

## Declaration of conformity for recyclability

According to the REACH regulation 1907/2006/EU, including all amendments through the regulation 2021/2045/EU, and the regulation CLP 1272/2008/EU, through the amendments up to 2021/643/EU and well as the guidance for identification and naming of substances under REACH and CLP (05.2017), are according to our film producer all our films with the exception of FWGS and FWGST, classified mono-constituent substances.

All substances and mixtures of substances, that have a main constituent at concentrations  $\geq 80\%$  and that are not classified as composite materials (plastics/paper, paper/metal or paper/plastics/metal) are identified as mono-constituent substances.

According to our film supplier following directives 94/62/EG and 97/129/EG, this is the applicable labelling for our films:

| Films                        | Product-Code   | Identification  |
|------------------------------|--|---|
| <b>PP-Banding films</b>      | FTN, FTND, FWG, FWGL, FSW,<br>as well as all colored banding films |    |
| <b>HDPE-Banding films</b>    | PEH  |   |
| <b>Special Banding films</b> | FWGS, FWGST  |  |

According to the film manufacturer our films comply with the below listed standards:

- **DIN EN 13428:2004** - Concentration of Heavy Metals <100 ppm is fulfilled (analogical to 94/62/EG and ROHS 2011/65/EU including amendment 2015/863/EU)
- **DIN EN 13430:2004** - Given Recyclability (Mono-constituent material)  
In case of FWGS and FWGST recyclability is given via the newly developed process on chemical recycling for the circular economy.
- **DIN EN 13431:2004** - Compliant with the requirements for energy recovery  
The specific energy gain in the thermal utilization is equal to 24 MJ/kg for PP, and 22 MJ/kg for HDPE; the minimum target is 11 MJ/kg.

We as ATS refer to the information given by our supplier and the interpretation of the above listed directives and standards. An external validation by us or our supplier has not been assigned.

On behalf of our film producer, we would like to point out, that the existing collection streams for flexible packaging are quite limited. With the exception of LDPE-films, there are no other separated collection streams and circuits existing. In general, the waste disposal of all other flexible packaging is within the fraction of the mixed plastics. In the newest high-tech recycling units this fraction is segregated into single-variety streams which are recycled to mono-constituent material streams. The remaining fraction either finds its way to the energy recovery or to the newly developed chemical recycling.

This declaration replaces all previous statements on the classification of our ATS-films and is valid until the issue of a new declaration, longest however until 31.12.2023.