

EU DECLARATION OF CONFORMITY

Packaging pursuant to (EU) Regulation 2025/40 (PPWR)

Cumulative declaration for all packaging materials in accordance with Art. 39 of the PPWR, in combination with appendix VII and VIII of the PPWR

Publishing company	norelem Normelemente GmbH & Co. KG
Address	Volmarstraße 1, 71706 Markgröningen, Germany
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This document consolidates the EU Declaration of Conformity for all packaging materials used by norelem Normelemente GmbH & Co. KG. It serves as a unified proof of compliance for customers and regulatory authorities pursuant to Article 15(3) of (EU) Regulation 2025/40 (PPWR). The detailed lists for each packaging group are attached as appendices A–D.

Note: Where individual requirements of Regulation (EU) 2025/40 are not yet directly applicable at the time of issue of this declaration, or where the delegated acts or implementing acts necessary to give them effect have not yet been adopted, this declaration is limited to the requirements in force on the date of issue.

1. Scope and packaging groups

This declaration applies to all packaging materials distributed by norelem Normelemente GmbH & Co. KG on the EU market. The packagings are divided into four groups. The complete article lists for each group are set out in appendices A–D.

Group	Material	Function	Appendix	Number of items
A	Paper/cardboard/carton	Transport packaging	App. A	28
B	Plastic	Sales packaging	App. B	12
C	Plastic	Transport packaging	App. C	15
D	Wood	Transport packaging	App. D	6

2. Publisher (Appendix VIII, No. 2)

The sole responsibility for the conformity of the packaging listed below lies with:

Company	norelem Normelemente GmbH & Co. KG
Address	Volmarstraße 1, 71706 Markgröningen, Germany
Email	material-compliance@norelem.de
Sales Tax ID No.	DE813191811

3. Declaration under sole responsibility (Appendix VIII, No. 3)

The publisher hereby declares, on their sole responsibility in accordance with Art. 39(4) of (EU) Regulation 2025/40, that the packagings listed in appendices A-D comply, to the best of the publisher's knowledge and based on an internal technical assessment, with the requirements of (EU) Regulation 2025/40 that were directly applicable at the time they were placed on the market.

4. Applied sustainability requirements (Appendix VIII, No. 5)

The sphere of application of the declaration referred to in point 2 complies with the relevant EU legislation on harmonisation:

Complies with the following regulations	Source
Regulation (EU) 2025/40 (PPWR)	ABI. L from 22.1.2025

Other EU legislation's remain applicable insofar as the packaging in question falls within thier scope. This list is not intended to be exhaustive with regard to legislation's that may come into force in the future.

5. Applied sustainability requirements (Appendix VIII, No. 6)

The applicable scope of the declaration referred to in point 2 meets – where applicable – the requirements for PPWR conformity pursuant to Art. 39 PPWR in conjunction with Art. 5–12 PPWR:

Article	Requirement	Status
Art. 5(4)	Heavy metals: $\Sigma (\text{Pb} + \text{Cd} + \text{Hg} + \text{CrVI}) \leq 100 \text{ mg/kg}$ per component	conform
Art. 5(5)	PFAS limit values – food contact only:	not applicable
Art. 6	Recyclable design <i>Confirmation of compliance with the criteria for Recyclable design</i> <i>Performance level (from 2030)</i>	not yet applicable / in preparation
Art. 7	Minimum recycled content in plastic packaging (Objectives from 2030)	not yet applicable / in preparation
Art. 8	Bio-based plastics – sustainability requirements	not applicable
Art. 9	Biodegradability (tea/coffee bags, fruit labels, Single portion; from 2028)	not applicable
Art. 10	Minimising packaging – there are as yet no harmonised standards. Art. 24 Empty space ratio $\leq 50\%$ (from 2030)	not yet applicable / in preparation
Art. 11	Reusability – Criteria (a)–(i) (only reusable packaging)	not applicable
Art. 12	Labelling (material codes; harmonised label from 2028)	not yet applicable / in preparation

For requirements which have yet to be specified by delegated legislation or implementing legislation of the EU Commission (in particular Art. 6 and Art. 7 of (EU) Regulation 2025/40), the assessment is subject to the finalisation of the criteria. The publisher undertakes to review this statement following the publication of the relevant legal measures and to update it where necessary.

6. Harmonised standards and other technical specifications

At the time of issuing this explanation, no harmonised standards in line with (EU) Regulation 2025/40 had yet been published in the official journal of the European Union for the packaging categories in question. Conformity assessment is therefore carried out on the basis of:

- (a) the directly applicable requirements of Art. 5 to 12 of (EU) regulation 2025/40,
- (b) the technical documentation provided by the packaging supplier in accordance with Art. 16 of (EU) regulation 2025/40.

