Rotim
Your packaging specialist

# PPWR Declaration Requirements

Heavy Metals & PFAS requirements under Regulation (EU) 2025/40

| DECLARATION NO. | DATE OF ISSUE | PLACE OF ISSUE |
|---|---|---|
| Rotim – PPWR – 2026 - 023 | 9 November 2026 | Nijmegen, Netherlands |

## 1. Manufacturer / responsible economic operator

**Rotim Verpakkingen B.V.**
Kerkenbos 1028
6546 BA Nijmegen
The Netherlands

## 2. Object of the declaration

**Packaging / packaging material identification:** Appendix: PPWR Applicability by Article
**Intended use / food-contact status:** Not applicable

## 3. Declaration

Rotim Verpakkingen B.V. hereby declares, under its responsibility and on the basis of the applicable technical documentation and supporting supplier information, that the packaging identified in Section 2 is assessed with regard to the substance requirements of Article 5 of Regulation (EU) 2025/40 on packaging and packaging waste (PPWR).

**Heavy metals —** In accordance with directive article 5(4), the sum of the concentrations of lead (Pb), cadmium (Cd), mercury (Hg) and hexavalent chromium (Cr(VI)) resulting from substances present in the packaging or packaging components shall not exceed 100 mg/kg.

**PFAS —** Although PFAS is not intentionally added to the product or used in the manufacturing process, it cannot be entirely ruled out that traces of the aforementioned substance may be present in the product. At the time of this statement's issuance, several provisions of Article 5.5 are still under development. The European Commission has not yet published the final list of PFAS substances subject to restrictions. Discussions regarding harmonized testing methods are still ongoing, and feedback from the industry is being taken into account. We are closely monitoring developments regarding the PPWR and will issue revisions to this statement if developments make it necessary.

## 4. Regulatory basis

| | |
|---|---|
| **Article 5(4)** | Maximum combined concentration of Pb + Cd + Hg + Cr(VI): 100 mg/kg. |
| **Article 5(5)** | PFAS restrictions for food-contact packaging from 12 August 2026, including the applicable thresholds. |
| **Articles 38–39** | Conformity assessment and EU Declaration of Conformity requirements. |
| **Annex VII–VIII** | Internal production control / technical documentation and model structure for the EU DoC. |

## 5. Authorised signature

Signed for and on behalf of Rotim Verpakkingen B.V.



Signature / Date

Maringka van Amerongen, CEO

Name / function

# Appendix: PPWR Applicability by Article

This appendix provides an overview of the articles ordered by the customer for which compliance with the applicable requirements of the Packaging and Packaging Waste Regulation (PPWR) has been confirmed.

| Article number | Description |
|---|---|
| BFA020030 | Opvulmateriaal Presentfill, zwart (2kg) |
| BFA020031 | Opvulmateriaal Presentfill, wit (2kg) |
| BFA020032 | Opvulmateriaal Presentfill, bruin (2kg) |
| BFA020033 | Opvulmateriaal Presentfill, creme (2kg) |
| BFA020034 | Opvulmateriaal Presentfill, bordeaux rood (2kg) |
| BFA020035 | Opvulmateriaal Presentfill, donkergroen (2kg) |
| BFA020036 | Opvulmateriaal Presentfill, rood (2kg) |
| BFA020037 | Opvulmateriaal Presentfill, blauw (2kg) |
| BFA020038 | Opvulmateriaal Presentfill, oranje (2kg) |
| BFA020039 | Opvulmateriaal Presentfill, geel (2kg) |
| BFA020043 | Opvulmateriaal Presentfill, lime groen (2kg) |
| BFA020044 | Opvulmateriaal Presentfill, grijs (2kg) |
| BFA020045 | Opvulmateriaal Presentfill, magenta (2kg) |
| BFA020050 | Opvulmateriaal Presentfill, zwart (10kg) |
| BFA020052 | Opvulmateriaal Presentfill, bruin (10kg) |
| BFA020053 | Opvulmateriaal Presentfill, creme (10kg) |
| BFA020054 | Opvulmateriaal Presentfill, rood (10kg) |
| BFA020056 | Opvulmateriaal Presentfill, magenta (10kg) |