

Environmental Statement



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For whom it may concern

All corrugated fibre board purchased by Castle Cartons on behalf of our customers conform to the following standards.

REACH (Registration, Evaluation and Authorisation of Chemicals):

The aim of REACH is to improve the protection of human health and the environment by better and earlier identification of properties of chemical substances.

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”. Corrugated Board is constructed by using a vegetable starch-based adhesive to bond layers of paper, as there is no chemical reaction taking place, no new substances are formed. We at Castle Cartons are only affected only as a downstream user of substances.

Under REACH paper and corrugated board are defined as ‘Articles’ whereas the focus of REACH is substances. Based on information from our board suppliers we are permitted to state that to the best of our knowledge the board we purchase does not contain the following

- In a concentration level above 0.1% substances identified in the current SVHC candidate List, last updated 5th November 2025
- SVHC substances listed in the authorization list in annex XIV of REACH regulation and last updated 1st November 2025
- Substances restricted by annex XVII to reach regulation and last updated 17th October 2025

None of the substances used in the paper and corrugate manufacturing process fulfils any of these conditions, and therefore they are exempted from REACH.

From the above statements, and separate assurances given us by our corrugated board suppliers, I am happy to assure you that all board produced by Castle Cartons Ltd meets the current requirements.

Notwithstanding all the statements above, it is possible that, due to the high waste content of unknown origin, particularly in the low-grade waste used in chip liner and waste based fluting, there might be very small quantities of contaminants in local concentrations.

The Toxic Substances Control Act

The Toxic Substances Control Act of 1976 is a US legislation that provides the EPA (Environmental Protection Agency) with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from the Toxic Substances Control Act, including, among others, food, drugs, cosmetics and pesticides. The Toxic Substances Control Act addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon and lead-based paint.

Our suppliers do not have specific statements on the Toxic Substances Control Act, as it is US legislation, they have stated the closest UK equivalent is REACH, please see above.

RoHS 2 Directive 2011/65/EU amended by 2015/863/EU

RoHS 2 Directive of the European Parliament and of the Council of 8 June 2011, amended by Directive 2015/863/EU, on the restriction of the use of certain hazardous substances in electrical and electronic equipment. RoHS 2 Directive applies to electrical and electronic equipment (EEE) set out in Annex I and does not apply to packaging.

Purity requirements listed in annex II of Directive 2011/65/EU concern hazardous substances including heavy metals and some organic compounds. The annex II is regularly updated by the authorities linked to the list of substances subject to authorizations published in the context of the 1907/2006/EC REACH regulation. The substances to consider as a priority are.

- Lead (0,1 %)
- Mercury (0,1 %)
- Cadmium (0,01 %)
- Hexavalent chromium (0,1 %)
- Polybrominated biphenyls (PBB) (0.1 %)
- Polybrominated diphenyl ethers (PBDE) (0.1 %)

And from July 2019

- Bis(2-ethylhexyl) phthalate (DEHP) (0.1 %)
- Butyl benzyl phthalate (BBP) (0.1 %)
- Dibutyl phthalate (DBP) (0.1 %)
- Di isobutyl phthalate (DIBP) (0.1 %)

The above, along with the organic substances listed in the RoHS 2 directive are not intentionally added by our board suppliers during any part of the production process, although the material can contain substances that are in the incoming raw material as traces or impurities.

Animal Derived Ingredients:

Paper: Animal derived ingredients are not introduced intentionally during our supplier's paper and solid board processes for technical purposes.

In the context of Good Manufacturing Practices (GMP) implementation implemented by our suppliers' mills, they have developed a policy intending to certify that all the chemicals that are used are compliant with food contact and environment regulations. One of the actions was the collection from all their suppliers of statements declaring that they do not use animal derived ingredients in the supplied additives. Although their products may contain the above substances that are in incoming raw materials as traces or impurities.

Glue: Our supplier states that Animal derived ingredients are not used in the glue manufacturing process.

