

EU DECLARATION OF CONFORMITY

Packaging and Packaging Waste Regulation (PPWR)

Regulation (EU) 2025/40 · Articles 5–12, 15, 38–39 and Annex VIII

Declaration No.: DBI/PPWR/2026-001 · Version 1.1 · Issued: 2026-08-11 · Status: LIVE — continuously updated

IMPORTANT NOTICE — LIVE DECLARATION

This declaration is issued in accordance with Article 39(2) PPWR, which requires the EU declaration of conformity to be continuously updated. It reflects the legal situation and the supplier's evidence collected as of the issue date. The European Commission has not yet adopted several implementing and delegated acts underlying certain requirements (in particular the recycled-content methodology under Article 7(8), the recyclability performance grades under Article 6(4), the minimum reuse rotations under Article 11(2), and the harmonized labelling acts under Article 12); this declaration therefore applies subject to those forthcoming acts. The conformity status of each packaging item is stated individually in Annex A and is updated as supplier evidence and technical documentation are completed. The current version supersedes all earlier versions once a new version number is entered in the version history (Section 8).

1. Manufacturer / issuer of the declaration (Article 15 PPWR)

This EU Declaration of Conformity is issued under the sole responsibility of the manufacturer within the meaning of Article 15 PPWR. By drawing up this declaration, DBI Plastics A/S assumes responsibility for the compliance of the packaging with the requirements of Regulation (EU) 2025/40 (Article 39(4) PPWR).

Manufacturer	DBI Plastics A/S
Registered address	Stenmaglevej 20D, 4295 Stenlille, Denmark
Contact	info@dbiplastics.com · +45 57 89 48 00
Responsible function	Ewelina Kozłowska – Global Head of Quality
Authorized representative	[Not applicable — manufacturer established in the Union]
Enterprise size	Not a micro-enterprise within the meaning of Recommendation 2003/361/EC (relevant to Article 15(12) PPWR)
Group note	Part of the packaging in scope is purchased through the Polish group company DBI Plastics Sp. z o.o. under the same group quality management system and the same supplier assessment procedure. This declaration is issued by DBI Plastics A/S for the packaging it places on the Union market.

2. Object of the declaration (Annex VIII, points 1 & 4)

This declaration covers the packaging and packaging materials placed on the EU market by DBI Plastics A/S and sourced from the packaging suppliers listed in Annex A. Each item is identified by its DBI item number (or supplier reference where no DBI code exists) and description, allowing traceability. The individual conformity status of each item is stated in Annex A and is updated as supplier evidence is completed.

3. Conformity assessment procedure (Article 38 & Annex VII PPWR)

Conformity with the applicable sustainability requirements of Articles 5–12 PPWR is assessed using the internal production control procedure (Module A) set out in Article 38 and Annex VII PPWR. The results are recorded in DBI's technical documentation, compiled from the information and supporting evidence provided by suppliers under Article 16 PPWR. This declaration is drawn up in accordance with the model structure and content of Annex VIII PPWR and states that fulfilment of the requirements laid down in or pursuant to Articles 5 to 12 has been demonstrated (Article 39(1) PPWR).

Held by / location	Global Quality function, DBI Plastics A/S, Stenmaglevej 20D, 4295 Stenlille, Denmark; electronic records in the DBI quality management system
Retention period	5 years from placing on the market for single-use packaging; 10 years for reusable packaging (Article 15(3) PPWR)
Basis of the assessment	Information and documentation provided by the suppliers under Article 16 PPWR, third-party test reports and certificates, and DBI's own incoming-goods inspection records

4. Declared conformity with PPWR requirements (Articles 5–12)

For the packaging in scope, **DBI declares conformity with the following requirements of PPWR**, to the extent that each applies to the packaging concerned. Per-item applicability and status are set out in Annex A.

Article 5 — Substances of concern

- The sum of concentration levels of lead, cadmium, mercury and hexavalent chromium (Pb + Cd + Hg + Cr(VI)) does not exceed 100 mg/kg.
- For food-contact packaging, per- and polyfluoroalkyl substances (PFAS) are within the limits applicable from 12 August 2026.
- Substances are managed in line with REACH (Regulation (EC) No 1907/2006), including Annex XVII restrictions and disclosure of any SVHC present above 0.1 % (w/w). Where an SVHC above 0.1 % is disclosed by a supplier (see Annex A) the affected items are marked accordingly and the information is carried into DBI's technical documentation pending resolution.

