

DECLARATION OF MATERIAL COMPLIANCE (EU 40/2025 PPWR)

Supplier: Cardboard s.r.o., Maničky 46/5, 616 00 Brno-Žabovřesky

Product / Material: Machine-board 300 – 900gr/m2

1. Declaration of Chemical Compliance (SoC)

We hereby confirm that we have identified all relevant substances in the material and its components and that:

- **does not contain prohibited substances** under applicable EU legislation,
- Substances of Concern (SoC) have been identified and are managed in accordance with legal requirements,
- upon request, we are able to provide additional information on these substances.

2. Declaration under PPWR – Article 5

We confirm that the packaging meets the requirements of EU regulation 40/ 2025 PPWR, in particular:

- limits for **heavy metals**,
- requirements for the **restriction of hazardous substances, including PFAS** (*analyses are done and enclosed*)
- other requirements pursuant to Article 5 of the PPWR.

3. Documentation and Audit

We undertake to:

- maintain documentation demonstrating the above compliance,
- provide it to the customer or inspection authorities upon request,
- promptly inform of any change that may affect the compliance of the packaging.

4. Responsibility

This declaration is issued based on available information, tests, and documentation from our suppliers and/or our own testing.

Date: 26.06.2026

Name and position: Klenovský Karel, executive

Signature:

Cardboard s.r.o.

Maničky 46/5, 616 00 Brno - Žabovřesky

DIČ: CZ28668253

KS Brno, oddíl C, vložka 57416

EXPLANATION OF REQUIREMENTS (SoC & PPWR)

1. Substances of Concern (SoC)

For the purposes of this declaration, **Substances of Concern (SoC)** are considered substances that:

- have hazardous properties (toxic, persistent, bioaccumulative, etc.),
- may migrate into the product (especially for food packaging),
- or may negatively affect packaging recyclability.

The supplier is required to **identify and manage** these substances.

There are several sources of information that can be consulted for each criterion listed in Article 2(27) of Regulation (EU) 2024/1781 (ESPR) to identify Substances of Concern (e.g. the 'Candidate list of Substances of very high concern for Authorisation' managed by ECHA Link:

<https://echa.europa.eu/candidate-list-table>

Annex VI of Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures * could be also used as a source for identifying SoCs.

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Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 (OJ L 353, 31.12.2008, pp. 1–1355).

2. Main SoC categories relevant for material / packaging

The supplier should take into account in particular the following groups of substances:

1. Regulated substances

- heavy metals (Pb, Cd, Hg, Cr VI)
- PFAS (per- and polyfluoroalkyl substances)
- substances under REACH (SVHC, restrictions)

2. Substances formed or present in materials

- **NIAS** (nonintentionally added substances – reaction and degradation products)
- **MOSH/MOAH** (mineral oils, especially in paper and recyclates)
- **photoinitiators and substances from printing inks** (e.g., benzophenone)

3. Specific chemical groups relevant for packaging

- **endocrine disruptors (EDCs)** (e.g., BPA, phthalates, alkylphenols),
- **nanomaterials** (e.g., nano TiO₂, ZnO),
- **antioxidants and polymer stabilizers** (e.g., BHT, phosphites),
- **melamine and formaldehyde resins**,
- **siloxanes (D4, D5, D6)**,
- **substances of concern in dyes and pigments** (azo dyes, carbon black).

4. **Newly monitored and emerging risk areas**

- microplastics (including particles <5 mm and secondary fragmentation),
- bio-based and degradable materials and additives,
- biocides in materials.

5. **Substances affecting recycling**

- multilayer barriers (e.g., EVOH, PVDC),
- adhesives (PU, epoxy),
- printing inks and coatings (de-inking issues).

3. Requirements under PPWR – summary of Article 5

Packaging must in particular meet the following:

- limits for heavy metal content,
- restrictions on hazardous substances (including PFAS),
- a requirement to minimize impacts on human health and the environment,
- a requirement for **safety throughout the entire life cycle (including recycling)**.

4. Documentation expected from the supplier

Upon request, the supplier must provide:

- material composition (BoM / material declarations),
- test results (e.g., migration, PFAS, heavy metals),
- information on the presence of SoC (including NIAS, if relevant).