

EU Declaration of Conformity

Regulation (EU) 2025/40 · Packaging and Packaging Waste · Article 39 & Annex VIII



Blue-bordered cells are input fields. Complete every section before signing. Retain for 5 years (single-use) or 10 years (reusable) from the date of placing on the EU market.

01 Unique identification number

A unique code identifying this specific packaging type. Annex VIII, point 1.

Packaging ID	MXI-PPWR-DOC-TUBES-001
e.g. PKG-2026-001	
Packaging type	Tubes — round (RT) and square (ST) cardboard shipping tubes. Transport (tertiary) packaging used to ship product from the Großmehring facility to customers in the European Union.
Short plain-language description	

02 Manufacturer or EU Authorised Representative

Name and address of the manufacturer and, where applicable, the manufacturer's authorised representative. Annex VIII, point 2.

Company name	RotoMetrics Deutschland GmbH (Maxcess Germany — Operations)
Legal entity	
Registered address	Einsteinstraße 7 / Interpark, 85098 Großmehring, Germany
Street, city, country, postal code	
Contact	compliance@maxcessintl.com
Email and phone of the compliance contact	+1 (405) 755-1600
EU Authorised Representative	Not applicable — the declaring manufacturer is established in the European Union (Großmehring, Germany), so no EU authorised representative is required under PPWR Art. 16.
Required if the manufacturer is established outside the EU. Otherwise N/A	

03 Sole responsibility

Mandatory verbatim text per Annex VIII, point 3. Do not modify.

"This declaration of conformity is issued under the sole responsibility of the manufacturer."

04 Object of the declaration

Identification of the packaging allowing traceability: composition, format, components, intended use. Annex VIII, point 4.

Primary materials	Spiral-wound cardboard tube body (kraft paper/cardboard) — dominant material by mass; plastic components are the two moulded end caps per tube, a VCI corrosion-inhibiting bag on RT1–RT4 and ST1–ST4, bubblewrap cushioning on every profile, packing tape and an invoice-holder pouch. RT5 and ST5 use oil paper in place of the VCI bag. No wood and no metal. Not food-contact packaging.
e.g. Kraft paper 80 %, adhesive 20 %	
Format and shape	10 profiles. Round tubes: RT1 26×10 cm, RT2 51×10 cm, RT3 20×15 cm, RT4 61×15 cm, RT5 82×20 cm. Square tubes: ST1 10×10×30 cm, ST2 10×10×50 cm, ST3 15×15×30 cm, ST4 15×15×60 cm, ST5 20×20×80 cm. End-cap diameter/section is matched to the tube (10, 15 or 20).
e.g. corrugated single-wall rectangular box	
Components and layers	Cardboard tube body; 2 × plastic end caps per tube; VCI bag (small 30×45 cm or large 45×60 cm) or oil paper as inner wrap; bubblewrap cushioning; packing tape; plastic invoice-holder pouch (recycling code 4). No coatings or laminates on the tube body.
Coatings, inks, adhesives, attachments	
Intended use	Transport (tertiary) packaging, B2B, single-use one-way. Used to ship rolls, sleeves and long-form product to EU customer destinations. Not placed on the market as a consumer sales unit.
Primary / secondary / tertiary · B2B or B2C · product family	
Single-use or reusable	5 years from the date placed on the EU market (single-use)
Determines the 5-year or 10-year retention	
Drawing or photograph reference	Component weights, quantities and suppliers: see PTD sheet, Section 2. Source register: Maxcess PPWR Packaging Profile Register MXI-PPWR-REG-001 v1.0 (GRO site, as revised 04-08-2026 — bubblewrap added to all profiles). Technical drawings / photographs: <reference to be added>.
Filename or document ID held in the technical file	

4a Manufacturer's assessment statement

Narrative summary of the conformity assessment, supporting the article-by-article matrix in Section 5.

Conformity assessed under Annex VII, Module A (Internal Production Control); no notified body involved. Art. 5 — substances of concern: the tube bodies are cardboard and the remaining components are moulded plastic end caps, a VCI bag or oil paper inner wrap, packing tape and an invoice-holder pouch; supplier declarations confirming Pb+Cd+Hg+Cr(VI) ≤ 100 mg/kg have been requested for every component and will be held in the technical file. The packaging is not food-contact, so the PFAS limits applying from August 2026 do not apply. Art. 6 — recyclability: requirements apply from 2030; the packaging is predominantly a single material (corrugated paper/cardboard), mechanically separable, with no laminates or recycling-disrupting coatings. Art. 7 — recycled content: applies to plastic packaging from 2030; a 0% recycled-content default is assumed until supplier data is verified. Art. 10 — minimisation: profile sizes are specified to the minimum weight and volume needed for product protection and transport safety, with no unnecessary liners or void fill. Art. 11 — reuse: Single-use — Art
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profile does not specify the minimum weight and volume needed for product protection and transport safety; with no unnecessary repeat of volume (Art. 12 — labelling: applies from 12 August 2028 under an implementing act not yet adopted. Weights are derived component by component in kilograms (qty × unit weight) per PTD Section 2.

05 Conformity statement

For each Article, mark one of three states. Use Notes to record the reason — applicable scope, exemption, or what supporting data can be provided on request. Annex VIII, points 5 and 6.

