

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 <i>e.g. PKG-2026-001</i>	MXI-PPWR-DOC-WHQ-PLASTICCRATE-001
Packaging type <i>Short plain-language description</i>	Reusable plastic transport crates (blue crates) with nylon end pieces, paper accessories and tape, used for shipments from the Eureka facility to the EU.

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 <i>Legal entity</i>	Rotometrics
Registered address <i>Street, city, country, postal code</i>	RotoMetrics Main Office 800 Howerton Lane Eureka MO 63025
Contact <i>Email and phone of the compliance contact</i>	Compliance@maxcessintl.com +1 (405) 755 1600
EU Authorised Representative <i>Required if the manufacturer is established outside the EU. Otherwise N/A.</i>	To be appointed. Maxcess International is established outside the EU; an EU Authorised Representative must be appointed to sign on the manufacturer's behalf before this DoC is issued (PPWR Art. 16).

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 <i>e.g. Kraft paper 80 %, adhesive 20 %</i>	Primarily plastic (blue transport crates + nylon end pieces). Paper / cardboard accessories: breakaway cardboard squares, labels, packing slips, CoFC envelopes, rust paper. Tape closures. No wood or metal in the current profile set. Non-food-contact.
Format and shape <i>e.g. corrugated single-wall rectangular box</i>	Reusable blue plastic crates (small/medium/large/XL); nylon end pieces; breakaway cardboard squares; paper labels/slips/envelopes; rust-preventative paper wrap; machine tape closure.
Components and layers <i>Coatings, inks, adhesives, attachments</i>	Plastic (crate body, nylon end pieces); paperboard accessories (recyclable fibre); paper wrap; tape. Non-food-contact.
Intended use <i>Primary / secondary / tertiary · B2B or B2C · product family</i>	Secondary / tertiary transport packaging, B2B. Eureka facility → EU. REVIEW WITH MANAGEMENT: crates are returned/reused informally but with no trackable reuse system (Art. 11 status open).
Single-use or reusable <i>Determines the 5-year or 10-year retention</i>	Single-use, one-way packaging — retention 5 years from date of placing on the EU market (Annex VIII).
Drawing or photograph reference <i>Filename or document ID held in the technical file</i>	See 'PTD' sheet, Section 2, for the per-profile component inventory, weights (kg) and material split.

4a Manufacturer's assessment statement

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

The packaging described herein has been assessed in accordance with Annex VII (Module A — Internal Production Control) of Regulation (EU) 2025/40. The manufacturer declares that the packaging meets the applicable requirements of Articles 5 through 12 as follows: substance concentration limits under Article 5 are addressed via supplier heavy-metal declarations held in the technical file — declarations are ON FILE for the plastic crates, nylon end pieces, rust-prevention items, tape and metal bolt sets, and remain OUTSTANDING for the breakaway cardboard squares (Veritiv). PFAS Article 5 limits apply to food-contact packaging only and are not in scope for this non-food-contact family. Packaging weight and volume have been minimised under Article 10; recyclability grades under Article 6 and recycled-content minimums under Article 7 (plastic) phase in from 2030; labelling under Article 12 applies from 12 August 2028. Covers the Eureka PCSM/PCM/PCL/PCXL blue plastic crates; component weights (kg) are in the PTD sheet.

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			Pb+Cd+Hg+Cr(VI) ≤ 100 mg/kg. Supplier declarations PENDING for this family — see PTD Section 5.
Art. 6	Recyclable packaging — design-for-recycling grades, applies from 2030	X			Plastic crates + nylon + paperboard in scope. Grade C default; design-for-recycling grades apply from 2030.
Art. 7	Minimum recycled content in plastic packaging — applies from 2030	X			Recycled-content targets on plastic from 2030. Conservative 0% held pending supplier data.
Art. 8	Biobased feedstock in plastic packaging — applies once delegated acts are adopted		X		Biobased rules apply to plastic once delegated acts adopt — none in force now.
Art. 9	Compostable packaging — specific formats only (tea bags, coffee pods, fruit/veg stickers, very light carrier bags)		X		Compostable rules cover only specific formats (tea bags, pods, stickers). Not applicable.
Art. 10	Packaging minimisation — weight, volume, unnecessary layers	X			Minimised to necessary weight/volume/layers. Component BOM in PTD Section 2.
Art. 11	Reusable packaging and reuse-system requirements			X	Single-use, one-way packaging — not placed on the market as reusable. Art. 11 reuse-system requirements not applicable.
Art. 12	Labelling of packaging — applies from August 2028, format set by implementing act		X		Labelling applies from 12 Aug 2028; format pending implementing act.

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 act applies to this industrial, non-food-contact packaging.

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

e.g. EN 13430, EN 13427. Otherwise N/A

N/A — no harmonised standard cited as mandatory. EN 13430 noted for future Art. 6 assessment from 2030.

Common or technical specifications

Internal test methods or specs. Otherwise N/A

Internal component-level weight methodology — Eureka PPWR Packaging Profile register (MXI-PPWR-REG-001), weights in kg per component.

Other technical basis

Supplier datasheets, lab test report IDs

Supplier heavy-metal declarations are ON FILE.

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

Article reference and grounds. Otherwise N/A

N/A — no formal PPWR exemption claimed.

Innovative-packaging features

Description and Article 13 derogation period. Otherwise N/A

N/A — no innovative-packaging features claimed under Article 13.

Other relevant information

This DoC covers Eureka PCSM/PCM/PCL/PCXL blue plastic crates only. It cannot be legally issued until (a) an EU Authorised Representative is named (Mx 143) and the SUPPLYING SUPPLIER is named (Mx 144) and (b) the supplier is added to the PPWR Supplier Register (Mx 145).

Free text. Otherwise N/A

appointed (Art. 16); (b) the OUTSTANDING supplier heavy-metal declarations are collected (Veritiv); and (c) the reuse-system status of the crates (Art. 11) is confirmed with management.

09 Signature

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

Place of issue	800 Howerton Ln
City, country	Eureka, MO 63025
Date of issue	8/11/2026
DD / MM / YYYY	
Authorised signatory	Andrew Dixon
Full legal name	
Role	Global Director of QEH&S
e.g. Head of Regulatory Compliance	

Signature

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