27/08/2026

General Supplier Information Statement under Regulation (EU) 2025/40 (PPWR) Supporting compliance with Articles 5–12, including PFAS, heavy metals and substances of concern

1. Introduction

This statement is issued by Plus Pack A/S to provide information and documentation as a supplier under Article 16 of Regulation (EU) 2025/40 on packaging and packaging waste (PPWR). It is intended to support the manufacturer of the packaging in preparing the technical documentation and conformity assessment required by the PPWR.

The statement applies to empty food contact packaging supplied by Plus Pack Group.

2. Role of Plus Pack under PPWR

For the purposes of the PPWR allocation of responsibilities, Plus Pack acts as a supplier of packaging and packaging materials for food application to its customers, and not the manufacturer of the final packaging placed on the market. The customer, or other economic operator that qualifies as manufacturer, is responsible for the conformity assessment under Article 38, the technical documentation under Annex VII and the EU Declaration of Conformity under Article 39, and must assess the packaging as a whole, including all components and any subsequent printing, coating, labelling, filling, sealing or other processing.

Plus Pack's responsibility is to provide the manufacturer with the information and documentation necessary to demonstrate conformity of the items supplied, as required by Article 16.

3. Supplier information and technical documentation

For the products within scope, Plus Pack makes available, as relevant and necessary for the manufacturer's assessment:

- technical product data sheets, incl. product identification, material description/composition, dimensions and applicable specifications;
- product specific food contact material Declarations of Compliance;
- other technical information required for the manufacturer's Annex VII documentation, subject where appropriate to proportionate confidentiality arrangements.

Product-specific documents should be read together with this general statement. They are provided through Plus Pack's established documentation channels or on justified request.

4. Compliance with Article 5 of Regulation (EU) 2025/40

Article 5 requires that packaging is manufactured so that the presence and concentration of substances of concern are minimized. In addition, the combined concentration of lead, cadmium, mercury and hexavalent chromium must not exceed 100 mg/kg, and food-contact packaging must comply with the applicable PFAS limits from 12 August 2026.

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4.1 Substances of concern

Plus Pack applies a documented, risk-based process to minimize substances of concern in the supplied packaging. The assessment is based, as applicable, on raw-material composition, supplier information, food-contact legislation and production knowledge. Based on this assessment, the products covered by this statement support compliance with Article 5(1). Absence of individual chemical substances is supported by product-specific food contact material Declaration of Compliance (DoC).

4.2 Heavy metals

Plus Pack does not intentionally add lead, cadmium, mercury or hexavalent chromium to the products covered by this statement. Based on raw-material specifications, supplier declarations and risk-based supporting documentation, the sum of the concentrations of these four substances in the supplied products does not exceed 100 mg/kg, as required by Article 5(4).

4.3 PFAS restriction in food-contact packaging

Plus Pack does not intentionally use or add PFAS in the manufacture of the products covered by this statement. Compliance with Article 5(5) is assessed on the basis of raw-material and formulation knowledge, supplier declarations, production controls and risk-based analytical verification where appropriate. The assessment covers both intentionally added and unintentionally present PFAS and the applicable concentration limits established in Article 5(5). On this basis, Plus Pack confirms that the products covered by this statement comply with Article 5(5) in the condition in which they are supplied.

5. Compliance with Articles 6-12 of Regulation (EU) 2025/40

Regulation (EU) 2025/40 introduces further requirements with future entry-into-force dates, including design for recyclability, minimum recycled content, etc. Plus Pack already now provides design and material data on technical data sheets for packaging supplied, while the manufacturer must assess the final packaging unit.

6. Conclusion and limitations

This statement relates solely to products supplied by Plus Pack Group. It is intended to support customer regulatory assessments and may be used together with the applicable food contact material Declaration of Compliance as well as technical data sheets available for products supplied. Changes to materials, suppliers, design, processing, legislation or assessment methods may require review and revision of this statement.

Plus Pack remains responsible for the accuracy of the information provided and for the conformity of the supplied item within its declared specifications and intended conditions of use. The manufacturer of the final packaging is responsible for assessing the complete packaging unit, including all components, the packaged product and any filling, sealing, printing, labelling, coating or other processing undertaken after supply by Plus Pack.

On behalf of the Quality department

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