

EU DECLARATION OF CONFORMITY

(DoC)

pursuant to Regulation (EU) 2025/40 (PPWR), Article 39 in conjunction with Annex VIII

Document No.:	DOC-PPWR-2026-001_V2_EN
Replaces:	DOC-PPWR-2026-001, Version 1.0 (fully replaced)
Version:	2.0
Date of issue:	16 July 2026
Packaging group:	Transport packaging – corrugated cardboard boxes, all weight classes, in two closure/equipment variants (see Section 3.1)
Valid for:	All carton sizes listed in Section 3 (variants V1–V4), irrespective of weight class, in both closure variants as set out in Section 3.1

1. Manufacturer Information (Economic Operator)

Company name:	Garburg Etiketten-Drucksysteme GmbH
Legal form:	GmbH
Postal address:	Ringstraße 36, 32584 Löhne, Germany
Email:	info@garburg.de
LUCID registration:	DE4395341370931

2. Declaration of Sole Responsibility

This EU Declaration of Conformity is issued under the sole responsibility of the manufacturer named above. The manufacturer declares that the packaging described in Section 3 meets all applicable requirements of Regulation (EU) 2025/40 (PPWR).

3. Description of the Packaging

All four variants (V1–V4) differ solely in their external dimensions. Carton material and basic construction are identical and apply irrespective of the weight class. The closure and equipment (adhesive tape, delivery note pouch, filling material) are provided in two variants, which are described in Section 3.1.

Variant	Description	External dimensions L×W×H (mm)	Empty weight (g)	Max. fill weight (kg)	Closure
V1	Small carton	300 × 200 × 150	[e.g. 280]	< 10	see Section 3.1
V2	Medium carton 1	415 × 315 × 300	[e.g. 450]	< 25	see Section 3.1
V3	Medium carton 2	500 × 300 × 300	[e.g. 720]	< 25	see Section 3.1
V4	Large carton	500 × 400 × 360	[e.g. 950]	< 30	see Section 3.1

Packaging type:	Transport packaging (single-use)
Carton material:	Corrugated cardboard (double-wall / BC flute), recycled-paper based
Filling material:	Paper (wrapping paper / paper cushioning), recyclable in the waste-paper stream
Printing inks / coating:	[None / water-based / no coating – please adjust]
Recyclability:	Fully recyclable in the waste-paper recycling stream

3.1 Closure and Equipment Variants

Depending on material availability, the cartons are placed on the market in one of two equally compliant closure and equipment variants. Both variants meet the requirements of the PPWR as set out in Section 4; they differ in the assessment under Art. 6 and Art. 7 (see the respective tables).

Description:	Paper system (single-reinforced <10 kg, double-reinforced >10 kg)
Adhesive tape:	Paper adhesive tape, fibre-reinforced, single or double layer
Delivery note pouch:	Paper, uncoated
Valid from:	16 July 2026 (new standard for all new orders)
Recyclability:	Fully recyclable in the waste-paper recycling stream

Description:	Variant TRANSITIONAL – Remaining Plastic Stock (time-limited)
Adhesive tape:	PP/PE adhesive tape (remaining inventory stock)
Delivery note pouch:	Plastic (PE), remaining inventory stock
Valid until:	Until stock is used up, no later than 28 February 2027
Recyclability:	Corrugated cardboard recyclable; plastic components (tape/pouch) must be separated during sorting

4. Conformity Assessment under Art. 5–12 PPWR

The conformity assessment procedure was carried out under Module A (internal production control by the manufacturer) in accordance with Annex VII of Regulation (EU) 2025/40.

Conformity Assessment – Variant NEW (Paper System)

Article	Requirement	Met	Remark / Evidence
Art. 5(1)(a)	Sum of Pb + Cd + Hg + Cr(VI) ≤ 100 mg/kg	Yes	Supplier declaration on file
Art. 5(1)(b)	No PFAS above PPWR threshold limits	Yes	Paper, adhesive & ink: PFAS-free per supplier declaration
Art. 5(2)	No REACH Annex XIV/XVII substances	Yes	Material SDS reviewed
Art. 6	Recyclability (Class A/B/C/D)	N/A	Not mandatory until 2030 (delegated act); packaging consists entirely of paper/cardboard
Art. 7	Minimum recycled plastic content	N/A	No plastic components (paper adhesive tape, paper delivery note pouch, paper filling material)
Art. 9	Compostability	N/A	Not a compostable packaging
Art. 10	Packaging minimisation	Yes	Empty space reduced to the functionally necessary minimum
Art. 11	Reuse / refill	N/A	Single-use packaging; reuse obligations apply from 2030

Conformity Assessment – Variant TRANSITIONAL (Remaining Plastic Stock)

Article	Requirement	Met	Remark / Evidence
Art. 5(1)(a)	Sum of Pb + Cd + Hg + Cr(VI) ≤ 100 mg/kg	Yes	Supplier declaration on file
Art. 5(1)(b)	No PFAS above PPWR threshold limits	Yes	Adhesive tape, pouch & ink: PFAS-free per supplier declaration
Art. 5(2)	No REACH Annex XIV/XVII substances	Yes	Material SDS reviewed
Art. 6	Recyclability (Class A/B/C/D)	N/A	Not mandatory until 2030 (delegated act); plastic

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			components (adhesive tape, delivery note pouch) must be taken into account in the future assessment
Art. 7	Minimum recycled plastic content	N/A	Not mandatory until 01 January 2030 or 3 years after the implementing act (Art. 7(8)), whichever is later; not due to an absence of plastic content – the packaging contains plastic (PP/PE adhesive tape, plastic pouch); the 5% de minimis threshold of total weight (Art. 7(5)(b)) is expected to be met and must be calculated from 2030 onwards
Art. 9	Compostability	N/A	Not a compostable packaging
Art. 10	Packaging minimisation	Yes	Empty space reduced to the functionally necessary minimum
Art. 11	Reuse / refill	N/A	Single-use packaging; reuse obligations apply from 2030

5. Legal Basis and Technical Specifications

Primary legal act:	Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste (PPWR)
Nat. implementation:	German Packaging Law Implementation Act (VerpackDG); as of 16 July 2026 not yet published
Chemicals legislation:	Regulation (EC) No 1907/2006 (REACH)
Notified body:	Not required (Module A – manufacturer self-verification)
Retention period:	5 years from placing on the market (single-use packaging, Art. 39(5) PPWR)

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6. Declaration of Conformity

We hereby declare under our sole responsibility that the packaging described in Section 3 (variants V1 to V4), in both closure and equipment variants described in Section 3.1 ("NEW" – paper system and "TRANSITIONAL" – remaining plastic stock), complies with the currently applicable requirements of Regulation (EU) 2025/40 (PPWR), in particular the substance restrictions under Article 5 as well as the further applicable Articles 6 to 12, insofar as these are already in force at the time this declaration is issued. The "TRANSITIONAL" variant is used exclusively until existing inventory stocks of plastic adhesive tape and delivery note pouches are used up; thereafter, only the "NEW" variant will be used.

7. Signature

Place, date: Löhne, 16 July 2026	Name, position: Thomas Trusch, QMB (Quality Management Officer), UMB (Environmental Management Officer), Executive Assistant
 Signature	 Company stamp