

San Pietro in Gu', 22/07/2026

To customers

**SUBJECT: Declaration of Conformity with Regulation (EU) 2025/40 on
Packaging and Packaging Waste (PPWR)**

ROTOGAL del Cav. Angelo Gallio & C. s.n.c. is actively engaged in preparing for the implementation of Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR). The PPWR establishes the overarching regulatory framework for packaging placed on the EU market. Therefore, many detailed compliance requirements will only be specified through future regulatory measures, including delegated acts, implementing acts and harmonised standards. At the current stage, compliance can only be assessed for the requirements already defined in the regulation and applicable legislation.

ROTOGAL issues Declarations of Conformity (DoCs) for packaging components for which ROTOGAL assumes the role of the manufacturer within the meaning of Article 3 of Regulation (EU) 2025/40. Respective DoCs are prepared in accordance with the applicable provisions of Chapter VII of Regulation (EU) 2025/40 and shall be made available to competent authorities upon justified request.

Please note that detailed PPWR compliance requirements will become fully defined only progressively over the coming years. ROTOGAL continuously monitors regulatory developments and works closely with suppliers and relevant stakeholders to address forthcoming obligations in line with the applicable regulatory timelines. This document reflects the current state of regulatory interpretation and available information as of the date of revision. It may be subject to change as further legal requirements, implementing measures and technical specifications become available.



IDENTIFICATION

Manufacturer: ROTOGAL del Cav. Angelo Gallio & C. s.n.c.

Address: Via Cavour, 68 - 35010 San Pietro in Gù (PD)

Product covered by this declaration: Adhesive packaging tapes manufactured by ROTOGAL del Cav. Angelo Gallio & C. s.n.c. (hereinafter, ROTOGAL), intended for the closing, sealing or securing of boxes and other packaging and, therefore, for incorporation as components of the final packaging used by the customer.

Scope: Types or families of adhesive tapes covered by this declaration:

- Adhesive tapes with plastic backings, including BOPP, PVC, PE, rPET and other polymeric substrates.
- Adhesive tapes with paper or regenerated cellulose backings.
- Adhesive tapes with reinforcements such as polyester and fiberglass.
- Tapes manufactured using different adhesive technologies, including acrylic adhesive, natural rubber and synthetic rubber (hot-melt).
- All product references, dimensions, thicknesses, colors, provided that remain within the same homogeneous product family.

DECLARATION AND SCOPE

The manufacturer hereby declares, under its sole responsibility, that the adhesive packaging tapes covered by this Declaration, comply with the requirements of Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR) that are applicable to their nature and intended use as packaging components incorporated into packaging.

This Declaration covers the different homogeneous families of adhesive tapes identified in the previous Section. Each family may include multiple product references, sizes, thicknesses, colors or formulations, that share the same essential structure and function, and are subject to the same applicable legal requirements and are covered by a common technical basis for conformity assessment.

This Declaration applies exclusively to adhesive tapes manufactured by ROTOGAL as packaging components intended for the closing, sealing or securing of packaging. It does not constitute a declaration of conformity for the complete packaging unit as such, whose conformity will depend on its design, composition, configuration, materials and intended use and shall remain the responsibility of the relevant economic operator under Regulation (EU) 2025/40.

Each product family, has been assessed within the framework of the PPWR Technical dossier established by ROTOGAL. This Declaration is based on that assessment, the available technical documentation and the information and declarations provided by suppliers of raw materials and components.



DECLARED REQUIREMENTS

Article 5 – Substances present in packaging

Heavy metals

Based on information provided by upstream suppliers and current knowledge, the sum of heavy metals (lead, cadmium, mercury and hexavalent chromium) in packaging materials used by ROTOGAL does not exceed 100 mg/kg, in line with applicable European requirements.

We hereby declare that, in the production of the adhesive tapes supplied to you, no intentional use is made of substances listed in Directive 94/62/EC.

