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EU Declaration of Conformity

pursuant to Article 39 and Annex VII of Regulation (EU) 2025/40 (PPWR) Markmann Oberflächentechnik GmbH

Document ID: Markmann-Oberflächentechnik-PPWR-DoC-001 • **Revision:** 1.0 • **Last updated:** Salzgitter, 10/08/2026

Dear Sir or Madam,

We are pleased to provide you with an overview of the current status regarding EU Regulation (EU) 2025/40 on packaging and packaging waste (PPWR), which enters into force on 12/08/2026. Individual additional requirements will enter into force gradually up to 2040. At the same time, the existing Packaging Directive 94/62/EC will be gradually replaced. The regulation applies to all packaging, including packaging-related components throughout the entire supply chain.

1. Applicability to our products

As an authorised converter of abrasives and adhesive and occupational safety products, we define ourselves as the producer/placer on the market (Annex VII Nos. 2+3). For all other packaging and packaging products where Markmann Oberflächentechnik GmbH does not act as the producer (contract manufacturing/supplier), **general duties of care/information apply**. This means that we have checked whether our upstream suppliers comply with their obligations pursuant to Articles 5-12 of PPWR 2025/40 and maintain separate documentation for this purpose.

2. Product changes/reformulations

At present, we have received no information from our raw material or upstream suppliers regarding changes to the packaging products we purchase (changes to ingredients). Following completion of the conformity assessment, we will inform our customers of additions/changes to the Declaration of Conformity through our information service.

3. Subject matter of the declaration (Annex VII No. 4)

All packaging articles referred to here, together with the relevant packaging components, have been assessed as harmonised as part of the conformity assessment: cardboard packaging, cardboard cores and tubes, plastic cores and tubes, closure/adhesive tape, shipping label, filling material, kraft paper, PE product overpackaging, delivery note pouch, PET strapping (2030) and stretch film (2030). All items mentioned are intended for single use without direct contact with food. The exception is the wooden pallets, with regard to their reusability.



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4. PPWR conformity pursuant to Art. 39

A significant new feature of the PPWR is the obligation to prepare Declarations of Conformity for packaging, including packaging-related components, from 12/08/2026.

The Declaration of Conformity is based on technical documentation and upstream supplier declarations and includes, among other things, compliance with the following requirements:

- Limitation of substances of very high concern (SVHCs pursuant to the REACH Candidate List) to below 0.1%
- Compliance with the restrictions according to REACH Annex XVII
- Limit values for lead, cadmium, mercury and chromium VI (total content < 100 mg/kg) (PPWR Art. 5)
- PFAS limits for packaging intended to come into contact with food (PPWR Art. 5)

In accordance with Article 5 of the PPWR Regulation, we confirm that the product packaging placed on the market by us, including the relevant packaging components, demonstrably complies with the applicable requirements.

5. Standards and specifications applied (Annex VII No. 6)

Fully applied standards: PPWR 2025/40 Articles 5, 6, 10, 11 and 12 (Module A, Annex VII)

SVHCs pursuant to the REACH Candidate List

6. Sustainability requirements applied (Annex VIII No. 5)

Art. 5	Heavy metals: $\sum (Pb + Cd + Hg + CrVI) \leq 100\text{mg/kg}$ per component	compliant
	PFAS limits – only for contact with food	not applicable
Art. 6	Design for recycling	compliant
Art. 7	Minimum recycled content of plastic packaging	from 2030
Art. 8	Bio-based plastics pursuant to Directive (EU) 2018/2001	from 12/02/2028
Art. 9	Compostability	from 12/02/2028
Art. 10	Packaging minimisation	compliant
Art. 11	Reusability (only reusable packaging)	not applicable
Art. 12	Labelling (material codes, HS label)	compliant

Note on exceptions and non-applicability

Individual product-specific components of composite products cannot always be provided, as the respective component accounts for less than 5% of the total weight per packaging unit.



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7. Involvement of a notified body (Annex VII No. 7)

Not applicable, conformity assessment according to Module A

8. General information

We will communicate any changes to this Declaration of Conformity resulting from the gradual expansion of the requirements in good time.

If you have any questions, please use the email address below.

compliance@markmann.de

We hope that this has been helpful to you and are happy to answer any questions you may have.

Kind regards,

Petros Karatzovalis
Management Director
Markmann Oberflächentechnik GmbH

Karsten Garn
Head of Contract Manufacturing
Markmann Oberflächentechnik GmbH

Annex: Article overview



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Overview of the cardboard packaging used and packaging-related components

Cardboard packaging		Packaging-related component	
Articles	H article/EAN	Articles	Description
3010002050	DV032301074	0389300	Fillpak TT paper
3010001738	DV032300589	EUROpal	Euro pallets
3010002960	DV032300282	EinwegPal	Single-use pallets/cross battens
3010002340	DV032300381	11492-0025	Hard paper tubes
3010005012	1312 600400370BCDR.	11492-0025	Hard paper tubes
3010005013	DV032301124	11492-0026	Hard paper tubes
3010005011	1312330330400	11492-0026	Hard paper tubes
3010002338	DV032300290	11492-0027	Hard paper tubes
3010001942	DV022300292	11492-0027	Hard paper tubes
3010001739	DV032303237	11492-0031	Hard paper tubes
3010001952	DV032303211	11492-0031	Hard paper tubes
3010001923	DV772300146	11492-0041	Hard paper tubes
3010002891	DV772300153	11492-0041	Hard paper tubes
3010002051	DV032302452	11492-0043	Hard paper tubes
3010002355	DV032303187	11492-0043	Hard paper tubes
3010005007	DV032300407	11492-0034	Cores 600
3010002345	DV032301132	11492-0035	Cores 1234
3010005014	DV032301165	11492-0057	Cores 300
3010002356	DV032303203	600607	Thermal transfer film
3010001777	DV032301140	600576	Thermal transfer film
3010005016	DV032302403	E005796	Self-adhesive labels
3010005015	DV032302007	E005462	Self-adhesive labels
3010005010	1312 12012090	14-505031100	Edge protector brackets
3010001979		21-25045050	PE bag
3010001979		51-M100150	Kraft mixed paper
3010005009	72610330122	22015050	Brown kraft paper
3010005008	72610330121	22015075	Kraft paper FK902
3010001778	DV032303120	22010100	Brown kraft paper
3010002353	DV032303112	Technical documentation pursuant to Annex VII available separately.	
3010002351	DV032303070		
3010002052	DV032303104		
3010002348	DV032302627		
3010002343	DV032301066		
3010002342	DV032300639		
3010001945	DV032300670		

