

GENERAL PRODUCT COMPLIANCE DATASHEET

Summary version for customers — suppliers are identified by their ETIDUERO, S.L. internal code.

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Summary of the General Product Compliance Datasheet, version 20, dated 20 October 2026. It supersedes version 19 of this summary, dated 6 October 2026. Replacing supplier names with their internal code and omitting manufacturer names and trade references does not alter the technical content of the document.

Reason for revision: incorporation of the documentation from 00623 received on 20/10/2026: external laboratory test report (The Industrial Analysis Service Ltd., 18/05/2026) on a sample of the manufacturer's UV inks, providing the supplier's first analytical heavy metals figure, and the supplier's reply to ETIDUERO's information request of 18/08/2026, confirming the use of the two ink references identified in its declaration of 07/08/2026. Remains COMPLIANT WITH RESERVATION. This version retains in full the content of version 19, dated 6 October 2026.

1. Regulations

- Regulation (EC) 1907/2006 – REACH.
- Safety Data Sheets (SDS).
- Regulation (EU) 10/2011 and (EC) 1935/2004 – Food contact materials.
- Regulation (EU) 528/2012 – Biocidal Products.
- Directive (EU) 2015/863 – RoHS.
- California Proposition 65.
- TSCA (USA).
- Regulation (EU) 988/2023 – General Product Safety.
- Regulation (EU) 2025/40 – Packaging and Packaging Waste, PPWR (generally applicable from 12 August 2026).
- Regulation (EU) 2024/3190 – Restriction of hazardous bisphenols, including Bisphenol S (BPS), in food contact materials (applicable to thermal labels from 20 July 2026).
- Regulation (EU) 2024/2462 – Restriction of PFHxA and related substances (entry 79 of Annex XVII to REACH).



- Spanish Royal Decree 1055/2022 on packaging and packaging waste, and Royal Decree 553/2020 (waste shipment control and monitoring document, DCS) — traceability of packaging waste management.

2. Restricted substances

- Allergens (Regulation (EU) 1169/2011, Annex II).
- Substances of animal origin and BSE/TSE.
- Benzophenone, Bisphenol A (BPA), hazardous bisphenols — including Bisphenol S (BPS, CAS 80-09-1), present as an SVHC in certain thermal label references (00417, 00476, 00975 and 00070). For the thermal paper of 00477 it has been verified that the grades supplied to ETIDUERO are free of phenolic compounds. 00417 has designated the BPS-free references that replace its three BPS-containing thermal references for food use, and all three hold a valid Food Contact Statement; see section 4.3.
- Chlorine-based bleaching agents.
- Conflict minerals, endocrine disruptors, epoxy derivatives, GMOs, heavy metals (Pb, Cd, Hg, Cr(VI)), Halal/Kosher, irradiation, mineral oils (MOSH/MOAH), latex, nitrosamines, oxo-degradable materials, ozone-depleting substances, PFAS, persistent organic pollutants (POPs), restricted phthalates, polycyclic aromatic hydrocarbons (PAHs), PVC (unless expressly stated), microplastics, vegan.
- Copper at high concentration (30% w/w) and a category 1B reprotoxic substance — 2-(dimethylamino)-2-(4-methylbenzyl)-1-(4-morpholinophenyl)butan-1-one (CAS 119344-86-4), classified as SVHC — identified in two specific UV ink references from 00623, which the supplier confirmed on 20/10/2026 that ETIDUERO uses (last shipment in April 2026); see section 4.6.
- Hexafluoropropylene, a substance classified as PFAS, declared as an additive in four polyethylene film references from 00664 (white and clear, with and without top coat), with replacement by PFAS-free versions announced by the supplier; see section 4.3.

3. Compliance statuses

This datasheet is based on the information, tests and declarations provided by the raw material and component suppliers of ETIDUERO, S.L., gathered in good faith and according to the best knowledge available at the date of issue. ETIDUERO, S.L. does not, as a general rule, carry out its own analytical testing for the restricted substances listed in section 2; the external laboratory tests supporting certain compliance statuses have been provided by the suppliers and are identified in section 4.



