Smurfit Westrock Product Safety
Allée des Fougères, 33380 Biganos, France
Tel +33 (0)557 708 700, Fax +33 (0)557 708 715,
smurfitwestrock.com

REACH STATEMENT

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Position of paper, board and packages produced by European Smurfit Westrock mills and corrugated plants in relation to Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

REACH has an impact on all producers and importers (into EU) of chemical substances in volumes > 1 ton/year and legal entity. Furthermore, REACH has an impact on downstream users of chemicals.

Registration

European Smurfit Westrock paper mills, board mills, corrugated and sheet plants are mainly affected by REACH as downstream users of chemicals.

Some mills are also producing substances on site, for which there is a registration obligation. However, these substances are not related to the manufacturing of paper and board.

Cellulose pulp, which is the main raw material for paper and board, is explicitly exempted from registration according to Annex IV and Annex V, point 8 “Substances occurring in nature, if they are not chemically modified”.

The chemicals that we use in our industry are normally not pure substances but preparations. Many of our suppliers are formulators (downstream users) of chemical preparations, without registration obligations. The manufacturer or importer of the “pure” substance has the registration obligation.

We have asked our suppliers whether the substances they supply will be registered. We have received confirmation that our suppliers will ensure timely implementation of REACH. We don’t foresee any substantial changes in the quality of our supplied paper, board and packages due to REACH.

Substances in articles

Paper, board, and packages are articles in terms of REACH, and the chemicals used in the manufacture are consequently “substances in articles”.
As manufacturers of paper, board, and packages, we are impacted by Article 7, “Registration and notification of substances in articles”.

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The demands, in Article 7, which are relevant to us, imply that we need to consider whether our paper, board or packages contain substances, meeting the criteria in Article 57, and identified in accordance with Article 59 (1), in concentrations above 0.1%, and the total amount of the substance is > 1 tonne/year. If both criteria are met the European Chemicals Agency (ECHA) must be notified.

The substances as defined in Article 57 are:

- Substances classified as Carcinogenic, Mutagenic, or toxic to Reproduction (CMR), meeting the criteria for classification in category 1 or 2 in accordance with directive 67/548/EEC. This directive was recently replaced by the new EU regulation (EC) No 1272/2008 on classification, labeling and packaging of chemical substances and mixtures, the so-called CLP Regulation. According to the new CLP Regulation these substances shall be classified as 1a or 1b,
- Substances which are persistent, very persistent, bioaccumulative, very bioaccumulative and toxic in accordance with the criteria set out in Annex XIII of REACH (PBT, vPvB substances),
- Substances for which there is scientific evidence of probable serious effects to human health or the environment.

These substances are **potential** Substances of Very High Concern (SVHC) and the use of them might eventually need authorization from ECHA.

The EU member states continuously recommend substances to be evaluated and, possibly, included in the SVHC-candidate list. The consequence is that the presence of SVHC in products must continuously be assessed.

The increased demands on paper, board and packages in food contact and more rigorous environmental regulations (e.g., Directive 94/62) in recent years, has put the focus on the use of chemicals. An action to minimize the use of hazardous chemicals has already started.

With the exception of packaging and display printed using digital printing process, and for which situation must be checked with local sales contact, the in-depth survey carried out in all paper and board mills, corrugated and sheet plants, within Smurfit Westrock Europe, based on the information received from our up-stream chemical suppliers, permits us to state that, to the best of our knowledge, **the paper, board and packages that we manufacture, do not contain:**

- **In a concentration above 0.1 %, substances identified in the current SVHC candidate list** (Article 59 of REACH regulation)
  https://echa.europa.eu/candidate-list-table

- **SVHC substances listed in the current Authorization list** (Annex XIV of REACH regulation)
  https://echa.europa.eu/authorisation-list
- **Substances restricted in the current restriction list** (Annex XVII of REACH Regulation)
  https://echa.europa.eu/substances-restricted-under-reach

Smurfit Westrock Europe actively monitors the evolution of these 3 lists.
If in the future we discover a chemical used in our facilities, and mentioned in one of these lists, we undertake to inform our customers immediately.

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Nadia MOUAKKA
Product Safety Manager
Smurfit Westrock Paper & Corrugated Europe