

PPWR (Packaging and Packaging Waste Regulation)

Dalvik, 12 June 2026

Dear Customer,

The European Union has introduced the Regulation (EU) 2025/40 (PPWR), establishing new and comprehensive requirements for packaging placed on the EU market. These requirements will progressively apply starting from 12 August 2026 and will impact all actors within the packaging value chain.

At Rotovia, we are proactively preparing to ensure full compliance with these requirements and to support our customers throughout this transition. We Share, Care and Can Do.

Our Commitment

Rotovia will ensure compliance with mandatory PPWR requirements applicable from 12 August 2026, including:

- Substance restrictions (e.g. PFAS and heavy metals).
- Where applicable, EU Declaration of Conformity and technical documentation, for each product as and when the applicable requirements become binding.
- Integration of relevant upstream regulatory information, including REACH compliance information provided by suppliers, into our compliance assessment process.

For requirements with later applicability (e.g. recyclability, reuse, and design criteria), we are aligning our development and validation processes to meet the respective future deadlines. Our objective is to achieve:

- Full compliance for applicable packaging placed on the market from August 2026.
- Progressive compliance for all additional requirements in line with PPWR implementation milestones (2030 and beyond).

We will provide the required EU Declaration of Conformity and supporting technical documentation in accordance with PPWR obligations, where applicable.

Rotovia integrates REACH compliance verification into its supplier qualification, material approval and regulatory compliance processes to support the use of materials and components that meet applicable REACH requirements.

Our Approach to Compliance

To achieve this, Rotovia has established a structured PPWR compliance program including:

- A Compliance Register, maintained to capture:
 - Key PPWR requirements.
 - Current industry guidance interpretations and applicability decisions.
 - Defined compliance approach and implementation status.
- Materials and Components Assessment: All raw materials and components concerned are systematically evaluated against PPWR requirements, including substance restrictions and regulatory compliance criteria. The assessment process incorporates relevant REACH compliance considerations, including applicable Annex XVII restrictions and communicated SVHC information where relevant.

Rotovia hf.

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- **Product-Level Compliance Assessment:** Each product concerned is assessed based on its full composition (materials and components). Compliance is determined at product level, ensuring alignment with PPWR requirements relevant to the intended use.
- **Risk-Based Substance Compliance (PFAS & Restricted Substances)** - In line with current industry guidance, Rotovia applies a tiered approach:
 - Supplier declaration: Confirmation of no intentional PFAS use where applicable.
 - Risk assessment: Based on material type, supplier reliability, and application.
 - Calculation / estimation: Worst-case evaluation where relevant.
 - Testing: When required, triggered by identified risk or regulatory necessity.
- **Technical Documentation and Compliance Governance:** Technical files are created and maintained for all relevant packaging in accordance with PPWR requirements. Where applicable, a EU Declaration of Conformity is generated based on the completed product assessment.
- **Supplier Compliance Management:** Suppliers are formally requested to provide declarations in line with our standard PPWR supplier declaration template, covering:
 - Substance restrictions (including PFAS thresholds).
 - REACH Regulation (EC) No. 1907/2006 compliance, including Annex XVII restrictions and communication of Candidate List SVHC substances where applicable.
 - Food contact compliance where relevant.
- **Supplier Data Management:** A supplier database is maintained to track:
 - Supplier declaration status.
 - Supplier compliance coverage.
 - Updates and changes.