

# EU DECLARATION OF CONFORMITY

Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR)  
[Article 39 | Annex VIII | Module A - Internal Production Control](#)

**CONTROLLED SCOPE**

This declaration follows the Annex VIII EU Declaration of Conformity structure. It covers only NON-FOOD-CONTACT, SINGLE-USE packaging objects identified below and only where XIAMEN FINER IMPORT & EXPORT CO., LTD qualifies as the PPWR “manufacturer” for the relevant packaging. The four inks in laboratory Materials 01-04 are supporting component evidence and are not separate packaging objects.

|                                  |                                                        |
|----------------------------------|--------------------------------------------------------|
| EU Declaration of Conformity No. | DOC-FINER-PPWR-2026-ALL                                |
| Version                          | v1.0                                                   |
| Issue Date                       | 18 August 2026                                         |
| Supersedes                       | N/A - First issue                                      |
| Technical File Reference         | TF-FINER-PPWR-2026-ALL                                 |
| Supporting Test Report           | STC20260807014 dated 13 August 2026                    |
| Declared Packaging Objects       | PKG-05 to PKG-16 (12 objects; see Point 4 and Annex A) |

1. No. ... (unique identification of the packaging)

Master Scope ID: FINER-PPWR-2026-SCOPE-A

Packaging identification: PKG-05 to PKG-16. Each PKG number is tied to the corresponding laboratory Material No. in Test Report STC20260807014 and to the exact construction description reproduced in Point 4 / Annex A.

Traceability rule: this declaration applies only where the relevant commercial product, order, drawing/artwork revision, BOM and production lot can be mapped in the controlled technical file to the declared PKG construction without a composition-relevant change. If that mapping cannot be demonstrated, the product is outside the scope of this declaration.

2. Name and address of the manufacturer and, where applicable, the manufacturer’s authorised representative

|                           |                                                                                                                                                                                                                     |
|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Manufacturer              | XIAMEN FINER IMPORT & EXPORT CO., LTD                                                                                                                                                                               |
| Registered Address        | 508, Building 2, No. 29, Changhong Road, Huli District, Xiamen, Fujian Province, China                                                                                                                              |
| Contact                   | sara@finer-packaging.com                                                                                                                                                                                            |
| Authorised Representative | None appointed under this declaration. Where an authorised representative is required for a specific market arrangement, its details shall be added to the technical file and this declaration reviewed before use. |

3. Sole responsibility statement

DECLARATION OF SOLE RESPONSIBILITY

This declaration of conformity is issued under the sole responsibility of the manufacturer: XIAMEN FINER IMPORT & EXPORT CO., LTD.

4. Object of the declaration (identification of the packaging allowing traceability)

The objects of this declaration are the following non-food-contact, single-use packaging objects. Descriptions are aligned to Test Report STC20260807014. Laboratory Materials 01-04 (Black, Cyan, Magenta and Yellow inks) are supporting packaging-component evidence only and are not separate objects of this declaration.

| DoC Object ID | Lab Material No. | Description / construction                                                                       | Packaging type                   |
|---------------|------------------|--------------------------------------------------------------------------------------------------|----------------------------------|
| PKG-05        | 05               | Black print / translucent PLA plastic (plastic bag)                                              | Plastic bag                      |
| PKG-06        | 06               | Pink/black PE plastic (plastic bag)                                                              | Plastic bag                      |
| PKG-07        | 07               | Orange coating / brown kraft paper / transparent double-sided tape (paper mailer)                | Paper mailer                     |
| PKG-08        | 08               | Black coating / silver PET/AL/PE multilayer composite film (pouch)                               | Pouch                            |
| PKG-09        | 09               | Gray coating / white cardboard / ribbon (paper bag)                                              | Paper bag                        |
| PKG-10        | 10               | Green coating / art paper / grey board with EVA foam and ribbon (paper gift box)                 | Paper gift box                   |
| PKG-11        | 11               | White/black coating / brown kraft corrugated paper (paper box)                                   | Paper box                        |
| PKG-12        | 12               | Purple/black coating / hot stamping foil / UV coating / white cardboard + lamination (paper box) | Paper box                        |
| PKG-13        | 13               | Black print / white seed paper (hangtag)                                                         | Hangtag / packaging component    |
| PKG-14        | 14               | White print / black/white kraft paper (hangtag)                                                  | Hangtag / packaging component    |
| PKG-15        | 15               | Silver coating / hot stamping foil / UV coating / white cardboard + varnish (paper box)          | Paper box                        |
| PKG-16        | 16               | Black/white coating / brown kraft paper (paper card)                                             | Paper card / packaging component |

