



Packaging & Packaging Waste Regulation (PPWR)

Declaration of Conformity

No. 003/PPWR/VIII/26

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

Section 1 — Manufacturer

Legal Entity Name	PT Indah Kiat Pulp and Paper Tbk
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Section 2 — Identification of the Packaging

Product / SKU Reference	Delipac (Food-Oven-Cup)
Product Description	Biodegradable Cupstock Paperboard
Intended Use	Food and Beverages Packaging

For Packaging and/or Packaging Material refer to:

Declaration of Conformity No. 002/PPWR/VIII/26

Section 3 — Declaration of Conformity

The undersigned hereby declares, under its sole responsibility, that **the product** identified in Section 2 has been assessed against the applicable requirements of **Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR)**.

Compliance with applicable PPWR requirements is demonstrated through the conformity assessment described in this Declaration and supported by documentation maintained within the manufacturer's Technical File.

Where a requirement is not relevant to the product, packaging or packaging material covered by this Declaration, the status "Not Applicable" may be assigned together with a brief justification.

This Declaration is issued on the basis of information available at the time of issue and applies only to the scope identified in Section 2.

3.1 Restrictions on Substances of Concern

Compliance Status	Compliant
Heavy Metals (Pb, Cd, Hg, Cr VI)	Not exceed 100 ppm
PFAS	Compliant
Other Restricted Substances	SVHC-REACH Compliant
Test Report Reference	Laboratory test report with standards as follow: 1. EU 2025/40 PPWR 2. EC 1907/2006 REACH 3. Directive 2011/65/EU RoHS
Justification / Reasoning	Comply based on laboratory test report

3.2 Design for Recycling and Recyclability

Compliance Status	Not yet determined
Recyclability Grade	Recyclability = 98%
Recyclability Assessment Method	1. Minimum standard for determining the recyclability of packaging of the ZSVR (state 28/08/2025) 2. EN 13430 regarding material recyclability in the post-use phase 3. ISO 14021 is fulfilled for the following countries: European Union (EU), Norway (NO), Switzerland (CH), United Kingdom (UK)
Design for Recycling Criteria Met	Ordinary mixed paper and boards, Grade 1.01.00 (EU)
Recycling Stream	Path 13: Paper, cardboard
Assessment Body (if applicable)	CHI cyclos-HTP Institute

Justification / Reasoning	PPWR recyclability grading criteria (A–C) are still under development through delegated acts and harmonised standards. Therefore, a formal recyclability grade has not yet been assigned. The above assessment is based on the current packaging material composition and currently available recyclability guidance.
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3.3 Minimum Recycled Content in Plastic Packaging

Compliance Status	N/A
Contact-Sensitive Plastic (%)	N/A
Non-Contact-Sensitive Plastic (%)	N/A
Other Materials (%)	N/A
Verification Method	Mass balance
Certification Body	N/A
Justification / Reasoning	Product does not contain any recycle plastic component

3.4 Biobased Feedstock in Plastic Packaging

Compliance Status	N/A
Biobased Content (%)	N/A
Certification / Verification	N/A
Justification / Reasoning	Product does not contain any biobased feedstock plastic component

3.5 Compostable Packaging Requirements

Compliance Status	Compliant
Composability Standard	1. EN 13432:2000-12, Requirements for packaging recoverable through composting and biodegradation – Test scheme and evaluation criteria for the final acceptance of packaging 2. NF T51-800:2015, Plastics – Specifications for plastics suitable for home composting
Certification	1. ISEGA Cert GmbH Aschaffenburg, Cert No. 15072K E 24 2. DIN CERTCO Gesellschaft für Konformitätsbewertung mbH, Cert. No. 9G0473 & 9P0192
Type of Composting	Industrial and Home Composting

Justification / Reasoning	Product is designed, marketed, and certified as compostable packaging
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3.6 Packaging Minimisation

Compliance Status	Compliant, refer to Declaration of Conformity No. 002/PPWR/VIII/26
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3.7 Reusable Packaging