PFAS

ROTOGAL declares that no intentional use is made in the production of the adhesive tapes supplied to you of per- and polyfluoroalkyl substances (PFAS).

Any unintentional traces resulting from raw materials or upstream production processes are not subject to specific monitoring within the Quality Management System.

The specific PFAS requirements laid down in Regulation (EU) 2025/40 apply to packaging intended to come into contact with food. The adhesive tapes covered by this Declaration are not intended for food-contact applications and, accordingly, those specific requirements do not apply to their intended use.

**ROTOGAL's assessments are based on the information currently available within the supply chain and may be affected by ongoing regulatory developments, additional guidance, and the outcome of ongoing work by the European Chemicals Agency (ECHA) concerning substances of concern in packaging.*

In addition, the European Commission is expected to publish a report on substances of concern in packaging (beyond heavy metals and PFAS) by the end of 2026. Any subsequent regulatory measures, potentially introduced through REACH restrictions and/or design-for-recycling requirements, will be addressed by ROTOGAL taking into account the applicable implementation timelines.

Article 6 – Recyclability of packaging

The adhesive tapes covered by this Declaration have been designed and manufactured taking into account their function as packaging components and their potential influence on the recyclability of the final packaging into which they are incorporated.

Assessment of the recyclability of the complete packaging unit will depend on the combination of materials, design, configuration and recycling system applicable to the final packaging unit.

The delegated acts, implementing acts and harmonized standards that will establish the official methodology for assessing and classifying recyclability, are pending further development and publication. Accordingly, this Declaration is issued on the basis of the current state of applicable legislation and available technical documentation and will be reviewed when such regulatory developments introduce requirements applicable to adhesive tapes as packaging components.





ITALIAN EXCELLENCE IN TAPE PRODUCTION SINCE 1972

Article 7 – Recycled content in plastic materials, where applicable

As of the date of issue of this Declaration, no generally applicable minimum recycled plastic content is currently declared for the adhesive tapes covered herein. ROTOGAL will assess and apply any requirements that may become applicable under Article 7 of Regulation (EU) 2025/40 and its implementing framework, taking into account the nature and intended use of each product family.

Article 8 – Packaging minimization

The adhesive tapes are designed and manufactured by optimizing the amount of material required to perform their technical function of closing, sealing or securing packaging, without compromising the required performance. Compliance of the final packaging with minimization requirements, will also depend on the design and configuration of the complete packaging unit defined by the operator responsible for it.

Articles 9 and 10 – Reuse

Requirements relating to reuse must be assessed in relation to the final packaging and its intended use. Adhesive tape, as a consumable component intended for closing or sealing, does not in itself constitute reusable packaging.

Article 11 – Labelling, where applicable

The harmonized labelling requirements provided for in Article 11, will apply when they become legally applicable to the nature and function of the product or to the final packaging into which it is incorporated. ROTOGAL will review this Declaration when implementing legislation establishes specific applicable requirements.

Pending the full implementation of the applicable provisions, ROTOGAL continues to comply with the relevant national legislation and the guidance issued by the competent authorities, including the packaging material identification requirements laid down under Italian legislation. (CONAI)



REGULATORY UPDATES

Some requirements of Regulation (EU) 2025/40 are still subject to future delegated acts, implementing acts or harmonised standards. Therefore, this Declaration is based on the legislation and technical documentation available on the date of issue and will be reviewed and updated when those requirements become applicable.

All information contained in this document is given in good faith and is based on sources believed to be reliable and accurate at the date of publication of this document.

This Statement expires 12 months after the date of issue or in case of regulatory changes before such date. Please ask for a new confirmation if needed. This declaration is exclusively for our customers and respective competent authorities. It is not intended for publication either in printed or electronic form (e.g. via Internet) by others. Thus, neither partial nor full reproduction or publication is permitted without prior written authorization.

We remain at your disposal for any further information.

Best regards,

Rotogal del Cav. Angelo Gallio & C. s.n.c.

Angelo Gallio – Legal Representative