Article 6 — Recyclability

- Packaging is designed for recycling; the material class, category and sub-category are identified in the technical documentation and, where declared by the supplier, in the PPWR material classification column of Annex A.
- *Article 6 applies in part pending the delegated and implementing acts on design-for-recycling criteria and recyclability performance grades referred to in Article 6(4).*

Article 7 — Minimum recycled content (plastic packaging)

- Applies only to the plastic parts of packaging. From 1 January 2030 (or 3 years after entry into force of the Article 7(8) implementing act, whichever is later), each plastic part must contain a minimum percentage of post-consumer recycled content, calculated as an average per manufacturing plant and year: 30 % for contact-sensitive PET (except single-use beverage bottles); 10 % for contact-sensitive non-PET plastics (same exception); 30 % for single-use plastic beverage bottles; and 35 % for other plastic packaging. Thresholds rise from 1 January 2040 (up to 50 %, 25 %, 65 % and 65 % respectively).
- Recycled content must be recovered from post-consumer plastic waste meeting the collection and recycling conditions of Article 7(3). Compliance is demonstrated in the technical documentation referred to in Annex VII (Article 7(6)).
- The requirement does not apply to non-plastic packaging (paper/board, wood, metal) or to the exemptions in Article 7(4)–(5) (e.g. compostable plastic packaging, certain contact-sensitive medical/medicinal packaging, dangerous-goods transport packaging, or any plastic part below 5 % of total unit weight).
- *The calculation and verification methodology is subject to the Commission implementing act due by 31 December 2026 (Article 7(8)); recycled-content figures are recorded on the basis of supplier declarations and certificates and will be reconciled once that methodology is in force.*

Articles 8–10 — Bio-based content, compostable packaging, minimization

- Articles 8 (bio-based content) and 9 (compostable packaging) apply only where such claims are made for the packaging.
- Article 10 (packaging minimization) — weight and volume are minimized to the extent applicable; empty space is minimized for grouped, transport and e-commerce packaging.

Article 11 — Reusable packaging

- Applies to packaging designed and placed on the market to be re-used multiple times. Reusable packaging (e.g. EPAL/EUR wooden pallets and half-pallets) meets the cumulative criteria of Article 11(1): it is conceived for multiple rotations under predictable use; meets health, safety and hygiene requirements; can be emptied/unloaded without damage that would prevent re-use; can be refilled or reloaded while maintaining product quality and safety; can be reconditioned in line with Part B of Annex VI; allows affixing of labels and information; can be handled without risk to health and safety; and meets the recyclability requirements of Article 6.
- Compliance is demonstrated in the technical documentation referred to in Annex VII (Article 11(3)).
- *The minimum number of rotations under Article 11(1)(b) is subject to the Commission delegated act due by 12 February 2027 (Article 11(2)); the reuse status will be reconciled once that act is in force.*

Article 12 — Labelling of packaging

- *Applies from 12 August 2028, or 24 months after entry into force of the relevant implementing acts under Article 12(6)–(7), whichever is later. Those acts are not yet adopted; labelling obligations are therefore not yet applicable.*

5. Referenced Union legal acts and standards (Annex VIII, points 5 & 6)

Where an item is subject to more than one Union act requiring an EU declaration of conformity, a single declaration referring to all such acts may be provided (Article 39(3) PPWR). The following acts and standards are referenced, as applicable to the packaging concerned:

- **Regulation (EU) 2025/40** — Packaging and Packaging Waste Regulation (PPWR).
- **Regulation (EC) No 1907/2006 (REACH)** — chemicals; Annex XVII restrictions; SVHC disclosure.
- **Regulation (EC) No 1935/2004** — materials and articles intended for food contact.
- **Regulation (EU) 2022/1616** — recycled plastic materials and articles intended for food contact.
- **Regulation (EC) No 1272/2008 (CLP)** — classification, labelling and packaging of substances and mixtures.
- **Decision 97/129/EC** — identification system for packaging materials (material codes referenced in Annex A).
- **Directive 2008/98/EC** — Waste Framework Directive.
- **EN 13427 / 13428 / 13429 / 13430 / 13431 / 13432** — harmonised packaging standards (requirements, minimisation, reuse, material recycling, energy recovery, composting).

6. Technical documentation and supporting evidence

The detailed results of the conformity assessment are held in DBI's technical documentation (Annex VII PPWR). Supporting evidence per supplier includes material composition (polymer type and PPWR material classification, PCR/PIR share), REACH/SVHC declarations, heavy-metals results ($\text{Pb} + \text{Cd} + \text{Hg} + \text{Cr (VI)} \leq 100 \text{ mg/kg}$), PFAS declarations, food-contact conformity where relevant, recyclability information, reuse documentation where relevant, and third-party test reports and certificates.