This statement will be updated following the publication of the harmonised standards. The obligation to update does not affect the validity of this statement for the period prior to the update.

7. Involvement of a notified body (Appendix VIII, No. 7)

The conformity assessment was carried out by the manufacturer in accordance with appendix VII, Module A (internal production control) of (EU) regulation 2025/40. The involvement of a notified body is not required for the relevant packaging categories under this regulation and has therefore not taken place.

8. Signing (Appendix VIII, No. 8)

Signatory (Name)	Andreas Tomaschko
Function	Head of Logistics
Town/city	Sulz am Neckar
Date	2026-07-22



Signature

This statement is provided electronically or, upon request, in paper form (in accordance with Art. 15(3) of (EU) regulation 2025/40).

Appendix A (pursuant to VIII, No. 1 and 4)

Group A | Paper/Cardboard/Carton | Transport packaging

Packaging function and material

Packaging type, Art. 3 PPWR:	Transport packaging
Packaging category' (as per Appendix II, Table 1)	2
Main material	Paper/cardboard/carton
Disposable / Reusable	Disposable
Intended use	Protecting goods during transport and handling, and ensuring safe and efficient transport

Article lists

Type No.	Article No.	Description	Dimensions	Weight (empty)
A-TR-PAP-01-26	197827	C6 delivery note envelopes	175 x 130 mm	2.55 g
A-TR-PAP-02-26	239543	DIN A4 delivery note envelopes	340 x 250 mm	5.0 g
A-TR-PAP-03-26	235057	UN packaging 4G/X7	180 x 160 x 250 mm	0.16 kg
A-TR-PAP-04-26	235058	UN packaging 4G/X16	250 x 250 x 360 mm	0.48 kg
A-TR-PAP-05-26	235059	Vermiculite cushions	180 x 150 mm	69.05 g
A-TR-PAP-06-26	284753	Shipping labels	150 x 110 mm (rolls)	0.76 kg
A-TR-PAP-07-26	188819	Punch cut	1180 x 780 mm	1.0 kg
A-TR-PAP-08-26	211109	Corrugated cardboard cuts	554 x 356 mm	3.0 kg
A-TR-PAP-09-26	350807	Collapsible box 551x351x245	551 x 351 x 245 mm	0.90 kg
A-TR-PAP-10-26	350808	Collapsible box 200x150x50	200 x 150 x 50 mm	0.06 kg
A-TR-PAP-11-26	350791	Collapsible box 238x168x79	238 x 168 x 79 mm	0.14 kg
A-TR-PAP-12-26	350793	Collapsible box 238x168x79	238 x 168 x 79 mm	0.14 kg
A-TR-PAP-13-26	350790	Collapsible box 238x168x79	238 x 168 x 79 mm	0.14 kg
A-TR-PAP-14-26	350798	Collapsible box 348x233x77	348 x 233 x 77 mm	0.24 kg
A-TR-PAP-15-26	350799	Collapsible box 348x233x77	348 x 233 x 77 mm	0.24 kg
A-TR-PAP-16-26	350795	Collapsible box 386x286x183	386 x 286 x 183 mm	0.52 kg
A-TR-PAP-17-26	350797	Collapsible box 386x286x183	386 x 286 x 183 mm	0.52 kg
A-TR-PAP-18-26	350796	Collapsible box 386x286x183	386 x 286 x 183 mm	0.52 kg
A-TR-PAP-19-26	350806	Collapsible box 626x188x77	626 x 188 x 77 mm	0.34 kg
A-TR-PAP-20-26	350805	Collapsible box 626x188x77	626 x 188 x 77 mm	0.34 kg

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A-TR-PAP-21-26	350803	Collapsible box 626x386x173	626 x 386 x 173 mm	0.96 kg
A-TR-PAP-22-26	350804	Collapsible box 626x386x173	626 x 386 x 173 mm	0.96 kg
A-TR-PAP-23-26	282407	Paper for filling machines	350 x 275	0.08 kg
A-TR-PAP-24-26	188821	Corrugated cardboard collapsible carton	500 x 500 x 200 mm	0.54 kg
A-TR-PAP-25-26	228915	Delivery note envelope	235 x 175 mm	7.2 g
A-TR-PAP-26-26	188905	Shipping sleeves (65x65)	65 x 65 x 123.5 mm	0.64 kg
A-TR-PAP-27-26	188906	Shipping sleeves (105x105)	105 x 105 x 123.5 mm	1.0 kg
A-TR-PAP-28-26	197833	Cardboard edge protectors	2195 x 60 mm	0.44 kg

Appendix B (as per VIII, No. 1 and 4)

Group B | Plastics | Sales packaging

Packaging function and material

Packaging type, Art. 3 PPWR:	Sales packaging
Packaging category¹ (as per Appendix II, Table 1)	11
Main material	PE – flexible
Disposable / Reusable	Disposable
Intended use	Protection and packaging of products as sales packaging for sale to the end user.

