

Welcome!

Agenda June 17th

- Introduction of PPWR
- Timeline PPWR and August 2026 requirements
- Definition Manufacturer
- Material and information to be used now
- Learnings and input from Customer Dialogue
- Processes ahead and example of Boxon's processes / interpretations
- Questions and comments (including follow up from this webinar)
 - Please write questions in the chat during the webinar!



PPWR – All you need to know!

Get a better understanding of PPWR and the upcoming requirements together with our Sustainability Expert, Henrik Linder!



On 17 June, we invite you to an exclusive customer session with Boxon's CSO, Henrik Linder.

During this session, Henrik will guide you through the key elements of the Packaging and Packaging Waste Regulation (PPWR), what the upcoming requirements mean for your business, and how you can prepare.

The PPWR will affect many companies in the years ahead, with initial requirements coming into force from 12 August 2026.

During the session, you will gain:

- An overview of the PPWR and its purpose
- Key definitions and interpretations of the regulation
- Insights into the first requirements taking effect from 12 August 2026
- Practical guidance on how to prepare your organisation
- Examples of how Boxon can support you with documentation, compliance and information regarding Substances of Concern
- An opportunity to ask questions during a concluding Q&A session

Date: 17 June 2026

Time: 09:00–09:45 CET

Secure your place by registering here: [Customer Session – PPWR](#)

We look forward to seeing you online!

Warm welcome!

Disclaimer – Boxon’s approach & processes

- Today’s webinar and all Boxon processes = Boxon’s interpretation
- Different interpretations from different suppliers, manufacturers and customers
- “Background information” – not like the EUDR set up which seems to be confusing for many actors
- Still missing delegated acts from the EU Commission – might come more information during the summer...
- This is a start! Learnings and set up structures – most important areas within PPWR is to come



Packaging & Packaging Waste Regulation (PPWR)

- An EU regulation revising current packaging and waste rules
- Aims to reduce environmental impact and harmonize rules across the EU
- Starts August 2026 and includes all packaging placed on the European Market
- Key goals:
 - Prevent packaging waste
 - Promote reuse and recycling
 - Set uniform EU rules for all actors



Breakdown of PPWR Requirements – timeline



Substances of Concern

Lead, mercury, hexavalent chromium and cadmium cannot exceed 100 mg/kg
+ PFAS limits (food contact packaging)

Timeline: 12th of Aug 2026

Formal Statements in writing
1. PFAS (food contact)
2. Heavy Metals



Sharing of information

Technical documentation connected to the packaging should be kept and updated to demonstrate compliance

Declaration of Conformity (DoC)

Timeline: 12th of Aug 2026

Ongoing – Conformity Assessment by category is conducted
Uncertainties within reporting scope



Labelling

Packaging must be market with a harmonized label to facilitate sorting. A QR code may be placed on the packaging to facilitate sorting

Timeline: 2028 (estimated Aug)

Waiting for further details and instructions, estimated to come Aug 2026



Packaging Minimization

Packaging shall be minimum regarding weight and volume and be evaluated against performance criteria

Timeline: 2030

Direction is set – waiting for details and guidelines



Recycled Content

Plastic packaging must contain minimum levels of recycled content

**Timeline: 2030 35% PCR content
2035 65% PCR content**

Boxon can offer alternatives already today and through categorization of sustainable products. Content will be updated



Excessive packaging

Transport packaging shall have a maximum empty space ratio by 50% unless technically unavoidable

Timeline: 2030

Direction is set – waiting for more details and guidelines.



Re-use targets

Transport packaging (e.g. pallets) should reach minimum targets of reusability, based on where the packaging is transported

**Timeline: 2030 40% reusability
2030 100% reusability between sites
2040 70% reusability**

Direction is set – waiting for details and guidelines



Recyclability

All packaging placed on the market shall be recyclable and graded A–C

**Timeline: 2030 70% recyclability
Recyclable at scale 2035**

Direction is set – waiting for details and guidelines

Definition of Manufacturer within PPWR

- **Boxon as an example**
 - Standard articles
 - Customized articles
- **You as a Boxon Customer!**
 - Considered manufacturer on all customized articles
 - Boxon is manufacturer on all Boxon standard articles
- **Obligations of the manufacturer (Article 15)**
 - Create Declaration of Conformity (DoC) based on conformity assessment
 - Sharing of information (see text to the right)

Article 15 Paragraph 10 (PPWR)

“Manufacturers shall, upon a reasoned request from a national authority, provide all the information and documentation necessary to demonstrate the conformity of the packaging with the requirements laid down in or pursuant to Articles 5 to 12, including the technical documentation. The relevant documents shall be made available within 10 days of receipt of the request from the national authority.”

