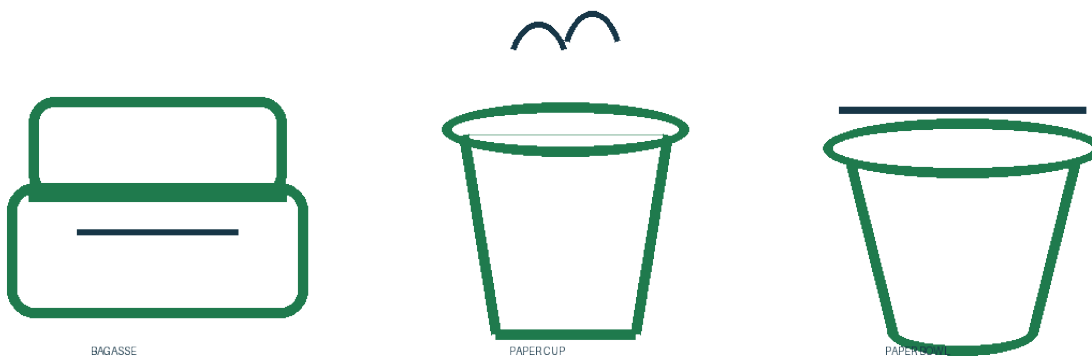


BIOLEADER®

PPWR DECLARATION OF CONFORMITY & EVIDENCE MAPPING

Starter Pack for Foodservice Packaging

Sugarcane Bagasse Containers | Paper Cups | Paper Bowls



Regulation (EU) 2025/40 | Version 2.0 | Published 5 August 2026

Continuous update commitment

Bioleader® will continue to review and update this starter pack when new PPWR delegated acts, implementing acts, harmonised standards, common specifications, official guidance or other material legal developments affect the content. Always use the latest edition available from Bioleader®.

Important legal status

This is a specimen and procurement guide. It is not an issued EU Declaration of Conformity, does not certify any Bioleader® product, and must not be signed or reused without product-specific evidence and a confirmed manufacturer role.

Prepared by Bioleader Editorial & Product Team
Xiamen Bioleader Environmental Protection Technology Co., Ltd. | www.bioleaderpack.com

How to Use This Starter Pack

Purpose, scope and continuous update policy

Quick legal baseline

Regulation (EU) 2025/40 entered into force on 11 February 2025 and applies from 12 August 2026. Article 39 requires the EU Declaration of Conformity to follow Annex VIII, include the Annex VII elements and be continuously updated.

What this pack contains

- A manufacturer-role decision guide for foodservice packaging.
- A practical explanation of the eight Annex VIII declaration sections.
- Three separate specimen declarations: an unbranded bagasse clamshell, a customer-branded paper hot cup and an importer-own-brand paper bowl with a separate PP lid.
- An Articles 5-12 applicability matrix, Annex VII technical-file checklist, buyer document request form, claims-to-evidence matrix and a Bioleader® certificate-scope mapping annex.

What this pack does not do

- It does not determine the legal manufacturer for a real transaction without reviewing the branding, design control, filling and placing-on-market facts.
- It does not confirm that a product is recyclable, compostable, PFAS compliant, food-contact suitable, plastic-free or otherwise compliant.
- It does not replace product-specific legal review, food-contact documentation, national EPR analysis or market-surveillance requirements.
- It does not create a CE mark or require a notified body under the standard Module A procedure.

Living document policy

Bioleader® will maintain this publication as a living document. The cover and footer show the version and publication date. When the legal or technical baseline changes, the online edition may be revised and reissued with a new version number. Buyers should archive the version used for each project and verify whether a newer edition is available before approval or signature.

Document map

Pages	Content	Primary use
3-4	Role decision guide and Annex VIII anatomy	Determine who signs and what the declaration must contain
5-6	Specimen A - unbranded bagasse clamshell	Standard final-form service packaging scenario
7-8	Specimen B - customer-branded paper hot cup	Brand-user manufacturer scenario
9-10	Specimen C - importer-own-brand paper bowl + PP lid	Article 21 manufacturer scenario
11-14	Applicability, technical file, buyer form and claims matrix	Build and verify the evidence package
15-18	Bioleader® certificate, test-report and carbon-evidence mapping	Match public evidence to the exact SKU, component, claim and technical-file section
19	Update policy, references and contact	Version control and source review

Use the PDF with the technical file

The DoC is a signed summary. The Annex VII technical file is the evidence base. A declaration without the supporting file is not a defensible compliance system.

