Due Diligence Guidelines & Checklist

Protecting Your Business from Risky Paper Imports
Version 1.0 – August 2025 | Prepared by Ian Bates in collaboration with BIFFA & Two Sides

FOR PAPER MILLS & BOARD PRODUCERS

1. Forest & Fibre Traceability

- Is all virgin fibre sourced from managed forests?
- Are raw materials traceable to origin and geolocated, as required under the EUDR?
- Is FSC or PEFC certification valid, current, and independently verifiable?

2. EUDR Readiness

- Has your mill conducted a self-audit for EUDR deforestation-free compliance?
- Are you keeping transaction records for 5 years as mandated under EUDR?
- Can you provide a due diligence statement (DDS) to downstream buyers?

3. Chemical Safety

- Are barrier coatings and treatments free from PFAS, BPA, phthalates, and halogenated compounds?
- Are heat-resistant applications (e.g. baking paper) tested for VOC migration under EU food contact standards?
- Are silicone or greaseproof coatings applied via compliant, audited processes?

4. Certification Integrity

- Have all sustainability and food-contact certificates been verified with the issuing body?
- Are brokers or agents involved in any part of your FSC/PEFC chain-of-custody?

FOR CONVERTERS & PACKAGING MANUFACTURERS

1. Supplier Vetting

- Have all mill partners provided evidence of legal sourcing, EUDR compliance, and chain-of-custody?
- Are any low-cost materials from unfamiliar Asian brokers flagged for additional scrutiny?

2. Product Safety

- Have you tested samples for chemical migration (e.g. PFAS in baking liners or recycled board)?
- Do inks, adhesives, and coatings used meet EU Regulation (EC) No 1935/2004?

3. Risk Flags

Be wary of:

- "Too cheap to be true" offers
- Sudden drops in board prices
- New suppliers with unverifiable certifications
- Missing batch traceability or vague country of origin

4. Contracts & Claims

- Are green claims clearly substantiated in product specs and marketing?
- Do you require legal indemnity from suppliers in case of non-compliance or recall?

FOR BRANDS, RETAILERS & BUYING TEAMS

1. Procurement Protocols

- Do you have a supplier code of conduct covering EUDR, food safety, and green claims?
- Are your packaging suppliers contractually obligated to disclose raw material sources?

2. Marketing & Legal

- Are you reviewing claims such as "biodegradable", "eco", or "100% sustainable" through legal and ESG teams?
- Have you aligned your green claims with UK CMA and EU Green Claims Directive guidelines?

3. Audit Readiness

- Can your team trace packaging materials back to mill or forest source?
- Are you keeping documentation of due diligence, testing, and audits?

4. NGO/Reputation Risk

- Could a watchdog NGO or investigative journalist expose your packaging source?
- Would your packaging claims stand up to public or regulatory scrutiny?

Summary

This checklist is a starting point, not a substitute for formal legal, food safety or regulatory advice. But in a landscape where greenwash is rife and public trust is fragile, it's a vital shield against reputational and compliance disaster.

For support developing your own bespoke due diligence protocols or supplier audit tools, please contact:

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