

PPWR Declaration Requirements

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

DECLARATION NO.	DATE OF ISSUE	PLACE OF ISSUE
Rotim – PPWR – 2026 - 003	19 October 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: Non-food-contact

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
BCA020071	Verzendzak WIT SMALL 25x34+5cm (100)
BCA020075	Verzendzak WIT XL 60 x 45,7+5cm 1 plakstrip (100)
BCA020104	Verzendzak Eco LILA MEDIUM 35x43cm (100)
BCA020200	Verzendzak RECYCLED wit small 25x34cm+4cm 45my (100)
BCA020201	Verzendzak RECYCLED WIT MEDIUM 33,5x43cm+4cm (100)
BCA020300	Verzendzak FLOWERS SMALL 25x34cm (100)
BCA020304	[0]Verzendzak STRIPES MEDIUM 35x43cm (100)
BCA020310	Verzendzak LEOPARD SMALL 25x34cm (100)
BCA020311	Verzendzak LEOPARD MEDIUM 35x43cm (100)
BCA020312	Verzendzak LEOPARD LARGE 50x35,3cm (100)
BCA020313	Verzendzak LEOPARD XL 60x45,7cm (100)
BCA020400	[0]Verzendzak BLOOMS SMALL 25x34cm (100)
BCA020401	[0]Verzendzak BLOOMS MEDIUM 35x43cm (100)
BCA020402	[0]Verzendzak BLOOMS LARGE 50x35cm (100)
BCA020403	Verzendzak DOTS BLACK SMALL 25x34cm (100)
BCA020404	Verzendzak DOTS BLACK MEDIUM 35x43cm (100)
BCA020405	Verzendzak DOTS BLACK LARGE 50x35cm (100)
BCA020406	Verzendzak DOTS PINK SMALL 25x34cm (100)
BCA020407	Verzendzak DOTS PINK MEDIUM 35x43cm (100)
BCA020408	Verzendzak DOTS PINK LARGE 50x35cm (100)
BCA170250	Verzendzak WIT XS 17x25+5cm (100)
BCA200415	Verzendzak BOWS YELLOW SMALL 25x34cm (100)
BCA200416	Verzendzak BOWS YELLOW MEDIUM 35x43cm (100)
BCA200417	Verzendzak BOWS YELLOW LARGE 50x35,5cm (100)

Article number	Description
BCA200418	Verzendzak LEOPARD PINK SMALL 25x34cm (100)
BCA200419	Verzendzak LEOPARD PINK MEDIUM 35x43cm (100)
BCA200420	Verzendzak LEOPARD PINK LARGE 50x35,5cm (100)
BCA200421	Verzendzak LEOPARD PINK XL 60x45,7 cm (100)
BCA253401	Verzendzak GOUD SMALL 25x34+5cm (100)
BCA253402	Verzendzak ZWART SMALL 25x34+5cm (100)
BCA253403	Verzendzak ROZE SMALL 25x34+5cm (100)
BCA253415	Verzendzak STRIPES PINK SMALL 25x34cm (100)
BCA253416	Verzendzak BRUIN MET WITTE STIPPEN SMALL 25x34cm (100)
BCA253416 OUTLET	Verzendzak BRUIN MET WITTE STIPPEN SMALL 25x34cm (100)
BCA335430	Verzendzak WIT MEDIUM 35x43+5cm (100)
BCA335431	Verzendzak ROZE MEDIUM 35x43+5cm (100)
BCA335433	Verzendzak ZWART MEDIUM 35x43+5cm (100)
BCA335434	Verzendzak GOUD MEDIUM 35x43+5cm (100)
BCA335445	[0]Verzendzak HAPPY HEARTS MEDIUM 35x43cm (100)
BCA335449	Verzendzak STARS GOLD MEDIUM 35x43cm (100)
BCA335450	Verzendzak STRIPES PINK MEDIUM 35x43cm (100)
BCA335451	Verzendzak BRUIN MET WITTE STIPPEN MEDIUM 35x43cm (100)
BCA335451 OUTLET	Verzendzak BRUIN MET WITTE STIPPEN MEDIUM 35x43cm (100)
BCA500000	Verzendzak BLACK STARS MEDIUM 35x43cm (100)
BCA500001	Verzendzak BLACK GOLD STARS LARGE 50x35,5cm (100)
BCA506353	Verzendzak WIT LARGE 50x35+5cm (100)
BCA506355	Verzendzak GOUD LARGE 50x35+5cm (100)
BCA506357	Verzendzak ROZE LARGE 50x35+5cm (100)
BCA506369	Verzendzak STARS GREEN LARGE 50x35,5cm (100)
BCA506371	Verzendzak STRIPES PINK LARGE 50x35,5cm (100)

Article number	Description
BCA506372	Verzendzak BRUIN MET WITTE STIPPEN LARGE 50x35,5cm (100)
BCA610456	Verzendzak ZWART XL 60x45,7+5cm (100)
BCA610458	Verzendzak ROZE XL 60x45,7+5cm (100)
BCA610462	Verzendzak GOUD XL 60x45,7cm+ 5cm (100)
BCA610464	Verzendzak STARS PINK GOLD XL 60x45,7 cm (100)
BCA610465	Verzendzak STRIPES PINK XL 60x45,7 cm (100)
BCA610466	Verzendzak BRUIN MET WITTE STIPPEN XL 60x45,7 cm (100)
BCA610467	Verzendzak STRIPES BLUE LARGE 50x35,3cm (100)
BCA610468	Verzendzak STRIPES BLUE MEDIUM 35x43cm (100)
BCA610469	Verzendzak STRIPES BLUE 25x34cm (100)
BCA610470	Verzendzak STRIPES BLUE XL 60x45,7 cm (100)
ECA050040	Tas LDPE 45x50+2x4cm 50µ wit (250st)
ECA050041	Tas LDPE 60x51+2x4cm 50µ wit (250st)
ECA050042	Tas LDPE 37x44+2x4cm 50µ transparant (250st)
ECA050044	Tas LDPE 37x44+2x4cm 50µ zwart (250st)
ECA050046	Tas LDPE 45x50+2x4cm 50µ zwart (250st)
ECA600510	Tas LDPE 60x51+2x4cm 50µ Zwart (250st)
EEE050066	Afvalzak LDPE 70 + 2x15x200cm (84) 40my
EFA455056	Polyzak LDPE vlak 40x60cm 25µ (500)
EJA010051	Buisfolie 15cm 50my LDPE - Transparant
EJA010053	Buisfolie 30cm 50my LDPE - Transparant
EJA010100	Buisfolie 10cm 100my LDPE - Transparant
EJA010101	Buisfolie 15cm 100my LDPE - Transparant
EJA010102	Buisfolie 20cm 100my LDPE - Transparant