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April 27, 2026

## **Product Statement**

Dear Valued Customer,

We sincerely appreciate your continued trust and substantial support for our company over the years.

On January 22, 2025, the European Union officially published Regulation (EU) 2025/40 on packaging and packaging waste (referred to as PPWR). This regulation will formally repeal and fully replace the current Directive 94/62/EC as of August 12, 2026, becoming the primary legislation for packaging and packaging waste management in the EU. To safeguard customer interests and clarify compliance standards, our company hereby provides the following formal explanation:

### **I. Definitions**

#### **(1) Total Fluorine**

Total fluorine refers to the total amount of all fluorine elements contained in a sample, including various fluorine-containing forms such as organic fluorine and inorganic fluorine compounds. Its composition encompasses all fluorine-containing forms, including organic fluorine, fluoride salts dissolved in the sample, and other fluorine compounds (including PFAS).

#### **(2) Inorganic Fluorine**

Inorganic fluorine refers to compounds formed by the combination of fluorine elements with inorganic groups. They do not contain organic carbon-fluorine chemical bonds and constitute the inorganic portion of the total fluorine content.

In paper, potential sources of inorganic fluorine primarily include raw materials (such as trace fluorine naturally present in plant fibers,



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fluoride impurities in mineral fillers), etc. Common inorganic fluorine compounds include sodium fluoride, calcium fluoride, fluorosilicic acid, etc. These substances do not fall under the category of PFAS.

### **(3) Organic Fluorine Compounds**

Organic fluorine compounds are substances formed by the combination of fluorine elements with organic compounds through carbon-fluorine (C-F) chemical bonds. They constitute the organic portion of the total fluorine content and cover a wide range. PFAS is an important sub-category within organic fluorine compounds.

Organic fluorine potentially involved in paper includes PFAS (such as perfluorooctanoic acid, perfluorooctane sulfonic acid, their salts, and related substances) and non-PFAS organic fluorine (such as certain fluoropolymers that do not possess the long-term persistence, bioaccumulative characteristics, etc., typical of PFAS). Among these, PFAS has become a key target of global regulatory control due to its environmental persistence and bioaccumulative nature.

## **II. Specific Requirements**

The core basis for the EU's control of fluorine content in coated food packaging paper and various food contact packaging materials is the Packaging and Packaging Waste Regulation (EU) 2025/40 (referred to as PPWR). This regulation came into force on February 11, 2025, and will be mandatory from August 12, 2026. The specific PFAS control limits are as follows:

### **(i) PFAS limit requirements**

1. Detection limit for individual PFAS substances:  $\leq 25$  ppb (Polymeric PFAS are excluded and not subject to quantification);
2. Sum of PFAS substances after degradation of precursor



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substances:  $\leq 250$  ppb (Polymeric PFAS are excluded and not subject to quantification);

3. Total PFAS content (including polymeric PFAS):  $\leq 50$  ppm; If the product's total fluorine content exceeds 50 mg/kg, a fluorine content supporting document must be provided simultaneously (specifying whether it is in the form of PFAS or non-PFAS).

Associated Testing Standards: Total Fluorine Content is tested according to the EN 14582:2016 standard; individual PFAS substances are tested according to the new DIN EN 17681-1:2025 standard, which can accurately capture various PFAS forms, ensuring comprehensive and reliable test results.

**(ii) Heavy metal limit requirements**

The total content of lead, cadmium, mercury, and hexavalent chromium shall not exceed 100 mg/kg.

**(iii) Packaging recyclability requirements**

The PPWR explicitly requires that from 12 August 2026, all packaging placed on the EU market must be recyclable.

**III. Testing and Compliance Statement for Our Products**

Guangxi Jingui Pulp & Paper Co., Ltd. (hereinafter referred to as "our company"), as a responsible paper manufacturer, is always committed to producing safe, environmentally friendly, and compliant paper products, and places high importance on the impact of our products on health and the environment. During the production process, our company does not intentionally add any per- and polyfluoroalkyl substances (PFAS) as functional ingredients or processing aids. Only trace amounts of inorganic fluorine may potentially be introduced from natural mineral fillers. However, all our paper products have been tested



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by third-party accredited laboratories, The final paper test results comply with the requirements of the PPWR regulations:

- (i) PFAS limit requirements
- (ii) Heavy metal limit requirements

We ensure that our production and operation activities strictly comply with all applicable standards and norms of the PPWR regulations.

The above PFAS and heavy metal detection reports, if needed, relevant test reports can be requested from our company at any time to review the test data and verify product compliance.

At the same time, our paper products can be recycled, after disposal by entering the existing waste paper recycling system. The production process does not use any coatings or additives that hinder recyclability, fully meeting the recyclability requirements of PPWR's and aligning with the EU's circular economy objectives.

Furthermore, if your company has specific requirements regarding inorganic fluorine that go beyond the PPWR regulation, please communicate these with us in advance. Our company will develop targeted solutions and make every effort to meet customer needs.

Our company consistently upholds the bottom line of product quality and compliance, strictly follows relevant global industry regulations and standards in production, and continuously provides your company with safe and compliant food packaging products. If you have any questions, please feel free to contact us for discussion.

We hereby make this statement!

Wishing you smooth business and every success!



广西金桂浆纸业有限公司  
GUANG XI JINGUI PULP & PAPER CO., LTD.

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