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 - 036	20 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
BCA12345	Doosje
BDA105914	Doos/ vouwkarton f0412 ,1000x590x145 mm Bruin, tbv inpak postdozen zwart/roze
BDA106015	Doos/ vouwkarton f0401,B-golf 1050x600x150mm Bruin, tbv postdozen zwart/roze
BDA109522	Doos 1095x220x330mm bruin + 4 rillijnen (275)
BDA110002B	Doos 394x244x334mm Bruin, perforatie in hoeken, type 2 (1320)
BDA110003	Doos 592x392x610mm Bruin, perforatie in hoeken V2
BDA110005	Doos 394x244x334mm Bruin, type 2 + perforatie op hoeken (1320)
BDA111110	Doos 113x113x100mm Bruin (25/5250)
BDA151510	Doos 150x150x100mm Bruin (25/2475)
BDA151515	Doos 150x150x150mm Bruin (25/2800)
BDA160132	25x Postdozen pms Goud 871c, 16x13x6cm
BDA160133	25x Postdozen pms Roze 217c , 16x13x6cm
BDA160134	25x Postdozen Roze 500c , 16x13x6cm
BDA160135	25x Postdozen ZWART, 16x13x6cm
BDA160136	25x Postdozen WIT, 16x13x6cm
BDA160137	25x Postdozen WIT, 16x13x9cm
BDA160138	25x Postdozen ZWART, 16x13x9cm
BDA160139	25x Postdozen Roze pms 500c, 16x13x9cm
BDA160140	25x Postdozen Roze pms 217c, 16x13x9cm
BDA160141	25x Postdozen Goud pms 871c, 16x13x9cm
BDA160142	25x Postdozen Bruin, 16x13x6cm
BDA160143	25x Postdozen Bruin, 16x13x9cm

Article number	Description
BDA191909	Autolockdoos 195x195x87mm bruin + plakstrip (10/360)
BDA191911	Doos 190x190x110mm
BDA199590	Autolockdoos 195x95x90mm. bruin+plakstrip (10/3.520)
BDA200306	Opvulplaat 200 x 306mm BC-golf 2.31K
BDA201591	Doos 200x150x90mm Bruin (25/3150)
BDA202003	Doos 200x200x200mm Bruin (25/2100)
BDA211519	Autolockdoos 213x153x109mm. MK20 bruin+plakstrip (10/1760)
BDA252015	Doos 250x200x150mm Wit (25/1950)
BDA252525	Doos 250x250x250mm Bruin B-golf
BDA261613	Doos 265x165x130mm Bruin (25/2475)
BDA262016	Autolockdoos 260x200x160mm bruin+plakstrip (10/1440)
BDA281907	25x Postdozen ZWART, 28x19x7,5cm
BDA281908	25x Postdozen ROZE, 28x19x7,5cm pms 500c
BDA281909	25x Postdozen GOUD, 28x19x7,5cm
BDA281911	25x Postdozen PINK LAVENDER, 28x19x7,5cm pms 217c
BDA281970	25x Postdozen WIT, 28x19x7.5cm
BDA281971	25x Postdozen BRUIN, 28x19x7,5cm
BDA302125	Doos A4 305x215x250 Wit (1200)
BDA302130	Doos A4 304x215x300mm Wit (610)
BDA302208	Doos 305x215x150mm Wit (25/1625)
BDA302213	Doos 300x215x100mm Bruin (20/1400)
BDA303030	Doos 300x300x300mm Wit (25)
BDA303031	Doos 300x300x300mm Bruin (25/700)
BDA312026	Doos 315 x 225 x 260mm Bruin B-golf (25/1100)
BDA312520	Doos 310x250x200mm Bruin (kraft) B-golf f0201
BDA312521	Doos 310x250x200mm Wit B-golf f0201

Article number	Description
BDA321612	Autolockdoos 315x155x120mm bruin + plakstrip (10/1600)
BDA323298	Doos 320x320x980mm bruin B-golf - korte kleppen
BDA352514	Autolockdoos 350x256x135mm bruin + plakstrip (10/1440)
BDA352516	Doos 350x250x150mm Wit (25)
BDA352808	25x Postdozen ZWART, 35x28x8cm
BDA352809	25x Postdozen GOUD, 35x28x8cm
BDA352812	25x Postdozen ROZE, 35x28x8cm
BDA352813	25x Postdozen PINK LAVENDER, 35x28x8cm
BDA352817	25x Postdozen WIT, 35x28x8cm
BDA352819	25x Postdozen BRUIN, 35x28x8cm
BDA352825	25x Postdozen STIPPEN, 35x28x8cm
BDA383014	25x Postdozen ZWART, 38x30x14cm
BDA383015	Dubbelgolf doos, 380x300x155mm, Bruin (20)
BDA383016	25x Postdozen ROZE, 38x30x14cm
BDA383017	25x Postdozen GOUD, 38x30x14cm
BDA383019	25x Postdozen BRUIN, 38x30x14 cm
BDA383020	25x Postdozen PINK LAVENDER, 38x30x14 cm
BDA383021	25x Postdozen WIT, 38x30x14 cm
BDA383025	25x Postdozen STIPPEN, 38x30x14cm
BDA392911	Doos 395x290x125mm Wit (25/900)
BDA402515	Doos 400x250x150mm Bruin (25/1400)
BDA402520	Doos 2B 400x250x205mm + rillijnen Bruin
BDA403014	Doos 395x295x140mm Bruin (25/700)
BDA403018	Doos 400x300x180mm Wit (25/650)
BDA403021	Doos 400x300x200mm Bruin (25/650)
BDA403320	Doos 400x330x200mm Bruin (25)
BDA413036	Doos 410x300x360mm Bruin, 1x rillijn (25/600)

