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To the clients of
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Art. 5 PPWR: Heavy metals in packaging; requirements for wooden products

Article 5 of the PPWR (Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste) sets a limit of 100 mg/kg for the maximum allowable total concentration of lead, cadmium, mercury, and hexavalent chromium in packaging and packaging components.

According to Annex B of EN ISO 17225-1 (2021): Solid biofuels – Fuel specifications and classes: Part 1: General requirements, typical value ranges for naturally occurring woody materials, with no or negligible amounts of bark, leaves, and needles, regarding the mentioned heavy metals can be assumed as follows:

Lead: < 0.5 to 10.0 mg/kg
Cadmium: < 0.05 to 0.50 mg/kg
Mercury: < 0.02 to 0.05 mg/kg
Total chromium: 0.2 to 10.0 mg/kg

Adding it all up results in a maximum overall concentration of 20.55 mg/kg.
Based on this, compliance with the PPWR limit can be assumed, as long as the wood is untreated or not potentially contaminated from previous use.

Fresh timber is treated with the anti-blue stain agent Impralit BSK effect + between April and November. The limit values regarding the aforementioned heavy metals are complied with in this process.

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Art. 5 PPWR: PFAS in packaging; requirements for wooden products

Article 5 of the PPWR (Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste) Article 5 of the PPWR sets the following limit values for PFAS in packaging and packaging components:

- 25 ppb for any PFAS as measured with targeted PFAS analysis, excluding polymeric PFAS
- 250 ppb for the sum of PFAS measured as the sum of targeted PFAS analysis, excluding polymeric PFAS
- 50 ppm for PFAS, including polymeric PFAS; if the total fluorine content exceeds 50 mg/kg, evidence of the content of PFAS or non-PFAS must be provided

PFAS are synthetically produced chemicals that are introduced into wood exclusively through deliberate treatment with PFAS-containing products, e.g. varnishes, paints or wood preservatives. These substances do not occur in untreated wood. The total fluorine content of 50 mg/kg, which is also specified, exceeds the typical value range of 5 mg/kg for fluorine in natural wood as stated in Annex B of EN ISO 17225-1 (2021): Solid biofuels - Fuel specifications and classes:
Part 1: General requirements, which specifies a typical range of 5 mg/kg for fluorine in natural wood-like materials, with or without insignificant amounts of bark, leaves and needles.

On this basis, it can in any case be assumed that the PFAS limit values of the PPWR are complied with, provided that the wood is untreated or has not been contaminated by previous use.

Fresh timber is treated with the blue-stain protector Impralit BSK effect + between April and November. The aforementioned limit values for PFAS are complied with in this process.

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Location, date

company signature