

Declaration of Conformity according to PPWR (EU) 2025/40

Packaging and Packaging Waste Regulation

1. Product Identification

The packaging numbers/IDs covered by this declaration are listed under the following link. Please note that the documents are continuously updated in accordance with information received from our suppliers and evolving legal requirements:

<https://mitras-composites.com/Downloads>

The VDA packaging labels refer to this link. Using the packaging ID ("GEBINDE..."), all relevant information concerning the packaging used can be obtained from our website. The information is continuously maintained and updated, including updates received from our packaging suppliers.

(10) Bezeichnung Lieferung, Leistung / Description Euro-NS Gr.2, 900mm, RAL 7035, 900x1110x310mm 843207	
Zeichnungen: 	
(13) Datum / Date 15.07.2026	(14) Änderungsstand Konstruktion / Eng. Change
Chargen-Nr.	PPWR: GEBINDE218 

Example of VDA packaging label reference

2. Scope of Application

This declaration applies to transport packaging used for the shipment of our products. This may include:

- Corrugated cardboard packaging used as outer packaging, intermediate layers or cushioning material
- Films used for the protection of the outer packaging or the goods, for example as dust protection
- Wooden pallets used as load carriers

3. Declaration of Conformity

Mitras Composites Systems GmbH hereby declares under its sole responsibility that the above-mentioned packaging complies with the applicable requirements of Regulation (EU) 2025/40 on Packaging and Packaging Waste (Packaging and Packaging Waste Regulation - PPWR). The conformity assessment has been carried out based on the available technical documentation and the legal requirements applicable at the date of issue of this declaration.

4. Packaging Minimization

The packaging has been designed in accordance with the PPWR requirements regarding weight and volume and has been reduced to the minimum necessary to ensure its intended function. The design has been developed in close cooperation with our customers.

5. Design for Recycling / Recyclability (Art. 6 PPWR)

The packaging used has been developed and/or selected according to the principles of "Design for Recycling". The packaging materials are intended for high-quality material recovery according to their respective material types and can be processed within established recycling streams. The recyclability of individual packaging items depends on their specific material composition and on the requirements applicable under the Packaging and Packaging Waste Regulation (PPWR) at the relevant point in time.

Based on our current knowledge, the packaging referred to in this declaration complies with the requirements for recycling-oriented design in accordance with Article 6 PPWR.

6. Substance Restrictions - Substances of Concern (Art. 5(1) PPWR)

The packaging has been manufactured in accordance with applicable legal requirements to ensure that the presence and concentration of Substances of Concern (SoC), as defined in Article 3(1) PPWR in conjunction with Article 2(27) of ESPR (EU) 2024/1781, are minimized. The assessment is based on the following information:

- The ESPR definition of Substances of Concern, including hazard-category-based and, where relevant, recycling-related criteria
- Available substance and material information, considering the manufacturing process
- Information received from upstream supplier stages

For all raw materials, auxiliary materials and operating materials, including adhesives, coatings and printing inks, corresponding supplier declarations and compliance statements are available. Material selection is carried out considering potential migration risks within the entire packaging structure, based on customer-provided application information and compliance with applicable legal requirements.

The total concentration of heavy metals (lead, cadmium, mercury and hexavalent chromium) is below 100 ppm. This corresponds to Directive 94/62/EC as well as the continuing provisions of Article 5(4) PPWR. The requirements of Regulation (EC) No. 1907/2006 (REACH) concerning CMR and PBT substances are complied with; any traces, if present, are close to or below the analytical detection limit.

7. Minimum Recycled Content (Art. 7 PPWR)

The packaging used includes pallets, cardboard packaging and packaging films made from different materials. Depending on the material type and specific design, these packaging materials may contain recycled content. The actual recycled content is determined by the respective raw material and packaging suppliers and may vary due to production-related and batch-specific factors. Therefore, a general and binding statement regarding the recycled content for all packaging materials used cannot be provided.

Information regarding the recycled content of individual packaging items can be provided upon request, where available, based on information received from the relevant suppliers.

8. Reusability (Art. 11 and Art. 29 PPWR)

The packaging covered by this declaration is generally designed as single-use transport packaging and is therefore not part of a reuse system. Due to its intended use, material characteristics and logistical requirements, multiple use is generally not foreseen. The packaging is fully recyclable and complies with the requirements for Design for Recycling according to Article 6 PPWR. No obligation concerning reuse according to Article 29 PPWR applies to this packaging.

9. Labelling

The packaging is labelled, or can be labelled, in accordance with the applicable PPWR labelling requirements and relevant national regulations.

10. Test and Supporting Documentation

The conformity assessment is based on the following documentation:

- Supplier technical documentation
- Supplier declarations regarding hazardous substances
- Internal product specifications
- Customer-specific packaging specifications, for example packaging instructions

The technical documentation is maintained in accordance with PPWR requirements and will be made available to the competent authorities upon request.

11. Additional Information

The packaging is compatible with established collection, sorting and recycling systems for paper, cardboard and plastic films.

Radeburg, 06 August 2026

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