

Forum Rezyklat

Conformity Assessment Template

Technical Documentation for the Declaration of
Conformity under PPWR

Version 2.0
01.07.2026

Introduction

Context

The European Union's Packaging and Packaging Waste Regulation (PPWR) entered into force in February 2025 and will be legally binding from August 2026. It marks a significant step toward a circular economy by setting ambitious goals for reducing packaging waste, enhancing recyclability, and increasing transparency across the supply chain. A key requirement is the Declaration of Conformity, which mandates detailed, standardized information about packaging - data that is currently not collected or exchanged in a standardized manner. To support stakeholders in meeting these complex obligations, Forum Rezyklat has developed this template. It was created through collaboration among a wide range of companies at the national level (e.g. packaging suppliers, producers, licensing partners, solution providers, brand owners, retailers, etc.) and will be further developed at the European level in the next steps. The current template, including all tabs, focuses on Article 5 and Article 11 of the PPWR, as both will enter into force in August 2026. In GDSN – the Global Data Synchronization Network for manufacturers and retailers – the Declaration of Conformity can already be uploaded and shared with retailers or data recipients using existing attributes.

Aim of the Template

The template serves as a foundation for the technical documentation required to create a Declaration of Conformity. It provides a clear structure for summarizing the necessary data and helps prevent misinterpretations caused by inconsistent definitions and understandings. By consolidating information about individual packaging components into a single document, the template simplifies the process of preparing the Declaration of Conformity.

At the same time, the template functions as a guidance document that supports companies internally in collecting and organizing all necessary data for the technical documentation. In combination with the Supplier Declaration template (as an integral part of the technical documentation), this guidance template ensures that all relevant aspects are considered and helps companies prepare comprehensive and consistent technical documentation.

Use of the Template

The template is intended for use by any party responsible for declaring packaging compliance, including manufacturers, distributors, and importers. It covers key packaging categories, such as paper, plastic, metal, and glass. Besides, it is suitable for cross-sector applications, including industries such as pharmaceuticals, food, and cosmetics.

Points to Consider

In the "Guidance Document" tab, the packaging type can be selected in row 7: Sales Packaging (Article 3(5) PPWR), Grouped Packaging (Article 3(6) PPWR), Transport Packaging (Article 3(7) PPWR), or E-commerce Packaging (Article 3(8) PPWR).

Please note that the question on food contact (row 19) applies not only to sales packaging, but also to grouped and transport packaging, provided they come into direct contact with food.

PPWR and Minimum Standard ZSVR

The recyclability and separability information contained in this document has been established in accordance with Regulation (EU) 2025/40 (PPWR) and the applicable ZSVR Minimum Standard for Determining the Recyclability of Packaging. Component assessments are based on current sorting and recycling practices and consider the influence of individual packaging components on the recyclability of the overall packaging system.

FR Data Matrix

This document is based on the specifications and structures of the data matrix and aligns with the attributes and specified descriptions (code lists) defined therein.

[Data Matrix FR](#)

Log of changes

Version	Date of changes	Changes conducted by	Summary of changes
1.0	10. July 2025	Forum Rezyklat	First publication
2.0	1. July 2026	Forum Rezyklat	Second Publication

Guidance Document for the Technical Documentation

Input fields



i This document may be used as guidance for the preparation of the technical documentation. It should not be considered complete, as the scope and level of detail may vary depending on the company and the specific packaging.							
No.... (unique identification of the packaging)	4-066447-342055						
Name and address of the manufacturer and, where applicable, the manufacturer's authorised representative	dm-drogerie markt Am dm-Platz 1 DE-76227 Karlsruhe						
An analysis and assessment of non-conformity risks in accordance with Annex VII, point 2 of the PPWR has been completed (1)	Yes						
description of the packaging	sales packaging	tube	Beauty/Personal Care/Hygiene	Hair Products			
The following harmonised standards, common specification standards and other relevant technical specifications have been applied.	REACH Verordnung						
Designation of the component	Main Component	Component 2	Component 3	Component 4	Component 5	Component 6	Component 7
	tube						
internal component no.	1234						

