



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 food packaging and packaging components with direct or indirect food contact
Validity reference: 12.08.2026

Company	FPS Flexpack GmbH
Address	Lochfeldstraße 29, 76437 Rastatt
Responsible for Documentation	Bernhard Klumpp, Commercial Management / Authorised Signatory
Document Type	Conformity assessment / PPWR verification overview for food packaging
Scope	Flexible packaging and packaging components with di- rect or indirect food contact
Field of Application	Food, sales, secondary, outer and transport packaging with a food reference
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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, food law certificates and article specifications remain authoritative.

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1. Purpose, Scope and Role Description

This detailed declaration describes the PPWR conformity assessment of FPS Flexpack GmbH for food packaging and packaging components that may be intended for direct or indirect food contact. It does not replace the content of the previous pure EU declaration of conformity, but builds on it in terms of wording, structure and verification logic analogous to the card-board/corrugated board declaration as a confirmation of the existence of the declaration of conformity.

The declaration is based on the technical documentation of FPS Flexpack GmbH, product- and material-specific certificates, raw material information, supplier declarations, specifications and food law documents. The respective original documents remain authoritative for detailed information.

1.1 Role Description according to PPWR

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

For customer-specific packaging, the assessment is carried out on the basis of the final specification, the approved material structure, the intended food contact and the provided raw material information. These are available.

2. Summary EU Declaration of conformity and reference to Food Law

FPS Flexpack GmbH declares to the best of its knowledge and on the basis of the available evidence that the food 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.

In addition, where relevant, the food law requirements of Regulation (EC) No 1935/2004, Regulation (EC) No 2023/2006, Regulation (EC) No 1907/2006 (REACH), Regulation (EU) 2019/1021 (POP) and the LFGB are taken into account.

The conformity concerns in particular substance restrictions, food contact, recyclability, packaging minimization, labeling, technical documentation, conformity assessment and EU declaration of conformity.

3. Material and Product Groups: Food Packaging

Material- / Product Group	Examples	PPWR-Food relevance	Assessment FPS Flexpack
Flexible packaging and composite materials	Bags, blanks, film composites, packaging components	Art. 5, 6, 7, 10, 12, 15, 38, 39; Food contact	Assessment depends on material structure, barrier, printing, adhesives and contact conditions
Paper/cardboard components with food reference	Inserts, trays, outer packaging, intermediate layers	Art. 5, 6, 10, 12; Reg (EC) 1935/2004; GMP	Food contact only with intended use and approved specification
Plastic components	Films, windows, barriers, coatings, labels	Art. 5, 6, 7, 8, 10, 12	Separate assessment of recycled content, substance conformity and recyclability required
Auxiliaries	Printing inks, adhesives, varnishes, tapes, labels	Art. 5, 6, 10, 12; Food law	Permissible only insofar as food contact, substance conformity and recycling are not adversely affected

4. Detailed PPWR Conformity Assessment Articles 5 to 12

4.1 Article 5 – Substances in packaging

Heavy metals, PFAS, REACH/SVHC, POP substances and other substances of concern are assessed for food packaging on the basis of supplier declarations, raw material specifications and analysis reports. The sum of the relevant heavy metals must not exceed the limit value according to PPWR; according to current knowledge, PFAS are not intentionally added.

4.2 Article 6 – Recyclability

Recyclability is assessed on a product- and material-specific basis in the technical documentation. Influencing factors are in particular the material structure, composite proportions, barriers, printing inks, adhesives, labels and suitability for the respective recycling stream.

4.3 Article 7 – Recycled content in plastic packaging

Insofar as plastic packaging or plastic components are used, the relevance of recycled content and its suitability for food contact must be assessed separately. For non-plastic components, the article is not directly applicable.

**4.4 Article 8 – Bio-based raw materials in plastic packaging**

Relevance only arises for bio-based plastic components, coatings or barrier elements. Paper or cardboard components are assessed separately via the respective material group.

4.5 Article 9 – Compostable packaging

The food packaging considered is not flatly declared as compostable packaging. Compostability is only to be specified if it is product-specifically proven and approved.

4.6 Article 10 – Packaging minimization

Food packaging is designed to meet product protection, hygiene, shelf life, sealability, machine run, transport stability and customer requirements without unnecessarily increasing weight or volume.

4.7 Article 11 – Reusable packaging

Single-use food packaging is not automatically reusable packaging. Reusable systems, load carriers or transport aids are assessed and documented separately.

4.8 Article 12 – Labeling

Material markings, customer markings and future harmonized EU labeling requirements are taken into account according to the packaging type, material structure, food contact and customer requirements. New labeling requirements are to be included in the amendment service.



5. Obligations of Economic Operators and Verification Organization

FPS Flexpack merges the available supplier data, material-related declarations of conformity, food law certificates and technical specifications into a verifiable verification file. The verification file contains in particular technical documentation, risk assessment on substance conformity, material and article classification, food contact assessment, recyclability assessment, document control and 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 food packaging, substance restrictions, PFAS, REACH/SVHC, food contact and recyclability.

Existing technical documentation of FPS Flexpack GmbH for food packaging as well as existing product-related specifications.

6.2 Validity and right to make 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	