

DECLARATION OF CONFORMITY WITH THE PPWR REGULATION

Bubble Wrap and PE SONG Foam

Regulation (EU) 2025/40 on packaging and packaging waste

We treat packaging not as a formality, but as an element of our responsibility toward the environment and our customers. In developing our range of film and PE foam, we consistently work to reduce the environmental impact of our production – by increasing the share of recovered material, ensuring the recyclability of our packaging, and optimizing raw material consumption – while maintaining the full protective properties for which our products were designed.

We regard the publication of Regulation (EU) 2025/40 (PPWR) as confirmation of the direction in which we are already developing, rather than as a starting point. The declaration below presents the current state of compliance of our products with the requirements of the Regulation, along with our commitments for the coming period.

1. Details of the entity issuing the declaration

Company name:	MAC-GRAF SP. Z O.O.
Address of the production plant:	UL. BYDGOSKICH PRZEMYSŁOWCÓW 21 85-862 BYDGOSZCZ, Poland
Tax ID (NIP):	554-293-34-69
Document reference number:	02/2026
Date of issue:	11 August 2026

2. Subject of the declaration

This declaration covers the following product groups manufactured by the entity indicated above:

- Bubble wrap (protective packaging made of polyethylene)
- Fill&Wrap film (protective packaging made of polyethylene)
- PE SONG foam (protective packaging made of polyethylene)
- Laminate – a combination of bubble wrap and PE foam, produced by thermal bonding, without the use of adhesives or other bonding substances

Packaging formats: bubble wrap and PE SONG foam are available in various forms (e.g. rolls, bags, sheets) – depending on the order.

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This declaration covers all products meeting the material and technological characteristics described above, regardless of individual catalogue code (SKU). A detailed breakdown of the trade groups, together with the rule for their identification in the ERP system, is provided in Annex 1 to this declaration.

Intended use: packaging and protective material used in the transport and storage of goods. Products are sold through two distribution channels: B2B sales (based on a sales document containing the buyer's tax identification number (NIP)) and retail-channel sales, where the product may reach the end consumer directly (B2C).

3. Basis and procedure for conformity assessment

Conformity has been assessed under the manufacturer's internal self-control procedure (module A), in accordance with the principles set out in Regulation (EU) 2025/40. The declaration is issued on the sole responsibility of the entity indicated in Section 1, on the basis of technical documentation held by the company and documentation provided by raw material suppliers.

4. Hazardous substances and chemicals (Article 5 PPWR, REACH Regulation)

Based on documentation provided by raw material suppliers, we confirm that:

- the raw materials used do not contain substances of very high concern (SVHC) at a concentration $\geq 0.1\%$ by weight, in accordance with the current candidate list published by ECHA;
- the combined concentration of lead, cadmium, mercury and hexavalent chromium does not exceed the threshold of 100 mg/kg – confirmed by COBRO report No. BCO-03/23 dated 21 March 2023;
- substances from the PFAS group (per- and polyfluoroalkyl substances) are not intentionally added during the production process, as confirmed by documents received from raw material suppliers.

Source documentation from suppliers is retained and made available upon reasonable request by the competent market surveillance authorities.

5. Packaging minimisation (Articles 9 and 10 PPWR)

The weight and thickness of the products offered are selected in each case to the minimum necessary to maintain the protective properties required for goods in transport and storage. Product design is subject to ongoing optimisation aimed at reducing raw material consumption, without lowering the level of protection provided to the packaged goods or the functionality of the packaging.

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6. Design for recycling (Article 6 PPWR)

The products offered are based on homogeneous polyethylene (PE), which supports their compatibility with the standard recycling stream for this material and facilitates processing in typical mechanical recycling installations, without the need for prior material separation. This applies in particular to single-material products – made entirely of one type of plastic, without the admixture of other polymers, metallised films, or paper layers.

It is worth noting that this also applies to the Laminate – despite its name suggesting a combination of different materials, this product is created by joining bubble wrap and PE foam through thermal welding, without the use of adhesives or other bonding substances. Because both layers are polyethylene-based, the product retains material homogeneity and remains compatible with the standard PE recycling stream – unlike typical laminates combining different types of plastic or non-polyolefin materials, which hinder recycling.

The recyclability of the products, at a level of 95–100% (class A), has been confirmed by testing carried out by COBRO – the Packaging Research and Development Institute, report No. BCO-03/23 dated 21 March 2023. The report covers both bubble wrap and PE foam and is available on request.