INTENDED-USE LIMIT

Food-contact use is expressly outside the scope of this declaration. If any declared packaging is intended for food contact, this declaration must be revised and Article 5(5) PFAS evidence plus applicable food-contact compliance evidence must be added before that packaging is placed on the Union market.

5. Conformity with relevant Union harmonisation legislation

CONFORMITY STATEMENT

The objects described in Point 4 are declared to be in conformity with the requirements of Regulation (EU) 2025/40 on packaging and packaging waste that are applicable to those objects on the date of issue, within the scope and conditions stated in this declaration and the referenced technical file. Fulfilment is assessed under Module A - Internal Production Control. This declaration does not anticipate requirements whose legal application date has not yet occurred and does not create future recyclability grades, recycled-content, compostability, reusability or harmonised-labelling claims.

| PPWR provision | Topic                                     | Status at issue date | Conformity basis / scope                                                                                                                                                                                                                                                                                                                                                    |
|----------------|-------------------------------------------|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Article 5(4)   | Pb, Cd, Hg and Cr(VI) concentration limit | Applicable           | STC20260807014 reports Pb, Cd and Hg N.D. at <5 mg/kg MDL and Cr(VI) N.D. at <8 mg/kg MDL for Materials 01-16; combined sum N.D.; laboratory conclusion PASS against 100 mg/kg sum limit. Manufacturer accepts sole responsibility for this evidence mapping. Other applicable Union substance restrictions remain separately applicable and are not replaced by this test. |

| PPWR provision | Topic                                         | Status at issue date                                     | Conformity basis / scope                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------|-----------------------------------------------|----------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Article 5(5)   | PFAS limits for food-contact packaging        | Outside scope                                            | This declaration covers non-food-contact use only. No PFAS conformity claim is made. Food-contact use requires a revised DoC with PFAS evidence.                                                                                                                                                                                                                                                                           |
| Article 6(1)   | Recyclability - transitional requirement      | Applicable                                               | By signature, the manufacturer confirms the declared packaging is released under internal production control against the transitional material-recycling requirement described by the Commission with reference to the PPWD / EN 13430:2004 basis. No PPWR recyclability grade or recycled-at-scale claim is made. Formal PPWR Article 38 / Annex VII recyclability assessment linked to Article 6(4) is not yet required. |
| Article 7      | Minimum recycled content in plastic packaging | Future-dated                                             | No current minimum recycled-content percentage is declared under this DoC. Future Article 7 targets and calculation rules must be assessed before their applicable dates.                                                                                                                                                                                                                                                  |
| Article 8      | Biobased feedstock in plastic packaging       | No current product claim                                 | No biobased-content compliance claim is made. The presence of PLA in PKG-05 is a material description, not a regulatory bio-based-content or compostability claim.                                                                                                                                                                                                                                                         |
| Article 9      | Compostable packaging                         | No current product claim / future-dated where applicable | No compostability claim is made. Any later mandatory compostability requirement for a specific packaging format must be assessed separately before its application date.                                                                                                                                                                                                                                                   |
| Article 10     | Packaging minimisation                        | Transitional baseline                                    | Full Article 10(1)-(2) requirements apply from 1 January 2030. Until then, the existing minimisation baseline remains relevant. By signature, the manufacturer confirms the declared packaging is produced to functional specifications and is not intentionally designed with unnecessary material or volume solely to increase perceived volume; future Article 10 assessment must be updated before 2030.               |
| Article 11     | Reusable packaging                            | Not applicable to declared scope                         | This declaration is limited to single-use packaging. No reusable-packaging claim is made.                                                                                                                                                                                                                                                                                                                                  |
| Article 12     | Harmonised packaging labelling                | Future-dated                                             | The harmonised material-composition labelling regime is not yet applicable on the issue date. This DoC makes no future Article 12 labelling-compliance claim.                                                                                                                                                                                                                                                              |