For the purposes of this document three compliance statuses are used, also identified by colour in the tables of section 4:

- **COMPLIANT** — the supplier demonstrates compliance with the parameter by means of an express declaration and, where applicable, supporting analytical testing.
- **COMPLIANT WITH RESERVATION** — a supplier declaration exists, but it is qualitative ("not intentionally added") or, even where a figure is given, it is not accompanied by the supplier's own analytical testing.
- **NON-COMPLIANT** — the supplier has not provided the documentation required to demonstrate compliance.

The **NON-COMPLIANT** status expresses a documentary non-conformity — absence of evidence in ETIDUERO's file — and does not imply that a breach of the limits set by the Regulation has been established.

Responsibility for the overall conformity assessment of the final packaging (recyclability, recycled content, design for recycling, recycling-at-scale criteria) lies with the manufacturer or the economic operator placing the finished packaging on the EU market, in accordance with the PPWR. This datasheet applies to the components as supplied by each supplier and does not cover subsequent processing (printing, die-cutting, additional lamination) that may alter their composition or compliance status.

Criterion on cardboard cores (tubes and rings): they do not constitute primary, secondary or tertiary packaging, they are not part of the packaging that ETIDUERO places on the market and they do not affect its conformity. Accordingly, the requirements of Article 5 of Regulation (EU) 2025/40 (heavy metals, PFAS, substances of concern) are not demanded of them, and the only documentary requirement ETIDUERO asks of its core suppliers is the component's recyclability declaration, accompanied by its technical datasheets.

4. Documentary evidence by supplier (as at 20 October 2026)

Summary of the PPWR/REACH documentation reviewed in the supplier folder, organised by material category. Each supplier is identified by its ETIDUERO, S.L. internal code.

4.1 Corrugated cardboard (boxes, sheets)

Supplier	Available evidence	Status
00952	General declaration of conformity (20/02/2026): heavy metals <100 ppm. PPWR support/role statement (22/05/2026). Box technical datasheets per reference (revised 17/06/2026) with explicit confirmation of PPWR Art. 5.4. Laboratory conformity document (Food Contact Laboratory, University of Girona, 25/03/2026, valid 2 years): tests on corrugated board sheet and packaging with recycled fibre, taking the worst case, with express verification of Article 5, points 4 and 5, of Regulation (EU) 2025/40, as well as Royal Decree 1055/2022, BfR Recommendation XXXVI v.2025 and Regulations (EC) 1935/2004 and 2023/2006. Result: suitable for direct contact with dry and fatty foods on the unprinted side. Issued under a multisite scheme.	COMPLIANT
00283	PPWR declaration (April 2025): heavy metals <100 ppm; recyclability and design requirements UNE-EN 13428/13430/13431/13432. Food contact declaration of conformity (20/02/2026). Absence of PFAS (April 2025). AINIA migration tests (20/03/2026): compliant. AIDIMME heavy metals test (03/03/2026): sum 10.45 mg/kg — SATISFACTORY.	COMPLIANT
00578	Food contact declaration of conformity (Rev. 9, 10/04/2025). Heavy metals (11/03/2026): <100 mg/kg. Allergens/GMOs (07/01/2026). PFAS (08/05/2026). REACH (2025 and 19/03/2026). Certificates: BRC Grade A (until 31/05/2027), ISO 9001 (2027), ISO 45001 (2029), FSC (2030).	COMPLIANT
01005	Supplier registration recorded (28/04/2026). Document folder created but no declaration of conformity, REACH, PFAS or heavy metals documentation provided to date.	NON-COMPLIANT

4.2 Cardboard cores / tubes

Supplier	Available evidence	Status
00567	Component that is not part of the packaging (ETIDUERO's criterion on cores): only the recyclability declaration is required. PPWR support statement (14/04/2026): cardboard tubes, edge protectors, rings and pallets; composition 85% paper/cardboard, 15% additives and glues, 0% plastic; recyclable in the paper and cardboard stream in accordance with EN 13430:2004. Technical specifications per reference (revision 1, 15/09/2026), issued for ETIDUERO: tubes 25.7x32x1200, 25.7x32x1600, 40.5x47x1600, 50.5x59x1200 and 77x85x1600, and rings 25.7x32x103 and 25.7x32x105, grade ST0; dimensions and tolerances according to UNE-ISO 11093-4; papers 100% of recycled origin, renewable and biodegradable; non-toxic lubricants, suitable for the food industry; management system certified to ISO 9001, 14001 and 45001. Supplementary documentation: REACH/SVHC (05/02/2026) and PFAS (19/05/2026, "not applicable"). Recyclability is demonstrated; no heavy metals declaration is required.	COMPLIANT
00363	Component that is not part of the packaging (ETIDUERO's criterion on cores): only the recyclability declaration with its technical datasheets is required. Supplier registered; document folder created with no documents provided. Awaiting receipt of the recyclability declaration.	NON-COMPLIANT

