



FPS Flexpack GmbH, Lochfeldstraße 29, DE-76437 Rastatt
EU Confirmation of the Existence of a Declaration of Conformity according to PPWR
Regulation (EU) 2025/40 on Packaging and Packaging Waste for Cardboard, Paper,
Corrugated Board, Paper-Based Packaging and Associated Transport Packaging
Validity Reference: 12.08.2026

Company	FPS Flexpack GmbH
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Responsible for Documentation	Bernhard Klumpp, Commercial Management / Authorised Signatory
Document Type	Conformity Assessment / PPWR Proof Overview
Scope	Cardboard, Paper, Corrugated Board, paper- based packaging and associated transport packaging
Field of Application	Food, sales, secondary, outer and transport packaging with food contact
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“All declarations of conformity from suppliers for this product group are available to the company FPS Flexpack GmbH and will be made available to the competent authorities within 14 days upon request in accordance with PPWR Annex VII Point 4.”

Note: This declaration does not replace legal advice. The official legal text of Regulation (EU) 2025/40 as well as the respective original supplier documents, test reports and article specifications remain authoritative.

Table of Contents

1. Purpose, Scope and Role Description
2. Summary EU Declaration of Conformity
3. Material and Product Groups: Cardboard and Corrugated Board
4. Detailed PPWR Conformity Assessment Articles 5 to 12
5. Obligations of Economic Operators and Evidence Organization
6. Source Base, Validity and Signature



1. Purpose, Scope and Role Description

This detailed declaration describes the PPWR conformity assessment of FPS Flexpack GmbH for paper-based packaging made of cardboard, paper and corrugated board. The focus is on packaging in the food environment, in particular on outer, secondary, sales and transport packaging as well as on those packaging components that may be intended for direct or indirect food contact.

The declaration is based on existing supplier declarations, technical documentations, article overviews, substance verifications, PFAS/REACH/heavy metal confirmations, recyclability assessments and food law statements. The respective original documents are part of the technical evidence file and remain authoritative for detailed information.

1.1 Role Description according to PPWR

FPS Flexpack GmbH assesses the packaging placed on the market or made available within the scope of its own role as an economic operator. Depending on the customer order and supply chain, FPS Flexpack can act as a producer, importer, supplier or distributor.

For customer-specific packaging, the assessment is carried out on the basis of the final specification, the approved design and the raw material information provided.

Suppliers and raw material manufacturers provide the material, technical and recycling-related information; FPS Flexpack has these at its disposal.

2. Summary EU Declaration of Conformity

FPS Flexpack GmbH declares to the best of its knowledge and on the basis of the available evidence that the cardboard, paper and corrugated board packaging falling under the scope fulfills the relevant requirements of Regulation (EU) 2025/40 when used as intended, insofar as these requirements are applicable to the respective packaging type, material group and use.

Conformity relates in particular to the requirements for substance restrictions, recyclability, packaging minimization, labeling, technical documentation, conformity assessment and EU declaration of conformity. Requirements that specifically affect plastic packaging, compostable packaging, refill models or specific single-use plastic articles are assessed separately if relevant.

3. Material- and Product Groups: Cardboard / Corrugated Board

Material- / Product Group	Examples	PPWR-Relevance	FPS Flexpack Assessment
Corrugated board PAP 20	Folding boxes, transport boxes, die-cut packaging	Art. 5, 6, 10, 12, 15, 38, 39	Recyclable in the paper stream; substance proofs available; article-specific specification required
Cardboard PAP 21	Solid board, folding boxes, cardboard boxes	Art. 5, 6, 10, 12, 15, 38, 39	Paper-based assessment; food contact only for intended use
Paper PAP 22	Inserts, intermediate layers, paper-based components	Art. 5, 6, 10, 12	Suitability depends on coating, printing and food contact
EPAL/Wooden load carriers FOR 50	Pallets and transport aids	Art. 11, 29-31	Reusable pool system; separately verifiable
Auxiliary materials	Adhesives, printing inks, tapes, labels	Art. 5, 6, 10, 12	Only permitted insofar as they do not impermissibly impair recycling and material conformity

4. Detailed PPWR Conformity Assessment Articles 5 to 12

4.1 Article 5 – Substances in Packaging

For cardboard and corrugated board packaging, heavy metals, PFAS, REACH/SVHC, POP substances and other substances of concern are assessed on the basis of supplier declarations and analytical reports. The permissible sum of relevant heavy metals is complied with according to the available evidence. PFAS are not intentionally added; possible traces from recycled fiber streams are to be assessed on a risk basis and followed up in the event of new findings.

4.2 Article 6 – Recyclability

Cardboard and corrugated board are fundamentally recyclable as paper fiber packaging via established paper and cardboard recycling systems. The assessment is carried out taking into account material uniformity, printing inks, adhesives, labels, tapes and other components.

4.3 Article 7 – Recycled Content in Plastic Packaging

For pure cardboard and corrugated board packaging, this article is generally not directly applicable. As soon as plastic components, film windows, barriers, plastic straps or composite materials are used, a separate assessment according to plastic requirements is necessary.

**4.4 Article 8 – Bio-based Raw Materials in Plastic Packaging**

Generally not directly applicable for paper-based cardboard and corrugated board packaging. Relevance only arises for bio-based plastic components, coatings or barrier elements.

4.5 Article 9 – Compostable Packaging

The packaging under consideration is fundamentally intended for the paper/cardboard recycling stream and is not declared as compostable packaging. Compostability is therefore not used as a standard disposal route.

4.6 Article 10 – Packaging Minimization

Packaging is designed in such a way that the protective function, transport stability, storage stability, food hygiene, machine running and customer requirements are fulfilled without unnecessarily increasing weight or volume.

4.7 Article 11 – Reusable Packaging

Single-use cardboard boxes and single-use corrugated board packaging are not automatically reusable packaging. For reusable transport packaging, in particular EPAL load carriers, system proofs and pool information are used separately.

4.8 Article 12 – Labeling

Material markings such as PAP 20, PAP 21, PAP 22 and FOR 50 are provided in accordance with the type of packaging, customer requirements and applicable guidelines. Future harmonized labeling specifications are to be included in the amendment service.



5. Obligations of Economic Operators and Evidence Organization

FPS Flexpack merges the available supplier data, material-related declarations of conformity and technical specifications into a verifiable evidence file. The evidence file contains in particular the technical documentation, the risk assessment on material conformity, the material and article classification, the recyclability assessment, the document control and the EU declaration of conformity.

6. Source Base, Validity and Signature

6.1 Source Base

Regulation (EU) 2025/40 on packaging and packaging waste, published in the Official Journal of the EU on 22.01.2025.

Available supplier declarations and technical documentation on cardboard, paper, corrugated board, PPWR, heavy metals, PFAS, REACH/SVHC, food contact and recyclability.

Existing technical documentation of FPS Flexpack GmbH on corrugated board and cardboard packaging according to PPWR.

6.2 Validity and Provision for Amendments

This declaration applies to the described food packaging from 12.08.2026. It must be reviewed and updated if there are changes in the legal situation, article composition, supplier data, material qualities, printing inks, adhesives, coatings, food contact conditions, customer requirements or harmonized specifications.

6.3 Signature

Place, Date	Name / Function	Signature / Stamp
Rastatt, 12.08.2026	Bernhard Klumpp / Commercial Management, Power of Attorney	