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## **PPWR Implementation Approach and PFAS Risk Assessment Methodology**

Joma Packaging d.o.o. has established a structured compliance program to address the requirements of the EU Packaging and Packaging Waste Regulation (PPWR), Regulation (EU) 2025/40 on Packaging and Packaging Waste. The objective of this program is to ensure that all packaging materials supplied by our company comply with applicable regulatory requirements while maintaining transparency and traceability across the supply chain.

To achieve this, all packaging articles are systematically assigned to defined product groups based on material type, application, and packaging structure. This grouping allows a consistent and efficient evaluation of regulatory compliance across comparable materials and components.

### **1. Verification of Supplier Documentation**

As a first step, supplier documentation is reviewed to ensure regulatory completeness and reliability. This review includes:

- verification of supplier declarations and regulatory statements
- review of material compliance documentation (e.g., declarations for food contact materials)
- confirmation of the completeness of the declared material composition
- evaluation of available compliance statements regarding restricted substances.

Supplier documentation serves as the primary source of compliance verification. Where documentation is incomplete or inconsistent, additional assessments or analytical testing may be required.

### **2. Material Composition Assessment**

For each product group, the material structure and composition of all relevant packaging components are evaluated. This review ensures transparency of the material composition and allows identification of potential regulatory concerns.

Particular attention is given to:

- polymer type and additives
- multilayer or composite structures
- functional coatings or treatments
- auxiliary materials and processing aids.

This step ensures that all relevant materials within the packaging structure are identified and evaluated from a regulatory perspective.

### 3. Risk Classification Using a PFAS Risk Matrix

All product groups are evaluated using a four-level PFAS risk matrix, which has been developed in cooperation with Packforce Austria, an Austrian packaging industry forum.

The purpose of the risk matrix is to evaluate the probability that PFAS substances may be present in a packaging material or packaging component. The methodology allows a structured and transparent assessment of potential PFAS relevance within packaging systems.

The evaluation considers several influencing factors, including:

- the material type
- production and processing technologies
- functional additives, coatings, or surface treatments
- packaging design and multilayer structures
- potential contamination pathways within the supply chain.

The matrix therefore serves as a structured instrument to identify areas where PFAS substances could potentially occur from a regulatory perspective.

### 4. Definition of Testing Strategies

Based on the outcome of the risk classification, appropriate testing and verification measures are defined.

The following risk classes are applied:

Risk Class    Measure

Risk Class 1 No analytical testing required

Risk Class 2 Random testing if supplier documentation is incomplete or inconsistent

Risk Class 3 Definition of a testing strategy (e.g., targeted random testing)

Risk Class 4 Extended testing strategy (e.g., extended sampling or batch testing)

This risk-based approach ensures that analytical resources are used in a targeted and scientifically justified manner. At the same time, it provides a documented and auditable basis for regulatory due diligence.

## 5. Objective of the Risk Matrix

The PFAS risk matrix provides a structured and transparent framework to identify where PFAS substances may be regulatory relevant within packaging materials and packaging components. The methodology creates a documented and traceable basis to:

- identify potential PFAS risks within packaging systems
- prioritize analytical testing based on risk
- support regulatory compliance assessments
- demonstrate due diligence in accordance with applicable EU legislation.

Through this structured approach, the company ensures that the verification of regulatory limits and substance restrictions can be demonstrated in a traceable, verifiable, and auditable manner.

## 6. Documentation and Compliance Verification

The results of the supplier documentation review, material composition assessment, and risk classification are documented internally. Where required, analytical testing results are integrated into the compliance documentation.

This documentation forms the basis for:

- regulatory assessments
- preparation of customer compliance documentation
- declarations of compliance where applicable.

Technical documentation will be updated continuously in line with regulatory developments and the publication of further implementing acts related to the PPWR.

## 7. Continuous Review of Packaging Design

In parallel, we continuously review packaging designs with regard to material efficiency, recyclability, and regulatory compatibility in line with the future design-for-recycling requirements of the PPWR.

This review includes:

- evaluation of packaging materials with regard to recyclability in existing recycling streams
- assessment of opportunities for material reduction (lightweighting)
- review of material substitutions where technically feasible
- evaluation of packaging structures with regard to improved recycling performance.

Where possible, packaging developments aim to reduce overall material consumption while maintaining required functionality, product protection, and regulatory compliance.

In addition, we continuously monitor technological developments in packaging materials and recycling systems in order to identify opportunities for further improvement in packaging sustainability.

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## 8. Continuous Regulatory Monitoring

Regulatory developments related to the PPWR and other relevant EU legislation are continuously monitored. Internal compliance processes will be adjusted where necessary to ensure alignment with future regulatory requirements.

Further adaptations may be implemented once additional implementing acts, guidance documents, or harmonized technical standards under the PPWR framework are published.

This structured compliance approach allows Joma Packaging d.o.o. to ensure regulatory transparency, maintain robust supply chain documentation, and demonstrate responsible and risk-based compliance management for packaging materials supplied to our customers.