

Statement

PPWR

EPS Packaging



Nortrup, 03.07.26

Dear Sir or Madam,

With this letter, we are fulfilling our obligation under Article 16 of the PPWR. Based on supplier declarations, we can inform you of the following:

- No heavy metals are intentionally added during the production of the raw material or during further processing at our facility. Consequently, it can be assumed that the limit values for heavy metals specified in Article 5 are complied with.
- Similarly, PFAS are not intentionally used either during the production of the raw material or during further processing at our facility. Therefore, it can also be assumed here that the limit values for PFAS in accordance with Article 5 are met.
- The products delivered to you are, according to the terminology of the REACH Regulation, "articles" that are not subject to the registration requirement under the REACH Regulation.

We can assure you that, to the best of our current knowledge, the articles do not contain any substances of very high concern (SVHCs) from the Candidate List in concentrations exceeding 0.1%, in accordance with Article 33 of the REACH Regulation (Regulation (EC) No. 1907/2006). We base this on the declarations from our suppliers regarding the currently valid REACH Candidate List published by the European Chemicals Agency (ECHA).

- EPS is generally recyclable and thus currently meets the requirements of Article 6 of the PPWR.
In April 2026, the standard BS EN 18120-9:2026-04-21 was published. It is expected that this standard will be used in the future to assess the recyclability of EPS. This will make it possible to classify EPS as Performance Level A under the PPWR. A legally binding statement on this matter is expected in 2028 following the publication of the delegated acts under Article 6(4).
- Furthermore, we want to bring the following Conversio study to your attention: [„Aufkommen, Abfallströme und Verwertung von EPS Verpackungsabfällen in Deutschland“ Conversio, 2019](#)

These confirmations apply to the status of the products at the time they leave our factories or warehouses.

As soon as we are able to confirm further requirements under the PPWR, we will do so and notify you accordingly.

Please note that, due to time constraints, we are unable to fill out any documents or Excel spreadsheets on your behalf.

Please also note that we are not permitted to perform your duties as a manufacturer on your behalf. For this reason, we are also unable to prepare and/or issue any technical documentation or declarations of conformity under the PPWR for products for which you are the manufacturer under the PPWR.

Statement

PPWR

EPS Packaging



The right to inspect the declaration of conformity under the PPWR and to request technical documentation under the PPWR rests with the national authority.

This statement becomes invalid if, after the date of issuance of this document, the European Commission makes changes to the legal framework or its interpretation.

If you have any questions, please feel free to contact your representative at our company.

Sincerely,

Nicholas Delkeskamp

Geschäftsführender Gesellschafter

Delkeskamp Verpackungswerke GmbH