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 - 030	10 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
CAB000001	20x Geschenkdoos ZWART MAT 20x15x8cm
CAB000002	20x Geschenkdoos ZWART MAT 12,5x12,5x5,5cm
CAB000007	20x Geschenkdoos ROZE MAT 20x15x8cm
CAB000008	20x Geschenkdoos ZWART MAT 35,5x16,8x9,4cm
CAB000009	20x Geschenkdoos ROZE MAT 35,5x16,8x9,4cm
CAB000010	20x Geschenkdoos GOUD 12,5x12,5x5,5cm
CAB000011	20x Geschenkdoos GOUD 20x15x8cm
CAB000020	Gondeldoos 10,5x9,5x3cm wit
CAB000021	Gondeldoos 10,5x9,5x3cm zwart
CAB000023	Gondeldoos 10,5x9,5x3cm roze
CAB000025	Gondeldoos 11x15,5x4cm wit
CAB000026	Gondeldoos 11x15,5x4cm zwart
CAB000027	Gondeldoos 11x15,5x4cm roze
CAB000030	Gondeldoos 11cmx23x4cm wit
CAB000031	Gondeldoos 11cmx23x4cm zwart
CAB000032	Gondeldoos 11cmx23x4cm roze
CAB000203	20x Geschenkdoos Merry Christmas GOUD/ZWART 12,5x12,5x5,5cm
DRA600005	10x Luxe papieren tas, ZWART 14x8,5x21 cm
DRA600006	10x Luxe papieren tas GOUD 14x8,5x21cm
DRA600008	10x Luxe papieren tas, ZWART 18x8x24 cm
DRA600009	10x Luxe papieren tas GOUD 18x8x24cm
DRA600011	10x Luxe papieren tas, ZWART 25+11x32 cm
DRA600012	10x Luxe papieren tas GOUD 25+11x32 cm
DRA600031	10x Luxe papieren tas, WIT 14x8,5x21 cm

Article number	Description
DRA600032	10x Luxe papieren tas, WIT 18x8x24 cm
DRA600033	10x Luxe papieren tas, WIT 25+11x32 cm
DRA600040	10x Luxe papieren tas ROZE 14x8,5x21cm
DRA600041	10x Luxe papieren tas ROZE 18x8x24cm
DRA600042	10x Luxe papieren tas, ZWART 42x12x35 cm
DRA600043	10x Luxe papieren tas, WIT 42x12x35 cm
DRH100010	10x luxe papieren tassen 22x10x18+4cm zwart/zwart 250gr
DRH100011	10x luxe papieren tassen 35x12x28+5cm zwart/zwart 250gr
DRH100012	10x luxe papieren tassen 42x13x37+5cm zwart/zwart 250gr
DRH100013	10x luxe papieren tassen 55x14x43+7,5cm zwart/zwart 250gr
DRH100020	10x luxe papieren tassen 22x10x18+4cm beige 200gr
DRH100021	10x luxe papieren tassen 35x12x28+5cm beige 200gr
DRH100022	10x luxe papieren tassen 42x13x37+5cm beige 200gr
DRH100023	10x luxe papieren tassen 55x14x43+5cm beige 200gr
DRH100024	10x luxe papieren tassen 22x10x18+4cm dusty rose 200gr
DRH100025	10x luxe papieren tassen 35x12x28+5cm dusty rose 200gr
DRH100026	10x luxe papieren tassen 42x13x37+5cm dusty rose 200gr
DRH100027	10x luxe papieren tassen 55x14x43+5cm dusty rose 200gr
DRH100028	10x luxe papieren tassen bruin kraft 22x8x16cm 180gr, zwart handvat
DRH100029	10x luxe papieren tassen bruin kraft 30x12x25cm 180gr, zwart handvat
DRH100030	10x luxe papieren tassen bruin kraft 42x13x31cm 180gr, zwart handvat
DRH100031	10x luxe papieren tassen bruin kraft 57x17x40cm 230gr, zwart handvat

Article number	Description
DRH100035	10x luxe papieren tassen 22x10x18+4cm Bourgondie PMS 209U 200gr
DRH100036	10x luxe papieren tassen 35x12x28+5cm Bourgondie PMS 209U 200gr
DRH100037	10x luxe papieren tassen 42x13x37+5cm Bourgondie PMS 209U 200gr
DRH100038	10x luxe papieren tassen 22x10x18+4cm Olive green PMS 5743U 200gr
DRH100039	10x luxe papieren tassen 35x12x28+5cm Olive green PMS 5743U 200gr
DRH100040	10x luxe papieren tassen 42x13x37+5cm Olive green PMS 5743U 200gr
GBC070100	Cadeauzakken, mat zwart, + zijvouw 12x5x16cm +2cm flap (25 st)
GBC070101	Cadeauzakken, mat zwart, + zijvouw 19x7x24cm +4cm flap (25 st)
GBC070102	Cadeauzakken, mat zwart, + zijvouw 30x10x36cm +4cm flap (25 st)
GBC070103	Cadeauzakken, goud glossy + zijvouw 12x5x16cm +2cm flap (25 st)
GBC070104	Cadeauzakken, goud glossy + zijvouw 19x7x24cm +4cm flap (25 st)
GBC070105	Cadeauzakken, goud glossy + zijvouw 30x10x36cm +4cm flap (25 st)