Article number	Description
BDA463030	Autolockdoos 460x309x300mm bruin+plakstrip met rillijn (10/360)
BDA543832	Autolockdoos 540x380x320 mm bruin + plakstrip (10/360)
BDA593913	Doos 590x390x128mm Bruin EG B-golf (20/600)
BDA593921	Doos 590x390x210mm Bruin EG B-golf (640)
BDA594810	Doos 590x480x109mm Bruin (25)
BDA604646	Dubbelgolf doos 4, 600x460x450mm, Bruin, 2x rillijnen (200)
BDA613714	25x Postdozen ZWART, 61x37x14cm
BDA613714B	25x Postdozen ZWART, 61x37x14cm
BDA626247	Doos 625x625x47mm Bruin / bruin karton
BDA694483	Doos 697x447x83mm Bruin / bruin karton
BDA714116	Doos 710x410x160mm Bruin / bruin karton
BDA790119	Plaat 790 x 1190 mm BC-golf 2x 175 KL (1)
BDA980118	Plaat 980 x1180mm F0110, B-golf 120T / 100W / 120T ca. 340 gr/m2 (550)
BDC191915	Dubbelgolf doos f0201 195x195x155 mm BC golf Bruin
BDC202014BR	Doos bruin + 1 kleur opdruk (zwart) 220x220x145mm
BDC252520	Dubbelgolf doos 250x250x200mm Bruin (640)
BDC302216	Dubbelgolf doos 304x217x150mm Bruin (960)
BDC302825	Dubbelgolf doos 300x275x250mm Bruin (640)
BDC352429	Dubbelgolf doos 350x240x290mm Bruin (320)
BDC360280	Dubbelgolf doos 360x280x260mm Bruin EB f0201 (440)
BDC381514	Dubbelgolf doos 380x150x140mm Bruin (960)
BDC403030	Dubbelgolf doos 400x300x300mm Bruin (640)
BDC403035	Dubbelgolf doos 400x300x350mm Bruin (320)
BDC450260	Dubbelgolf doos 450x350x260mm Bruin EB f0201 (440)
BDC452035	Dubbelgolf doos 450x200x350mm BC golf Bruin

Article number	Description
BDC453045	Dubbelgolf doos 450x300x450mm BC golf Bruin
BDC453530	Dubbelgolf doos 450x350x300mm BC golf Bruin
BDC504020	Doos 500x400x200mm Bruin f0201 , dubbelgolf BC
BDC504030	Doos 500x400x300mm Bruin f0201 , dubbelgolf BC
BDC505060	Doos 500x500x600mm BC- golf Bruin f0201
BDC765624	Dubbelgolf doos 765x565x240mm BC golf Bruin
BDC765647	Dubbelgolf doos 765x565x470mm BC golf Bruin
BDC785838	Dubbelgolf doos, 780x580x380mm, Bruin, 4x rillijn (225)
BDC785847	Dubbelgolf doos 785x585x470mm BC golf Bruin
BDC805030	Doos 800x500x300mm Bruin f0201 , dubbelgolf BC
BDC805050	Doos 800x500x500mm Bruin f0201 , dubbelgolf BC
BDC805051	Doos 800x500x500mm BC kwaliteit 2.70 M Bruin f0201 , dubbelgolf
BDG161151	Postdoos 152x101x46mm WIT (50/13.000)
BDG181350	Postdoos 172x121x41mm BRUIN (50/13.000)
BDG322351	Postdoos 312x216x46mm WIT (50/3.900)
BDG613213	25x Postdozen ZWART, 61x32.9x13.5cm
BDG613214	25x Postdozen GOUD pms 871c , 61x32.9x13.5cm
BDG613215	25x Postdozen ROZE pms 217c , 61x32.9x13.5cm
BDG613216	25x Postdozen WIT , 61x32.9x13.5cm
BDG613217	25x Postdozen BRUIN kraft, 61x32.9x13.5cm
BDG613218	25x Postdozen ROZE pms 500cc , 61x32.9x13.5cm
CCA300136	Flesverzenddoos 1-fles dia.105mm x max. 360mm hoog SCP (20/960)
CCA300237	Flesverzenddoos 3-fles dia.90mm x max. 360mm hoog +1-inlegB, SCP (10/640)
CCA300239	Flesverzenddoos 12-fles dia 90mm 360mm hoog +4-inleg B SCP (10/160)
CCA300240	Inleg flesverzenddoos tbv 3/6/9/12 B-golf bruin 360mm (520)

Article number	Description
CCA300245	Flesverzenddoos 2-fles dia.90mm x max 360 hoog + 1-inleg (10/960)
CCA300246	Inleg flesverzenddoos tbv 2-fles (960)
CCA300460	Flesverzenddoos 6-fles dia 90mm x max 360mm hoog +2-inlegB SCP (10/320)
CCA300461	Flesverzenddoos 4-fles dia 90mm x max 360mm hoog +2-inleg (10/480)
CTA030396	Brievenbusdoos A6 Wit/Bruin (50/6600)
CTA030399	Brievenbusdoos A6 Bruin/Bruin (50/)
CTA030400	Brievenbusdoos A5 Bruin/Bruin (50/4200)
CTA030415	Brievenbusdoos A5 Wit/Bruin (50/4200)
CTA030416	Brievenbusdoos A4 Wit/Bruin (50/4400)
CTA030421	Brievenbusdoos A4+ Bruin/Bruin (50/2200)
CTA030422	Brievenbusdoos A4+ Wit/Bruin (50/2200)