## 6. Harmonised standards, common specifications and other technical specifications

The following references are used as technical evidence or transitional assessment references. Inclusion here does not represent that each IEC method is a PPWR harmonised standard; the IEC references are laboratory analytical methods / other technical specifications.

| Reference                               | Use in this declaration                                                                                                                                                                                                                                                            |
|-----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| IEC 62321-4:2013+A1:2017                | Laboratory method reference for mercury analysis reported in STC20260807014.                                                                                                                                                                                                       |
| IEC 62321-5:2013                        | Laboratory method reference for cadmium and lead analysis reported in STC20260807014.                                                                                                                                                                                              |
| IEC 62321-7-1:2015 / IEC 62321-7-2:2017 | Laboratory method references reported for Cr(VI). The laboratory report states “or” and does not allocate one method to each material; this DoC does not add a method allocation not stated by the laboratory.                                                                     |
| EN 13430:2004                           | Transitional material-recycling assessment basis referenced by the European Commission guidance until the Article 6(2)(a) design-for-recycling requirements become applicable. Used under manufacturer internal production control; no future PPWR recyclability grade is claimed. |
| EN 13428:2004                           | Existing packaging minimisation compliance methodology / transitional reference through the end of 2029, as described in Commission guidance. Future Article 10 assessment must be updated when applicable.                                                                        |
| Test Report STC20260807014              | STAR-TECH (Shenzhen) Co., Ltd., dated 13 August 2026; Materials 01-16; heavy-metal evidence described in Annex C.                                                                                                                                                                  |

## 7. Notified body

Not applicable. Conformity assessment is carried out under Module A - Internal Production Control. No notified body is involved in the PPWR conformity assessment for this declaration. STAR-TECH (Shenzhen) Co., Ltd. is referenced only as the laboratory that issued Test Report STC20260807014 and is not identified as a notified body.

8. Additional information

**MANUFACTURER-ROLE CONDITION**

This EU Declaration of Conformity may be used only where XIAMEN FINER IMPORT & EXPORT CO., LTD is the PPWR “manufacturer” for the relevant packaging under the facts of the transaction. Where a customer / brand owner has the packaging or packaged product designed or manufactured under its own name or trademark (subject to the PPWR rules and exceptions), that entity may be the manufacturer and must issue its own Article 39 / Annex VIII declaration; this document may then serve only as supplier technical evidence.

- Scope is non-food-contact and single-use only. Any food-contact or reusable application requires reassessment and a revised declaration.
- Materials 01-04 are ink-component evidence only. They support Article 5(4) evidence mapping but are not separate packaging objects in this DoC.
- The declaration is valid only while composition, supplier, manufacturing process, construction, intended use and traceability mapping remain controlled and equivalent to the declared scope.
- Any composition-relevant change, supplier change, process change, packaging-design change, intended-use change, relevant legal/standard change or new adverse evidence triggers review before further use.
- The laboratory report carries STAR-TECH signatures and company seal. The report itself also states that where it is not stamped with an accreditation-recognised seal, it is limited in external evidentiary use. Accordingly, this DoC treats STC20260807014 as supporting test evidence rather than as accreditation-marked certification; the manufacturer retains sole responsibility for the conformity declaration.
- Technical documentation and this DoC shall be retained in accordance with PPWR retention requirements: for single-use packaging, 5 years from the date the packaging is placed on the market; reusable packaging would require 10 years, but reusable packaging is outside the scope of this declaration.