4.3 Self-adhesive labels

Supplier	Available evidence	Status
00417 — previous documentation	Heavy Metals Compliance Statement (Jan. 2026): sum <100 ppm. Updated SVHC list (05/05/2026, based on the ECHA list of 04/02/2026): confirms Bisphenol S (BPS, CAS 80-09-1) in several thermal references. Specific letter to ETIDUERO (19/06/2026) with a nominal list of BPS-containing references and of references in PFAS transition. The PFAS Transition Statement of 24/06/2026 is superseded by that of 06/08/2026.	COMPLIANT WITH RESERVATION

Supplier	Available evidence	Status
00417 — supplier technical information, PPWR Art. 16 (06/08/2026, incorporated on 09/09/2026)	Covers Arts. 5 to 11 of Regulation (EU) 2025/40. Heavy metals (Art. 5.4): no reason to consider that the 100 mg/kg limit is exceeded, based on information from its raw material suppliers and on non-intentional addition in its own manufacturing; the supplier does not consider a specific test necessary. PFAS (Art. 5.5): references not expected to exceed the limits, except those in its Annexes I and II (in transition, with non-substituted PFAS, with recycled content or made of PVC), none of which is among those supplied to ETIDUERO. Recyclability (Art. 6): no design-for-recycling assessment until implementing acts exist, foreseeably not before 2030. Recycled content (Art. 7): as stated in each technical datasheet and, failing that, virgin material; FSC Mix Credit certification does not demonstrate a recycled percentage. Arts. 9, 10 and 11 (compostability, minimisation, reuse): not applicable to its materials.	COMPLIANT WITH RESERVATION
00417 — PFAS Transition Statement (06/08/2026)	Confirms the transition to PFAS-free raw materials for the two polyethylene references supplied to ETIDUERO, applicable to material shipped from 01/06/2026 and 06/08/2026 respectively, with written confirmation from the supplier that all material delivered from those dates meets the thresholds of Art. 5.5. No analytical testing: the supplier does not consider a specific test necessary (European Commission PPWR FAQ no. 14).	COMPLIANT WITH RESERVATION
00417 — declaration of conformity on bisphenols, Regulation (EU) 2024/3190 (16/07/2026)	Its products intended for food contact comply with that Regulation and with (EC) 1935/2004. It maintains that BPS-containing thermal labels may be placed on the EU market for the first time at least until August 2027, a criterion different from the one applied in this file (20/07/2026).	COMPLIANT WITH RESERVATION
00417 — supplier's reply to ETIDUERO's request (incorporated on 09/09/2026)	Designates the Bisphenol S-free thermal references that replace the three BPS-containing references for food use. States that it does not hold the results of the incidental heavy metals tests or of the total fluorine screening. Refers its position on Arts. 6, 7 and 9 to the technical information of 06/08/2026, specifying that recyclability depends on the packaging and not on the label. Provides the limit figure but no analytical test: the reservation becomes stable and reflects a documented refusal.	COMPLIANT WITH RESERVATION