Documents and tools that we can use already now

Formal Statements of
Substances of Concern

(PFAS & Heavy Metals)

PPWR Assurance Declaration

Conformity Assessment
documents (category/material)

Declaration of Conformity
(DoC) Sample Templates

PPWR Q&A document

Formal Statements

Substances of
Concern

PFAS
(food contact
packaging)

Heavy Metals
(all packaging)



2026-05-07

Boxon Group - Statement on PFAS in Packaging

Boxon Group acts as a supplier and solution provider and does not manufacture packaging materials. In this role, Boxon provides supporting documentation based on supplier data to assist customers in fulfilling their obligations as manufacturers under the EU Packaging and Packaging Waste Regulation (PPWR) 2025/40.

With reference to Article 5(5) (PFAS restrictions in packaging, particularly for food contact applications), applicable from 12 August 2026, Boxon confirms the following based on information and declarations received from its suppliers:

- PFAS are not intentionally added in the manufacture of packaging materials supplied by Boxon, based on supplier declarations.
- Available analytical testing (where performed) has not identified the presence of targeted PFAS above current detection limits.

From 12 August 2026, primary food-contact packaging shall not be placed on the market if it contains PFAS at or above the following thresholds:

- 25 ppb for any individual PFAS (targeted analysis, excluding polymeric PFAS)
- 250 ppb for the sum of PFAS (targeted analysis, excluding polymeric PFAS)
- 50 ppm for total fluorine (including polymeric PFAS)

Where total fluorine exceeds 50 mg/kg, additional information may be required to demonstrate whether the fluorine content originates from PFAS or non-PFAS substances.

At the current stage of regulatory implementation:

- Testing methodologies and measurement approaches (including total fluorine and sum parameters) are still evolving, and harmonized standards at EU level are not yet fully established.
- Compliance assessments are therefore based on supplier declarations, available analytical data, and best available knowledge.

This statement reflects the current best available knowledge and supplier-provided data and is intended to support customers in the preparation of their PPWR technical documentation (Annex VII).

Boxon continues to engage with suppliers and monitor regulatory developments to ensure that relevant documentation is updated in line with PPWR requirements.

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2026-05-07

Boxon Group - Statement on Heavy Metals in Packaging

Boxon Group acts as a supplier and solution provider of packaging and does not manufacture packaging materials. In this role, Boxon supports its customers by collecting and providing relevant technical documentation from qualified suppliers to support the preparation of the manufacturer's technical file in accordance with the EU Packaging and Packaging Waste Regulation (PPWR) 2025/40.

Based on declarations and supporting documentation received from its suppliers, Boxon confirms the following:

- The substances lead (Pb), cadmium (Cd), mercury (Hg), and hexavalent chromium (Cr VI) are not intentionally added during the manufacturing of packaging materials supplied by Boxon, based on supplier declarations.

Regulatory Limits for Heavy Metals

In line with applicable EU packaging legislation, the sum of the concentration levels of lead (Pb), cadmium (Cd), mercury (Hg), and hexavalent chromium (Cr VI) in packaging shall not exceed:

- 100 ppm by weight (0.01%)

This limit applies to the total concentration of these four heavy metals present in packaging materials or components.

Statement Scope and Use

This statement is based on supplier declarations and available test data and is intended to support customers in demonstrating compliance within their PPWR technical documentation (Annex VII).

Boxon continues to engage with suppliers and monitor regulatory developments to ensure that supporting documentation remains aligned with applicable legal requirements and any further clarification under the PPWR framework.

