

Statement on compliance with the Packaging and Packaging Waste Regulation (PPWR) for products manufactured by Torraspapel

Torraspapel, as a manufacturer of a wide range of paper products, including papers intended for food contact applications, hereby states that it is actively, systematically, and continuously working to ensure compliance with the applicable requirements of Regulation (EU) 2025/40 on packaging and packaging waste (PPWR) as they apply to its products.

Regulation (EU) 2025/40 entered into force on 11 February 2025 and will become generally applicable as of 12 August 2026. This Regulation establishes a harmonised regulatory framework within the European Union aimed at strengthening the protection of human health, improving the recyclability of packaging, and promoting the circular economy.

In accordance with Article 5 of the PPWR and with the principles applicable to food contact materials, Torraspapel systematically assesses the raw materials, additives, processing aids, coatings, and functional treatments used in the manufacture of its products. In this context, Torraspapel works on a continuous basis to identify and minimise substances of concern. In addition, Torraspapel applies Good Manufacturing Practices (GMP) and maintains supplier control and traceability systems, in line with its responsibilities as an economic operator.

With regard to per- and polyfluoroalkyl substances (PFAS), Torraspapel declares that PFAS are neither used nor intentionally added to the products it manufactures. Total Fluorine (TF) content is generally below the technical reference value of 50 ppm, which is used as an indicator of the absence of intentionally added PFAS in accordance with the approach currently applied by authorities and the guidance published by the European Commission.

In the absence of fully harmonised methods for the assessment of all PFAS, including certain polymeric PFAS, the company bases its approach on strict raw material control, the application of GMP, continuous regulatory monitoring, and collaboration with specialised external laboratories. Torraspapel adapts its procedures as new criteria, official methods, or delegated acts are published within the framework of the PPWR.

Furthermore, Torraspapel ensures that the sum of the concentrations of lead (Pb), cadmium (Cd), mercury (Hg) and hexavalent chromium (Cr(VI)) in packaging or packaging components does not exceed 100 mg/kg (ppm) by weight, in accordance with applicable regulatory requirements.

In addition, Torraspapel assesses the compatibility of its products with existing recycling processes, develops technical solutions to ensure both product safety and recyclability, and actively prepares for the future implementation of Design for Recycling (DfR) criteria to be established through delegated acts under Regulation (EU) 2025/40.

Torraspapel reaffirms its commitment to food safety, the protection of human health, and environmental sustainability, and will continue to actively advance the preparation and updating of the technical documentation required to demonstrate compliance with the applicable requirements of Regulation (EU) 2025/40, in accordance with the prevailing regulatory framework and the official guidance issued by the European Commission.

More information on Torraspapel 's commitment to sustainability is available at torraspapel.com
