

8 November 2024

## Position of Metsä Tissue concerning REACH requirements

It is part of our company philosophy to minimize all risks of our products regarding environment, health and safety. Metsä Tissue operates in accordance with the valid EC directives and the respective applicable legislation regarding the selection, the storage and the use of chemicals.

At Metsä Tissue the application of the REACH – legislation is based amongst others on the recommendations of the European Tissue Symposium (ETS) and the Confederation of European Paper Industries (CEPI). We only accept chemicals which comply with the REACH requirements. In special trainings our personnel was additionally explained the effects the REACH requirements have on our production units.

REACH defines tissue and greaseproof papers as "articles". Generally articles must not be registered according to REACH. Exceptions exist if the product releases substances according to the regulations and these substances are processed in quantities > 1t/a or if the product contains so-called SVHCs (substances of very high concern; listed in the candidate list and in Annex XIV of the REACH regulation) in a concentration of > 0,1%. This is not the case with us and we want to explain it as follows:

As Metsä Tissue itself does not produce the chemicals used (and nor the packaging material) in its paper production but obtains them from external suppliers, Metsä Tissue is in the role of the so-called "downstream user" of these substances in this regard. We communicate regularly with our suppliers that we accept only those substances that were legally registered for the use in our products.

In line with our integrated management system (certified e.g. to ISO 9001, ISO 14001, ISO 45001, BRC) we have determined a procedure by which all chemical substances and formulations used by us will be recorded and checked. Part of this procedure is the review of the safety data sheets of the purchased substances and formulations, including the substances listed in the safety data sheet. SVHCs > 0,1% are subject to be shown in the safety data sheet, you can find the current list here: <a href="https://echa.europa.eu/en/candidate-list-table">https://echa.europa.eu/en/candidate-list-table</a>

In addition we receive at regular intervals statements of our suppliers concerning SVHCs and use only substances for the production of our tissue and greaseproof products, which are intended for this special purpose. This includes also consideration of the restrictions, set in Annex XVII of the REACH regulation. Based on the statements and safety data sheets of our suppliers as well as on our systems of testing the incoming raw material and also on our knowledge of the manufacturing processes we can confirm that our tissue and greaseproof products do not contain SVHCs > 0,1%. We will actively observe updates of the SVHC-lists (candidate list and Annex XIV) as well as the list of restrictions in Annex XVII.

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