Supplier	Available evidence	Status
00417 — Food Contact Statements for the BPS-free replacement references (incorporated on 22/09/2026)	Three food contact statements, one for each Bisphenol S-free thermal reference designated for food use, issued on 05/01/2026 (valid until 31/01/2027), 26/08/2026 (until 31/08/2028) and 01/09/2026 (until 30/09/2027). They declare conformity of the adhesive and the face material with Regulation (EC) 1935/2004 and with the good manufacturing practices of Regulation (EC) 2023/2006, with components assessed in accordance with Regulation (EU) 10/2011, and provide overall migration tests of the adhesive according to EN 1186 (<10 mg/dm ²) and specific migration tests (EN 13130). Scope of use: adhesive suitable for dry, moist and, depending on the reference, fatty foods with a reduction factor or non-fatty foods only; face material suitable only for foods that are washed, peeled or shelled before consumption, and not designed as food packaging. Assessment of the final article (NIAS, oligomers, migration) is the responsibility of the finished packaging manufacturer. They contain no information on bisphenols, heavy metals or PFAS; the absence of BPS is demonstrated by the declaration of 16/07/2026 and the supplier's reply.	COMPLIANT WITH RESERVATION
00417 — general REACH declaration and technical datasheet (incorporated on 22/09/2026)	General REACH declaration (March 2026): the supplier notifies its customers and ECHA of SVHCs present above 0.1% w/w in accordance with Art. 33, based on the candidate list of 04/02/2026; a generic document, with no content per reference, which does not replace the SVHC list or the nominal letter of 19/06/2026. Technical datasheet (June 2026) for a clear BOPP overlaminating film with acrylic adhesive: technical data only, no PPWR information; the reference is covered by the supplier's general declarations.	COMPLIANT WITH RESERVATION
00417 — Food Contact Statement for an additional thermal reference (incorporated on 06/10/2026)	Food contact statement for a thermal reference not included among those designated as replacements (issued on 04/07/2025, revised on 26/06/2026, valid until 30/06/2027): adhesive suitable for dry, moist and non-fatty foods; face material suitable only for foods that are washed, peeled or shelled before consumption; conformity with Regulations (EC) 1935/2004 and (EC) 2023/2006; overall migration of the adhesive <10 mg/dm ² (EN 1186); safety limits for a hydrotreated petroleum distillate and for PAHs present as NIAS in the final article. It does not address bisphenols, heavy metals or PFAS, so it does not change the status; there is no record of whether ETIDUERO uses the reference or whether it contains BPS. It ceases to be valid if twelve months elapse without purchases.	COMPLIANT WITH RESERVATION



Supplier	Available evidence	Status
00476	PPWR Statement (08/06/2026): heavy metals <100 mg/kg; food-contact PFAS within limits. Regulatory update note (12/06/2026): transition to Bisphenol S-free materials for food use from 20/07/2026; BPS-containing products limited to non-food use. Combined Statement of 22/09/2026 (incorporated on 06/10/2026, superseding that of 25/06/2026): external laboratory analysis of representative materials, with the sum of Pb, Cd, Hg and Cr(VI) below 100 ppm (typically <2 ppm per metal) and total fluorine below 50 mg/kg; BPS-containing thermal products are being transitioned to BPS-free alternatives for food contact; it notes that the application of Art. 5.5 remains subject to the development of test methods. European food contact declarations of conformity for two paper materials (that of 05/08/2025, valid for three years: face suitable for dry and fatty foods up to 90 °C and adhesive suitable for dry, moist and dairy-type foods, 2 dm² per kg of food, overall migration <2.0 mg/dm²; that of 23/10/2024, valid for three years: face and adhesive for dry and non-fatty foods). Mineral oil declaration (09/06/2026): the concern relates mainly to MOAH; most of its papers are virgin fibre; the hot-melt adhesives and two of the water-based adhesives contain mineral oils, predominantly highly refined MOSH, assessed and tested by an accredited laboratory. Supplier communication (06/10/2026): one paper reference is discontinued and replaced by another that ETIDUERO already uses.	COMPLIANT
00070	General Product Compliance Datasheet (07/07/2026), superseding that of 27/04/2026: includes a specific PPWR section and declares Pb, Cd, Hg and Cr(VI) not intentionally added above the limits of Dir. 94/62/EC, the PPWR and CONEG legislation. REACH/SVHC updated to 04/02/2026, n-hexane <0.1% w/w. PFAS: not intentionally added, verified through chain of custody and process risk assessment in line with the FINAT approach, with selective supporting analytical tests; a declared exception for premium greaseproof-type papers containing fluorinated substances, being discontinued. Supplier communication (21/08/2026): it does not hold analytical tests for all materials and issues its declaration on the basis of non-intentional addition, identifying printing as the main source of risk. No analytical figure in ppm is provided. Supplier communication (23/09/2026) with the FINAT information note on Art. 5.5 (May 2026): supplier's position aligned with that note and with Commission FAQs 14/15. Documentation incorporated on 06/10/2026, in reply to ETIDUERO's request of	COMPLIANT WITH RESERVATION



