

JAMES CROPPER

JAMES CROPPER PACKAGING AND PACKAGING WASTE REGULATION (PPWR) STATEMENT AUGUST 2026

James Cropper is committed to supporting customers in meeting their obligations under the EU Packaging and Packaging Waste Regulation (PPWR) (Regulation (EU) 2025/40).

As a UK manufacturer of specialty paper and board, we primarily supply paper/board reels and sheets to converters and merchants on a business-to-business basis, in these instances under EU definitions James Cropper is the 'Supplier'. These products are packaging substrates rather than finished packaging at the point of supply. Under PPWR, the responsibility for assessing and declaring conformity of finished packaging generally rests with the converter or brand owner (the 'Manufacturer' under EU definitions) placing the packaging on the EU market. James Cropper supports these customers by providing relevant product and compliance information as required.

Declaration of Conformity (DoC)

For paper and board reels, sheets and other substrate materials supplied to converters, James Cropper does not issue PPWR Declarations of Conformity. These products are packaging materials and are not yet packaging when supplied by James Cropper. The Declaration of Conformity is therefore the responsibility of the converter or brand owner responsible for the finished packaging.

Where James Cropper manufactures packaging in its own right, we will maintain the appropriate conformity documentation in accordance with applicable PPWR requirements, and James Cropper will assume 'Manufacturer' status.

Heavy Metals and PFAS

PPWR includes requirements relating to the presence of certain substances in packaging. For applicable products, James Cropper can provide statements supporting compliance with the heavy metals requirements set out in Article 5(4) of Regulation (EU) 2025/40.

To the best of our knowledge, and based on supplier information and internal risk assessments, no lead, cadmium, mercury or hexavalent chromium is intentionally added during manufacture, and the combined concentration of these substances does not exceed the limit specified in Article 5(4) of the Regulation.

The PFAS restrictions contained within Article 5(5) apply to food-contact packaging. James Cropper does not manufacture packaging intended for food-contact applications unless specifically agreed with the customer and supplied as such. Therefore, the PFAS restrictions are generally not applicable to our standard product portfolio, and routine PFAS or fluorine testing is not undertaken for these products.

MAKING A MATERIAL DIFFERENCE

Burnside Mills,
Kendal, Cumbria,
LA9 6PZ, United Kingdom

JamesCropperSpecialityPapers Ltd. Registered in England: No. 04690555.
James Cropper Converting Ltd. Registered in England: No. 04690526.
Registered Offices as above.

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Recyclability

The detailed PPWR recyclability assessment methodology and Design for Recycling criteria are being developed by the European Commission and will be implemented in phases. Recyclability assessments will be determined at the level of the finished packaging item rather than the substrate alone. James Cropper will continue to support customers by providing relevant material information to assist with future compliance assessments.

Information Available to Customers

Upon request, James Cropper can provide relevant supporting information, including:

- Product specifications and technical data.
- Heavy metals compliance statements.
- Information to support customers' PPWR conformity assessments.

James Cropper will continue to monitor developments in the PPWR and work closely with customers to support their compliance requirements as the regulation continues to evolve.

Yours Sincerely,
Quality & Compliance Team
James Cropper Paper & Packaging

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