7. Notified body (Annex VIII, point 7)

Not applicable. Conformity is assessed under internal production control (Module A, Annex VII PPWR), which does not provide for the intervention of a notified body. No notified body has been involved and no certificate has been issued by a notified body. The third-party test reports and certificates listed in Annex B are supporting evidence within the technical documentation and are not notified-body certificates.

8. Language, updating and validity (Article 39(2) and 39(3) PPWR)

- This declaration is drawn up in English. In accordance with Article 39(2) PPWR it will be drawn up in, or translated into, the language or languages required by each Member State in which the packaging is placed on or made available on the market; translations are provided by DBI on request and the English text is the reference version.
- This declaration is continuously updated, as required by Article 39(2) PPWR. A new version is issued whenever the scope changes, an item moves between the annexes, the supplier evidence changes, or a delegated or implementing act referred to above enters into force. The current version supersedes all earlier versions.
- This declaration may consist of a dossier made up of the relevant individual declarations of conformity within the meaning of Article 39(3) PPWR; the per-item annexes identify the packaging to which each assessment relates, as required by Annex VII, point 4.
- A copy of this declaration and of the technical documentation is made available to the competent authorities on request (Annex VII, point 4).

9. Signature (Annex VIII — signing block)

Signed for and on behalf of DBI Plastics A/S:

Name: Ewelina Kozłowska

Function: Global Head of Quality

Place and date: Stenlille, 03.08.2026

Signature / company stamp:



10. Version history

Version	Date	Change
1.0		Initial preliminary declaration; per-item register established in Annex A.
1.1	2026-08-11	Paper labels and TTR ribbon update: supplier item references added to Annex A; SVHC bisphenol S marking extended on a precautionary basis pending supplier clarification. Compliance review against Articles 15, 38 and 39 and Annexes VII and VIII. Section 7 (notified body — not applicable, Annex VIII point 7) and Section 8 (language, updating and validity).

ANNEX A — Per-item compliance register

Live register of the packaging items in scope. The status of each item is updated as supplier evidence is received; this annex is the operative, continuously updated part of the declaration (Article 39(2) PPWR). The PPWR material classification is quoted from the supplier declarations where provided (material codes per Decision 97/129/EC and the relevant EN standards).

Status legend: **Compliant** = evidence complete; **Requested** = request sent / under review

Material codes: PAP 20 = corrugated board; PAP 21 = non-corrugated (solid) board; PAP 22 = paper; PE-LD 4 = low-density polyethylene; PP 5 = polypropylene; PET 1 = polyethylene terephthalate; FE 40 = steel; FOR 50 = wood.