Supplier	Available evidence	Status
	23/09/2026: food contact declarations of conformity for three paper references (27/08/2026, 28/08/2026 and 08/09/2026; valid for two years; two with one adhesive and one with another), suitable for dry and moist non-fatty foods with a maximum of 2 dm² per kg of food, compliant with Regulations (EC) 1935/2004 and (EU) 10/2011, with external laboratory migration tests. In each one the supplier declares that the reference meets the PFAS requirements of the PPWR on the basis of the raw material chain of custody, its process risk assessment (FINAT approach) and a selective analytical screening whose results are not shared, with no total fluorine figure: partial nominal confirmation, limited to those three references and to two of the five adhesives queried, without confirming the exclusion of the greaseproof ranges. MOSH/MOAH declarations for the two adhesives (24/11/2025 and 01/04/2026): in one, white mineral oil is a main ingredient and in the other it may be present; specific tests show no significant migration, with MOSH below 0.2 mg/kg per fraction in one case and the detected amount within BfR limits in the other, and no MOAH detected in either; the supplier specifies that it does not routinely analyse these substances and cannot guarantee their absence. The declarations also verify the specific migration of metals into food, a test distinct from the sum under Art. 5.4. The reservation is maintained: the screening results and confirmation for the remaining references are missing.	
00975	Statement on compliance with PPWR (July 2026): the sum of Pb, Cd, Hg and Cr(VI) does not exceed 100 mg/kg, and PFAS are neither used nor intentionally added, with Total Fluorine generally below 50 ppm. It supersedes and extends the statement of May 2026. PFAS Self-Adhesive (11/02/2026): absence of PFOA, PFOS and analogues. Declarations of conformity per reference (April–June 2026). The reservation remains because no own analytical test is provided.	COMPLIANT WITH RESERVATION



Supplier	Available evidence	Status
00664	Technical information 02/2026 on Article 5 of the PPWR, incorporated on 26/08/2026: lead, cadmium, mercury and hexavalent chromium, or their compounds, are not used as process substances or additives in the manufacture of the adhesive material compounds, and the PFAS limits of Art. 5.5 are met (25 ppb per individual non-polymeric PFAS, 250 ppb for the sum of non-polymeric PFAS and 50 ppm total PFAS), since neither PFAS nor heavy metals are components of the formulations; it warns that, owing to the ubiquitous presence of PFAS, traces cannot be ruled out. It declares four express exceptions — polyethylene film references, white and clear, with and without top coat — which list hexafluoropropylene as an additive, with replacement by PFAS-free versions announced as imminent. Qualitative declaration, with no analytical figure or own test. The complete absence of documentation in previous versions is resolved.	COMPLIANT WITH RESERVATION

4.4 Thermal and non-thermal paper reels

Supplier	Available evidence	Status
00477	PPWR product statement (01/07/2026): heavy metals Pb+Cd+Hg+Cr(VI) <100 mg/kg and absence of PFAS according to the OECD definition, with no analytical certificate attached; compostability (from 12/02/2028), reuse and recyclability (from 01/01/2030) and recycled content (from 01/01/2030) will be declared in later phases. Documentation incorporated on 28/08/2026 in reply to ETIDUERO's request of 18/08/2026: environmental safety and sustainability declaration (August 2026), confirming compliance with Regulation (EU) 2025/40 for heavy metals and PFAS, non-use of substances under entry 79 of Annex XVII to REACH, ISO 9001, 14001, 45001 and 50001 certifications and EcoVadis Gold, absence of MOSH/MOAH, biocides, banned pesticides, phthalates, nanoparticles and natural latex, compliance with RoHS, EN 71-3 and GPSR, and the technical recyclability of thermal paper without phenolic components; pulp declaration (July 2026): 100% ECF virgin fibre from pine, spruce and eucalyptus of PEFC and/or FSC origin, with no recycled material; REACH declaration (04/02/2026), identifying Bisphenol S above 0.1% w/w only in grades other than those supplied to ETIDUERO; and technical datasheets for the grades actually supplied to ETIDUERO, all produced without the addition of phenolic compounds. The presence of BPS in the supplied references is ruled out. The supplier expressly declines to provide a heavy metals test, as it does not use them in its production: the reservation reflects a documented refusal and not a pending request.	COMPLIANT WITH RESERVATION



