

DECLARATION OF CONFORMITY (DoC)

Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR)

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1. Manufacturer

Vartdal Plastindustri AS

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2. Product Scope

This Declaration of Conformity applies to the following **Expanded Polystyrene (EPS) food-contact packaging product families** manufactured by Vartdal Plastindustri AS, including all associated sizes and variants unless otherwise specified.

Standard Product Families

Product Family	Material	Intended Use
VARTDALKASSEN	Virgin Expanded Polystyrene (EPS)	Food-contact packaging
VARTDALKASSEN AIRBOX	Virgin Expanded Polystyrene (EPS)	Food-contact packaging
VARTDAL MATKASSER	Virgin Expanded Polystyrene (EPS)	Food-contact packaging
TERMOPOR FISKEKASSER	Virgin Expanded Polystyrene (EPS)	Food-contact packaging

VARTDAL LOOP Product Families

Product Family	Material	Intended Use
VARTDALKASSEN LOOP	REDcert ² -certified mass balance EPS	Food-contact packaging
VARTDALKASSEN AIRBOX LOOP	REDcert ² -certified mass balance EPS	Food-contact packaging

The products are intended for the hygienic storage, handling and transportation of fresh fish, seafood and other chilled food products.

3. Applicable Legislation

This Declaration has been prepared with reference to the applicable requirements of:

- Regulation (EU) 2025/40 on packaging and packaging waste (PPWR)
- Regulation (EC) No. 1935/2004 on materials and articles intended to come into contact with food
- Commission Regulation (EU) No. 10/2011 on plastic materials and articles intended to come into contact with food
- Regulation (EC) No. 1907/2006 (REACH)

4. Declaration

Vartdal Plastindustri AS hereby declares, under its sole responsibility, that the product families identified in this Declaration have been assessed against the applicable requirements of Regulation (EU) 2025/40 on packaging and packaging waste (PPWR), as applicable at the date of issue.

The products are manufactured under controlled production processes using approved raw materials and documented quality procedures.

5. Regulatory Context

Regulation (EU) 2025/40 is being implemented through a phased approach. Certain obligations are already applicable, while others will become applicable through future implementation dates, implementing acts, delegated acts and guidance issued by the European Commission.

This Declaration of Conformity reflects the legislation, technical guidance and supporting information available at the date of issue.

Vartdal Plastindustri AS will review and revise this declaration where future legislative developments materially affect the products covered by this declaration.

6. Compliance Assessment

The products covered by this Declaration have been assessed with respect to the applicable requirements of Regulation (EU) 2025/40.

Requirement	Assessment	Basis for Assessment
Packaging minimization	Assessed	Product design optimized for intended use
Design for recycling	Assessed	Mono-material Expanded Polystyrene (EPS) design, facilitating recycling

Requirement	Assessment	Basis for Assessment
Restrictions on substances	Assessed	Supplier declarations and internal technical documentation and compliance verification
PFAS	Compliant	Supplier information, product knowledge and internal verification; see Section 10
Food-contact compliance	Compliant	Valid EK Certificate
REACH	Compliant	Supplier declarations
SVHC	Compliant	Supplier declarations
REDcert ² -certified product families	Product dependent	REDcert ² -certified mass balance chain-of-custody system; see Section 8
Reuse	Regulatory implementation ongoing	Ongoing European Commission implementation work

Assessment Status Definitions

Compliant

Requirement is applicable and supported by documented evidence.

Assessed

Requirement has been evaluated and addressed as applicable.

Product dependent

The assessment varies according to the product family and is described in this Declaration.

Regulatory implementation ongoing

The requirement is subject to ongoing implementation or clarification under Regulation (EU) 2025/40.

7. Food-contact Compliance

The products covered by this Declaration are intended for direct contact with fish, seafood and other food products.

Compliance with applicable food-contact legislation is demonstrated through a valid **EK Certificate (Emballasjekonvensjonens samsvarserklæring om helsemessig sikker næringsmidelemballasje)**.

The certificate demonstrates conformity with the applicable requirements of:

- Regulation (EC) No. 1935/2004
- Commission Regulation (EU) No. 10/2011
- Applicable amendments thereto

The certificate is maintained by Vartdal Plastindustri AS.

8. REDcert²-Certified Product Families

The **VARTDAL LOOP** product concept comprises Expanded Polystyrene (EPS) products manufactured using EPS raw materials produced under a **REDcert²-certified mass balance chain-of-custody system**.