Compliance Status	N/A
Reuse System Description	N/A
Minimum Number of Rotations	N/A
Reuse Certification	N/A
Justification / Reasoning	Product consists of single-use sales, grouped, and transport packaging components and is not designed to operate within a reusable packaging system

3.8 Marking and Labelling (Article 12)

Compliance Status	Not yet determined
Material Composition Marking	Efforts are underway to implement appropriate labelling in accordance with applicable PPWR requirements
QR Code / Digital Label	Efforts are underway to implement appropriate labelling in accordance with applicable PPWR requirements
Sorting Instructions	Product support established paper recycling streams
Reusability Marking	N/A
Justification / Reasoning	Product is paper-based component and intended for paper recycling streams

Section 4 — Standards and Technical Specifications Applied

List all harmonised standards, technical specifications, and conformity assessment procedures applied in preparing this Declaration of Conformity.

Standard / Reference	Title / Description	Applicable Section
<i>Regulation (EU) 2025/40</i>	Packaging and Packaging Waste Regulation (PPWR)	<i>All Section</i>
<i>Regulation (EC) No. 1907/2006</i>	Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)	<i>All Section</i>
<i>Directive 2011/65/EU</i>	the restriction of the use of certain hazardous substances in electrical and electronic equipment	<i>All Section</i>
<i>EN 13432:2000-12</i>	Requirements for packaging recoverable through composting and biodegradation – Test scheme and evaluation criteria for the final acceptance of packaging	<i>All Section</i>
<i>NF T51-800:2015</i>	Plastics – Specifications for plastics suitable for home composting	<i>All Section</i>
<i>ISO 14021:2026</i>	Environmental statements and programmes for products – Self declare environmental claims	<i>All Section</i>
<i>EN 13430:2004</i>	Packaging. Requirements for packaging recoverable by material recycling	<i>All Section</i>
<i>ZSVR (stated 28/08/2025)</i>	Minimum standard for determining the recyclability of packaging	<i>All Section</i>

GUIDANCE NOTE: Harmonised standards under PPWR are being developed. The EN 13427 family (listed above as examples) was developed under the former Packaging Directive and remains relevant as a reference until PPWR-specific harmonised standards are published in the Official Journal. Monitor CEN/TC 261 working groups for upcoming PPWR-specific standards. Where no harmonised standard exists, document the internal or third-party methodology used to assess conformity.

Section 5 — Supporting Technical Documentation

The following technical documentation is held by the manufacture in support of this Declaration of Conformity. This documentation must be retained for a minimum of 5 years (single-use packaging) or 10 years (reusable packaging) from the date the packaging was last placed on the EU market and made available to the Competent Authorities / market surveillance authorities upon request within the EU market

- Product Specifications / Technical Data Sheets
- Material Composition Information (BOM)
- Packaging Component Specifications
- Packaging Weight Calculations
- Supplier Declarations
- Safety Data Sheets (SDS), where available
- Applicable Test Reports
- Food Contact Compliance Documentation, where relevant
- PFAS and Other Substances of Concern Supporting Evidence
- Recyclability Supporting Evidence, where applicable
- Recycled Content Declarations, where applicable
- Compostability Certifications and Supporting Evidence, where applicable
- Packaging Artwork and Labelling Evidence
- Traceability and Change Control Records

Documentation Location	PT Indah Kiat Pulp & Paper, Tbk. Jl. Raya Serang Km. 76 Kec. Kragilan, Kab. Serang, Banten 42184 Indonesia
Responsible Person	Chang Jung Hua
Retention Period End Date	Five (5) years since published

GUIDANCE NOTE: *Technical documentation must be available in a language understood by the market surveillance authority of the relevant Member State. For multi-market operations, consider maintaining documentation in English as a common baseline, with translations available on request. Digital documentation management systems with audit trails are strongly recommended for enterprise environments.*

Section 6 — Authorised Signatory

This Declaration of Conformity is issued under the sole responsibility of the economic operator identified in Section 1.

Date	August 20th, 2026
Full Name	Chang Jung Hua
Title / Position	Group Div. Head, Technical
Signature	