Who Is the PPWR Manufacturer?

Foodservice packaging role decision guide

The PPWR manufacturer is not always the physical factory. The role depends on the packaging type, branding, design control, filling and market-placement facts. The Commission guidance also distinguishes the manufacturer role from the producer role used for extended producer responsibility.

Step 1 - Is the item packaging?

Scenario	Likely PPWR treatment
Cup or food container sold empty to consumers for private use	May not be packaging when designed and intended to be sold empty by the final distributor.
Cup, bowl, clamshell or food container filled at the point of sale	Service packaging.
Cup or food container sold by the final distributor containing food or drink	Packaging when it performs a packaging function.
Disposable knife, fork or spoon	Generally outside this foodservice-packaging DoC pack; assess separately.

Step 2 - Identify the manufacturer

Commercial scenario	Who is normally the manufacturer?	Procurement implication
Final-form unbranded service packaging	The company that manufactures the final service packaging.	Supplier may issue the DoC, supported by its Annex VII file.
Service packaging clearly branded with the user's name or trademark	The user / brand owner.	Supplier provides the technical information required for the brand owner's file.
Sales or grouped packaging filled with a product	Normally the filler, often the product brand owner.	The filler controls the final packaging configuration and declaration.
Importer or distributor places packaging under its own name or trademark, or modifies it in a compliance-relevant way	The importer or distributor is treated as the manufacturer under Article 21.	The importer or distributor assumes Article 15 obligations.

Manufacturer is not the same as producer

Role	Primary PPWR function
Manufacturer	Ensures conformity with the sustainability and labelling requirements in Articles 5-12 and draws up the DoC.
Producer	Fulfils EPR registration, reporting and financing obligations in the Member State where packaging is expected to become waste.

One manufacturer, potentially multiple producers

The Commission guidance states that there is one manufacturer EU-wide for the packaging, while producer obligations may arise in different Member States. Do not use an EPR registration to infer who must sign the DoC.

Annex VIII: The Eight Required Sections

Structure, evidence and update logic

1. Unique identification of the packaging and the declaration number.
2. Name and address of the manufacturer and, where applicable, the authorised representative.
3. Statement that the declaration is issued under the sole responsibility of the manufacturer.
4. Object of the declaration: packaging identification, description and traceability information.
5. Statement of conformity with Regulation (EU) 2025/40 and any other Union acts included in the same declaration.
6. References to relevant harmonised standards, common specifications or other technical specifications used.
7. Notified-body information where applicable. Under the standard PPWR Module A procedure, this is normally not applicable.
8. Additional information, place and date of issue, name, function and signature.

Three operational rules that matter

Rule	Practical meaning
One packaging type	Annex VII requires a written declaration for each packaging type. A controlled family can be managed only when the covered variants and evidence are clearly defined.
Module A internal production control	The manufacturer establishes the technical file, controls production and declares conformity under its sole responsibility.
Continuous update	Article 39 requires the DoC to be continuously updated. Article 15 also requires re-assessment when changes could affect conformity.

What should sit behind the signed declaration?

- **Product identity:** SKU, dimensions, weight, colour, intended use, packaging type and version.
- **Construction:** Body, lid, liner, coating, additives, inks, adhesives, labels, sleeves and other components.
- **Assessment basis:** Applicable requirements, standards, common specifications, analytical methods, design solutions and risk analysis.
- **Evidence:** Drawings, specifications, declarations, certificates, test reports and finished-product mapping.
- **Manufacturing control:** Approved materials, process controls, inspections, batch traceability, supplier approval and change notification.

DoC is not a certification logo

A signed DoC is the manufacturer's legal declaration under Module A. It does not automatically prove compostability, recyclability, food-contact compliance, PFAS compliance or acceptance by a local waste facility.