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PPWR Assurance Declaration

To be used
together with
SoC
Statements

Provide
assurance on
the coming
processes



2026-06-11

PPWR Assurance Declaration

As part of Boxon Group's preparation for the Packaging and Packaging Waste Regulation, Regulation (EU) 2025/40, we would like to provide clarity on our approach to PPWR-related documentation.

Boxon Group's PPWR compliance assurance

For packaging supplied by Boxon Group, we ensure that applicable packaging components comply with relevant EU packaging legislation and the applicable requirements of Regulation (EU) 2025/40, including:

- Adequate thresholds of substances of concern which comprehend PFAS and Heavy Metals
- Declaration of Conformity (DoC)
- Technical documentation and conformity assessment requirements

Boxon Group can support customers with relevant PPWR-related information, including substance statements, sample conformity documentation, packaging-type assessments, material composition, weight, recyclability and recycled content information where applicable.

Timing and scope of product-specific PPWR documentation

The PPWR Declaration of Conformity requirement becomes applicable from **12 August 2026** for packaging placed on the EU market from that date. From that point, packaging types placed on the EU market must be supported by the relevant conformity documentation.

Packaging already placed on the market before the applicable date is not subject to the same PPWR Declaration of Conformity requirement, and existing articles may not be ordered again after 12 August 2026.

How Boxon Group will support customers

For products ordered and placed on the EU market starting **12 August 2026 onwards**, Boxon Group will support customers with applicable PPWR documentation based on the relevant packaging type, product scope and available supply chain information.

Where documentation is requested by a formal national authority, Boxon Group will assist with the necessary information and documentation within the applicable regulatory framework. Article 15 of the PPWR includes an obligation to provide relevant information and documentation upon reasoned request from national authorities, and the documents must be made available within the required timeframe (10 days).

Boxon Group confirms that we are preparing for the PPWR requirements and will continue to support customers as the regulatory framework becomes applicable and further guidance becomes available.

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2026-06-11

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Conformity Assessment

One comprehensive Conformity Assessment per material / category

The foundation of creating the DoC (Declaration of Conformity)

 2026-06-15

Conformity Assessment Corrugated Packaging

General Description of the Packaging and Its Intended Use

This document applies to corrugated packaging as a material group supplied by Boxon. Product-specific characteristics are defined through internal specifications and product codes. This document covers the following corrugated packaging formats:

- Corrugated slotted boxes
- Corrugated die-cut and functional boxes
- Corrugated pallet boxes
- Corrugated sheets and single-face board
- Heavy Duty Corrugated Packaging
- Honeycomb structures
- Corrugated pallets

Products are identified through internal product specifications, codes, and customer purchase orders.

Intended use:

- Paper-based packaging for containment, protection, and transport of goods
- (Primarily non-food contact unless otherwise specified).

Conceptual Design, Materials and Components

Material
The packaging consists of corrugated fibreboard, composed of:

- Combination of linerboards and fluting
- Virgin and/or recycled fibre content depending on product specification


Structure:
Multi-layer corrugated board consisting of outer liner(s), fluting, inner liner(s). Configurations include:

- Single-wall, double-wall, or triple-wall board
- Sheets or converted packaging (e.g. boxes, pallets)
- Engineered structures such as honeycomb

Additional materials

- Starch-based or water-based adhesives used in board formation
- Coatings, treatments, or reinforcements may be applied depending on application (e.g. moisture resistance, barrier properties).

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Allowed variations within the material group

- Dimensions
- Flute type (e.g. B, C, E, BC)
- Board thickness and strength
- Structural design
- Fibre composition (virgin/recycled)
- Surface condition (coated or uncoated)

Description and Explanation of Design

Corrugated packaging is designed as a fibre-based structural system where mechanical performance is achieved through the interaction of liners and fluting.

- The fluting provides cushioning and shock absorption
- The liners provide surface strength and resistance to compression
- The combination of layers enables stacking strength and load distribution

Performance characteristics such as compression strength, puncture resistance, and durability are influenced by:

- Flute profile and geometry
- Number of layers (single, double, triple wall)
- Fibre composition and grammage
- Structural design of the packaging

The packaging is designed to:

- Protect goods during transport
- Absorb impacts
- Enable efficient stacking and logistics handling

Standards and Technical Specifications

Harmonised standards (Article 34)

- No harmonised standards have been applied at this stage.

