



StoraEnso

1 (4)

EU PPWR Compliance Statement

Object of the declaration	AvantKraft Brown™ AvantKraft WhiteTop™
Issue date	25.6.2026
Area of validity	Applicable for EU market
Role of economic operator	Supplier
Economic operator	Stora Enso Oyj, Varkaus Mill
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Stora Enso is committed to supporting compliance with the EU Packaging and Packaging Waste Regulation (PPWR, Regulation (EU) 2025/40), which applies from 12 August 2026. As a **supplier** of material for packaging, we provide manufacturers with all information required to carry out the conformity assessment and prepare the EU PPWR Declaration of Conformity (PPWR DoC) in accordance with Articles 38–39 and Annexes VII–VIII.

1. GENERAL DESCRIPTION OF THE PACKAGING OR PACKAGING MATERIAL AND ITS INTENDED USE

☐ Packaging	
☒ Packaging material	Varkaus Mill paperboards are designed for wide range of packaging applications. Paperboards are also suitable for food contact described in FCM Declaration of Compliance.

2. CONCEPTUAL DESIGN, MANUFACTURING DRAWING

Conceptual design

Please see product specific technical data sheet (TDS)

Manufacturing drawing

☐ Applicable	
☒ Not applicable	For packaging materials

3. COMPLIANCE WITH SUBSTANCE REQUIREMENTS (Article 5)

Article 5 of the PPWR restricts the presence of hazardous substances in packaging, including heavy metals and per- and polyfluoroalkyl substances (PFAS).

Based on the materials and processes under the supplier's control, the supplied product is not intentionally manufactured with heavy metals or PFAS in a manner that would adversely affect recyclability, safety, or compliance with applicable EU requirements.

Heavy Metals (Article 5(4))

Testing has been done in an external accredited laboratory. Analyses have been performed on representative samples as referred to in EN 13428:2004. The sum of the concentrations of lead, cadmium, mercury and hexavalent chromium in the product does not exceed 100 mg/kg and thus the product is considered to be compliant.

PFAS in Food-Contact Packaging (Article 5(5))

The European Commission Notice on the Guidance for PPWR recommends stepwise approach for verifying compliance with the PFAS restrictions. Analyses have been performed on representative samples based on Combustion Ion Chromatography (CIC) method. Total fluorine of the product is below 50 mg/kg (50 ppm) and thus considered to be compliant.

When the product is intended for packing food, please see more information about the food contact compliance in the product specific FCM DoC.

4. RECYCLABILITY ASSESSMENT (Article 6)

Article 6 establishes that all packaging placed on the market is designed for material recycling in accordance with the general obligation in Article 6(1). Until delegated act 6(4) enters into force, expected by 1 January 2028, recyclability is ensured through compliance with standard EN 13430:2004.

This product is designed for material recycling and is compatible with existing collection, sorting and recycling systems in the European Union.

The economic operator placing the final package and/or product into the market should do a self-assessment according to EN 13430:2004.

5. PACKAGING MINIMISATION ASSESSMENT (Article 10)

Article 10 guides that the packaging placed on the market is designed so that its weight and volume is reduced to the minimum necessary to ensure its functionality, taking account of the shape and material from which the packaging is made. Until Article 10 enters into force from 1 January 2030, compliance with packaging minimization is ensured through compliance with standard EN 13428:2004.

The economic operator placing the final package and/or product into the market should do a self-assessment according to EN 13428:2004.

6. REUSABILITY ASSESSMENT (Article 11)

Article 11 determinate the packaging reusability. Packaging placed on the market from 11 February 2025 shall be considered to be reusable where it fulfils all of the requirements in article 11. By 12 February 2027, the Commission shall adopt a delegated act by establishing a minimum number for the rotations for reusable packaging.

Reusability

☐ Reusable	
☒ Not reusable	

7. STANDARDS AND SPECIFICATIONS

Scope of Application	Standard/Specification
Total fluorine	Sample prepared according to ISO 21646:2022, following analysis according to EN 15408: 2011
Packaging minimisation, Heavy Metals	EN 13428:2004 Packaging – Requirements specific to manufacturing and composition – Prevention by source reduction
Recyclability – material recycling	EN 13430:2004 Packaging – Requirements for packaging recoverable by material recycling

8. TEST REPORTS

Representative samples have been properly tested. Detailed test results are considered commercially sensitive information. For competition law reasons, such data is made available only to relevant authorities upon request.

Notes:

- This statement covers packaging placed on the market from 12 August 2026, the date from which PPWR applies. Packaging delivered to your facilities before 12 August 2026 is not subject to PPWR sustainability or labelling requirements under Recital (14) of the Regulation, and does not require a Supplier Compliance Statement or a manufacturer's EU Declaration of Conformity. Such stock may remain in use without withdrawal or remediation under PPWR.
- This document is applicable until the relevant secondary legislation is adopted and comes into force.
- By 31 December 2026, the Commission shall adopt implementing acts establishing the format for technical documentation. This template shall be reviewed and updated once those implementing acts are adopted.
- The compliance statement may be available in several languages. In case of conflict between the language versions the English version prevails.