Rotim
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PPWR Declaration Requirements

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

DECLARATION NO.	DATE OF ISSUE	PLACE OF ISSUE
Rotim – PPWR – 2026 - 026	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
BCA020019	1000x Paklijstenveloppen Blanco A5 225x165mm
BCA020040	1000x Paklijstenveloppen Blanco A8 225x122mm
BCA400506	Kledingzak transparant 165x220 mm +40mm klep + plakstrip 40my (100)
BCA400510	Kledingzak transparant 300x400mm +50mm klep + plakstrip 45my (100) XL
BCA750550	Verzendzak WIT 75x55+5cm 1 plakstrip (50)
EFH060001	Gripzak LDPE 5,5x6,5 cm (1000)
EFH060003	Gripzak LDPE 7x10 cm (1000)
EFH060005	Gripzak LDPE 9x10 cm (1000)
EFH060014	Gripzak LDPE 16x28 cm (100)
EFH060016	Gripzak LDPE 22x28 cm (100)
EFH060019	Gripzak LDPE 30x40 cm (100)
EFH060050	Gripzak extra lang 5,5x15 cm (1000)
EFH060051	Gripzak extra lang 5,5x18 cm (1000)
EFH060052	Gripzak extra lang 5,5x30 cm (1000)
EFH060054	Gripzak extra lang 9x23 cm (1000)
EFH060055	Gripzak extra lang 10x20 cm (1000)