Declaration of Conformity

In accordance with Regulation 2025/40 Packaging and Packaging Waste Regulation

Source reduction – Heavy metals – Minimization of hazardous substances – Recycling

The PPWR covers the entire packaging life cycle and aims to reduce environmental impact, promote circularity, and improve recyclability and material efficiency.

1. Supplier:

Transoplast BV
Ulenpasweg 2
7041 GB 's-Heerenberg
The Netherlands

Transoplast BV
Diepenbekerweg 30
3500 Hasselt
Belgium

Transoplast GmbH
Groendahlscher Weg 87
46446 Emmerich
Germany

2. Product specification:





Product name	Rotatable pin AD16xH66
Article number	53.VG.ZA120446
Material	Comp 13/14
External dimensions	24 × 24 × 66 mm
Weight	0,02 kg

3. Declaration of Conformity PPWR

We hereby declare that this plastic product intended for packaging & logistics that is delivered by Transoplast complies with the Packaging and Packaging Waste Regulation 2025/40 – in short PPWR.

4. Material

The product is manufactured from Comp 13/14.

This material is recyclable and can be collected, processed and reintroduced into the material cycle as a secondary raw material for the production of new plastic products.

The actual recyclability of the product depends on the availability of suitable collection, sorting and recycling systems, as well as on the condition and possible contamination of the product at the end of its useful life.

5. Reuse

The plastic product, manufactured from Comp 13/14, has been specifically designed and manufactured for repeated use. At the end of its useful service life, the product can be collected and recycled for use as a raw material in the production of new plastic products.

The product:

1. Has been conceived, designed and placed on the market with the objective of being reused multiple times;
2. Has been designed to complete the highest practicable number of rotations under normal and reasonably foreseeable conditions of use;
3. Complies with the applicable requirements relating to consumer health, safety and hygiene;
4. Can be emptied or unloaded without sustaining damage that would prevent its continued use or reuse;
5. Can be cleaned, inspected, repaired or otherwise reconditioned, where necessary, while retaining its ability to perform its intended function;
6. Complies with the applicable requirements for recyclable packaging, enabling the material to be recycled once the product becomes waste.

The actual number of reuse cycles depends on the application, the load, handling conditions, cleaning methods, storage conditions and the manner in which the product is used and maintained.

6. Source Reduction - Minimization of Hazardous substances

The presence of hazardous substances in the plastic materials and packaging components supplied by Transoplast is minimised in accordance with EN 13428, particularly with regard to emissions, ash and leachate resulting from incineration, landfill or other waste treatment processes.

Where Transoplast is responsible for the product design, source reduction is taken into account. Where the product specification is provided by the customer, responsibility for source reduction remains with the customer.

7. Recovery

7.1 *Recovery*: Material

The product is designed and manufactured with due consideration for recyclability. At the end of its useful life, it can be recovered through material recycling in accordance with EN 13430, subject to appropriate collection, sorting and recycling facilities.

7.2 *Recovery*: Energy

Where material recycling is not feasible, the Comp 13/14 material may be suitable for energy recovery through controlled incineration in accordance with EN 13431.

7.3 *Recovery*: Biobased Material Usage & Biodegradability

The product does not contain biobased material and is not designed for composting or biodegradation in accordance with EN 13432. Requirements specifically applicable to compostable or biodegradable packaging are therefore not applicable.

8. Compliance with material requirements

Heavy metals (<100 ppm)	Compliant
REACH (EU 2024/2462)	Compliant
PFAS *	* not added intentionally

* To the best of our knowledge and based on information provided by our material suppliers, no per- and polyfluoroalkyl substances (PFAS) are intentionally added to the materials used in this product.

9. Minimizing the amount of packaging

The packaging has been designed and manufactured so that its weight and volume are limited to the minimum necessary to ensure adequate functionality.

During product development, due consideration is given to stability, safety and hygiene requirements for transport, logistics and storage applications.

Double walls, ribs and other reinforcing features are included only where necessary to improve the strength, durability and performance of the product. They are not intended to make the product appear unnecessarily larger or heavier, nor to cause avoidable consumption of raw materials.

10. Labelling and Product Identification

The packaging complies with the labelling and identification requirements applicable at the time it is placed on the market, in accordance with Article 12 of the PPWR and any related implementing and delegated acts.

11. Documentation

Relevant supporting documentation is retained and can be provided to the competent authorities upon request. There is no legal obligation to share documents such as test or migration reports with customers. To protect our confidential know-how, processes and sources, these documents are generally not disclosed.

Issue date: 18-11-2026
Valid until: 18-11-2028

Signatory - Names & positions:
Wilhelmus Menting & Alexander Menting
Owners / Management Team

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