EU Declaration of Conformity

PPWR — Regulation (EU) 2025/40

Self-declaration of the manufacturer pursuant to Article 39 and Annex VIII · Packaging and Packaging Waste Regulation

Annex VIII No. 1

Identification

Declaration number	DOC-PPWR-01626

Annex VIII No. 2

Issuer (manufacturer)

Company name	Headstock Distribution Ltd
Registered address	Steelpark Road, Coombs Wood Business Park West, Halesowen B62 8HD, United Kingdom

Annex VIII No. 3

Statement of sole responsibility

Headstock Distribution Ltd declares under its sole responsibility that the packaging described below meets the applicable requirements of Regulation (EU) 2025/40 of the European Parliament and of the Council on packaging and packaging waste.

Annex VIII No. 4

Subject of the declaration

Trade designation / product	Packaging for HH APT Series (APT-* TB4, TB6, TB8
Materials / composition (primary)	Predominantly cardboard (recycled fibre), Paper
Materials / composition (secondary)	Predominantly cardboard (recycled fibre); BOPP tape and paper label

Annex VIII No. 5

Applied harmonisation legislation

The subject of the declaration is in conformity with Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR).

Annex VIII No. 6

Applied sustainability requirements

Status per applicable provision. Evidence is held in the technical documentation (Annex VII).

Article	Requirement	Status
Art. 5(4)	Heavy metals: Σ (Pb + Cd + Hg + CrVI) ≤ 100 mg/kg per component	**Conforms**
Art. 5(5)	PFAS limits — food-contact packaging only *Not food-contact packaging.*	**Not applicable**
Art. 6	Design for recycling (from 12.08.2026) *Recyclability grade applies from 01.01.2030.*	**Conforms**
Art. 7	Minimum recycled content — plastic packaging (targets from 2030)	**Not applicable**
Art. 8	Bio-based plastics — sustainability requirements	**Not applicable**
Art. 9	Compostability (single-portion / specified items)	**Not applicable**
Art. 10	Packaging minimisation — minimum weight/volume; empty-space ratio ≤ 50% (from 2030)	**Conforms**
Art. 11	Reusability — criteria (a)–(i) (reusable packaging only)	**Not applicable**
Art. 12	Labelling — material codes; harmonised label (from 08/2028)	**Not applicable**

Annex VIII No. 7

Applied standards and specifications

Fully applied standards	EN 13428:2004 (minimisation) · EN 13430:2004 (recyclability) applied as assessment methodology; minimisation assessed per PPWR Annex IV. Applied under the transitional provisions of Art. 70(1)(b).

Signature

Signed for and on behalf of **Headstock Distribution Ltd**:

Place of issue	Date of issue	Name / function
Halesowen, United Kingdom	02/10/2026	Richard Thompson Director of Product Design