

Declaration of Conformity for technical plastic pipes, winding cores

1. Manufacturer

Zapf GmbH & Co. KG

Köditz Str 76, DE 95030 Hof

2. Product

Engineering plastic tubes / winding cores made of polyethylene (PE)

Intended use:

- Support and winding cores for industrial applications
- Functional components for transport, processing and production processes
- Technical components for the further processing of films, paper, non-woven fabrics, woven fabrics or similar materials

3. Classification under the PPWR

We hereby confirm that the technical plastic tubes/winding cores manufactured by us do not constitute packaging within the meaning of Regulation (EU) 2025/40 (PPWR).

This classification is based on Article 3 of the PPWR and the further details set out in Annex I:

‘Rolls, sleeves and cylinders around which flexible materials are wound are considered to be packaging, unless they form part of production equipment or do not serve to present a sales unit.’

Our products meet these requirements:

The tubes serve as functional support, winding and processing elements within industrial processes.

An integral part

The tubes are required for

- stability,
- handling,
- transport,
- storage and
- further processing

of the wound material.

No packaging function

The tubes are not used for:

- marketing,
- presentation or
- providing a sales unit

to the end consumer.

This interpretation is further supported by the case law of the European Court of Justice (ECJ, Cases C-313/15 and C-530/15), according to which the specific technical function of the product is decisive for its classification.

Consequently, the pipes and winding cores supplied are to be regarded as technical products and not as packaging.

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4. Material composition

Base material:

- Polyethylene (HD-PE)
- CAS No. 9002-88-4

5. Recyclability

The technical pipes are made of high-density polyethylene (PE-HD).

Material designation: PE-HD (recycling code 2)

Properties:

- Recyclable as a material
- Established European recycling streams in place
- Can be recycled multiple times without significant material loss

☒ Recyclable

☐ Not recyclable

The actual recycling rate depends on the collection and recycling infrastructure available locally.

6. Absence of harmful substances

Based on the supplier declarations and raw material specifications, we confirm the following properties:

PFAS

Per- and polyfluoroalkyl substances (PFAS) are not intentionally used or added.

This includes, in particular:

- PFOS
- PFOA
- PTFE
- perfluorinated surfactants and related compounds.

SVHC substances

The PE raw material used does not contain any substances on the REACH Candidate List (SVHC) in concentrations exceeding the statutory threshold of 0.1% by weight.

Heavy metals

The concentration of the following heavy metals is below the permissible limit values:

- Cadmium (Cd) < 10 ppm
- Mercury (Hg) < 10 ppm
- Lead (Pb) < 10 ppm
- Chromium(VI) < 10 ppm

The total concentration of heavy metals is below 100 ppm.

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Other groups of substances of concern

The following, in particular, are not used intentionally:

- PFAS
- Bisphenols
- Phthalates
- Organotin compounds
- PVC
- PVDC
- Halogenated plastics
- Brominated flame retardants
- PCBs
- PBBs
- PCP
- Biocides
- Formaldehydes
- Silicones
- Conflict minerals.

Conclusion

Based on the manufacturer's declarations provided, there is no evidence of substances that would contravene the requirements of Article 5 of the PPWR. According to current knowledge, the PE-HD raw material used meets the substance requirements of the PPWR.

8. Compostability

The products are made of polyethylene (PE-HD).

Polyethylene is:

- not biodegradable
- not industrially compostable
- not suitable for home composting

9. REACH compliance

The PE-HD raw material used meets the requirements of Regulation (EC) No 1907/2006 (REACH).

In particular, the manufacturer confirms:

- no SVHC substances > 0.1%
- no substances listed in Annex XIV of REACH
- compliance with Annex XVII of REACH
- compliance with the requirements set out in Article 32 of REACH.

Furthermore, the materials used are listed in the relevant international chemical inventories and comply with the applicable European chemical requirements.

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10. Additional statement regarding the CLP Regulation

The PE-HD raw material used is not classified as hazardous under Regulation (EC) No 1272/2008 (CLP).

11. Final confirmation

We hereby confirm, to the best of our knowledge and on the basis of the supplier information provided, that the technical plastic tubes/winding cores supplied meet the requirements described above.

As the technical plastic tubes/winding cores supplied do not constitute packaging within the meaning of Regulation (EU) 2025/40 (PPWR), the above assessment in relation to Article 5 of the PPWR is made on a voluntary basis and solely for the sake of transparency towards our customers.

This declaration is based exclusively on the information contained in the documents provided to us by the respective material manufacturers.