



Document Title: **O-I EUROPE — SUPPLIER COMPLIANCE INFORMATION PACKAGE**

Subtitle: Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR)

Date: 01/07/2026

1. PURPOSE AND SCOPE

This Supplier Compliance Information Package ("SCIP" or "Package") is issued for O-I Europe Sàrl and its European affiliates listed in Annex 1 here below ("O-I" or "the Company") in their capacity as supplier of glass packaging within the meaning of Article 3(16) of Regulation (EU) 2025/40 on Packaging and Packaging Waste ("PPWR").

The purpose of this Package is to provide O-I's customers ("Customers") - in their capacity as manufacturers under Article 3(13) PPWR - with the technical information and compliance statements necessary to support their own conformity assessment obligations under the PPWR.

This Package covers the following areas of PPWR compliance:

- Substances of concern (PFAS, BPA, heavy metals)
- Recyclability
- Technical documentation

Important Note on Roles and Responsibilities

Under the PPWR, the manufacturer (i.e., the entity that designs or manufactures packaging or has packaging designed or manufactured under its own name or trademark) bears the primary responsibility for:

- ensuring that packaging complies with the requirements of the PPWR (Art. 15(1));
- carrying out the conformity assessment (Art. 15(2) and Annexes VII–VIII);
- drawing up the EU Declaration of Conformity (Art. 38–39 and Annex IX);
- affixing the conformity marking (Art. 40).

As a supplier, O-I's obligation under Article 16(1) PPWR is to provide the manufacturer with all necessary technical documentation and information to enable the manufacturer to demonstrate conformity.

2. PFAS (PER- AND POLYFLUOROALKYL SUBSTANCES)

2.1 Regulatory Background

Article 5(5) of the PPWR prohibits the placing on the market of food-contact packaging containing PFAS above the following thresholds, effective 12 August 2026:



- 25 ppb for any individual non-polymeric PFAS (targeted analysis);
- 250 ppb for the sum of non-polymeric PFAS (targeted analysis);
- 50 ppm for total PFAS including polymeric forms (total fluorine screening).

2.2 O-I – PFAS Statement

O-I hereby states the following:

- (a) PFAS are not an ingredient in O-I's glass batch formulations, nor are they intentionally added at any stage of the glass manufacturing process.
- (b) PFAS are not present in the final glass composition. Due to the extreme temperatures involved in glass melting (exceeding 1,500°C) and annealing processes, organic compounds - including PFAS - cannot survive in the glass matrix.
- (c) O-I is actively participating in the FEVE (European Container Glass Federation) coordinated task force which is assigned to develop industry standards.

3. BPA AND OTHER BISPHENOLS

3.1 Regulatory Background

Regulation (EU) 2024/3190 prohibits the use of Bisphenol A (BPA), its salts, and other specified bisphenols and their derivatives in food-contact packaging, including packaging coatings and linings.

3.2 O-I — BPA Statement

O-I hereby states the following:

- (a) BPA, its salts, and other hazardous bisphenols or their derivatives are not intentionally used in the manufacture of O-I glass containers, including coatings and linings.
- (b) Glass is an inert material, due to the extreme temperatures involved in glass melting (exceeding 1,500°C) and annealing processes, organic compounds - including BPA - cannot survive in the glass matrix.
- (c) O-I glass containers are therefore compliant with Regulation (EU) 2024/3190 as regards BPA and related substances.

4. HEAVY METALS

4.1 Regulatory Background

Article 5(1) of the PPWR maintains the existing concentration limits for heavy metals in packaging, originally established under Directive 94/62/EC: the sum of lead (Pb), cadmium (Cd), mercury (Hg), and hexavalent chromium (Cr VI) must not exceed 100 ppm by weight in packaging or packaging components. Article 70(3) preserves Commission Decision 2001/171/EC, as extended indefinitely by Commission Decision 2006/340/EC.



