

**EU DECLARATION OF CONFORMITY
IN ACCORDANCE WITH REGULATION (EU) 2025/40 (PPWR)**

Declaration No: 12
Date: 14.09 2026
Place: Piekary Śląskie

1. IDENTIFICATION OF THE PACKAGING

OPAK-00043

2. PRODUCER/MANUFACTURER

Name: Firma Chempur
Adress: ul. Jana Lortza 70A 41-940 Piekary Śląskie Polska
NIP: 653 000 89 98
Email: pganc@chempur.pl

3. STATEMENT OF RESPOSIBILITY

The Declaration of Conformity has been prepared based on the available technical data, Safety Data Sheets (SDSs), and statements provided by the suppliers of packaging materials and components. This information is considered reliable and constitutes the basis for assessing the conformity of the packaging with the requirements of Regulation (EU) 2025/40 (PPWR).

This declaration of conformity is issued under the sole responsibility of the manufacturer.

4. OBJECT OF THE DECLARATION

Component name:

- 200 L METAL DRUM

Material: steel sheet

Packaging Level: sales packaging

Intended for food contact: no

Packaging size: 200L

**5. CONFORMITY WITH THE RELEVANT UNION HARMONISATION
LEGISLATION**

Evidence of Conformity with PPWR Requirements:

Article 5. Requirements concerning substances in packaging

Complies with the requirements set out in Article 5(4) of Regulation (EU) 2025/40 of the European Parliament and of the Council on packaging and packaging waste (PPWR).

The total concentration of lead (Pb), cadmium (Cd), mercury (Hg) and hexavalent chromium (Cr VI), resulting from the presence of these substances in the packaging or its constituent components, does not exceed 100 mg/kg.

Article 6. Recyclability – Steel drums consist of approximately 99% of homogeneous steel material, classified as Category 4 in accordance with Annex II, Table 2 of the PPWR Regulation. Steel is a permanent material that can be recycled multiple times without losing its properties. Paints, varnishes, sealing compounds, closure seals and coatings constitute a minor proportion of the packaging by mass and do not adversely affect the recyclability of steel, as they decompose during the melting process. The proportion of recyclable materials exceeds 95%; therefore, the packaging qualifies for Recyclability Class A in accordance with Annex II, Table 3 of the PPWR Regulation.

Article 7. Recycled content – The drums are metal packaging in which the proportion of plastic components does not exceed 5% of the total packaging weight.

In accordance with Article 7(5) of the PPWR Regulation, no minimum recycled content requirements currently apply to this type of packaging. The proportion of recycled steel depends on the availability of raw materials and quality requirements. Typically, the average recycled content ranges from 16% to 20%.

The average recycled content of the steel used in 2025 was 17.36%.

Article 9. Compostability – no data available

Article 10. Minimisation – Steel drums have been designed in accordance with the principle of minimising the amount of material used while maintaining full functionality, safe use, and compliance with applicable technical and legal requirements, including requirements applicable to packaging for the transport of dangerous goods.

Article 11. Reusability – Steel drums have been designed as reusable packaging. They can be cleaned, reconditioned and refilled in accordance with the requirements set out in Annex VI, Part B of the PPWR Regulation. Packaging intended for the transport of dangerous goods may undergo reconditioning and be reused after obtaining the appropriate approvals in accordance with the applicable ADR regulations.

Article 12. Labelling

The marking includes, in particular:

- material identification code FE40;
- production batch number;
- markings required by transport regulations, including the UN marking, where applicable.

6. RELEVANT HARMONISED STANDARDS

no data available

7. NOTIFIED BODY

no data available

8. ADDITIONAL INFORMATION

Signed for and on behalf of:

FIRMA C HEMPUR®
41-940 PIEKARY ŚLĄSKIE
ul. Jana Łortza 70a, tel. 032-287-20-52
Nr rejestrowy BDO•000004363
NIP 653-000-89-98

Name, function, signature: Patrycja Ganc, Environmental Protection Specialist

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mgr inż. Patrycja Ganc