Possible Contaminants:

Dioxin: Any bleaching on brown paper is Total Chlorine Free (TCF). Any bleaching on white paper is carried out using Elemental Chlorine Free (ECF) methods.

Heavy Metals: The BPPA (now the CPA) commissioned laboratory tests on a wide selection of fiberboard and paper products and concluded that levels of heavy metal contamination were extremely low, and well below the levels permitted by the CONEG standards and Article 11 of the EU Packaging and Packaging Waste Directive 94/62/EC (implemented in the U.K. in part III of the Packaging (Essential Requirements) Regulations 1998).

It is worth, however, raising the point that the increasing diversity of sources of recycled material, that comes with the encouragement to recycle, gives rise to a remote chance that spot contamination could occur. This is particularly true of waste based fluting medium and with double wall board, chip center liner, both of which are made from low grade waste.

Latex: No latex is used in the manufacture of any of our board.

GMOs: Wheat starch of French origin is used as an adhesive, and no genetically modified wheat is grown in France.

PFAS Identification

Our suppliers' statements regarding Perfluoroalkyl substances are available on request.

State of California Proposition 65

Proposition 65, officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986, protects the state's drinking water sources from being contaminated with chemicals known to cause cancer, birth defects or other reproductive harm, and requires businesses to inform Californians about exposures to such chemicals.

Proposition 65 also defines safe harbour levels, which include No Significant Risk Levels (NSRLs) for cancer causing chemicals and Maximum Allowable Dose Levels (MADLs) for chemicals causing reproductive toxicity, have been established for many of the chemicals listed under Proposition 65. Exposure levels and discharges to drinking water sources that are below the safe harbour levels are exempt from the requirements of Proposition 65.

None of the substances listed in Proposition 65 Safe Harbour Levels are intentionally added in to our supplier's paper and solid board mills during our paper process for technical purposes. Therefore, we can state that all papers and solid board grades purchased by Castle Cartons Limited are free from these substances, although our products may contain the above substances that are in incoming raw materials as traces or impurities.

Forest Management:

Castle Cartons Ltd only purchases corrugated fibre board from suppliers that buy their paper from mills who use wood from well managed forests. Our suppliers favour paper mills that are certified to a Forest Certification system such as the 'Forest Stewardship Council' (FSC) and environmental management systems such as ISO 14001. Our supplies are not currently accredited to 'Program for the Endorsement of Forest Certification' (PEFC) as they feel that FSC is currently working to stricter standards. Castle Cartons Limited does not hold its own FSC certification.

Our main supplier supplies FSC Mix 70%. This certification covers the use of both virgin and recycled fibers in the material they produce. To gain this certification our supplier's overall output of corrugate is manufactured with at least 70% of the content being recycled material, although this would alter dependent on the individual material grades. The remaining 30% is made up of FSC certified, or FSC controlled materials. Controlled material isn't FSC certified but is from forests that must meet the rules set out by the FSC. These rules aim to reduce the risk of illegally harvested wood, or wood harvested in violation of human rights.

Individual papers that are 100% produced from recycled materials are controlled by the FSC chain of custody, to ensure the responsible sourcing of recovered fibre. At least 70% of the content must be post-consumer waste, the remaining 30% can be reclaimed from manufacturing, in the form of offcuts or defective material. Using recycled material optimizes the use of the forest resources and reduces the need to harvest more trees.

Directive 94/62/EC on Packaging Waste

According to our material suppliers, Lead, Cadmium, Mercury and hexavalent Chromium have not been intentionally introduced during the manufacture of paper and do not exceed 100ppm by weight (EN13428), and the level of substances hazardous to the environment in the paper is less than 0.1% (EN13428) Our suppliers regularly analyse the heavy metals content in all of the paper and solid board grades they produce, and they state they are in line with article 11 of directive94/62/EC on heavy metals content

Prevention by source reduction (EN 13428)

Where Castle Cartons retains the design responsibilities, regard will be made by source reduction. When the packer/filler provides the specification for the packaging, responsibility for minimisation at source cannot be delegated to Castle Cartons Limited.