4.2 O-I — Heavy Metals Statement

O-I hereby states the following:

- (a) O-I confirms that it does not intentionally introduce regulated heavy metals into its glass formulations.
- (b) Glass packaging benefits from a permanent derogation established by Commission Decision 2001/171/EC in conjunction with Commission Decision 2006/340/EC. Under this derogation, where the average heavy metals concentration - measured over twelve consecutive monthly controls from each individual glass furnace - exceeds 200 ppm, the manufacturer is required to report to the competent authorities of the relevant Member States (Art. 5, Decision 2001/171/EC).
- (c) glass containers produced by O-I are compliant with the specifications concerning heavy metals (lead, cadmium, mercury and chromium VI) required by the above-mentioned Decision.
- (d) O-I maintains internal quality control procedures and periodic testing to verify ongoing compliance.

5. RECYCLABILITY

5.1 Regulatory Background

Article 6 of the PPWR establishes progressive recyclability requirements:

- From 1 January 2030: all packaging must be designed for recycling (Design for Recycling — DfR criteria);
- From 1 January 2035: all packaging must be recyclable at scale.

5.2 O-I — Recyclability Statement

- (a) Glass is one of the few packaging materials that is infinitely recyclable without loss of quality or purity. Glass containers can be recycled endlessly in a closed-loop system.
- (b) O-I actively supports and promotes glass collection and recycling infrastructure across Europe through its participation in FEVE and national recycling schemes.
- (c) O-I's glass containers are designed to be compatible with existing glass recycling streams and infrastructure.
- (d) O-I will provide Customers with specific recyclability data and DfR assessments as the delegated acts and implementing acts under Article 6 PPWR are adopted.

6. TECHNICAL DOCUMENTATION AND COOPERATION

6.1 O-I's Commitment

In accordance with Article 16(1) of the PPWR, O-I commits to:

- (a) Providing Customers with all necessary technical documentation and information to enable them to carry out the conformity assessment required under the PPWR;



- (b) Cooperating with Customers and, where applicable, with market surveillance authorities, in demonstrating the conformity of glass packaging supplied by O-I;
- (c) Maintaining and updating technical documentation in line with evolving regulatory requirements, delegated acts, and implementing acts;
- (d) Participating in industry-wide initiatives (including through FEVE) to develop harmonised testing methodologies and compliance frameworks.

7. IMPORTANT LIMITATIONS AND DISCLAIMERS

This Package is subject to the following limitations and disclaimers:

- (a) **Supplier Role Only.** This Package is issued by O-I in its capacity as supplier under Article 3(16) of the PPWR. It does not constitute, and must not be construed as, a Declaration of Conformity under Articles 38–39 and Annex IX of the PPWR. The responsibility for issuing the Declaration of Conformity rests exclusively with the manufacturer (the Customer).
- (b) **Scope of Coverage.** The statements and information contained in this Package relate exclusively to O-I glass containers as supplied to the Customer. They do not extend to any materials, components, or treatments applied by third parties after delivery, including but not limited to: inks, labels, adhesives, closures, sleeves, coatings, or filling materials.
- (c) **Best Available Information.** The statements contained herein are based on the best available scientific, technical, and regulatory information as of the date of issuance. O-I reserves the right to update or amend this Package as new information, testing data, regulatory guidance, or delegated/implementing acts become available.
- (d) **No Additional Obligations.** This Package does not create any legal obligations beyond those expressly set out in the applicable supply contract between O-I and the Customer. In the event of any inconsistency between this Package and the supply contract, the terms of the supply contract shall prevail.
- (e) **Evolving Regulatory Framework.** The PPWR is a new regulation with numerous provisions subject to future delegated and implementing acts. Several compliance requirements (including recyclability criteria, recycled content calculation methodologies, and labelling specifications) are not yet fully defined. O-I's statements on these topics are based on the current state of the regulation and will be updated as the regulatory framework evolves.

Sincerely,

Issued by:

Martino Ghibaudo

O-I Quality Leader, Europe



ANNEX 1 - O-I Europe Sàrl European Affiliates List

Entity Name	Domestic Jurisdiction
O-I Estonia AS	Estonia
O-I Germany GmbH & Co. KG	Germany
O-I Glass Limited	United Kingdom
O-I Netherlands B.V.	Netherlands
O-I Czech Republic a.s.	Czech Republic
O-I Poland SA	Poland
Vidrieria Rovira S.L.	Spain
O-I France SAS	France
O-I Hungary Limited	Hungary
San Domenico Vetraria S.p.A.	Italy
Vetrerie Meridionali S.p.A.	Italy
O-I Italy S.p.A.	Italy