Supplier	Available evidence	Status
01001	Statement PPWR – Paper product (18/05/2026, valid until 18/05/2027): confirms heavy metals content in accordance with Directive 94/62/EC and declares that PFAS and SVHC substances are not intentionally used; no analytical figure in ppm. Specific PFC/PFAS certificate (23/05/2026). Product Safety Statement (12/02/2026): compliance with Regulation (EU) 2025/40, absence of bisphenols and of intentionally added microplastics, SVHCs according to the ECHA list of 04/02/2026, food contact BfR XXXVI, 100% ECF virgin fibre and recyclability. The only quantitative values provided in that documentation relate to EN 71-3:2019+A2:2024, which measures migration of elements and is not equivalent to the sum under Art. 5.4. Paper Profile environmental datasheets (2025). Documentation incorporated on 06/10/2026, in reply to ETIDUERO's request: (i) new Product Safety Statement (22/09/2026, valid until 22/09/2027), superseding that of 12/02/2026 with the same scope (Regulation (EU) 2025/40, paper recyclable in accordance with its requirements, 100% ECF virgin fibre, SVHCs according to the list of 04/02/2026, no added microplastics, absence of CMR 1A/1B/2 substances and of bisphenols, metals according to EN 71-3 well below the limit); (ii) certificate of conformity from ISEGA Cert GmbH (17/06/2026, valid 2 years) for one specific grade: heavy metals and total organic fluorine (TOF) testing in accordance with Regulation (EU) 2025/40 and CONEG legislation, and conformity with Art. 5, paragraphs 4 and 5, taking the EU guidance document into account; suitable for direct contact with dry and fatty foods (BfR XXXVI, Regulation (EC) 1935/2004); the certificate does not report test figures or the sum Pb+Cd+Hg+Cr(VI); (iii) "Paper composition and mineral oil" declaration (23/05/2026, valid until 23/05/2027): no raw materials containing mineral oils are used. Communication from the sales office in Spain (06/10/2026): confirms that this grade meets the 100 mg/kg limit for the sum of the four metals; the quality manager is based in Sweden. Remains COMPLIANT WITH RESERVATION: the independent laboratory certificate supports both parameters, but without figures, for a single grade, and with no record that it is the grade supplied to ETIDUERO or that it covers the rest of the range.	COMPLIANT WITH RESERVATION

Supplier	Available evidence	Status
00499	First documentation received from the supplier, incorporated on 06/10/2026 (the two PPWR declarations have been in the supplier folder since 14/09/2026 and had not been included in previous versions): (i) declarations of compliance with the heavy metals (Art. 5.4) and PFAS (Art. 5.5) requirements of Regulation (EU) 2025/40 (31/07/2026), one for one grade and another for two grades, with an annex of AIDIMME test reports (laboratory accredited by ENAC, ISO/IEC 17025; reports 311.I.2607.653 to 655.ES.01): total fluorine below 50 mg/kg, which under the tiered approach of the Commission guidance document (C/2026/3084) is considered compliant with Art. 5.5, and sum of lead, cadmium, mercury and hexavalent chromium not exceeding 100 mg/kg; the laboratory rates the three samples COMPLIANT and the supplier retains the analytical evidence, available on request, without numerical values or the full reports being provided; (ii) REACH declaration (11/02/2026): absence of the 253 SVHCs on the candidate list of 04/02/2026; (iii) declaration that mineral oil hydrocarbons (MOSH and MOAH) are not intentionally added in the manufacturing process (30/01/2026); (iv) food contact paper declaration (30/01/2026): BfR XXXVI, FDA 21 CFR 176.170 to 176.180, Regulations (EC) 1935/2004 and 2023/2006 and Directive 94/62/EC, with no conditions of use or contact limits; (v) supplier's reply to ETIDUERO's request of 06/10/2026, stating 100% virgin fibre paper (Art. 7), with no supporting document. Moves from NON-COMPLIANT to COMPLIANT WITH RESERVATION: compliance for heavy metals and PFAS is supported by an accredited laboratory, but without figures or full reports, for only three paper grades, with no record of which ones ETIDUERO uses, and the mineral oil declaration is qualitative, with no test.	COMPLIANT WITH RESERVATION