Common specifications (Article 37)

- No common specifications have been applied at this stage.


Other relevant technical specifications

Compliance is supported through:

- Supplier material specifications
- Internal product requirements and design specifications
- Industry practices (e.g. standard corrugated design principles and recognised performance/testing methodologies)

• e.g. General SUW-cardboard standard or FEFCO

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Parts of standards applied
Not applicable.

Solutions adopted where harmonised standards are not applied
In the absence of harmonised standards or common specifications, compliance with applicable PPWR requirements is ensured through:

- Supplier declarations on material composition and substance compliance
- Internal verification of material specifications
- Application of established industry practices for corrugated packaging design and performance
- Use of relevant testing methods where applicable

Qualitative Description of how Assessments Provided for Articles 5 Through 11 Have Been Carried Out.

Article 5 – Substances

- Materials are sourced from suppliers declaring compliance with applicable substance restrictions.
- PFAS substances are not intentionally added to this type of packaging.
- Compliance with heavy metal concentration limits is ensured through supplier declarations.

Article 6 – Recyclability (supporting information)

- Corrugated packaging is fibre-based and generally compatible with paper recycling streams.
- Coatings or treatments may affect recyclability where applied.
- Final recyclability assessment remains the responsibility of the legal manufacturer.

Article 10 – Packaging minimisation (supporting information)

- Packaging design is adapted to meet functional and structural requirements.
- Variations in thickness and structure are driven by performance needs.
- Final minimisation assessment remains the responsibility of the legal manufacturer.

Article 11 – Reuse (where applicable)

- No Misleading reusable claims are stated on our corrugated packaging

Supporting Documentation

Statements regarding compliance with PPWR are provided together with this assessment and may include:

- PFAS Statement
- Heavy metals statement

Where applicable, testing is performed to verify compliance with relevant requirements. This may include:

- PFAS Certificate of Analysis (CoA) for Food Contact packaging only

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Declaration of Conformity (DoC)

Per category where we include article information

Possible to get template from us also when you as a customer are considered to be Manufacturer



EU Declaration of Conformity

1. Declaration of Conformity No. _

This declaration applies to corrugated packaging identified through internal product codes and linked documentation.

2. Name and address of the manufacturer and, where applicable, the manufacturer's authorised representative:

Name of the Manufacturer	Boxon Group AB
Address of the Manufacturer	Grustagsgatan 3, 254 64, Helsingborg, Sweden

3. This declaration of conformity is issued under the sole responsibility of the manufacturer.

4. Object of the declaration (identification of the packaging allowing traceability): description of the packaging:

- Corrugated packaging supplied by Boxon, defined as a material group and including, but not limited to:
- Corrugated slotted boxes
 - Corrugated die-cut and functional boxes
 - Corrugated pallet boxes
 - Corrugated sheets and single-face board
 - Heavy-duty corrugated packaging
 - Honeycomb structures
 - Corrugated pallets

The packaging consists of corrugated fibreboard composed of linerboards and fluting, using virgin and/or recycled fibres. It may include starch-based adhesives and, where applicable, coatings or treatments.

5. The object of the declaration referred to in point 4 is in conformity with the relevant Union harmonisation legislation:

The Object(s) of Declaration documented above is/are in conformity with the Packaging and Packaging Waste Regulation (2025/40/EU)

6. References to the relevant harmonised standards or the common specifications used or references to the other technical specifications in relation to which conformity is declared:

No harmonised standards under EU harmonisation legislation have been formally applied. Conformity is demonstrated through internal specifications, supplier declarations, and recognised industry standards (e.g. FEFCO and relevant EN standards where applicable).

7. Notified Body Information:

Not Applicable



8. Additional information:

Compliance with applicable requirements of Regulation (EU) 2025/40, including but not limited to Article 5 (substances), is supported by technical documentation prepared in accordance with Annex VII. This includes supplier declarations, substance assessments, and where relevant, analytical testing.