Material code: 04 – LDPE (low-density polyethylene), in accordance with the commonly used plastic material marking.

As of 1 January 2030, the Regulation additionally introduces formal recyclability classes (A–D, with a minimum threshold of 70%), and from 2035, class E for recycling at industrial scale. In preparation for these requirements, we are currently undergoing RecyClass certification, which also includes an assessment of the products' recyclability – the result of this process will form the basis for supplementing this declaration with the assigned class, sufficiently in advance of the entry into force of this requirement.

7. Recycled material content

In our production process we use raw material from pre-consumer recycling (PIR), recovered from our own production waste, in the following proportions: bubble wrap – min. 25% PIR; PE foam (2–6 mm thickness) – min. 30% PIR. The use of PIR reduces the consumption of virgin raw material.

In parallel, we are working on introducing material derived from post-consumer recycling (PCR) – RecyClass certification is currently underway, and its completion will form the basis for extending the declaration to include this material category in the next revision of the document.

8. Quality and environmental management systems

Production covered by this declaration is carried out under certified management systems:

- ISO 9001 – Quality Management
- ISO 14001 – Environmental Management
- ISO 45001 – Occupational Health and Safety Management

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9. Labelling (Article 12 PPWR)

Sales are carried out through two distribution channels, for which the obligations arising from Article 12 PPWR differ:

- B2B sales (based on a sales document containing the buyer's identification data) – the requirements for harmonised packaging labelling intended for the end consumer do not apply directly.
- Retail-channel sales (B2C) – the product may reach the end consumer directly, and therefore the obligation to apply harmonised PPWR labelling will apply from 12 August 2028 (or 24 months from the publication of the relevant European Commission implementing act, if this occurs later).

We currently use material labelling on our labels in accordance with established market practice (plastic material code together with the recycling symbol), which serves as the starting point for implementing the new, harmonised labelling. The exact appearance and format of this labelling have not yet been published by the European Commission. We undertake to implement the new labelling in the B2C channel promptly following the publication of the relevant implementing act and within the timeframe set out by the regulations.

10. Technical documentation

In accordance with the requirements of the Regulation, technical documentation is maintained confirming compliance with the requirements described in this declaration. This documentation is available for inspection upon reasonable request by the competent market surveillance authorities.

11. Our future commitment

We do not treat PPWR compliance as an end state, but as a process that we develop together with our customers. We are actively working to increase the share of post-consumer recycled material, we monitor evolving regulatory requirements and adapt our production processes accordingly, so that our customers can build their own PPWR compliance based on reliable and up-to-date data from us as their supplier.

Person authorized to represent the entity:

Full name: Członek Zarządu

Position: Leszek Cieżki

Signature:

Mac-Graf Sp. Z o.o.

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Annex 1 – Product Groups Covered by the PPWR Declaration of Conformity

Applies to: Declaration of Conformity with the PPWR Regulation No. 2/2026 dated 11 August 2026

Trade group name	Category per PPWR declaration	Material	Format / packaging	Identification rule in the ERP system
Bubble film	Bubble wrap	PE	roll	The 'Product name / type' field in the ERP matches one of the names in the 'Trade group name' column (regardless of index number)
Bubble film sheet	Bubble wrap	PE	sheet	
Bubble film half-sleeve	Bubble wrap	PE	half-sleeve	
Bubble film sleeve	Bubble wrap	PE	sleeve	
Bubble film bag	Bubble wrap	PE	bag	The 'Product name / type' field in the ERP matches one of the names in the 'Trade group name' column (regardless of index number)
PE SONG foam	PE SONG foam	PE	roll	
PE SONG foam sheet	PE SONG foam	PE	sheet	
PE SONG foam bag	PE SONG foam	PE	bag	
SONG laminated foam	Laminate	PE (bubble wrap + PE foam, thermally welded)	roll	The 'Product name / type' field in the ERP matches one of the names in the 'Trade group name' column (regardless of index number)
SONG laminate sheet	Laminate	PE (bubble wrap + PE foam, thermally welded)	sheet	
Laminated foam bag	Laminate	PE (bubble wrap + PE foam, thermally welded)	bag	

This list covers all SKUs assigned to the above trade groups in the Supplier's ERP system – identified by product name/type rather than by index number (index numbers are assigned sequentially and are not related to the product type). A complete, current list of SKU codes together with their group assignment is available on request in electronic form (an ERP export filtered by the 'Product name / type' field).

Członek Zarządu

Leszek Cieżki