Art. 5: Requirements for substances in packaging Without prejudice to the restrictions on chemicals set out in Annex XVII to Regulation (EC) No 1907/2006 or, where applicable, to the restrictions and specific measures on food-contact materials and articles in Regulation (EC) No 1935/2004, the sum of the concentrations of lead, cadmium, mercury and hexavalent chromium resulting from substances present in packaging or packaging components shall not exceed 100 mg/kg.	The sum of the concentrations of lead, cadmium, mercury and hexavalent chromium resulting from substances present in packaging or packaging components shall not exceed 100 mg/kg.
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Is the packaging component compliant with the limit value of 100 mg/kg of contain lead, cadmium, mercury or hexavalent chromium?	Yes						
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Proof in technical documentation!							
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⚠ Information: A report on the effects of the substances of concern on humans and the environment will be prepared by the end of 2026							
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From ... [18 months from the date of entry into force of this Regulation], foodcontact packaging shall not be placed on the market if it contains per- and polyfluorinated alkyl substances (PFAS) in a concentration equal to or above the following limit values to the extent that the placing on the market of packaging containing such a concentration of PFAS is not prohibited pursuant to another Union legal act	*PFAS' means any substance that contains at least one fully fluorinated methyl (CF₃-) or methylene (-CF₂-) carbon atom (without any H/Cl/Br/I attached to it), except substances that only contain the following structural elements: CF₃-X or XCF₂-X', where X = -OR or -NRR' and X' = methyl (-CH₃), methylene (-CH₂-), an aromatic group, a carbonyl group (-C(O)-), -OR'', -SR'' or -NR''R'''; and where R/R'/R''/R''' is a hydrogen (-H), methyl (-CH₃), methylene (-CH₂-), an aromatic group or a carbonyl group (-C(O)-).						
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Does the packaging or any packaging component in consideration get in contact with food? (2)	No						
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Is PFAS intentionally used in the production of the packaging due to technical or functional reasons? (3)							
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Is PFAS intentionally used in the production process (Filling the packaging with the finished product) due to technical or functional reasons? (4)							
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i The required information (see row 19-21) should be obtainable from supplier declarations.							
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Total Flourine (TF) below 50 ppm (compliant), answer with "yes"; and continue row 25 If it is above 50 ppm (non compliant); go to row 24.							
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Is the organic fluorine below 50 ppm answer with "yes" (compliant); go to row 25.							
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i This limit value is defined in accordance with Article 5 (5) (c) of the PPWR. if answered "yes" further analysis is recommended to check compliance with the 25ppb and 205ppb concentration limit (e.g. sampling, laboratory testing, test reports).							
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Is the individual PFAS level (excluding polymeric PFAS) below 25 ppb and the sum of all PFAS (excluding polymeric PFAS) below 250 ppb?							
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i This limit value is defined in accordance with Article 5 (5) (a) and (b) of the PPWR.							
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i Apart from Article 5(4) and (5), all other requirements of Article 5 must also be complied with.							
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Proof in technical documentation!							
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Art. 11: Reusable Packaging 1. Packaging placed on the market from 11 February 2025 shall be considered to be reusable where it fulfils all of the following requirements: [...]							
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Has the packaging been expressly designed and developed with the aim of being reused several times?	No						
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Have the requirements in Article 11 for reusable packaging been met?							
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i Please note that Article 11 is not yet final; a delegated act is expected in February 2027.							
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Proof in technical documentation!							
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(1) The assessment of non-conformity risk can be carried out using the supplier declaration (second page) template.

(2) It is not conclusively clarified whether Article 5 requirements must be assessed at component level. The practical approach is left to the discretion of each company.

* Note: This question applies not only to sales packaging, but also to grouped and transport packaging if they are in contact with food.

(3) The handling of this requirement depends on the respective company's internal PFAS compliance management and can differ accordingly.

(4) The handling of this requirement depends on the respective company's internal PFAS compliance management and can differ accordingly.

Supplier Declaration

Input fields



Document	TD No.	Short text	
	0000-4		

Supplier:

Packaging material is provided by the contract manufacturer:	dm-drogerie markt Am dm-Platz 1 DE-76227 Karlsruhe
with preliminary products from:	please fill in name and address

We hereby declare that the following Packagings are in conformity to the (EU) 2025/40.

Unique Packaging Identifier:

GTIN / article number if applicable	Product name	Primary packaging food	Reusable packaging
4-066447-342055	Balea Professional Aqua Hyaluron	No	No

Quality assurance:

According to the Defect Evaluation List of the pharmaceutical industry (Editio Cantor).

Article 5: Concentration of prohibited substances

For all packaging materials used, compliance with the limit values of 100mg/kg in sum of cadmium, hexavalent chrome, lead and mercury is ensured. The process is validated, and the introduction of contaminants is excluded.

For food contact material the limit values of PFAS is ensured according to following limitations:

a) 25 ppb for any PFAS as measured with targeted PFAS analysis (polymeric PFAS excluded from quantification);

b) 250 ppb for the sum of PFAS measured as the sum of targeted PFAS analysis, where applicable with prior degradation of precursors (polymeric PFAS excluded from quantification); and

c) 50 ppm for PFASs (including polymeric PFAS); if total fluorine exceeds 50 mg/kg the manufacturer, importer or downstream user as defined respectively in Article 3, points (9), (11) and (13) of Regulation (EC) No 1907/2006 shall, upon request, provide to the manufacturer or the importer as defined respectively in Article 3(1), points (13) and (17), of this Regulation proof of the quantity of fluorine measured as content of either PFAS or non- PFAS in order for them to draw up the technical documentation as referred to in Annex VII to this Regulation.

