

EU DECLARATION OF CONFORMITY

for packaging specified by VITO and/or completed at VITO

pursuant to Article 39 in conjunction with Annex VIII of Regulation (EU) 2025/40 on packaging and packaging waste (PPWR)

Declaration number	VITO-PPWR-2026-001	Version	1.0
Technical documentation	VITO-PPWR-KV-01 / PV-01 / PV-02 / FV-01	Date	09.09.2026

1. No. / unique identification of the packaging

This document consolidates the EU declarations of conformity for the packaging types individually identified below. The specific item or variant is additionally identified by the respective approved technical documentation, internal item/packaging codes and, where available, supplier item numbers.

Identification	Packaging type	Description / traceability	Status / use
VITO-PPWR-KV-01	Carton shipping	Shipping/product carton individually specified according to VITO requirements; optionally with cardboard discs/interlayers, closure/adhesive tape and label.	Single-use
VITO-PPWR-PV-01	Pallet shipment – stretch film	Transport packaging consisting of packages on a pallet, where applicable with edge protection, strapping, stretch film and label. The stretch film is used to secure the load/pallet.	Single-use packaging system; pallet may be reusable
VITO-PPWR-PV-02	Product packaging – shrink film	Optional product-proximate shrink packaging. The shrink film encloses the actual product or a defined product unit. The shrink-wrapped product is subsequently packed in a shipping/product carton. The shrink film is not used to secure the pallet or load.	Only for selected products
VITO-PPWR-FV-01	LDPE bag / PE protective packaging	Flexible protective/product wrapping made of LDPE or PE in accordance with the approved technical specification and documented variant approval.	Single-use

1.1 Individual packaging materials / components used

In addition to the packaging types identified above, the individual packaging materials and components actually used are listed below. This list further specifies Section 1; the subject of the conformity assessment remains the respective assigned packaging types and the item and variant versions approved in the technical documentation.

Individual packaging material / component	Material / description	Assignment	Typical use / note
Shipping/product cartons	Corrugated board / solid board in accordance with the approved specification	KV-01	Single-use; shipping or product packaging
Cardboard discs / interlayers	Paper / cardboard or approved inserts in accordance with the specification	KV-01	Optional protection, separation or securing inside the carton
Hand/machine stretch film	Plastic film in accordance with the approved specification	PV-01	Load/pallet securing
Shrink film	Plastic film in accordance with the approved specification	PV-02	Product-proximate wrapping; not for pallet or load securing
Strapping	Plastic strapping in accordance with the approved specification	PV-01	Bundling or load securing
Edge protection	Solid board / cardboard or material in accordance with the approved specification	PV-01	Protection of edges and stabilisation of the load
Closure/adhesive tape	Paper or plastic carrier with adhesive in accordance with the specification	KV-01	Closing or securing the carton
Labels	Paper / plastic and adhesive in accordance with the approved specification	KV-01 / PV-01	Labelling, where used in the respective packaging system
Film bags / PE protective packaging	LDPE / PE in accordance with the approved technical specification	FV-01	Flexible protective or product wrapping; single-use

Individual packaging material / component	Material / description	Assignment	Typical use / note
Pallets	Wood; where applicable, further components in accordance with the approved specification	PV-01	Carrier of the transport packaging system; single-use or reusable

2. Name and address of the manufacturer

VITO Irmen GmbH & Co. KG
Mittelstraße 74–80
53424 Remagen
Germany

3. Responsibility

VITO Irmen GmbH & Co. KG, as the manufacturer of the packaging types specified by it and/or completed in its own shipping process, bears sole responsibility for issuing this declaration of conformity.

For customer-specific cartons, VITO specifies in particular the dimensions and design. The physical producers of the empty packaging materials act as suppliers and provide the information and evidence required for the technical documentation.

4. Object of the declaration

The declaration covers exclusively the packaging types identified in Section 1 and only those specific item/variant versions documented as reviewed and approved in the respective assigned technical documentation. Traceability is ensured by internal VITO item/packaging codes, supplier specifications, batch/lot information and/or accompanying documents.

5. Compliance with the applicable Union legislation

The packaging described in Section 4 and technically approved complies with the requirements of Regulation (EU) 2025/40 (PPWR) applicable at the time it is placed on the market, in particular the requirements laid down in or pursuant to Articles 5 to 12, insofar as they apply to the respective packaging type and at the relevant date of application.

Art. 5 – Substances	Art. 5(1) – Substances of concern: The assessment is carried out taking into account the applicable chemicals legislation, in particular REACH Regulation (EC) No 1907/2006 and other applicable substance-related requirements. It is based on the available material information, supplier declarations and other evidence. Art. 5(4) – Heavy metals: Based on the available supplier declarations, material specifications and other evidence, the sum of the concentrations of lead, cadmium, mercury and hexavalent chromium in the approved packaging and packaging components is below 100 mg/kg. Art. 5(5) – PFAS: The requirements concern food-contact packaging. The VITO packaging and packaging components covered by this declaration are not intended for food contact. The requirements of Article 5(5) are therefore not applicable to the packaging and packaging components declared here.
Art. 6 – Recyclability	Recyclability is assessed in accordance with the applicable legal requirements and documented in the technical documentation; subsequent design-for-recycling/performance grades will be added when they become applicable.
Art. 7 – Recycled content	For plastic packaging, future applicable minimum recycled-content percentages and verification methods will be added in due time; as of 12.08.2026, no quotas that are not yet applicable are anticipated.
Art. 9 – Compostability	The packaging types covered are not declared as compostable; Article 9 is therefore not applicable in this respect.
Art. 10 – Minimisation	Dimensions and material use are determined by protection, handling and logistics requirements; the formalised minimisation assessment will be documented from its statutory date of application.
Art. 11 – Reuse	Reusable standard components (e.g. reusable pallets) are covered by the respective reuse system and available third-party documentation; they are not automatically a separate object of this VITO declaration.

Art. 12 – Labelling

Labelling will be implemented in accordance with the statutory application deadlines and implementing acts; identification and accompanying information are documented in the technical documentation.

6. Harmonised standards, common specifications and other technical specifications

At present, no separate harmonised standards or common specifications under Articles 36/37 PPWR are cited as the sole basis for conformity. The assessment is carried out in accordance with Module A on the basis of the PPWR and the approved technical documentation.

Where applicable, the following are used: VITO dimensional/design specifications, supplier specifications, data sheets, FEFCO design information, test reports, supplier declarations and available third-party declarations of conformity.

7. Notified body

Not applicable. The conformity assessment is carried out pursuant to Article 38 PPWR in conjunction with Annex VII in accordance with Module A (internal production control). No notified body has been involved in this conformity assessment.

8. Additional information

The technical documentation contains the description/intended purpose, materials and components, relevant specifications, the risk assessment of non-conformity, as well as test and supplier evidence. Changes relevant to conformity trigger a review and, where necessary, a reassessment.

The declaration and technical documentation are retained for five years (single-use) or ten years (reusable) from the date of placing on the market and are made available to the authorities upon request.

Signed for and on behalf of:

VITO Irmén GmbH & Co. KG
Remagen, 09 September 2026

This document was created electronically and is
valid without signature.