4.5 Adhesive tape

Supplier	Available evidence	Status
00387	Declaration PPWR-00387-R-2026001 Rev.01 (13/07/2026): heavy metals sum <100 ppm, supported by external laboratory analyses. PFAS declared not applicable (not intended for food contact). Recyclability (Art. 6) and recycled content (Art. 7) pending official methodology, correctly flagged as such by the supplier.	COMPLIANT

4.6 Printing inks

Supplier	Available evidence	Status
00276 — previous documentation	Declaration concerning Regulation (EU) 2025/40 (20/05/2026, valid 2 years): PFAS "meets the limits" (declarative). Heavy metals sum <100 mg/kg, based on supplier declarations (risk-based approach, no own analytical test per batch). Supporting documentation from raw material manufacturers: one (Total Fluorine <10 ppm, Cd<1.5 / Pb<20 / Hg<0.1 / Cr(VI)<2 ppm); the ink manufacturer (sum <100 mg/kg, technically recyclable); a third (explicit compliance with Arts. 5.4 and 5.5); and a fourth expressly states that it CANNOT yet confirm full unconditional compliance with the PPWR (24/06/2026). Supplier communication (21/08/2026): identifies the reference supplied to ETIDUERO and confirms that it is covered by the manufacturer's declaration of conformity. Specific confirmations from the ink manufacturer dated 25/08/2026, incorporated on 28/08/2026 and referring by name to the reference supplied: heavy metals — total content of lead, cadmium, mercury and hexavalent chromium below 100 mg/kg, with declared compliance with Directive 94/62/EC, Directive 2011/65/EU (RoHS 2) and its amendment 2015/863/EU, EN 71-3 and CONEG legislation; and PFAS and PTFE — not intentionally used in the formulation nor present, to the best of its knowledge, in the raw materials. The request for confirmation of scope that was listed as pending is closed. Neither of the two confirmations includes a laboratory report, so the reservation is maintained.	COMPLIANT WITH RESERVATION
00276 — declaration of absence of MOSH, MOAH and POSH (02/03/2026, incorporated on 22/09/2026)	Issued under French legislation on mineral oils in packaging and printed matter (AGEC Law no. 2020-105, Decree no. 2020-1725 and Order of 13/04/2022) for its own series of inks and varnishes: saturated (MOSH) and aromatic (MOAH) mineral oil hydrocarbons are not used as raw materials nor intentionally added; some additives may contribute traces, not routinely controlled by its suppliers, with expected content in the wet product below 0.5% MOSH and 0.05% MOAH; polyolefin oligomeric saturated hydrocarbons (POSH) are not part of the formulations. Valid for one year from issue (until 02/03/2027). Qualitative declaration, with no analytical test. It does not mention the reference supplied to ETIDUERO, nor does it address heavy metals or PFAS, so it does not change the supplier's status.	COMPLIANT WITH RESERVATION



Supplier	Available evidence	Status
00583	Manufacturer's documentation, signed by its Product Stewardship EMEA manager: note on the PPWR (January 2026) and Regulatory Statement Printing Inks (11/05/2026). It expressly acknowledges that Art. 5 of the PPWR covers inks and varnishes, which become part of the packaging once applied. Heavy metals not intentionally added; total incidental content of Pb+Cd+Hg+Cr declared below 100 ppm, with random (non-systematic) tests on finished product and certified qualification of all raw materials. It provides maximum values per metal for contaminants soluble in 0.1 M hydrochloric acid on dry ink film: Sb <125, As <25, Cd <25, Cr <50, Pb <50, Hg <12 and Se <50 ppm; this is a solubility test different from the calculation under Art. 5.4, and its arithmetic sum would exceed 100 ppm, so it does not replace the total sum declaration. PFAS: identifies PTFE waxes as a potential source, declares reformulation in progress and offers PFAS- and PTFE-free ranges. Allergens, mineral oils and PFAS are not routinely tested on finished product: declarative approach in line with EuPIA guidelines. Substances of concern: awaiting the Commission report provided for in Art. 5.2 by 31/12/2026.	COMPLIANT WITH RESERVATION
00623 — previous documentation	Declaration Letter, Non-use of Substances (manufacturer, 07/08/2026) for two UV ink references: declares absence of heavy metals, PFAS and SVHC/CMR 1A-1B substances, EXCEPT two substances identified in Annex 2 — copper (CAS 7440-50-8, 300,000 ppm / 30% w/w) in one reference, and 2-(dimethylamino)-2-(4-methylbenzyl)-1-(4-morpholinophenyl)butan-1-one (CAS 119344-86-4, 37,181 ppm) in another — the latter classified as a category 1B reprotoxic SVHC. Additional declarations (02/06/2026) for two other product lines, with no excepted substances. Qualitative declaration on heavy metals, with no ppm figure or own laboratory test.	COMPLIANT WITH RESERVATION