Reusable Nature of Packaging (EN 13429)

Corrugated Board Packaging is not designed for re-use.

Recovery

All forms of recovery are key waste management options required by Directive 94/62/EC. Papers are recoverable by the three methods (recycling, energy recovery and organic recovery) listed in the Directive to satisfy the Essential Requirements. Our statement concerning all board grades intended for packaging produced by our main suppliers is as follows:

Recovery – Material Recycling:

All material grades intended for packaging supplied to Castle Cartons Limited, are recoverable by material recycling according to the requirements laid down in EN 13430.

Recovery – Energy Recovery:

The papers supplied to Castle Cartons Limited can be recovered in the form of energy. The energy recovery is that described in standard EN 13431.

Recovery – Biodegradability:

All corrugated board grades intended for packaging supplied to Castle Cartons Limited, can be recovered through composting and biodegradation according to EN 13432.

Recycled Content of Board:

Except for Kraft papers and various enhanced fluting, all papers purchased by Castle Cartons Limited are 100% recycled fibre. The Kraft grades contain up to approximately 30% recycled fibre, the actual proportion varying slightly from make to make, since the important factor is not to include a minimum proportion of recycled material but to maintain the performance of the paper. Below are the approximate percentage of recycled fibre in board with a balanced weight inner and outer liners, waste-based fluting and, where applicable, a chip center liner.

Single Wall Grades:

E Flute

Outer Paper Grade	Flute Paper Grade	Inner Paper Grade	Fluting Type	Recycled Content
125K	85g	125T	E	78%
150K	85g	150T	E	75%
200K	85g	200T	E	73%
150WTK	85g	150T	E	65%
200WTK	85g	200T	E	62%

B Flute

Outer Paper Grade	Flute Paper Grade	Inner Paper Grade	Fluting Type	Recycled Content
125K	85g	125T	B	78%
150K	85g	150T	B	77%
200K	85g	200T	B	74%
300K	85g	300T	B	74%
150WTK	85g	150T	B	72%
200WTK	85g	200T	B	62%

C Flute

Outer Paper Grade	Flute Paper Grade	Inner Paper Grade	Fluting Type	Recycled Content
150K	150	150T	C	78%
200K	85g	200T	C	75%

Double Wall Grades:

EB Flute

Outer Paper Grade	Flute Paper Grade	Inner Paper Grade	Fluting Type	Recycled Content
125K	85g	125T	EB	87%
150K	85g	150T	EB	84%
200K	85g	200T	EB	81%
150WTK	85g	200T	EB	78%
200WTK	85g	200T	EB	74%

BC Flute

Outer Paper Grade	Flute Paper Grade	Inner Paper Grade	Fluting Type	Recycled Content
125K	85g	125T	BC	87%
150K	85g	150T	BC	84%
200K	85g	200T	BC	82%
300K	85g	300T	BC	79%
150WTK	85g	150T	BC	78%
200WTK	85g	200T	BC	75%
200WTK	175	200T	BC	81%
300K	150	300K	BC	62%

Clay Coat Grades:

Outer Paper Grade	Flute Paper Grade	Inner Paper Grade	Fluting Type	Recycled Content
190CC	85g	200T	E	70%
190CC	85g	200T	B	70%
190CC	85g	200T	EB	70%
190CC	85g	200WTT	E	70%

Solid Board Grades:

Paper Grade	Measurement	Paper Type	Material	Recycled Content
690	Micron	WLC	Solid Board	0%
700	Micron	WLC	Solid Board	0%

Castle Cartons Limited has made every effort to ensure all the information in this document is accurate. If you require any further information regarding any of the above sections, please do not hesitate to contact us.

Yours sincerely

James Green
Managing Director