

产品声明

Product Statement

尊敬的客户：

衷心感谢贵司长期以来对我司的信任与大力支持！

2025年1月22日，欧盟正式发布了（EU）2025/40《包装和包装废弃物法规》（Packaging and Packaging Waste Regulation，简称PPWR），将于2026年8月12日正式废除并全面取代现有的94/62/EC指令，成为欧盟在包装和包装废弃物管理方面的主要法规。为保障客户权益、明确合规标准，我司特此作出如下正式说明：

一、定义：

（一）总氟

总氟，指一个样品中含有的全部氟元素总量，包括有机氟、无机氟化合物等各类含氟形态物质的总和，构成涵盖有机氟、溶解于样品中的氟化物盐类及其他氟化合物（含PFAS）等各类含氟形态物质。

（二）无机氟

无机氟，是氟元素与无机基团结合形成的化合物，不含有机碳-氟化学键，是总氟构成中的无机形态部分。

纸张中可能存在的无机氟主要来源于原料（如植物纤维中天然含有的微量氟、矿物填料中的氟化物杂质）等。常见的无机氟化合物包括氟化钠、氟化钙、氟硅酸等，此类物质不属于PFAS范畴。

（三）有机氟化物

有机氟化物，是氟元素与有机化合物通过碳-氟化学键结合形成的物质，是总氟构成中的有机形态部分，涵盖范围广泛，PFAS是有机氟化物中的一个重要类别。



纸张中可能涉及的有机氟包括PFAS（如全氟辛酸、全氟辛烷磺酸及其盐类和相关物质）、非PFAS类有机氟（如部分含氟聚合物，且该类聚合物不具备PFAS的长期持久性、生物累积性等特性）。其中，PFAS因具有环境持久性、生物累积性等特点，成为全球法规重点管控的对象。

二、具体规定

欧盟对淋膜食品包装纸及各类食品接触包装的氟含量管控，核心依据为《包装和包装废弃物法规》（EU）2025/40（简称PPWR）。该法规于2025年2月11日正式生效，自2026年8月12日起强制执行，具体PFAS管控限值如下：

- 1、单项PFAS物质检测限值 ≤ 25 ppb（聚合物类PFAS除外，不纳入定量范围）；
- 2、前体物质降解后，PFAS物质总和 ≤ 250 ppb（聚合物类PFAS除外，不纳入定量范围）；
- 3、PFASs总含量（含聚合物类PFAS） ≤ 50 ppm；若产品总氟含量超过50 mg/kg，需同步提供氟含量证明文件（以PFAS或非PFAS形式计）。

配套检测标准：总氟含量采用EN 14582:2016标准；单项PFAS物质检测采用新版EN 17681-1:2025标准，能精准捕获各类PFAS形态，确保检测结果全面可靠。

三、我司产品检测及合规说明

宁波亚洲浆纸业有限公司（以下简称“我司”）作为负责任的造纸企业，始终致力于生产安全、环保、合规的纸品，并高度重视产品对健康与环境的影响。生产过程中，我司未有意添加任何全氟和多氟烷基物质（PFAS）作为功能性原料或加工助剂，仅天然矿物质填料



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可能带入微量无机氟，但我司所有食品包装产品均经第三方权威机构检测，最终成纸检测结果符合PPWR法规对PFAS的限值要求，确保生产经营活动严格遵循所有适用标准与规范。

若有需要，可随时向我司申领相关检测报告，查阅检测数据，核实产品合规性。

此外，若贵司在PPWR法规基础上对无机氟有具体限制要求，需提前与我司沟通，我司将制定针对性方案，全力满足客户需求。

我司始终坚守产品质量与合规底线，严格遵循全球相关行业法规标准组织生产，持续为贵司提供安全、合规的食品包装产品。如有任何疑问，欢迎随时与我司对接沟通。

特此声明！

顺遂商祺！

宁波亚洲浆纸业有限公司

2026年3月17日

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,

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:

1. Detection limit for individual PFAS substances: ≤ 25 ppb (Polymeric PFAS are excluded and not subject to quantification);
2. Sum of PFAS substances after degradation of precursor substances: ≤ 250 ppb (Polymeric PFAS are excluded and not subject to quantification);
3. Total PFAS content (including polymeric PFAS): ≤ 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.

III. Testing and Compliance Statement for Our Products



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Ningbo Asia 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 food packaging products have been tested by third-party accredited laboratories, and the final paper test results confirm compliance with the PFAS limit requirements of the PPWR regulation. We ensure that our production and business operations strictly adhere to all applicable standards and specifications.

If needed, relevant test reports can be requested from our company at any time to review the test data and verify product compliance.

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.



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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!

Ningbo Asia Pulp & Paper Co., Ltd.