Further details on substance compliance, material composition, and other applicable regulatory requirements (including REACH, POP, TSCA, California Proposition 65, and RoHS, where relevant and applicable) are provided in the associated annex documentation forming part of the supporting compliance package.

Signatures

Signed for and on behalf of:	
Place and Date of Issue:	
Name and Function:	
Signature:	



Q&A document

Includes:

Understanding the regulation


Understanding your role

Documentation and compliance

PPWR in practice

PPWR timeline



 2026-05-06

Boxon Group EU Packaging & Packaging Waste Regulation (PPWR)

Customer-Focused Q&A – 2026 Requirements
Effective Date of Application: 12 August 2026 | Reference: Regulation (EU) 2025/40

About this Document

This Q&A has been prepared by Boxon Group to help our customers navigate the 2026 compliance requirements of the EU Packaging and Packaging Waste Regulation (PPWR), officially Regulation (EU) 2025/40. As your trusted packaging partner, Boxon is committed to providing clarity, guidance, and tailored solutions to ensure your packaging meets all applicable obligations on time.

Important Disclaimer: Scope of this Document
This document exclusively addresses requirements entering into force on 12 August 2026. The PPWR establishes a staggered compliance timeline, with additional obligations applicable in 2027, 2028, 2029, 2030, and beyond – including recycled content targets, digital labelling mandates, reuse rate quotas, and deposit return systems. Boxon Group will respond to all client inquiries related to current 2026 obligations and is fully equipped to support your compliance journey for the present year. We cannot provide detailed guidance on future-year requirements at this stage, as implementing acts, delegated acts, and Member State-level regulations for those periods are still being developed by the European Commission. Our teams will proactively update you as those requirements are confirmed.


Section 1. Understanding The Regulation

Q. What is PPWR and when does it apply to your business?
The Packaging and Packaging Waste Regulation (PPWR), officially Regulation (EU) 2025/40, is a directly applicable EU law replacing the previous Packaging Directive 94/62/EC. It entered into force on 11 February 2025 and will be fully enforceable from 12 August 2026. Unlike a directive, it applies uniformly in all EU Member States without requiring national transposition – meaning the same rules apply across the entire EU market. Any company that manufactures, imports, distributes, or places packaged goods on the EU market is within its scope, regardless of company size.

This Regulation applies to all packaging, regardless of the material used, and to all packaging waste, whether such packaging is used in or such packaging waste originates from industry, other manufacturing, retail or distribution, offices, services or households.

Q. What are the main roles inside PPWR
PPWR offers three important main roles, and these are: Manufacturer, importer, and distributor. Depending on your role you will have different responsibilities and priorities regarding the regulation

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 2026-05-06

Important Note: These Requirements differ whether your role is that of a Manufacturer, importer, or distributor. In the following question, we will cover this in more detail.

Q. What are the requirements of this regulation starting August 12 - 2026?

General Compliance Obligations (Begin)	Manufacturer ID on Packaging and Supporting Documents	No Misleading Green Claims	PFAS and Heavy Metal Limitations
All packaging placed on the EU market must comply with the PPWR. Manufacturers must complete a conformity assessment and draw up an EU Declaration of Conformity (DoC) under their sole responsibility.	Packaging must be accompanied by documentation with the manufacturer's name, trade name or trademark and a postal address (or equivalent via QR code/data carrier). A batch, type or serial number for traceability is also required.	Environmental claims on packaging are only valid if they relate to properties that genuinely exceed the minimum PPWR requirements, and must specify whether they apply to the unit, part, or all products.	No food-contact packaging may be placed on the market if it contains PFAS above 25 ppb for any individual PFAS, 250 ppb for total PFAS, 50 ppm total fluorine (incl. polymers PFAS). The sum of the concentrations of lead, cadmium, mercury and hexavalent chromium shall not exceed 100 mg/kg .

Section 2. Understanding your Role

Q. As our customer, how do you know if you are a manufacturer, importer, or distributor of a packaging product?
Think of yourself in a very simple story: Who makes it? Who brings it in? Who passes it on?