Article lists

Type No.	Article No.	Description	Dimensions	Weight (empty)
B-VK-KST-01-26	215686	Plastic bag 500 x 300	500 x 300 mm	22 g
B-VK-KST-02-26	345863	LDPE flat bag 250x390	250 x 390 mm	13.75 g
B-VK-KST-03-26	345862	LDPE flat bag 210x300	210 x 300 mm	9.3 g
B-VK-KST-04-26	345861	LDPE flat bag 150x210	150 x 210 mm	4.5 g
B-VK-KST-05-26	345860	LDPE flat bag	100 x 150 mm	1.4 g
B-VK-KST-06-26	345865	LDPE flat bag 400x600	400 x 600 mm	34.6 g
B-VK-KST-07-26	305369	Bags on a roll 100x100	100 x 100 mm	3.8 kg
B-VK-KST-08-26	305370	Bags on a roll 100x120	100 x 120 mm	3.94 kg
B-VK-KST-09-26	305371	Bags on a roll 125x165	125 x 165 mm	4.9 kg
B-VK-KST-10-26	305372	Bags on a roll 140x280	140 x 280 mm	4.58 kg
B-VK-KST-11-26	305373	Bags on a roll 180x180	180 x 180 mm	6.8 kg
B-VK-KST-12-26	335517	Bags on a roll 200x245	200 x 245 mm	6.02 kg

Appendix C (as per VIII, No. 1 and 4)

Group C | Plastics | Transport packaging

Packaging function and material

Packaging type, Art. 3 PPWR:	Transport packaging
Packaging category' (as per Appendix II, Table 1)	11
Main material	PE – flexible
Disposable / Reusable	Disposable
Intended use	Protecting goods during transport and handling, and ensuring safe and efficient transport

Article lists

Type No.	Article No.	Description	Dimensions	Weight (empty)
C-TR-KST-01-26	169031	Padded shipping envelopes	200 x 275 mm	13.8 g
C-TR-KST-02-26	235061	Adhesive tape	Ø 120 mm	339.75 g
C-TR-KST-03-26	235060	Absorbent tissues	500 x 400 mm	74.55 g
C-TR-KST-04-26	161134	Surface protection nets	300 x 210 mm	5.0 kg
C-TR-KST-05-26	161135	Surface protection nets	300 x 200 mm	4.0 kg
C-TR-KST-06-26	196854	Surface protection nets	300 x 220 mm	5.0 kg
C-TR-KST-07-26	349862	Special wrapping tape	Ø 575 mm	10.18 kg
C-TR-KST-08-26	188863	Adhesive tape	Ø 104 mm	181.55 g
C-TR-KST-09-26	188921	Padded envelopes	250 x 300 mm	10.4 g
C-TR-KST-10-26	188912	PE - FOIL SLEEVES, smooth foil	Ø 445 mm	19.0 kg
C-TR-KST-11-26	188916	Bubble wrap 120 x 100	120 x 100 mm	6.0 kg
C-TR-KST-12-26	188922	Bubble wrap 80 x 100	80 x 100 mm	4.0 kg
C-TR-KST-13-26	188899	Hand-stretch film 500 x 300	520 x 100 mm	2.44 kg
C-TR-KST-14-26	213318	Plastic wrapping band	Ø 410 mm	10.0 kg
C-TR-KST-15-26	218369	Stretch film	Ø 190 mm	3.0 kg

Appendix D (as per VIII, No. 1 and 4)

Group D | Wood | Transport packaging

Packaging function and material

Packaging type, Art. 3 PPWR:	Transport packaging
Packaging category‘ (as per Appendix II, Table 1)	20
Main material	Wood
Disposable / Reusable	Disposable
Intended use	Protecting goods during transport and handling, and ensuring safe and efficient transport.

Article lists

Type No.	Article No.	Description	Dimensions	Weight (empty)
D-TR-HOL-01-26	223787	Disposable pallets	1200 x 800 x 125 mm	9.0 kg
D-TR-HOL-02-26	224827	Wooden boards	4500 x 95 x 20 mm	5.3 kg
D-TR-HOL-03-26	197824	Folding crate floors	1200 x 800 x 145 mm	17.0 kg
D-TR-HOL-04-26	296776	Folding rings 12 mm	1965 x 700 x 30 mm	19.0 kg
D-TR-HOL-05-26	188852	Folding rings 12 mm	2150 x 573 x 25 mm	17.0 kg
D-TR-HOL-06-26	188851	9 mm intermediate bases	1000 x 793 x 35 mm	7.0 kg