



FPS Flexpack GmbH, Lochfeldstraße 29, DE-76437 Rastatt
Technical Documentation according to Regulation (EU) 2025/40 (PPWR)

for packaging and packaging waste for cardboard, paper, corrugated board,
paper-based packaging, and associated transport packaging

Validity reference: from August 12, 2026

Responsible for Documentation	Bernhard Klumpp, Commercial Management / Procurement
Status / Version	12.08.2026 / Version 2.0
Data Protection / Anonymization	All supplier names have been removed and replaced by Raw Material Manufacturer 1 to 9.
Scope of Application	Cardboard, paper, corrugated board, paper-based packaging, and associated transport packaging
Purpose	PPWR verification basis for internal approvals, customer inquiries, and audit preparation.
Note	The complete original verifications are available.

1. Brief Description and Scope of Application

This abridged complete documentation summarizes the existing technical verifications of FPS Flexpack GmbH. The documentation covers corrugated board packaging, cardboard packaging, blanks, compartments, compartment inserts, telescoping boxes, and comparable paper-based packaging components.

The packagings are predominantly considered as secondary, transport, and outer packaging in the context of food packaging. Direct food contact is only covered if a supplementary food contact or migration declaration is available for the specific article.



2. Documentation Basis - Anonymized Raw Material Manufacturers

To avoid supplier names, the individual verification sources are managed exclusively as Raw Material Manufacturer 1 to 9.

Source	Dokumentation Type	Essential Content	Status
Raw Material Manufacturer 1	Article overview / technical article data	Compartments, blanks, telescoping boxes; material and dimensional specifications, grammages, and weights.	integrated
Raw Material Manufacturer 2	Specification sheets	Folding boxes, compartment inserts, material structures, weights, printing specifications, and palletization.	integrated
Raw Material Manufacturer 3	Extended product and material information	Compliance references, additional components, recycled paper content, CO2 factors, and technical product data.	integrated
Raw Material Manufacturer 4	PPWR product data export	Article-related data on material composition, recycled content, recycling class, and PPWR assessment.	integrated
Raw Material Manufacturer 5	Heavy metal, PFAS, and standard grade documentation	Verifications for heavy metals, PFAS, recycled paper content, standard grades, and PPWR implementation.	integrated
Raw Material Manufacturer 6	PPWR declaration of conformity with article annex	Statements on recyclability, substance restrictions, labeling, FSC category, and technical article data.	integrated
Raw Material Manufacturer 7	PPWR technical documentation	Assessment according to Art. 5 to 12 and Art. 15 PPWR; recyclability, PFAS, REACH, labeling, and manufacturer obligations.	integrated
Raw Material Manufacturer 8	PPWR supplier declaration	Verifications regarding Art. 5 and Art. 6 PPWR, heavy metals, PFAS, REACH, EN 13430, and recycled material content.	integrated
Raw Material Manufacturer 9	PPWR customer information / implementation info	Information on substance restrictions, recyclability, recycling rates, labeling, roles, and producer responsibility.	managed as verification source

3. PPWR-Assessment

PPWR-Topic	Compact Assessment	Verification Proces / Con- duct	Status
Art. 5 Substances in packaging	Heavy metal limit values for lead, cadmium, mercury, and chromium VI are complied with or fallen below according to the available supplier verifications. PFAS are not intentionally used; possible traces from recycled fibers cannot be excluded for every individual case.	Supplier declarations / testing notices	verified
Art. 6 Recyclability	Paper-based corrugated board and cardboard packaging are fundamentally recyclable via the paper/cardboard recycling stream. Several verifications reference EN 13430 or recycling class / design-for-recyclability statements.	Supplier specifications / material specifications	verified
Art. 7 Recycled content in plastic	Not applicable for paper- and fiber-based packaging without relevant plastic content. Individual case reviews are possible for additional components.	Material assessment	not applicable / verify
Art. 8 Bio-based plastic content	Fundamentally not applicable for the documented paper-based packaging.	Material assessment	not applicable
Art. 9 Compostability	The documented packagings are oriented towards paper recycling; compostability is not targeted as a primary disposal route.	Material assessment	not applicable
Art. 10 Packaging minimization	Weight, volume, and dimensions must be assessed on an article-specific basis. A flat-rate minimization confirmation does not replace an article inspection.	Internal specification review	open / ongoing



