

Supplier declaration on packaging components for Articles 5 and 6 PPWR: Requirements for materials and recyclability

1.	Date: 22-Jun-26	Validity of this supplier's declaration: 2 years from the date of issue (subject to relevant changes in legal regulations)	Serial number . 5.1 Flexo_indirect _220626E
2.	Name and address of the declaring supplier	Brohl Wellpappe GmbH & Co. KG Nikolaus-Otto-Str. 356727 Mayen	
3.	Area of responsibility	Brohl Wellpappe GmbH & Co. KG, acting on its own responsibility in accordance with Regulation (EU) 2025/40 (PPWR), declares as a packaging supplier that its responsibility under this declaration relates exclusively to the packaging components it supplies. Any alteration or modification carried out after delivery by the manufacturer or by downstream economic operators within the meaning of the PPWR, e.g., material changes, is the responsibility of these parties and not of Brohl Wellpappe GmbH & Co. KG.	
4.	Declaration of Food Safety (LU)	The product group listed below is suitable for indirect contact with food.	
5.	Features of the Flexo product group	Flexo group includes corrugated cardboard products with the following options: 1) unprinted or flexo-printed (with standard dispersion ink flexo) 2) unpainted or painted (with water-based or UV paints) 3) unsealed or sealed (with dispersion or hot melt glue) 4) with or without additional application (such as tear strip, reinforcing tape, (double-sided) adhesive tape, permanently integrated carrying handles) See Appendix 1	
6.	List of specific items		
7.	Union legal acts	Regulation (EU) 2025/40 (Packaging and Packaging Waste Regulation (PPWR) Regulation (EC) No 1907/2006 (REACH) Regulation (EC) No 1935/2004 (for food contact) Regulation (EC) No 2023/2006 (GMP)	
8.	Standards	The following harmonized standards were used to assess compliance with the requirements for substance restrictions and recyclability in accordance with Regulation (EU) 2025/40 (PPWR): • EN 13427:2004 – Packaging – Requirements for the application of European standards in the field of packaging and packaging waste • EN 13428:2004 – Packaging – Requirements for manufacture and composition (including minimization of hazardous substances) • EN 13430:2004 – Packaging – Requirements for packaging for material recovery (recyclability) • EN 643:2014 – Paper, board and paperboard – European list of standard grades of recovered paper	

9. Requirements for substances in packaging according to Article 5 PPWR

Component name	Total items delivered	Raw papers / printing material	Corrugated cardboard glues	Printing ink	Varnish	Glue	Tear-off thread, reinforcement tape Double-sided adhesive tape	handles	staples
Heavy metal ^{1) 2)} Σ PB, Cd, Hg, CrVI < 100 mg/kg	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
PFA formulation ingredient? ¹⁾	No	No	No	No	No	No	No	No	No
Fluorine (total) ^{1) 3) 5)} < 50 ppb	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
PFA < PPWR limits ^{3) 4) 5)}	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
REACH complied with ^{1) 6)}	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Recyclability	Is given in accordance with Article 6 PPWR (as defined)								
Additional information	¹⁾ The classification is based on the declarations of our raw material suppliers. ²⁾ Brohl Wellpappe has verified compliance with the limit values through worst-case sampling analyses. ³⁾ For products intended for food contact (group LU), total fluorine was determined in worst-case samples. The results are significantly below the PPWR limits, and PFA limits are also not exceeded. ⁴⁾ There is currently no EU-mandated, uniform analytical method for the limit values for PFAs in products suitable for food contact, as set by the PPWR. ⁵⁾ PPWR only sets PFA limits for food contact products. Therefore, no other analyses were commissioned. ⁶⁾ The ECHA list of Substances of Very High Concern (SVHCs) is updated approximately every six months. Brohl Wellpappe monitors REACH declarations through corresponding supplier inquiries. Therefore, we provide a separate, updated REACH declaration.								

Mayen 22-Jun-26



Volker Goldhahn Coordinator Quality and Hygiene Management