Article	Subject	Applies & conforms	Not applicable	Available on request	Notes
Art. 5	Substance restrictions — heavy-metal sum ≤ 100 mg/kg (all packaging). PFAS limits from Aug 2026 apply only to food-contact packaging.			X	Applies. Heavy metals: combined Pb + Cd + Hg + Cr(VI) ≤ 100 mg/kg required for every component. Supplier declarations at that specific limit have been requested but are not yet on hand — register shows 'N/A' for all components. PFAS limits from Aug 2026 apply to food-contact packaging only; this packaging is not food-contact, so the PFAS limits do not apply. Evidence to be filed before signature.
Art. 6	Recyclable packaging — design-for-recycling grades, applies from 2030		X		Not yet in force — design-for-recycling requirements apply from 1 January 2030. Packaging is single-material by mass (corrugated paper/cardboard) and separable at end of life; assessment will be completed ahead of the 2030 date.
Art. 7	Minimum recycled content in plastic packaging — applies from 2030		X		Not yet in force — minimum recycled content in plastic packaging applies from 1 January 2030. 0% assumed — no verified recycled-content data from TURPLAST PRIMO for the tube bodies or end caps. Art. 7 applies to plastic packaging only, from 2030; the plastic fraction here is the end caps, VCI bag, tape and invoice holder.
Art. 8	Biobased feedstock in plastic packaging — applies once delegated acts are adopted		X		Not applicable — no bio-based plastic feedstock requirements are in force; delegated acts not yet adopted.
Art. 9	Compostable packaging — specific formats only (tea bags, coffee pods, fruit/veg stickers, very light carrier bags)		X		Not applicable — packaging is not one of the formats required to be compostable (tea bags, coffee pods, fruit/vegetable stickers, very light carrier bags).
Art. 10	Packaging minimisation — weight, volume, unnecessary layers	X			Applies and conforms. Packaging is specified to the minimum weight and volume needed for product protection, transport safety and handling. No double-walling, no unnecessary void fill and no non-functional features; the size range exists so that each shipment uses the smallest suitable profile. Bill of materials in the technical file.
Art. 11	Reusable packaging and reuse-system requirements		X		Single-use one-way transport packaging. No reuse system operated; Art. 11 not applicable.
Art. 12	Labelling of packaging — applies from August 2028, format set by implementing act		X		Not yet in force — packaging labelling requirements apply from 12 August 2028 and the format is set by an implementing act not yet adopted. Labelling will be implemented ahead of that date.

Other EU acts applied

List other Union acts the packaging conforms to (e.g. Reg. (EU) 10/2011). Otherwise N/A

N/A — no other Union legislation applies. The packaging is not food-contact, so Reg. (EU) 10/2011 does not apply.

06 Standards and technical specifications

References to harmonised standards, common specifications, or other technical specifications used in the conformity assessment. Annex VIII, point 6.

Harmonised standards	N/A — no harmonised standards or common specifications have been published under Regulation (EU) 2025/40 to date. EN 13427 / EN 13430 are available as legacy references but were not applied as the basis of this assessment.
e.g. EN 13430, EN 13427. Otherwise N/A	
Common or technical specifications	Internal assessment under Annex VII Module A: component-by-component bill of materials with weighed unit weights in kg, recorded in the Maxcess PPWR Packaging Profile Register MXI-PPWR-REG-001 v1.0 (GRO site, as revised 04-08-2026 — bubblewrap added to all profiles) and reproduced in PTD Section 2. Minimisation assessed against product-protection and transport-safety criteria.
Internal test methods or specs. Otherwise N/A	
Other technical basis	Supplier material data: TURPLAST PRIMO (cardboard tube bodies RT1–RT5 and ST1–ST5, and all round and square end caps), DALPO Sp. z o.o. sp.k. (packing tape), «supplier to confirm» (VCI bags, oil paper, invoice-holder pouches). Heavy-metal declarations requested from each; no third-party lab reports relied upon.
Supplier datasheets, lab test report IDs	

07 Notified body (where applicable)

Annex VIII point 7 begins "Where applicable." Conditional element — completed only when a notified body was involved.

Not applicable — Module A (Internal Production Control, Annex VII) used. No notified body involved.

08 Additional information

Exemptions, innovative-packaging features (Article 13), special conditions. Annex VIII, point 8.

Exemptions claimed	N/A — no exemption claimed. Note that the Art. 5 PFAS limits are not engaged because the packaging is not food-contact packaging; this is a scope point, not an exemption.
Article reference and grounds. Otherwise N/A	
Innovative-packaging features	N/A — no innovative-packaging features claimed under Art. 13.
Description and Article 13 derogation period. Otherwise N/A	
Other relevant information	Issued on the basis of the Maxcess PPWR Packaging Profile Register MXI-PPWR-REG-001 v1.0 (GRO site, as revised 04-08-2026 — bubblewrap added to all profiles). This declaration must not be signed until the blockers listed on the Overview sheet are closed — in particular the supplier heavy-metal declarations and confirmation of the EU destination data required for Section 3 of the PTD.
Free text. Otherwise N/A	

09 Signature

Place, date, name, role, and signature of the authorised signatory.

Place of issue	Großmehring, Germany
City, country	
Date of issue	8/10/2026
DD / MM / YYYY	
Authorised signatory	Andrew Dixon
Full legal name	
Role	Global Director QEH&S
e.g. Head of Regulatory Compliance	

Signature

Document reference MXI-PPWR-DOC-TUBES-001 · Version 1.0 (draft — unsigned)

Retain for 5 years (single-use) or 10 years (reusable) from the date of placing on the EU market. Must be made available to market surveillance authorities on request.