Signed for and on behalf of XIAMEN FINER IMPORT & EXPORT CO., LTD

|                              |                                                                                      |
|------------------------------|--------------------------------------------------------------------------------------|
| Name                         | Autumn Zhang                                                                         |
| Function                     | General Manager                                                                      |
| Place of issue               | Xiamen, People’s Republic of China                                                   |
| Date of issue                | 18 August 2026                                                                       |
| Signature                    |  |
| Company Official Seal / Chop |  |

ANNEX A - Packaging Object and Component Mapping

This annex forms part of EU Declaration of Conformity No. DOC-FINER-PPWR-2026-ALL. The PKG IDs are internal identifiers established by this declaration and correspond directly to laboratory Material Nos. 05-16. Commercial SKU / order / BOM / production-lot mapping must be maintained in TF-FINER-PPWR-2026-ALL for each released product.

| DoC ID | Lab No. | Laboratory description                              | Role in DoC               | Intended-use scope           |
|--------|---------|-----------------------------------------------------|---------------------------|------------------------------|
| PKG-05 | 05      | Black print / translucent PLA plastic (plastic bag) | Declared packaging object | Non-food-contact; single-use |
| PKG-06 | 06      | Pink/black PE plastic (plastic bag)                 | Declared packaging object | Non-food-contact; single-use |

| DoC ID | Lab No. | Laboratory description                                                                           | Role in DoC               | Intended-use scope           |
|--------|---------|--------------------------------------------------------------------------------------------------|---------------------------|------------------------------|
| PKG-07 | 07      | Orange coating / brown kraft paper / transparent double-sided tape (paper mailer)                | Declared packaging object | Non-food-contact; single-use |
| PKG-08 | 08      | Black coating / silver PET/AL/PE multilayer composite film (pouch)                               | Declared packaging object | Non-food-contact; single-use |
| PKG-09 | 09      | Gray coating / white cardboard / ribbon (paper bag)                                              | Declared packaging object | Non-food-contact; single-use |
| PKG-10 | 10      | Green coating / art paper / grey board with EVA foam and ribbon (paper gift box)                 | Declared packaging object | Non-food-contact; single-use |
| PKG-11 | 11      | White/black coating / brown kraft corrugated paper (paper box)                                   | Declared packaging object | Non-food-contact; single-use |
| PKG-12 | 12      | Purple/black coating / hot stamping foil / UV coating / white cardboard + lamination (paper box) | Declared packaging object | Non-food-contact; single-use |
| PKG-13 | 13      | Black print / white seed paper (hangtag)                                                         | Declared packaging object | Non-food-contact; single-use |
| PKG-14 | 14      | White print / black/white kraft paper (hangtag)                                                  | Declared packaging object | Non-food-contact; single-use |
| PKG-15 | 15      | Silver coating / hot stamping foil / UV coating / white cardboard + varnish (paper box)          | Declared packaging object | Non-food-contact; single-use |
| PKG-16 | 16      | Black/white coating / brown kraft paper (paper card)                                             | Declared packaging object | Non-food-contact; single-use |

### Supporting packaging-component evidence

| Component ID | Lab No. | Description | Status                                                                        |
|--------------|---------|-------------|-------------------------------------------------------------------------------|
| COMP-01      | 01      | Black ink   | Supporting Article 5(4) component evidence; not a standalone packaging object |
| COMP-02      | 02      | Cyan ink    | Supporting Article 5(4) component evidence; not a standalone packaging object |
| COMP-03      | 03      | Magenta ink | Supporting Article 5(4) component evidence; not a standalone packaging object |
| COMP-04      | 04      | Yellow ink  | Supporting Article 5(4) component evidence; not a standalone packaging object |

### Traceability release rule

For each commercial order released under this DoC, the controlled technical file should record at minimum: DoC Object ID; customer/product reference; order/PO reference; drawing or artwork revision; BOM/material specification revision; production lot/date; supplier/formulation status; and confirmation that the construction remains equivalent to the corresponding laboratory description. This information is not present in STC20260807014 and is therefore not invented in this declaration.