EU Declaration of Conformity - Specimen A

Unbranded Sugarcane Bagasse Clamshell - Service Packaging

SPECIMEN - ILLUSTRATIVE ONLY - NOT AN ISSUED DECLARATION

Declaration No.: EU-DOC-BG-CLAM-0001 | Example issue date: 2026-08-12

1. Unique identification	EU-DOC-BG-CLAM-0001 Packaging type version: v1.0
2. Manufacturer	Example Fibre Packaging Manufacturer Ltd. (fictional) Role example: final-form unbranded service-packaging manufacturer Address: [insert registered address] Contact: [insert compliance contact]
3. Sole responsibility	This declaration of conformity is issued under the sole responsibility of the manufacturer.
4. Object of the declaration	SKU / reference: BG-96-EXAMPLE Single-use one-piece hinged food container intended to be filled at the point of sale. Example dimensions: 240 x 155 x 70 mm. Example unit weight: 24 g. Natural-colour moulded fibre based predominantly on sugarcane bagasse. Actual formulation, additives, wet-strength system, grease barrier, colour and manufacturing site must be listed in the technical file. Technical drawing / image reference: Annex A of the technical file. Scope: clamshell body and integral hinged lid only. Any separate sleeve, label, liner, cutlery or outer packaging is excluded unless specifically identified.
5. Statement of conformity	The object of the declaration described in point 4 is declared in conformity with Regulation (EU) 2025/40 on packaging and packaging waste, in respect of the applicable requirements laid down in or pursuant to Articles 5 to 12, as identified in point 8. Other Union acts are outside the scope of this specimen unless separately listed.
6. Standards and technical specifications	List the harmonised standards, common specifications and other technical specifications actually used. If no applicable harmonised standard or common specification is available, identify the analytical methods, assessment methods and design solutions documented in the Annex VII technical file.
7. Notified body	Not applicable for Module A internal production control under Article 38 and Annex VII, unless another applicable Union act requires third-party involvement. No CE mark is created by this specimen.

Scope discipline

A declaration must identify the packaging type it covers. Do not use one generic declaration for an entire catalogue unless a controlled product family, its variants and the matching evidence are explicitly defined.

Specimen A - Additional Information

Unbranded Sugarcane Bagasse Clamshell

SPECIMEN - REPLACE ALL EXAMPLE STATUS ENTRIES WITH SKU-SPECIFIC EVIDENCE

8.1 Requirements applicability and conformity matrix

The matrix below is an illustrative starting point for an issue date of 12 August 2026. The manufacturer must replace each entry with a documented conclusion for the actual SKU, components, intended use, destination market and issue date.

PPWR area	Example status	Evidence / action required
Article 5 - substances	APPLICABLE / VERIFY	Heavy-metal limits and, for food-contact packaging from 12 August 2026, the three PFAS limits. Map reports to the exact colour, formulation, barrier and production site.
Article 6 - recyclability	APPLICABLE / VERIFY	Document the current recyclability assessment and the method used. Do not assume that fibre automatically proves recyclability; consider additives, coating, labels and contamination.
Article 7 - recycled plastic	EXAMPLE: NOT APPLICABLE	This example assumes no plastic component. Verify the complete formulation and any polymeric barrier or label before using this status.
Article 8 - bio-based plastic	NOT YET APPLICABLE	Monitor future Commission review and any later requirements affecting bio-based plastic components.
Article 9 - compostability	NOT IN MANDATORY LIST	A clamshell is not one of the Article 9(1) mandatory formats. Any compostable claim still needs finished-product evidence and local disposal qualification.
Article 10 - minimisation	NOT YET APPLICABLE	PPWR Article 10 applies from 1 January 2030. Continue documenting weight, dimensions and performance-based justification.
Article 11 - reusable packaging	NOT APPLICABLE	Single-use packaging specimen.
Article 12 - labelling	NOT YET APPLICABLE	Prepare product data for future harmonised labels; confirm the actual application date and relevant implementing acts before artwork approval.

