



Regulatory Compliance Statement Packaging and Packaging Waste (PPWR)

Scope:

This statement addresses material composition, packaging compliance, and producer responsibility in accordance with EU Packaging and Packaging Waste legislation and supports conformity with ISO 9001–based quality management systems.

1. Applicable Legislation and Standards

- Regulation (EU) 2025/40 – Packaging and Packaging Waste Regulation (PPWR)
- Regulation (EU) 2022/1274 – Producer responsibility for packaging
- Directive 94/62/EC – Packaging and Packaging Waste
- Regulation (EC) No 1272/2008 (CLP) – Annex VI, Part 3
- ISO 9001:2015 – Quality Management Systems (process control, supplier management, documentation)

2. Material Composition and Restricted Substances

(PPWR Articles 5, 6; ISO 9001 Clauses 8.4, 8.5)

TPP Techno Plastic Products AG confirms that, as a manufacturer, it does not intentionally use restricted or hazardous substances in its manufacturing processes.

In particular:

- Bisphenol A (BPA) and BPA derivatives (also referred to as *BPX*, listed in Annex VI, Part 3 of Regulation (EC) No 1272/2008) are neither used nor intentionally added at any stage of the manufacturing process.
- PVC, halogenated plastics, and Bisphenol A are not used in TPP products.
- All products are manufactured exclusively from virgin raw materials.

The use of virgin materials enables TPP to control raw material inputs, ensuring product conformity and allowing the exclusion of unintentionally introduced substances, in line with PPWR Article 5 (substance minimization) and ISO 9001 requirements for controlled production conditions.

TPP continuously improves internal handling and cleaning processes to minimize the risk of contamination, supporting product consistency and regulatory compliance.

3. Heavy Metals Compliance

(Directive 94/62/EC, Article 11; PPWR Article 5)

TPP confirms that packaging materials placed on the EU market comply with the heavy metal limits set out in Article 11 of Directive 94/62/EC.

The cumulative concentration of the following heavy metals does not exceed 100 ppm:

- Lead (Pb)
- Cadmium (Cd)
- Mercury (Hg)
- Hexavalent chromium (Cr VI)

Compliance is ensured through supplier qualification, documented declarations of conformity, and incoming material controls, in line with ISO 9001 Clause 8.4.



4. Packaging Compliance and Producer Responsibility

(PPWR Articles 6, 38–45; ISO 9001 Clauses 4.2, 8.4)

Based on formal statements provided by suppliers of packaging materials, TPP confirms that:

- Product and transport packaging complies with Directive 94/62/EC.
- Packaging materials comply with Regulation (EU) 2025/40, including requirements related to packaging minimization, material conformity, and producer responsibility.
- Packaging materials comply with Regulation (EU) 2022/1274 and applicable national legislation on extended producer responsibility (EPR).

TPP maintains documented supplier evaluations and compliance records, ensuring traceability.

5. Cellulose-Based Packaging Materials

(PPWR Articles 6, 9; ISO 9001 Clauses 8.4, 8.5)

Where packaging materials contain cellulose or paper-based components, TPP confirms:

- Cellulose is unbleached or bleached without chlorine gas, using TCF (Totally Chlorine Free) or ECF (Elemental Chlorine Free) methods.
- AOX emissions to the recipient do not exceed 0.25 kg per ton of pulp.

This supports PPWR objectives related to environmental performance and material sustainability.

6. Packaging Identification and Recycling Information

(PPWR Articles 11–13; ISO 9001 Clause 7.4)

- Packaging materials are not individually labeled with sorting or recycling instructions.
- To support correct waste management, TPP refers users to the TechDoc “Recycling Code”, which provide standardized material identification and facilitate correct sorting and recycling.

This approach is consistent with PPWR requirements for harmonized and reliable recycling information.

7. Quality Management, Traceability, and Audit Readiness

(ISO 9001 Clauses 4.4, 7.5, 9.1; PPWR Article 38)

TPP operates a process-based quality management system aligned with ISO 9001 principles, including:

- Supplier declarations of conformity for raw materials and packaging
- Material specifications and compliance documentation
- Batch-level traceability for products and packaging materials
- Periodic regulatory and supplier compliance reviews

Relevant documentation is maintained and controlled.

8. Statement Validity

This statement reflects the current regulatory status and supplier information at the time of issuance. It is subject to revision in the event of regulatory updates, material changes, or process modifications, in accordance with ISO 9001 change management requirements.



TPP Techno Plastic Products AG
Zollstrasse 7, CH-8219 Trasadingen, Switzerland
Tel. +41 (0)52 687 01 87, Fax +41 (0)52 687 01 77
info@tpp.ch, www.tpp.ch



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