## ANNEX B - Module A Internal Production Control / Technical File Index

The following records form, or are to be maintained as, the controlled evidence set supporting this master declaration. “Signature confirmation” means the manufacturer accepts responsibility for the stated internal production-control conclusion by signing Point 8.

| Ref.  | Record                                          | Status    | Control note                                    |
|-------|-------------------------------------------------|-----------|-------------------------------------------------|
| TF-01 | Test Report STC20260807014 dated 13 August 2026 | Available | Heavy-metal evidence; 7-page laboratory report. |
| TF-02 | Laboratory sample photographs - report page 4   | Available | Photographs of test samples.                    |

| Ref.  | Record                                                    | Status                                   | Control note                                                                                                                                           |
|-------|-----------------------------------------------------------|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| TF-03 | Customer-provided product photographs - report pages 5-6  | Available / limited                      | The report explicitly states these are customer-provided and are not the test sample; visual mapping only.                                             |
| TF-04 | Material / packaging description mapping 01-16            | Established                              | Annex A reproduces and normalises the report descriptions without adding unsupported composition claims.                                               |
| TF-05 | Article 5(4) heavy-metal evidence table                   | Established                              | Annex C maps reported N.D. / PASS results to Materials 01-16.                                                                                          |
| TF-06 | Article 6(1) transitional recyclability release statement | Signature confirmation                   | Manufacturer confirms release against the transitional material-recycling basis. Future DfR grade / recycled-at-scale conformity is not claimed.       |
| TF-07 | Transitional packaging minimisation statement             | Signature confirmation                   | Manufacturer confirms functional specification and absence of unnecessary perceived-volume features; update before full Article 10 requirements apply. |
| TF-08 | Shipment / order traceability register                    | Operational record required              | Must be completed by order / lot; not contained in the laboratory report.                                                                              |
| TF-09 | Food-contact / PFAS evidence                              | Not applicable to this declaration scope | Required before any food-contact use; this declaration is expressly non-food-contact.                                                                  |
| TF-10 | Regulatory review log                                     | Controlled record                        | Review after PPWR delegated/implementing acts, harmonised standards, Commission guidance, or other relevant legal changes.                             |

RELEASE PROHIBITIONS

Do not use this DoC for a product if any of the following applies: food-contact use without Article 5(5) PFAS evidence; reusable-packaging claim; inability to map the commercial product to a declared PKG construction; composition-relevant change since the evidence was established; a customer / brand owner is the PPWR manufacturer and has not issued its own DoC; or internal production control identifies a recyclability / minimisation nonconformity.

ANNEX C - Article 5(4) Heavy-Metal Evidence Mapping

Source: Test Report STC20260807014, STAR-TECH (Shenzhen) Co., Ltd., 13 August 2026. The report lists Materials 01-16 and reports the same analytical outcome for each material: Pb N.D. (<5 mg/kg MDL), Cd N.D. (<5 mg/kg MDL), Hg N.D. (<5 mg/kg MDL), Cr(VI) N.D. (<8 mg/kg MDL), combined sum N.D. against a 100 mg/kg limit, conclusion PASS. This annex does not add test results beyond the report.

| No. | Description                                                                       | Pb         | Cd         | Hg         | Cr(VI)     | Conclusion |
|-----|-----------------------------------------------------------------------------------|------------|------------|------------|------------|------------|
| 01  | Black ink                                                                         | N.D.<br><5 | N.D.<br><5 | N.D.<br><5 | N.D.<br><8 | PASS       |
| 02  | Cyan ink                                                                          | N.D.<br><5 | N.D.<br><5 | N.D.<br><5 | N.D.<br><8 | PASS       |
| 03  | Magenta ink                                                                       | N.D.<br><5 | N.D.<br><5 | N.D.<br><5 | N.D.<br><8 | PASS       |
| 04  | Yellow ink                                                                        | N.D.<br><5 | N.D.<br><5 | N.D.<br><5 | N.D.<br><8 | PASS       |
| 05  | Black print / translucent PLA plastic (plastic bag)                               | N.D.<br><5 | N.D.<br><5 | N.D.<br><5 | N.D.<br><8 | PASS       |
| 06  | Pink/black PE plastic (plastic bag)                                               | N.D.<br><5 | N.D.<br><5 | N.D.<br><5 | N.D.<br><8 | PASS       |
| 07  | Orange coating / brown kraft paper / transparent double-sided tape (paper mailer) | N.D.<br><5 | N.D.<br><5 | N.D.<br><5 | N.D.<br><8 | PASS       |
| 08  | Black coating / silver PET/AL/PE multilayer composite film (pouch)                | N.D.<br><5 | N.D.<br><5 | N.D.<br><5 | N.D.<br><8 | PASS       |
| 09  | Gray coating / white cardboard / ribbon (paper bag)                               | N.D.<br><5 | N.D.<br><5 | N.D.<br><5 | N.D.<br><8 | PASS       |