The following product families are included within the VARTDAL LOOP product concept:

- VARTDALKASSEN LOOP
- VARTDALKASSEN AIRBOX LOOP

Depending on the applicable product specification and customer requirements, the EPS raw material may be produced using one of the following **certified alternative feedstocks**:

- **Ccycled** – certified chemically recycled feedstock;
- **BMB (Bio Mass Balanced)** – certified sustainable biomass;
- **CREPS (Certified Recycled EPS)** – certified mechanically recycled feedstock.

Where certified alternative feedstocks are used, **100% of the fossil-based raw materials required for the manufacture of the EPS raw material are replaced by the corresponding certified alternative feedstock** under the REDcert²-certified mass balance chain-of-custody system. The applicable feedstock allocation is verified through a valid REDcert² certification maintained by Vartdal Plastindustri AS.

The REDcert² site certification held by Vartdal Plastindustri AS includes food packaging manufactured under the **Ccycled**, **BMB**, and **CREPS** product concepts.

Future Regulatory Requirements

Regulation (EU) 2025/40 establishes future recycled-content requirements for certain categories of plastic packaging, including contact-sensitive packaging, with phased implementation beginning in 2030.

At the date of issue of this Declaration, the European Commission continues to develop the implementation framework, including stakeholder consultations, implementing acts and technical guidance relating to:

- the scope of contact-sensitive packaging;
- methodologies for calculating and verifying recycled content;

- the applicability of recycled-content requirements to Expanded Polystyrene (EPS) fish boxes intended for direct contact with seafood; and
- recognition of certified mass balance methodologies and other compliant verification systems under Regulation (EU) 2025/40.

Vartdal Plastindustri AS will continue to monitor these developments and review this Declaration should future legislation or regulatory guidance materially affect the products covered.

9. Assessment of Reuse Requirements

The products covered by this Declaration are intended as hygienic transport packaging for fresh fish and seafood.

At the date of issue of this Declaration, the European Commission is continuing stakeholder consultations regarding the interpretation and implementation of the reuse provisions of Regulation (EU) 2025/40 as they apply to Expanded Polystyrene (EPS) fish boxes.

Consequently, no definitive regulatory position has yet been established regarding the applicability of reuse targets to this product category.

Vartdal Plastindustri AS recognizes that any future reuse assessment should consider, among other factors:

- food safety;
- hygiene;
- traceability;
- microbiological contamination risks;
- maintenance of the cold chain; and
- environmental performance throughout the product life cycle.

Vartdal Plastindustri AS will continue to monitor regulatory developments and review this Declaration should additional guidance, delegated acts or implementing legislation be published.

10. PFAS

Based on supplier information, product knowledge and internal verification, Vartdal Plastindustri AS declares that the products covered by this Declaration comply with the applicable PFAS requirements established under Regulation (EU) 2025/40 (PPWR).

This declaration is based on internal technical documentation and compliance verification maintained by Vartdal Plastindustri AS, supported by supplier information.

Vartdal Plastindustri AS will continue to monitor developments relating to PFAS under European legislation and review this Declaration should future regulatory requirements or supplier information change.

11. Basis for Assessment

Compliance has been assessed on the basis of:

- product specifications;
 - material composition;
 - supplier declarations;
 - internal technical documentation and compliance verification;
 - valid EK Certificate;
 - valid REDcert² certification (where applicable);
 - applicable European legislation; and
 - currently available guidance published by the European Commission.
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12. Supporting Documentation

The following documents support this Declaration of Conformity:

- Technical Data Sheet (TDS-FB-001)
- Declaration of Compliance – REACH
- Declaration of Compliance – SVHC
- EK Certificate (Food-contact Compliance)
- REDcert² Certification (VARTDAL LOOP product families)

Supporting documentation is maintained by Vartdal Plastindustri AS as part of its technical documentation.

13. Limitations of this Declaration

This Declaration of Conformity is based on the legislation, technical guidance and supporting documentation available at the date of issue.

Where provisions of Regulation (EU) 2025/40 are subject to future implementing acts, delegated acts or additional guidance, this Declaration reflects the current regulatory framework and available technical information.

Vartdal Plastindustri AS reserves the right to revise this Declaration should changes to legislation, product design, raw materials or supporting documentation materially affect the products covered.

14. Document Owner

Document Owner Vartdal Plastindustri AS

The Document Owner is responsible for the maintenance, periodic review and revision of this Declaration of Conformity.

15. Authorized Declaration

This Declaration of Conformity is issued under the sole responsibility of Vartdal Plastindustri AS.

Authorized by Mounir El'Mourabit

Title Chief Marketing Officer (CMO)

Company Vartdal Plastindustri AS

Date 14.07.2026

Signature M. El'Mourabit