Art. 11 Reusability	Reusability depends on the intended use and must be assessed on an article-by-article basis for transport/outer packaging.	Application review	as required
Art. 12 / 15 Labeling and producer obligations	Labeling, identification, traceability, technical documentation, and EU declaration of conformity are the responsibility of FPS Flexpack GmbH as the producer/distributor.	Application review	as required

4. Material- and Product Groups

Area	Summary	Assessment
Materialbasis	Wellpappen-Rohpapiere, Recyclingpapiere, Primärfaser-/Frischfaseranteile, Wellenstoff, Testliner, Kraftliner/Kraftlinerersatz und papierbasierte Komponenten.	dokumentiert
Adhesives / Auxiliaries	Starch glue, dispersion adhesives, and other adhesive/auxiliary substances are listed in statements from various raw material manufacturers.	Maintain verifications
Printing Inks / Additional Components	Printing inks, tear strips, silicone paper, adhesive tapes, or stapling components are only relevant on an article-specific basis.	individual case review
Recycled Content	Depending on the article or standard grade, recycled/recycled paper content is documented differently; individual sources state 100%, others give article-related values.	article-specific
Food Contact Reference	Direct food contact is not generally confirmed in the summary version. Separate food declarations or migration-related verifications are required.	to be attached separately

**5. Verification Structure: Raw Material Manufacturers 1 to 9**

Anonymized Source	Material / Verification Scope	Content-wise Use in the Technical Documentation
Raw Material Manufacturer 1	Corrugated board / secondary and transport packaging	Heavy metals < 100 ppm; recyclability; design for recycling; supplier verifications
Raw Material Manufacturer 2	Cardboard packaging / corrugated board	PPWR application from 12.08.2026; Art. 5 substances; recyclability; provision of information
Raw Material Manufacturer 3	Corrugated board / food environment	Food law assessment according to EC 1935/2004, GMP 2023/2006, and BfR XXXVI; heavy metals and PFAS risk analysis
Raw Material Manufacturer 4	Corrugated board / packaging	PFAS not intentionally added; heavy metal limit values fallen below
Raw Material Manufacturer 5	Corrugated board / packaging materials	Recyclability, substance restrictions, auxiliary materials, labeling according to material codes
Raw Material Manufacturer 6	EPAL / load carriers	Reusable transport packaging, open-loop system, recyclability
Raw Material Manufacturer 7	Corrugated board / technical information	Product data, recycled paper content, technical specifications, and compliance references
Raw Material Manufacturer 8	Cardboard / cardboard packaging	Cardboard and paper packaging, material data, and recycling suitability
Raw Material Manufacturer 9	Further supplier verifications	Additional PPWR, PFAS, REACH, and heavy metal information



6. Traceability and Document Control

Unique traceability is required for all relevant packaging and packaging waste for cardboard, paper, corrugated board, paper-based packaging, and associated transport packaging. This includes raw material code, raw material manufacturer number, delivery note, batch, internal article number, production order, and customer reference.

- Current technical data sheet of the composite material used
- Current PPWR Article 5 information or substance declaration regarding heavy metals and PFAS
- For food-related applications: food law assessment or corresponding supplier documents
- Internal material approval for the specific intended use
- Batch-related traceability data
- Update note in case of material or formulation changes

Place, Date	Name / Function	Signature / Stamp
Rastatt, 13.08.2026	Bernhard Klumpp / Commercial Management, Power of Attorney	

Note: This documentation does not replace legal advice or an original supplier declaration. The complete original documents as well as the respectively applicable legal requirements remain authoritative.