Article 11: Reusable Packaging

All packaging marked as reusable packaging are in accordance to Article 11 PPWR.

Analysis and assessment of the risk of non-conformity:

Category	Description of Non-Conformity	Risk Level	Action Required
Critical	PFAS or heavy metals above limits.	Extreme	Immediate stop-ship; recall; notification to authorities.
Major	Major typos relevant for conformity (e.g. recyclability); missing version control for changed materials; Missing DoC. (?)	High	Quarantine stock; update documentation within 10 days (the "10-day rule").
Minor	Minor typos and formatting errors; outdated references to withdrawn standards that don't affect safety.	Low	Correct at next revision; document as a "continuous improvement" item.

Created and released by Packaging Management

- hereby declared conformity with regulation (EU) 2025/40

Signature:		
Date:		

Change history:

Date	DOC 0000-00	New creation
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	Example	7. Where applicable, the notified body ... (name, address, number) ... performed ... (description of intervention) ... and issued the certificate(s): ... (details, including the date of the certificate(s), and, where appropriate, information on the duration and conditions of validity).	Required from	Additional acts / expected next steps
EU DECLARATION CONFIRMITY NR.*...	XXXX2285		2026	
1. No.... (unique identification of the packaging)	0000-0000-123-000		2026	
2. Name and address of the manufacturer and, where applicable, the manufacturer's authorised representative	XXX		2026	
3. This declaration of conformity is issued under the sole responsibility of the manufacturer.				
4. Object of the declaration (identification of the packaging allowing traceability) description of the packaging:	kind of packaging, type of packaging, intentional use, GPCs		2026	
5. The object of the declaration referred to point 4 is in conformity with the relevant Union harmonisation legislation: ... (reference to the other Union acts applied)	Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste.		2026	auf welcher Ebene: auf der für die die DoC ausgegeben wird
6. References to the relevant harmonised standards or the common specifications used or references to the other technical specifications in relation to which conformity is declared:				Minimalliste (Anforderungen) harmonised standards (zB D4R Kriterien, und andere Normen) die gelistet werden wenn es keine harmonised standards gibt > keine anführen
Art. 5: Requirements for substances in packaging	e.g. EN 13428:2004		2026	report on the presence of substances of concern in packaging
Art. 11: Reusable Packaging	EN13429		2025*	delegated acts in 2027
8. Additional information:				
Signed for and on behalf of:				
(place and date of issue):				
(name, function) (signature):				

* No minimum quantity of reusable packaging and no obligation to offer sustainable packaging in this Article, but harmonised definition for reusable packaging

Basis: Annex VIII, conformity declaration FR

EN

OJ L, 22.1.2025

ANNEX VIII

EU declaration of conformity No (*) ...

1. No ... (unique identification of the packaging):

2. Name and address of the manufacturer and, where applicable, the manufacturer's authorised representative:

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

4. Object of the declaration (identification of the packaging allowing traceability): description of the packaging:

5. The object of the declaration referred to point 4 is in conformity with the relevant Union harmonisation legislation: ... (reference to the other Union acts applied).

6. References to the relevant harmonised standards or the common specifications used or references to the other technical specifications in relation to which conformity is declared.

7. Where applicable, the notified body ... (name, address, number) ... performed ... (description of intervention) ... and issued the certificate(s): ... (details, including the date of the certificate(s), and, where appropriate, information on the duration and conditions of validity).

8. Additional information:

Signed for and on behalf of:

(place and date of issue):

(name, function) (signature):

EU DECLARATION OF CONFORMITY

NO (UNIQUE NO)

1. 00000000 - 000 - 00000000000000 - Brand - 20250225.

2. Name and address of the manufacturer and, where applicable, the manufacturer's authorised representative:

Company

Address

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

4. Object of the declaration (identification of the packaging allowing traceability): description of the packaging.

GTIN Sales Packaging (IT)	Product description	GTIN Sales Packaging (IT) Complex	GTIN Group Packaging (SW)	GTIN Group Packaging (CS)	GTIN Transport Packaging (PL)	Date

5. The object of the declaration referred to point 4 is in conformity with the relevant Union harmonisation legislation: Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste.

6. References to the relevant harmonised standards or the common specifications used or references to the other technical specifications in relation to which conformity is declared: EN13428; EN13429; EN13430; EN13431.

Responsible Person

Position

Location, Date