Risk Assessment: PPWR Article 5 Compliance Statement

Dijkstra Plastics B.V., as a **supplier of plastic packaging**, has performed and maintains a documented risk assessment to evaluate compliance of its packaging products with the applicable substance-related requirements of **Article 5 of Regulation (EU) 2025/40 (PPWR)**. The assessment covers packaging manufactured from virgin and recycled polypropylene (PP) and high-density polyethylene (HDPE), together with relevant intermediate materials incorporated into the finished packaging, including in-mould labels (IMLs), masterbatches and other constituent materials.

Based on this assessment, and taking into account supplier qualification, raw material specifications, purchasing requirements, manufacturing controls and risk-based verification activities, Dijkstra concludes that the packaging supplied to its customers is designed and manufactured to comply with the applicable substance-related requirements of:

- ~~***Article 5(1)** concerning the minimisation of substances of concern in packaging and packaging components;*~~
- **Article 5(4)** concerning the maximum combined concentration of lead, cadmium, mercury and hexavalent chromium;
- **Article 5(5)** concerning the PFAS restrictions applicable to food contact packaging; and
- the applicable requirements for **bisphenol A (BPA) and other hazardous bisphenols** established by **Commission Regulation (EU) 2024/3190** for food contact materials.

As a supplier within the packaging value chain, Dijkstra has implemented a compliance management system that relies on controlled material selection, supplier qualification, technical documentation, purchasing specifications, Certificates of Conformity (CoC) and/or Certificates of Analysis (CoA), internal manufacturing controls and risk-based analytical verification, where appropriate. For recycled materials, additional supplier requirements, fluorine screening criteria and enhanced verification measures have been introduced to address the higher inherent compliance relevance associated with recycled input streams.

This statement is intended to support Dijkstra's customers in demonstrating compliance with their own obligations under the PPWR by providing information on the conformity of the supplied packaging. The detailed technical rationale, risk classifications, evidence base and conformity assessment methodology supporting this statement are documented in the accompanying **PPWR Article 5 Risk Assessment**, which forms an integral part of Dijkstra's compliance management system. The assessment is maintained as a living document and is reviewed whenever relevant legislation, suppliers, raw materials, formulations, manufacturing processes or packaging components are modified.

(1) Development of a Risk Matrix for Assessing PFAS in Food Packaging (referred to as valid approach by the EU commission)
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