

# 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 polypropylene (PP)

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:

- Polypropylene (PP)
- CAS No. 9003-07-0
- Homopolymer polypropylene

## 5. Recyclability

The pipes are made of polypropylene (PP) and are, in principle, recyclable.

Material identification:

PP (polypropylene, plastic code 05)

Recyclability:

☒ Recyclable

☐ Not recyclable

The actual recycling rate depends on the collection, sorting and recycling infrastructure available in the region.

## 6. Absence of harmful substances

On the basis of the supplier declarations provided, we confirm the following:

### PFAS

The polypropylene raw material used contains no intentionally added PFAS (per- and polyfluoroalkyl substances).

### SVHC substances

The raw material used contains no substances on the REACH SVHC Candidate List in concentrations exceeding 0.1% by weight.

### Heavy metals

The total of:

- Lead (Pb)
- Cadmium (Cd)
- Mercury (Hg)
- Chromium VI

is less than 100 ppm.

### Other chemicals

According to the manufacturer's declarations provided, numerous groups of critical substances are not intentionally used, including:

- PFAS
- Bisphenols (including BPA)
- Phthalates
- Organotin compounds
- Brominated flame retardants
- Chlorinated paraffins
- POPs

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- Halogenated compounds
- Carcinogenic, mutagenic or reprotoxic substances (CMR)

## **Conclusion**

Based on the supplier declarations and raw material specifications provided, there is no evidence of the deliberate use of substances that would contravene the requirements of Article 5 of the PPWR. The materials used therefore comply with the substance requirements of the PPWR according to current knowledge.

## **7. Compostability**

The products are made of polypropylene (PP).

Polypropylene is:

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

Compostability according to PPWR: Not applicable.

## **8. REACH compliance**

The polypropylene raw material used complies with Regulation (EC) No 1907/2006 (REACH).

All substances subject to registration have been registered by the respective manufacturers or their upstream suppliers. Substances listed in Annex XVII of REACH are not intentionally used.

In addition, the raw material supplier confirms:

- no SVHC substances > 0.1% by weight
- no REACH Annex XIV candidate substances above the threshold limit
- compliance with the applicable REACH requirements.

## **9. Declaration**

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 supplied technical plastic tubes/winding cores 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.