

EU Declaration of Conformity (PPWR – Annex VIII)

FT-01 – NON-LAMINATED POLYPROPYLENE FABRIC FIBC, consisting of flexible intermediate bulk containers (FIBCs or big bags) with a main body made of polypropylene fabric without a continuous lamination or coating layer.

1. Manufacturer Information (Article 3, paragraph 13)

Company name: Az tech srl

Registered office (address): Nucleo Tagliata 43 Racconigi CN, Italy

Administrative office (address): Nucleo Tagliata 43 Racconigi CN, Italy

E-mail: info@aztech.it

2. This declaration is issued under the sole responsibility of the packaging Manufacturer.

3. Description of the packaging

Packaging identification

Unique packaging identification number: AZT 01/2026

Type of packaging pursuant to Article 3:

- ☒ Primary (Paragraph 1, point 5)
☐ Secondary (Paragraph 1, point 6)
☐ Tertiary (Paragraph 1, point 7)
☐ Packaging component (Paragraph 1, letter a)

Indicate the packaging category No. pursuant to Annex II, Table 1: 9

Predominant packaging material (e.g., paper, plastic, wood, etc.): polypropylene

Format (illustrative and non-exhaustive) pursuant to Annex II, Table 1: big bags (FIBCs)

Article 5 – Requirements for substances contained in packaging*

The packaging is designed and manufactured in accordance with Article 5 of Regulation (EU) 2025/40 (PPWR), minimizing the presence of substances of concern. Based on the information available in the supply chain, no substances subject to the restrictions of Article 5 have been identified in concentrations exceeding the applicable limit value (100 mg/kg).

Does the packaging component contain hazardous substances, including lead, cadmium, mercury, hexavalent chromium, or other substances of concern (including PFAS)?

No ☒

Yes ☐

If the answer is "Yes", provide details on the substances of concern present in the packaging and specify their concentration in the following table, expressed in mg/kg.

Name of the substance	Concentration (mg/kg)*

**The total concentration of lead, cadmium, mercury, and hexavalent chromium must be less than 100 mg/kg; PFAS limits do not apply since the packaging is not Food Contact Packaging.*

Based on the available declarations and evidence, no substances included in the REACH Candidate List are declared in concentrations higher than 0.1% by weight in the article. This wording does not equate to a declaration of absolute absence of SVHCs and must be reviewed in the event of an update to the Candidate List, changes to the formulation, or a change of supplier.

For lead, cadmium, mercury, and hexavalent chromium, the applicable cumulative limit is 100 mg/kg. For PFAS and fluorinated substances, the conclusions are formulated exclusively within the scope of validity of the reports and declarations available for individual suppliers, components, and samples.

Within the currently documented scope, no exceedances of the Article 5 limits emerge in the tested samples.

AZ tech S.r.l.

Nucleo Tagliata, 43 - 12035 RACCONIGI (CN) Telefono +39 0172 813224 Fax +39 0172 813886

Capitale Sociale € 100.000 i.v. – Partita IVA 03648340044

www.aztech.it - info@aztech.it aztech@pec.it

Article 6 – Recyclability*

Is the packaging recyclable? (*"recyclability": the compatibility of packaging with waste management and treatment by design, based on separate collection, sorting into separate streams, recycling at scale, and the use of recycled materials to replace primary raw materials. Art. 3, point 38*)

Yes ☐No ☒

The macro-family consists predominantly of polypropylene structures. In some configurations, polyethylene components may be present, such as liners, document pouches, or labels.

Pending the full application of the PPWR criteria and methodologies, the RecyClass Online Tool and the Design for Recycling Guidelines for flexible PP packaging are used as technical self-assessment tools. The outcomes constitute internal evidence and do not represent a certification nor, individually, definitive proof of conformity or a commercial claim of recyclability.

Recyclability must be reviewed in the event of changes to the structure, color or pigment, additives, liner, labels, document pouch, inks, overall weight, or other accessory components.

Article 7 – Minimum recycled content in plastic packaging

All plastic parts of packaging placed on the market contain the minimum percentage of recycled material recovered from post-consumer plastic waste (mandatory from **January 1, 2030**).

Does the plastic packaging contain the minimum percentage of recycled plastic material, or is it planned to include it in future product revisions or developments?

Yes ☐No ☒

If yes, attach appropriate supporting documentation. (**Es. UNI EN 15343, Second Life Plastic (PSV), Recycled Plastics Traceability**)

The macro-family does not currently involve the use of post-consumer recycled (PCR) material. Any future introduction of PCR will require a new assessment of traceability, regulatory compliance, contaminants, migration, NIAS, and performance characteristics.