Supplier	Available evidence	Status
00623 — reply to ETIDUERO's request and test report (incorporated on 20/10/2026)	Supplier's reply to the information request of 18/08/2026: as its heavy metals figure it reports that the total concentration of Cd, Pb, Hg and Cr(VI) is below the combined analytical detection limits (<17 mg/kg), using methods IEC 62321-5:2013 (ICP-MS) for Cd and Pb, IEC 62321-4:2013/AMD1:2017 (ICP-MS) for Hg and IEC 62321-7-2:2017 (UV-VIS) for Cr(VI); confirms no intentional addition of PFAS, with no total fluorine figure; confirms that ETIDUERO uses the two references, with the last shipment in April 2026; announces a forthcoming alternative to the reference containing the reprotoxic substance, with no date, and states that there is no alternative for the copper-containing one. Test report EW260000000383-01 (The Industrial Analysis Service Ltd., 18/05/2026, for the manufacturer): on a sample from one of the manufacturer's UV ink ranges, cadmium, lead, mercury and hexavalent chromium not detected, as well as bromine and the phthalates DEHP, BBP, DBP and DIBP; it does not analyse copper, PFAS or fluorine. It is the supplier's first analytical figure, but the report does not identify the reference, batch or colour of the sample, refers to a single sample and does not indicate laboratory accreditation: there is no record that it covers the two metallic references supplied. The reservation is maintained.	COMPLIANT WITH RESERVATION

4.7 Film

Supplier	Available evidence	Status
00616	Technical Documentation and PPWR Declaration of Conformity — NON FOOD (11/05/2026): mono-material stretch film 100% LDPE/LLDPE, not intended for food contact. Heavy metals sum <100 mg/kg and PFAS not intentionally added, both declarative (no laboratory report attached). SVHC <0.1% w/w. Recyclability: mono-material, Grade A/B according to current mechanical recycling streams.	COMPLIANT WITH RESERVATION

4.8 Thermal transfer ribbon

Supplier	Available evidence	Status
00737	Supplier compliance and Commitment Plan for Regulation (EU) 2025/40 (signed 29/06/2026). Signed and stamped reply to ETIDUERO's information request of 18/08/2026: confirms that all products supplied are below 100 ppm for the sum of heavy metals and contain no PFAS. Manufacturer certificates (30/03/2026, 25/06/2026 and 11/03/2026) per reference, the most recent with quantitative limits (heavy metals below 100 ppm and fluorine below 50 ppm) and declared test methods (IEC 62321-4/-5/-7-2 by ICP-OES and UV-Vis; BS EN 14582:2016 by ion chromatography). External laboratory reports: test of 242 SVHC substances (16/12/2024) with a "not detected" result for all of them, including lead, cadmium, Bisphenol S and the reprotoxic substance CAS 119344-86-4; and SGS test (12/08/2025) of specific migration of heavy metals according to EN 13130-1:2004 by ICP-MS, with Pb, Cd, Cr and Hg not detected and a compliant result.	COMPLIANT
00251	Five PPWR declarations of conformity, one per reference (issued between 21/07/2026 and 31/07/2026): heavy metals Pb+Cd+Hg+Cr(VI) ≤100 mg/kg confirmed per reference (PPWR Art. 5.4, with quantitative testing per metal in one of them), absence of SVHC substances (REACH), absence of BPA (Regulation 2024/3190) and PFAS within the limits of Art. 5.5 in all five references. Two of them also include specific migration tests for food contact.	COMPLIANT

4.9 Pallets

Supplier	Available evidence	Status
00537	Certificate (26/02/2026): the pallets supplied to ETIDUERO are 100% recycled and reused, and fully recyclable in subsequent cycles. Simple qualitative declaration, with no figures or laboratory test.	COMPLIANT WITH RESERVATION



Issued for the record and for all relevant purposes.

ETIDUERO, S.L.

Quality and Environment Management

20 October 2026