articles" and no REACH registration is needed. All suppliers of raw materials and chemical products of Mondi have confirmed their obligation to inform Mondi immediately about any changes in the production (e.g. recipes) of the material sold to Mondi based on REACH. Mondi also confirms your company the duty according to Reg(EC) 1907/2006 to inform you immediately on all REACH relevant changes of the paper grade produced by Mondi. This information duty includes as well the fulfilment of the 0,1% (w/w) limit for substances of very high concern (SVHC according to ECHA "candidate list of SVHC" - amendment status based on given date)

Formaldehyde[CAS: 50-00-0]

Formaldehyde is a registered chemical, which can be officially used to produce food contact materials in the EC under certain conditions. The paper grades listed above and produced by Mondi fulfil the requirements of the German Rec. XXXVI for food contact applications. There is no formaldehyde allowed in the final food contact paper grades (< 1 mg/dm² in the water extract).



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PCB

Not applicable . The paper grades listed above are neither flame-retardant nor grease-proof base paper grades. The listed paper grades meet the requirements of German Recommendation XXXVI "Paper and board for food Contact" for the defined applications. The Recommendation XXXVI is a positive list meaning only pre-evaluated and registered raw materials and chemical substances can be used to produce these food contact materials. As the chemical substances listed in Regulation (EC) 2019/1021 are not listed in Recommendation XXXVI they will not be used in the production of the paper grades listed above.

Comments:

- Polychlorinated biphenyls / PCBs incl dioxin like (DL) – PCBs: Since PCB are forbidden in most states over the world (181 states and the EC have signed the Stockholm Convention on Persistent Organic Pollutants in 2001, which is an international environmental treaty to eliminate or restrict the production and use of persistent organic pollutants (POPs). Polychlorinated biphenyls (PCBs) are listed as POPs. There is no PCB input and not PCB discussion in the pulp & paper industry for decades.
- Since recycled fibers are used in the production of the listed paper grades, a "free-of" statement cannot be given.

Bisphenols

The following documents outline the current regulations on bisphenol usage in our industrial sector:

- Reg (EU) 2024/3190 “on the use of bisphenol A (BPA) and other bisphenols and bisphenol derivatives with harmonised classification for specific hazardous properties in certain materials and articles intended to come into contact with food, amending Regulation (EU) No 10/2011 and repealing Regulation (EU) 2018/213”.

This regulation applies to the intentional use of BPA its salts and other hazardous bisphenols and derivatives in the manufacture of the following groups of food contact materials and articles according to Article 1, paragraph (2):

- a) Adhesives
- b) Rubbers
- c) Ion-exchange resins
- d) Plastics
- e) Printing inks
- f) Silicones
- g) Varnishes & coatings

According to Article 11 & 12 of the Reg(EU) 2024/3190 "Single-use & Repeat-use final food contact articles manufactured using BPA and complying with the rules as applicable before the date of entry into force of this Regulation, which do not comply with the rules in this Regulation, may be placed on the market until 20 July 2026."

- The Recommendation XXXVI “paper and board for food contact” of the German BfR gives a specific migration limit (SML) for secondary fibre containing grades. However, there is no relevant BPA and/or BPS transfer for the direct contact with dry, non-fatty foodstuffs seen by the German authorities.



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The paper grades listed above are not considered within the scope of Reg (EU) 2024/3190. The paper grades listed above and manufactured by Mondi are produced in accordance with the German Recommendation XXXVI "Paper and board for food contact" for the defined application.

As an international packaging group, Mondi is fully aware of its responsibility in the supply chain. Mondi is actively involved in all actions of the European Union and the European and national associations of paper manufacturing and converting industry regarding the bisphenol topic to ensure consumer health and market compliant food contact materials & articles solutions.

Comment - Due to the fibre composition (use of paper for recycling qualities) of the 'paper', a free-of statement cannot be provided.

Per- and polyfluorinated alkyl substances (PFAS)

PFAS, a substance group of more than 10.000 different compounds, are widely used in numerous industrial processes and consumer products due to their special technical properties. The following regulatory topics are currently discussed on European level:

- Reg(EU) 2025/40 "on packaging and packaging waste, amending Reg(EU) 2019/1020 and Dir(EU) 2019/904, and repealing Dir 94/62/EC" (PPWR):

On the Dec 19th 2024 the European Commission has signed-off the PPWR proposal, which has been published on 22th Jan 2025 and shall apply from Aug 12th 2026 (except Article 67(5) shall apply from Feb 12th 2029).

According to Article 5(5) food contact packaging shall not be placed on the market if it contains PFAS in a concentration equal or above the following limits:

- 25 ppb (parts per billion) for any individual PFAS compound measured using targeted analysis (polymeric PFAS excluded from quantification)
- 250 ppb for the sum of PFAS compounds measured as the sum of targeted PFAS analysis, where applicable with prior degradation of precursors (polymeric PFAS excluded from quantification)
- 50 ppm (parts per million) for total fluorine originating from PFAS sources (including polymeric PFAS)

On 30 March 2026, the guidance document "*Approval of the draft Commission Notice on the Guidance document for Regulation (EU) 2025/40 on packaging and packaging waste*" was officially published. This document specifies that PFAS compliance is assessed using a stepwise approach, including the determination of total fluorine (TF) and/or organic fluorine as initial screening parameters. Materials and articles with levels below the threshold of 50 ppm are considered compliant with the PFAS restriction requirements of the PPWR.

With reference to this guidance, we confirm that the above-listed paper based products fulfil the fluorine criteria of the PPWR, as determined using appropriate analytical methods.



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- REACH Reg(EC) 1907/2006:

The ongoing evaluation of the adapted PFAS restriction proposal or ban under REACH is being widely discussed due to the extensive feedback from concerned parties. Under the REACH regulation, several PFAS (per- and polyfluoroalkyl substances) compounds are restricted due to their potential risks to human health and the environment. Please also refer to our statement concerning REACH.

As an international packaging group, Mondi is fully aware of its responsibility in the supply chain. Mondi is actively involved in all actions of the European Union and the European and national associations of paper manufacturing and converting and packaging industry regarding the PFAS topic to ensure consumer health, market compliant food contact materials & articles and other packaging solutions.

This statement is valid (1a) until 20.04.2027 or good till cancelled.

Yours sincerely,
DocuSigned by:


Daniel Grodzki

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Technology Department Manager
Mondi Świecie Sp. z o.o.