

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-WHQ-ROUNDTUBE-001
e.g. PKG-2026-001	
Packaging type	Single-use round cardboard tubes (small/medium/large) used for shipments from the Eureka facility to the EU.
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
Legal entity	
Registered address	RotoMetrics Main Office 800 Howerton Lane Eureka MO 63025
Street, city, country, postal code	
Contact	Compliance@maxcessintl.com
Email and phone of the compliance contact	

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	Paper / cardboard round tubes (small 15x6x6, medium 19x6x6, large 31x7x7) with minor plastic (end caps / trace). Non-food-contact.
e.g. Kraft paper 80 %, adhesive 20 %	
Format and shape	Round cardboard tubes (small / medium / large); paper accessories; minor plastic. Single-use.
e.g. corrugated single-wall rectangular box	
Components and layers	Paper / cardboard (recyclable fibre); minor plastic; tape. Non-food-contact.
Coatings, inks, adhesives, attachments	
Intended use	Secondary / tertiary transport packaging, B2B. Eureka facility → EU. Single-use, one-way.
Primary / secondary / tertiary · B2B or B2C · product family	
Single-use or reusable	Single-use, one-way packaging — retention 5 years from date of placing on the EU market (Annex VIII).
Determines the 5-year or 10-year retention	
Drawing or photograph reference	See 'PTD' sheet, Section 2, for the per-profile component inventory, weights (kg) and material split.
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.

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 declarations held in the technical file (currently ON FILE for this family); packaging weight and volume have been minimised under Article 10; the packaging is fibre/wood-based with only trace plastic, so Article 7 recycled-content minimums (plastic) are not in scope; Article 6 design-for-recycling grades for the fibre fraction phase in from 2030; labelling under Article 12 applies from 12 August 2028. This packaging is single-use, one-way, and is not placed on the market as reusable, so Article 11 reuse-system requirements do not apply. Covers the Eureka CTS/CTM/CTL round cardboard tubes; component weights (kg) are in the PTD sheet.
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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
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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 ON FILE for this family — see PTD Section 5.
Art. 6	Recyclable packaging — design-for-recycling grades, applies from 2030	X			Fibre-based recyclability; trace plastic. Grade C default; design-for-recycling grades apply from 2030.
Art. 7	Minimum recycled content in plastic packaging — applies from 2030		X		Art. 7 recycled-content minimums apply to plastic packaging; this family is fibre/wood-based with only trace plastic — not in scope.
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	N/A — no other Union act applies to this industrial, non-food-contact packaging.
List other Union acts the packaging conforms to (e.g. Reg. (EU) 10/2011). Otherwise N/A	

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 standard cited as mandatory. EN 13430 noted for future Art. 6 assessment from 2030.
e.g. EN 13430, EN 13427. Otherwise N/A	
Common or technical specifications	Internal component-level weight methodology — Eureka PPWR Packaging Profile register (MXI-PPWR-REG-001), weights in kg per component.
Internal test methods or specs. Otherwise N/A	
Other technical basis	Supplier PPWR/EPR declarations for this family are on file. Packaging suppliers vary by component and have not been mapped to specific profiles.
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 formal PPWR exemption claimed.
Article reference and grounds. Otherwise N/A	
Innovative-packaging features	N/A — no innovative-packaging features claimed under Article 13.
Description and Article 13 derogation period. Otherwise N/A	
Other relevant information	This DoC covers Eureka CTS/CTM/CTL round cardboard tubes only (single-use). It cannot be legally issued until (a) an EU Authorised Representative is appointed (Art. 16) and (b) supplier substance declarations are collected.
Free text. Otherwise N/A	

09 Signature

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

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

Signature

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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.