

**STATEMENT CONCERNING THE COMPLIANCE OF DALPO POZNAŃ SP. Z O.O. TRADING SP. K.
WITH REGULATION (EU) 2025/40 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL
(PPWR)**

In connection with the entry into force of Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste (PPWR), we hereby confirm that the products placed on the market by Dalpo Poznań Sp. z o.o. Trading Sp. k. comply with the requirements of Regulation (EU) 2025/40.

I. Document identification details

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II. Identification details of the entity placing the product on the market

Company:	Dalpo Poznań Sp. z o.o. Trading Sp. k.
Address:	ul. Miedziana 3, 60-118 Poznań
Tax Identification Number (NIP):	PL 5252495535

III. Scope of the statement

This statement covers the products listed in Annex No. 1. The packaging products are available in various material and technological variants, resulting, among other things, from different carrier grammages and adhesive types. Detailed technical parameters are specified in the technical data sheets for the respective product groups, which supplement this statement.

The products covered by this statement may be converted into various dimensions, in particular different widths and lengths, in accordance with the specification of the respective product or customer requirements. Differences in total thickness and dimensions resulting from the converting process do not alter the material characteristics forming the basis for the assessment of compliance with the requirements of Regulation (EU) 2025/40 (PPWR), provided that the material composition applicable to the respective product remains unchanged.

[Annex No. 1 – Catalogue of Packaging Products](#)

IV. Procedure for conformity assessment

The conformity assessment procedure was carried out in accordance with Module A of Annex VII to Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024. The assessment was based on the technical documentation of the product, suppliers' declarations and available technical information concerning the product. The conformity assessment procedure does not require the involvement of a notified body.

V. Compliance with the requirements of Regulation (EU) 2025/40 applicable to the products listed in Annex No. 1

1. Requirements concerning substances present in packaging and packaging materials (Art. 5 PPWR, REACH Regulation)

The assessment was carried out on the basis of verified documentation provided by the suppliers of raw materials used in the manufacture of the products covered by this statement:

- the total concentration of lead (Pb), cadmium (Cd), mercury (Hg) and hexavalent chromium (Cr(VI)) does not exceed **100 mg/kg**, in accordance with Art. 5(4) of Regulation (EU) 2025/40,
- according to the documentation provided by suppliers, per- and polyfluoroalkyl substances (PFAS), including PFOA, PFOS and their derivatives, are not intentionally added to the supplied materials,
- raw materials used in the manufacture of tapes do not contain substances included in the Candidate List of Substances of Very High Concern (SVHC) of the European Chemicals Agency (ECHA) at concentrations exceeding 0.1% by weight,
- raw materials used in the manufacture of labels do not contain substances included in the Candidate List of Substances of Very High Concern (SVHC) of the European Chemicals Agency (ECHA) at concentrations exceeding 0.1% by weight.

An exception is the carrier used in the manufacture of the following labels: **TECL1, TECL2 and TJSC**. The supplier declares the possible presence in thermal paper of substances containing **Bisphenol S (4,4'-sulphonyldiphenol)**, **CAS 80-09-1**, at a concentration above 0.1% and above the threshold of 1 tonne/year/producer.

2. Design for recycling (Art. 6)

The products covered by this statement have been designed taking into account their recyclability and existing recycling methods appropriate for the materials used. A detailed assessment of product recyclability will be carried out once the relevant recyclability criteria and assessment methodology have been established in delegated acts adopted pursuant to Art. 6 of Regulation (EU) 2025/40.

Disposal of the resulting waste should be carried out in accordance with applicable regional, national, EU and international regulations. Tapes and labels used in accordance with the recommended method of use do not hinder the recycling of the material to which they have been applied. They also do not adversely affect the appropriate recycling stream for that material. For products equipped with cores, paper and plastic cores are suitable for material recycling. Paper cores additionally contain 50% to 60% recycled material (recovered paper).

Recyclability tests have been carried out for the products listed in the table below. The tests were performed by Papiertechnische Stiftung (PTS) in accordance with the CEPI Recyclability Laboratory Test Method, Version 2 (October 2022). The results were evaluated in accordance with the 4evergreen Fibre-based Packaging Recyclability Evaluation Protocol, beta version (December 2022).

Product	Result	Certificate No
Brown raft paper tape with rubber adhesive	84/100	ORD-01565-Cert-01
White paper tape with rubber adhesive	87/100	ORD-01565-Cert-02
TECL thermal paper label with rubber adhesive	91/100	ORD-01565-Cert-03
TECL thermal paper label with acrylic adhesive	91/100	ORD-01565-Cert-04

3. Minimum recycled content in plastic packaging (Art. 7)

The requirements concerning the minimum recycled content in plastic packaging will be applied in accordance with the timelines and scope specified in Art. 7 of Regulation (EU) 2025/40. The recycled content will be assessed for the products covered by this statement to which these requirements apply.

4. Packaging minimisation (Art. 10)

Compliance with the requirements of Art. 10 concerning packaging minimisation was assessed on the basis of the product technical documentation. It was determined that the product design does not contain unnecessary elements that increase its weight or volume, and that the materials and dimensions used are justified.

5. Reusable packaging (Art. 11)

The requirements of Art. 11 of Regulation (EU) 2025/40 of the European Parliament and of the Council concerning reusable packaging do not apply to this product.

6. Product identification and labelling (Art. 15)

Product traceability is ensured by placing a label containing the batch identification number on the carton. Detailed rules concerning product marking and identification are specified in Section II, points 6 and 13 of the "General Terms and Conditions of Sale and Delivery of Goods".

7. Documentation supporting compliance (Art. 38, Annex VII)

Documentation relating to the products covered by this statement is maintained and retained to the extent required by Regulation (EU) 2025/40. It forms the basis for the conformity assessment carried out and includes, in particular, technical documentation, supplier declarations and available test results and certificates. The documentation may be made available to the competent market surveillance authorities upon justified request.

VI. Additional information

The products covered by this statement are manufactured within the framework of certified management systems:

- ISO 9001:2015 – Certificate No. 4805125
- ISO 14001:2015 – Certificate No. 4800826

In addition, the Company holds an FSC® Chain of Custody (CoC) certificate, confirming the operation of a system for controlling the origin of materials covered by the certification scope – Certificate No. C 867736CUCOC- 01.2024.

VII. Monitoring of requirements and maintaining compliance

The implementation of subsequent requirements of Regulation (EU) 2025/40 and their applicable dates are monitored on an ongoing basis. This also applies to requirements for which a detailed assessment will become possible following the publication of the relevant delegated acts, implementing acts, methodologies or standards. Documentation and the conformity assessment carried out will be updated as subsequent PPWR requirements become applicable, to the extent relevant to the products covered by this statement.

VIII. Signature of the authorised person

Name and surname of the authorised person:

Position:.....

Date and place:.....

Marek Kawecki
CZŁONEK ZARZĄDU

16.09.2026