- You are a Manufacturer if: You physically produce the packaging OR the packaging is made under your name or trademark (even if someone else makes it for you).
 - Rule of thumb: "If your name is on the box, you probably own it."
- You are an Importer if: You bring packaging (or packaged goods) into the EU from outside.
 - Rule of thumb: "If it crosses a border because of you, it's on you."
- You are a Distributor if: You buy and resell packaging within the EU, that is if you didn't make it and didn't import it.
 - Rule of thumb: "If you didn't make it or import it, but you sold it—you're distributing it."

Important Note: You need to identify which role you will be fulfilling (Manufacturer Importer, or Distributor). Based on this identification in the next question we will cover each of your responsibilities.

Q. What are the concrete requirements for each role / scenario?
Requirements for a **Manufacturer:**

- Ask your suppliers to provide you with the technical data for each packaging type. This will be part of the documentation you need to show to the authorities. In practice, this technical data should include: PFAS & Heavy-metal statements, and technical specifications per packaging type (Corrugated, PE, PP, PET, etc)
- Using the technical data provided by your suppliers, you will compile a document called conformity assessment (see Annex VII of the EU Packaging and Packaging Waste

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Example of interpretations: “marking of packaging”

- Manufacturer requirements – see text to the right
- Boxon’s Interpretation and decision of marking
 - Missing delegated acts = uncertainties
 - Various interpretations of the text
 - Labeling directive – recyclability icons to come = synchronize
 - Customer examples – www.brandname.com
 - Costs and risks of “acting” – sync with Recycling symbols
 - Boxon’s decision within this area (when manufacturer)
 - Direct to www.boxon.com for more info
 - We can only make this decision when Boxon is Manufacturer

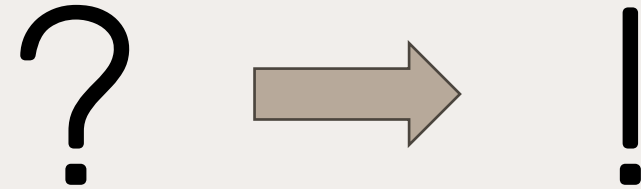


Article 15 Paragraph 6 (PPWR)

- “Manufacturers shall indicate on the packaging or on a QR code or another data carrier their name, registered trade name or registered trademark as well as the postal address at which and, where available, the electronic means of communication by which they can be contacted. Where that is not possible, the required information shall be provided as part of the information through the QR code or other type of standardised, open, digital data carrier as referred to in Article 12(1), (2), (4) or (5) or in a document accompanying the packaged product”

Why we don't sign DoC and send specifications now!

- Products / articles before August 12th are not in Scope technically
- Risk of articles not being up to date (material composition, recycled content, supplier, etc)
- Inactive articles that are potentially not ordered again after August 12th
- Still uncertainties and missing delegated acts...
- Risk of inefficiency for both you as a customer and Boxon (heavy administrative burden that needs to be updated when formally requested to show compliance and validation)
- = a structure and set up with the foundation ready and assurance on submitting all needed data and Declaration of Conformity upon formal request



Learnings and input from customers

- Pilot tests May 2026 – 6 weeks later = already outdated information (material, supplier, etc)
- Also, we can not fill in your extensive excel files or documentation templates when you as a customer are considered Manufacturer = send our material
- **Example of how many customers structure this work and processes**
 - Content of PPWR assurance, Substances of Concern and “ready when needed – approach”
 - Signatures on this assurance and documents that can be sent are sent
 - When needed formally – reach out to Boxon for updated and correct data, DoC, correct time frame, etc.



How we would like to structure the processes ahead

1. Contact us WHEN you have a formal request to show compliance from national authority
2. We will then provide all data and all product validation needed which will be updated to that requested time frame (for instance Aug 12th 2026 to Dec 31st 2026)
3. Your assurance that this process is valid is our proofs that we share with you already now (Statements on SoC, Conformity Assessment, DoC templates, Assurance documents, etc)

What we (Boxon) will do as Manufacturers!

We will work in the exact same way ourselves as stated to the left

= can't work in any other way in without facing the risk of having documentation that is incorrect and not updated

This is the start...

Development and learnings together – still things and areas that are uncertain...

Questions & Comments?

We will send out the presentation, answers to your questions and all material discussed in this webinar

Thank you for participating!

BOXON