8.2 Technical documentation reference

Annex VII technical file reference: [TD-SPECIMEN-A-0001 v1.0]. The file should exist before signature and should include the material construction, drawings, intended use, applicable-requirement analysis, standards or technical methods, assessment records, manufacturing controls and test reports.

8.3 Retention and update control

- **Retention:** Keep the DoC and technical documentation for 5 years after single-use packaging is placed on the market; 10 years for reusable packaging.
- **Re-assessment:** Review the declaration when design, formulation, coating, ink, supplier, lid, production site, standard, specification or legal requirement changes in a way that could affect conformity.
- **Language:** Prepare or translate the DoC into the language or languages required by the Member State where the packaging is placed or made available on the market.
- **Authority response:** Maintain the file so it can be provided promptly to the relevant national authority when requested.

Signature block

Field	Entry
Signed for and on behalf of	Example Fibre Packaging Manufacturer Ltd. (fictional)
Name and function	[Authorised signatory - insert actual name and role]
Place and date of issue	[City, Country, YYYY-MM-DD]
Signature	[Wet or valid electronic signature, as applicable]

Do not sign prematurely

The signatory takes responsibility for the declaration. Complete the Annex VII technical file, confirm the manufacturer role, and verify every applicable requirement before issue.



EU Declaration of Conformity - Specimen B

Customer-Branded Paper Hot Cup - Brand User Manufacturer Scenario

SPECIMEN - ILLUSTRATIVE ONLY - NOT AN ISSUED DECLARATION

Declaration No.: EU-DOC-PCUP-0001 | Example issue date: 2026-08-12

1. Unique identification	EU-DOC-PCUP-0001 Packaging type version: v1.0
2. Manufacturer	Example Coffee Brand GmbH (fictional) Role example: the user / brand owner is manufacturer because its name or trademark appears on the service packaging Address: [insert registered address] Contact: [insert compliance contact]
3. Sole responsibility	This declaration of conformity is issued under the sole responsibility of the manufacturer.
4. Object of the declaration	SKU / reference: PC-12OZ-BRAND-EXAMPLE Customer-branded 12 oz paper hot cup intended to be filled at the point of sale. Example dimensions: 90 mm top diameter x 60 mm base x 110 mm height. Example cup weight: 9.5 g. Paperboard body with PE lining and customer artwork. Ink system, paperboard grade, lining weight, seam construction and manufacturing site must be documented. Technical drawing / image reference: Annex A of the technical file. Scope: printed cup body only. The lid is excluded. A PP, CPLA, paper or other lid must be separately identified or included as a controlled packaging combination.
5. Statement of conformity	The object of the declaration described in point 4 is declared in conformity with Regulation (EU) 2025/40 on packaging and packaging waste, in respect of the applicable requirements laid down in or pursuant to Articles 5 to 12, as identified in point 8. Other Union acts are outside the scope of this specimen unless separately listed.
6. Standards and technical specifications	List the harmonised standards, common specifications and other technical specifications actually used. If no applicable harmonised standard or common specification is available, identify the analytical methods, assessment methods and design solutions documented in the Annex VII technical file.
7. Notified body	Not applicable for Module A internal production control under Article 38 and Annex VII, unless another applicable Union act requires third-party involvement. No CE mark is created by this specimen.

Scope discipline

A declaration must identify the packaging type it covers. Do not use one generic declaration for an entire catalogue unless a controlled product family, its variants and the matching evidence are explicitly defined.

Specimen B - Additional Information

Customer-Branded Paper Hot Cup

SPECIMEN - REPLACE ALL EXAMPLE STATUS ENTRIES WITH SKU-SPECIFIC EVIDENCE

8.1 Requirements applicability and conformity matrix

The matrix below is an illustrative starting point for an issue date of 12 August 2026. The manufacturer must replace each entry with a documented conclusion for the actual SKU, components, intended use, destination market and issue date.