| No. | Description                                                                                      | Pb         | Cd         | Hg         | Cr(VI)     | Conclusion |
|-----|--------------------------------------------------------------------------------------------------|------------|------------|------------|------------|------------|
| 10  | Green coating / art paper / grey board with EVA foam and ribbon (paper gift box)                 | N.D.<br><5 | N.D.<br><5 | N.D.<br><5 | N.D.<br><8 | PASS       |
| 11  | White/black coating / brown kraft corrugated paper (paper box)                                   | N.D.<br><5 | N.D.<br><5 | N.D.<br><5 | N.D.<br><8 | PASS       |
| 12  | Purple/black coating / hot stamping foil / UV coating / white cardboard + lamination (paper box) | N.D.<br><5 | N.D.<br><5 | N.D.<br><5 | N.D.<br><8 | PASS       |
| 13  | Black print / white seed paper (hangtag)                                                         | N.D.<br><5 | N.D.<br><5 | N.D.<br><5 | N.D.<br><8 | PASS       |
| 14  | White print / black/white kraft paper (hangtag)                                                  | N.D.<br><5 | N.D.<br><5 | N.D.<br><5 | N.D.<br><8 | PASS       |
| 15  | Silver coating / hot stamping foil / UV coating / white cardboard + varnish (paper box)          | N.D.<br><5 | N.D.<br><5 | N.D.<br><5 | N.D.<br><8 | PASS       |
| 16  | Black/white coating / brown kraft paper (paper card)                                             | N.D.<br><5 | N.D.<br><5 | N.D.<br><5 | N.D.<br><8 | PASS       |

Units: mg/kg. MDL = method detection limit. The laboratory report states the combined limit for Pb + Cd + Hg + Cr(VI) as 100 mg/kg and records the sum as N.D. for all materials.

## ANNEX D - Regulatory Reference Notes and Document Control

Primary legal and Commission references used for this declaration:

| Reference                                      | Note                                                                                                                                                                                                  |
|------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Regulation (EU) 2025/40                        | Official ELI: <a href="https://eur-lex.europa.eu/eli/reg/2025/40/oj/eng">https://eur-lex.europa.eu/eli/reg/2025/40/oj/eng</a>                                                                         |
| Article 39 / Annex VIII                        | EU Declaration of Conformity model and statement that fulfilment of requirements in or pursuant to Articles 5-12 has been demonstrated.                                                               |
| Article 38 / Annex VII                         | Conformity assessment procedure - Module A, Internal Production Control, and technical documentation framework.                                                                                       |
| Commission Notice C/2026/3702 / OJ C/2026/3084 | 2026 PPWR guidance. Among other issues, it explains the manufacturer role and the transitional interpretation for Article 6 recyclability and EN 13430:2004.                                          |
| EN 13430:2004                                  | Packaging - Requirements for packaging recoverable by material recycling; transitional reference identified by the Commission guidance.                                                               |
| EN 13428:2004                                  | Packaging - Requirements specific to manufacturing and composition - Prevention by source reduction; existing minimisation reference through the end of 2029 as explained by the Commission guidance. |

### Document control

|                 |                                                                                      |
|-----------------|--------------------------------------------------------------------------------------|
| Document Number | DOC-FINER-PPWR-2026-ALL                                                              |
| Version         | v1.0                                                                                 |
| Prepared by     | Sara Lin                                                                             |
| Reviewed by     | Andrew Zhuo                                                                          |
| Approved by     | Autumn Zhang                                                                         |
| Issue Date      | 18 August 2026                                                                       |
| Next Review     | Upon any release trigger stated in Point 8 / Annex B; no arbitrary fixed expiry date |