

TESTBOY GmbH · Postfach 14 23 · 49377 Vechta

To our customers

Vechta, 10.08.2026

Regulation on Hazardous Substances and Test Reports

Dear Sir or Madam,

In our opinion, a laboratory test report is not required for each individual packaging component. Point 2 of Annex VII to the PPWR merely requires an appropriate risk analysis and assessment regarding the risk of non-compliance; it does not mandate laboratory testing supported by a test report in every case. This is confirmed by the wording of Point 2 of Annex VII to the PPWR, according to which test reports form part of the technical documentation only "where appropriate". We would like to draw your attention to the applicable legal framework: the PPWR does not establish any right to obtain the Declaration of Conformity or technical documentation.

For example, in our view, a heavy metals analysis of the transparent LDPE stretch film and top film is unnecessary, as it is virtually impossible for transparent films to exceed the applicable limit values. Heavy metal contamination generally results from colour pigments, which are not used in these materials. The same applies to the corrugated cardboard trays used: here, too, printing inks or colourants represent the only potential source of heavy metals, and since such substances are not intentionally used, the risk of non-compliance is considered to be low.

With regard to PFAS, the European Commission has stated that laboratory analyses have demonstrated that, where PFAS are not intentionally added, the applicable limit values are met (FAQ of 30 March 2026, p. 13). Furthermore, in its letter dated 30 June 2025, our supplier confirmed that PFAS are not intentionally used in its production process. In our opinion, a laboratory analysis is therefore not mandatory in this case either.

With regard to the pallets, we act solely as the distributor of these pallets. The PPWR does not grant us a statutory right to obtain information from the actual manufacturer of the pallets.

Nevertheless, it should also be taken into account that the risk of non-compliance is low in this case.

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Notwithstanding the above, we have once again contacted our suppliers and requested additional information. However, we would like to emphasize that our packaging complies with the requirements applicable as of 12 August 2026 and may therefore continue to be lawfully placed on the market. This applies irrespective of whether our suppliers provide laboratory test reports.

Should you have any questions, please do not hesitate to contact us.

Kind regards



Evangelos Mpouras
Technical Director



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