

PPWR Guidance Document

Guidance for Customers on the EU Packaging and Packaging Waste Regulation (PPWR) (EU) 2025/40

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01 Introduction

This guidance has been prepared to explain Aquapurge Ltd.'s current approach to compliance with the Packaging and Packaging Waste Regulation (PPWR) (EU) 2025/40.

PPWR requirements are being introduced in phases from 12/08/2026. Aquapurge Ltd. are actively working with suppliers to obtain and verify the technical information required to support compliance. This document reflects our current understanding of the legislation at the date of publication and is provided for information only. **It should not be considered legal advice.**

02 PPWR Timeline Summary

August 12 th 2026	2028	2030
Key obligations include: • Declaration of Conformity (DoC) requirements • PFAS compliance requirements • Heavy metals compliance requirements <i>Certain packaging design and minimisation requirements from the Packaging and Packaging Waste Directive (PPWD) remain applicable during the transition period to PPWR.</i>	Expected introduction of: • Harmonised EU recycling labels and disposal pictograms	Expected introduction of: • Packaging recyclability performance grades • Minimum recycled content requirements • Packaging minimisation requirements • Recyclability thresholds, with packaging generally required to achieve 70% recyclability to remain on the market

03 Roles and Responsibilities

The responsibilities of Aquapurge Ltd. and its customers depend on the type and nature of the packaging supplied.

Custom-Designed Packaging:

Where packaging is produced to Customer specifications (dimensions, materials, print, performance requirements) and the Customer is filling and sealing, the Customer may be considered the “manufacturer” under PPWR and may therefore be responsible for demonstrating compliance. Aquapurge Ltd. will provide available technical information to support these obligations.

Third-Party Products:

For products manufactured by third parties, Aquapurge Ltd. will provide available compliance documentation received from the original manufacturer.

3.1 Who's the manufacturer

When considering who the manufacturer is under PPWR, two key questions should be asked:

- Who determines the packaging specification, including the size, material structure and performance requirements?
- Who completes the final conversion, filling and sealing process before the packaging is placed on the market?

If your company is completing one or more of these actions, you are likely the manufacturer for the purposes of PPWR.

04 Exemptions

Certain packaging applications may be exempt from specific PPWR requirements, including aspects of Article 6 (Recyclability of Packaging) and Article 7 (Minimum Recycled Content in Plastic Packaging), which form part of the requirements expected to apply from 2030.

Examples of potentially exempt applications include:

- Pharmaceutical and medical packaging
- Packaging for food intended for infants and young children
- Packaging used for the transport of dangerous goods
- Certain custom-designed transport packaging for large machinery or industrial equipment

Where exemptions apply, the use of multilayer barrier materials and the absence of post-consumer recycled (PCR) content may continue to be permitted after 2030 where necessary to maintain product safety, performance, shelf life, or regulatory compliance.

Review official guidance, EU regulations or advise when identifying exemptions.

05 Declaration of Conformity

PPWR requires the entity defined as the “manufacturer” to prepare and maintain a Declaration of Conformity (DoC) demonstrating that packaging complies with applicable regulatory requirements.

Aquapurge Ltd. will provide Declarations of Conformity for applicable products from third party suppliers.

For custom-designed packaging, Customers may be responsible for preparing the Declaration of Conformity where they are considered the manufacturer.

06 Compliance Information

Aquapurge Ltd. Currently has the following information available upon request:

Available upon Request	Currently Under Development
• Product specifications • Material composition data • Product weights • Packaging descriptions • Technical drawings – in most cases • PFAS statement • Heavy metals statement • PPWR statement • Supplier declarations and certifications (where available) • Product-specific PFAS test reports for all materials • Product-specific Heavy Metal test reports for all materials	Due to the phased implementation of PPWR and ongoing supplier engagement, the following information is under development: • Full recyclability assessments • Declarations of Conformity for required products

07 PFAS Compliance

PPWR restricts food-contact packaging from containing PFAS above specified limits as part of a three-step process.

PFAS Restrictions under Article 5 apply from 12 August 2026.

The regulation establishes the following concentration thresholds for PFAS in substances used in packaging applications:

- **25 ppb for any single non-polymeric PFAS**
- **250 ppb for the sum of non-polymeric PFAS**
- **50 ppm for total PFAS, including polymeric PFAS**

We confirm that our purging compounds contain no intentionally added PFAS, whether polymeric or non-polymeric. Based on formulation control and raw material supplier declarations, our products do not introduce PFAS into packaging materials and therefore comply with the PFAS thresholds set out above without requiring reformulation. Product specific information can be provided on request.

This declaration is made in accordance with UK REACH and EU REACH principles, including obligations related to substances of very high concern (SVHC), and reflects the information available at the time of issue.

08 Heavy Metals Compliance

PPWR restricts packaging from containing heavy metals above specified limits.

Aquapurge Ltd confirms that the following heavy metals are not intentionally added during the formulation or manufacture of any of our products:

- **Lead (Pb)**
- **Mercury (Hg)**
- **Cadmium (Cd)**
- **Hexavalent Chromium (Cr⁶⁺)**

Based on supplier declarations, raw material specifications, and available verification data, these substances are not expected to be present above trace levels associated with naturally occurring impurities or manufacturing contaminants.

Aquapurge Ltd maintains processes intended to ensure the continued compliance of its purging compounds with applicable Customer and regulatory requirements relating to the presence of heavy metals. Product specific information can be provided on request.

This declaration remains valid unless there are changes to product composition, raw material sources, manufacturing processes, or applicable regulatory requirements.

09 Recyclable Materials

For Customers that do not qualify for PPWR exemptions and may require recyclable packaging solutions containing recycled content from 2030 onwards, Aquapurge Ltd. is actively working with its material and packaging suppliers to develop alternative packaging structures.

10 Future Updates

Aquapurge Ltd. will continue to monitor PPWR developments and engage with Customers and suppliers as further requirements are implemented.

This guidance document will be reviewed periodically and updated as additional compliance information, testing data, and regulatory clarification become available.

Document Control	
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