Code	Role of DBI (Article 3(13) PPWR)	Item description	Material — PPWR classification	Article 15(3), point (a/b)	PPWR status
00-02014	Supplier	Sacks 850x1250x0.15my #54AS	Plastic film, PE-LD 4	single-use packaging	Requested
00-02015E	Supplier	Liner Bag Box #7 (600/200x1000x0.05)	Plastic film, PE-LD 4	single-use packaging	Requested
00-02307	Supplier	EUR pallet	Wood, FOR 50 (reusable, Art. 11)	reusable	Compliant
00-02317	Supplier	EUR half pallet	Wood, FOR 50 (reusable, Art. 11)	reusable	Compliant
00-02024A	Supplier	Packaging film 800 mm AS	Plastic film, PE-LD 4	single-use packaging	Compliant
00-02002A	Supplier	Bags 350x450x0.03	Plastic film, LDPE (PE-LD 4)	single-use packaging	Compliant
00-02003	Supplier	Bags 400x600x0.03	Plastic film, LDPE (PE-LD 4)	single-use packaging	Compliant
00-02003B	Supplier	Bags 500x800x0.03	Plastic film, LDPE (PE-LD 4)	single-use packaging	Compliant
00-02004	Supplier	Bags 180x300x0.03	Plastic film, LDPE (PE-LD 4)	single-use packaging	Compliant
00-02008	Supplier	Bags 600x1000x0.05	Plastic film, LDPE (PE-LD 4)	single-use packaging	Compliant
00-02316	Supplier	Bag 250x350 mm x30	Plastic film, LDPE (PE-LD 4)	single-use packaging	Compliant
00-02022A	Supplier	String plastic bag 200x250 mm	Plastic film, LDPE (PE-LD 4)	single-use packaging	Compliant
00-02116	Supplier	Transparent tape 75 mm x200 m	Plastic tape, PP 5	single-use packaging	Requested
00-02114	Supplier	Transparent tape 75 mm x66 m (ADT07N)	Plastic tape, PP 5	single-use packaging	Requested
—	Supplier	Pallet binding tape MFC165 PET	Plastic strap, PET 1	single-use packaging	Requested
—	Supplier	Mesh wire 160	Metal, FE 40	single-use packaging	Requested
—	Supplier	Stretch film	Plastic film, PE-LD 4	single-use packaging	Compliant
—	Supplier	Edge protectors / angle boards	Paper/board, PAP 21	single-use packaging	Compliant
00-EURO-XLD43221	Supplier	EURO container XLD43221(KLT)	Reusable container	reusable	Requested
	Manufacturer	Carton #2 - 30x20x23 cm	Corrugated board, PAP 20	single-use packaging	Compliant
00-02103	Manufacturer	Carton #3 - 40x30x20 cm	Corrugated board, PAP 20	single-use packaging	Compliant
00-02104	Manufacturer	Carton #4 - 40x30x28 cm	Corrugated board, PAP 20	single-use packaging	Compliant
00-02105	Manufacturer	Carton #6 - 59x39x27 cm	Corrugated board, PAP 20	single-use packaging	Compliant
00-02100	Manufacturer	Carton #6 BIO - 59x39x27 cm	Corrugated board, PAP 20	single-use packaging	Compliant
00-02100B	Manufacturer	Carton #7 - 59x39x53 cm	Corrugated board, PAP 20	single-use packaging	Compliant
00-02101	Manufacturer	Carton #7 BIO - 59x39x53 cm	Corrugated board, PAP 20	single-use packaging	Compliant
00-02101B	Manufacturer	CLEAN ROOM Carton #4 - 40x30x28 cm	Corrugated board, PAP 20	single-use packaging	Compliant
00-02112	Manufacturer	CLEAN ROOM Carton #6 - 59x39x27 cm	Corrugated board, PAP 20	single-use packaging	Compliant
00-02106	Manufacturer	Columbus container 119x79x77 cm	Corrugated board, PAP 20	single-use packaging	Compliant
00-02302	Manufacturer	Galia C-9 Box	Corrugated board, PAP 20	single-use packaging	Compliant
00-02320	Manufacturer	Galia C-9 Lid	Corrugated board, PAP 20	single-use packaging	Compliant
00-02321	Manufacturer	100x60.5 blue LABEL	Paper label, PAP 22 — SVHC bisphenol S >0.1%	single-use packaging	Compliant
05-03249	Supplier	Bag label with logo Ø25	Paper label, PAP 22	single-use packaging	Compliant
05-03247	Manufacturer	BIO sticker for bags	Paper label, PAP 22	single-use packaging	Compliant
00-02113	Manufacturer	Label 100x60.5	Paper label, PAP 22	single-use packaging	Compliant
05-03201	Supplier	Label 25x40 white	Paper label, PAP 22	single-use packaging	Compliant
05-03248	Supplier	White label big 148x210	Paper label, PAP 22 — SVHC bisphenol S >0.1%	single-use packaging	Compliant
05-03202	Supplier	Label 100x60.5 yellow	Paper label, PAP 22	single-use packaging	Compliant
05-03252	Supplier	Adhesive-free labels 100x210	Paper label, PAP 22	single-use packaging	Compliant
28948	Supplier	TTR ribbon 311 110x450	Thermal-transfer ribbon (to confirm)	single-use packaging	Compliant
TTR311	Supplier	Bag label with logo Ø25 pink	Paper label, PAP 22	single-use packaging	Compliant
05-03247-5	Manufacturer	DBI PLASTIC 100x60.5 orange	Paper label, PAP 22 — SVHC bisphenol S >0.1%	single-use packaging	Compliant
41406	Supplier	DBI PLASTIC 100x60.5 green	Paper label, PAP 22 — SVHC bisphenol S >0.1%	single-use packaging	Compliant
41407	Supplier	Galia C-14 Box	Corrugated board, PAP 20	single-use packaging	Requested
00-02323	Manufacturer	Galia C-14 Lid	Corrugated board, PAP 20	single-use packaging	Requested
00-02324	Manufacturer	ESD Bags 300x450 mm x80my	Plastic film, ESD	single-use packaging	Requested
00-02029	Supplier	ESD Bags 600x800x0.04 mm	Plastic film, ESD	single-use packaging	Requested
00-02030	Supplier	Bags 600+2F200x850x0.05 ESD	Plastic film, ESD	single-use packaging	Compliant
00-02016	Supplier	ESD foil	Plastic film, ESD	single-use packaging	Compliant
00-02035	Supplier	Carton #6 - 59x39x27 cm	Corrugated board, PAP 20	single-use packaging	Compliant
00-02100	Manufacturer	Carton #7 - 59x39x53 cm	Corrugated board, PAP 20	single-use packaging	Compliant
00-02101	Manufacturer				