Article 8 – Bio-based feedstocks in plastic packaging

By **February 12, 2028**, the European Commission will assess the introduction of targets and requirements for bio-based content in plastic packaging.

Does the plastic packaging contain a percentage of bio-based material, or is it planned to include it in future product revisions or developments?

Yes ☐No ☒

No compostable polymers, biodegradable plastics, certified bio-based raw materials, or components intended for industrial or home composting are declared. Therefore, no claims of biodegradability, compostability, or bio-based content are made.

Article 9 – Compostable packaging

By **February 12, 2028**, the manufacturer must ensure compliance with the applicable compostability requirements according to the following article.

Is the packaging currently compostable, or is compliance with these requirements planned for future product revisions or developments?

Yes ☐No ☒

If yes, attach appropriate supporting documentation (**UNI EN 13432 certification**)

No compostable polymers, biodegradable plastics, certified bio-based raw materials, or components intended for industrial or home composting are declared. Therefore, no claims of biodegradability, compostability, or bio-based content are made.

Article 10 – Packaging minimization

By January 1, 2030, the manufacturer or importer must ensure that packaging placed on the market is designed in such a way that its weight and volume are reduced to the minimum necessary to ensure its functionality, taking into account the shape and material of which it is made.

Has the packaging been designed to minimize weight and volume while ensuring functionality?

Yes ☒

No ☐

FIBCs are designed with a mass, fabric weight, and construction configuration compatible with the required function, taking into account the nominal capacity, safe working load (SWL), safety factor, fabric strength, seams, and lifting loops, filling methods, lifting, handling, storage, and discharging methods, as well as any baffle (form-stable), antistatic, or dangerous goods transport functions.

Reducing the amount of material cannot compromise the safety, integrity, containment, rated capacity, stability, and performance of the packaging throughout its intended lifecycle.

Article 11 – Reusability (where applicable)*

The packaging is reusable if it meets the requirements established in this article.

Is the packaging reusable, or is compliance with the requirements planned for future product revisions or developments?

Yes ☐

No ☒

The items in the macro-family are designed and marketed as single-use packaging and are not included in an organized reuse system. No provision is made for procedures regarding return, post-use sorting, washing, sanitization, integrity checking, repair, rotation management, or recording the number of cycles.

The material possibility of refilling an FIBC is not considered sufficient to qualify it as reusable packaging pursuant to Article 11. Actual use must be verified against Article 25 and Annex V of Regulation (EU) 2025/40.

Article 12 – Packaging labeling*

By August 12, 2028, the packaging must bear the harmonized labeling information required by Article 12 of the PPWR, including the indication of material composition to facilitate proper collection and sorting. **As of today's date, the packaging must fulfill mandatory environmental labeling obligations (specific to each European state; in Italy, Article 219, paragraph 5 of Legislative Decree 152/2006 and subsequent amendments).**

Is this information already present on the label, or is its implementation planned for future product revisions or developments?

Yes ☒

No ☐

4. The object of the declaration described in point 3 is in conformity with the relevant Union harmonization legislation (reference to the other Union acts applied).

5. References to the relevant harmonized standards or common specifications used or references to the other technical specifications in relation to which conformity is declared:

- Regulation (EU) 2025/40 on packaging and packaging waste;
- Annex VII of Regulation (EU) 2025/40;
- Annex VIII of Regulation (EU) 2025/40;
- Regulation (EC) No 1907/2006, for the relevant aspects relating to substances;
- Regulation (EC) No 1935/2004, Regulation (EC) No 2023/2006, and Regulation (EU) No 10/2011, where applicable to configurations intended for food contact;
- RecyClass Recyclability Methodology and Design for Recycling Guidelines for flexible PP packaging, used as transitional technical support;
- test reports, declarations, and technical specifications kept in the technical file FT-01.

6. Involvement of the Notified Body (where applicable)

Authorized representative: not applicable.

Notified body or third-party conformity assessment body: not applicable.

This declaration:

- applies exclusively to the packaging identified in the scope and related traceability documentation;
- is valid provided that no significant changes occur in the composition, structure, production process, supplier, or intended use;
- will be reviewed in the event of regulatory updates, new delegated or implementing acts, technical modifications, or the acquisition of new evidence;

7. Additional information

The declared conformity refers to the applicable requirements of **Regulation (EU) 2025/40 in force at the date of issue of this document** and to the information currently available throughout the supply chain. Any future regulatory changes, delegated acts, implementing acts, interpretative guidelines, or updates to technical information may require a revision of this Declaration of Conformity and, consequently, of the related Technical Documentation.

AZ Tech S.r.l.