PPWR area	Example status	Evidence / action required
Article 5 - substances	APPLICABLE / VERIFY	Heavy metals, PFAS limits for food-contact packaging, food-contact declarations and migration evidence as required under other applicable Union acts. Match the ink, lining and paperboard construction.
Article 6 - recyclability	APPLICABLE / VERIFY	Assess paperboard, PE lining, seam, ink and any labels or sleeves as one construction. Do not describe the cup as recyclable in every market without local-system qualification.
Article 7 - recycled plastic	NOT YET APPLICABLE	Future applicability depends on the plastic lining, its weight, target category, calculation methodology and any exemption. Record the plastic-part weight now.
Article 8 - bio-based plastic	NOT APPLICABLE TO PE LINING	This specimen uses PE lining. A PLA-lined cup requires a separate assessment and should not be treated as a hot-drink PLA cup without verified temperature suitability.
Article 9 - compostability	NOT IN MANDATORY LIST	A paper hot cup is not automatically required to be compostable. Do not claim compostability unless the finished cup and all relevant components are covered by suitable evidence.
Article 10 - minimisation	NOT YET APPLICABLE	Maintain basis weight, lining weight, dimensions and performance tests to support later minimisation assessment.
Article 11 - reusable packaging	NOT APPLICABLE	Single-use paper cup specimen.
Article 12 - labelling	NOT YET APPLICABLE	Reserve artwork space and controlled data fields, but do not invent a PPWR label before the official specification and application date are confirmed.

8.2 Technical documentation reference

Annex VII technical file reference: [TD-SPECIMEN-B-0001 v1.0]. The file should exist before signature and should include the material construction, drawings, intended use, applicable-requirement analysis, standards or technical methods, assessment records, manufacturing controls and test reports.

8.3 Retention and update control

- **Retention:** Keep the DoC and technical documentation for 5 years after single-use packaging is placed on the market; 10 years for reusable packaging.
- **Re-assessment:** Review the declaration when design, formulation, coating, ink, supplier, lid, production site, standard, specification or legal requirement changes in a way that could affect conformity.
- **Language:** Prepare or translate the DoC into the language or languages required by the Member State where the packaging is placed or made available on the market.
- **Authority response:** Maintain the file so it can be provided promptly to the relevant national authority when requested.

Signature block

Field	Entry
Signed for and on behalf of	Example Coffee Brand GmbH (fictional)
Name and function	[Authorised signatory - insert actual name and role]
Place and date of issue	[City, Country, YYYY-MM-DD]
Signature	[Wet or valid electronic signature, as applicable]

Do not sign prematurely

The signatory takes responsibility for the declaration. Complete the Annex VII technical file, confirm the manufacturer role, and verify every applicable requirement before issue.



EU Declaration of Conformity - Specimen C

Importer-Own-Brand Paper Bowl with PP Lid - Article 21 Scenario

SPECIMEN - ILLUSTRATIVE ONLY - NOT AN ISSUED DECLARATION

Declaration No.: EU-DOC-PBOWL-0001 | Example issue date: 2026-08-12

1. Unique identification	EU-DOC-PBOWL-0001 Packaging type version: v1.0
2. Manufacturer	Example EU Foodservice Imports S.A. (fictional) Role example: importer places the packaging under its own trademark and is treated as the manufacturer Address: [insert registered address] Contact: [insert compliance contact]
3. Sole responsibility	This declaration of conformity is issued under the sole responsibility of the manufacturer.
4. Object of the declaration	SKU / reference: PB-750-PPSET-EXAMPLE Importer-own-brand 750 ml kraft paper food bowl supplied with a separate PP lid and intended for takeaway food. Example bowl dimensions: 150 mm top diameter x 128 mm base x 70 mm height. Example weights: bowl 18 g; lid 7 g. Bowl construction: kraft paperboard with PP lining and one-colour print. Lid: injection-moulded PP. The bowl and lid component versions, colours, weights and production sites must be controlled in the technical file. Technical drawing / image reference: Annex A of the technical file. Scope: one defined bowl and one defined PP lid supplied as a controlled set. A PET lid, paper lid, different print, different lining or different bowl size requires separate version control and may require a separate declaration.
5. Statement of conformity	The object of the declaration described in point 4 is declared in conformity with Regulation (EU) 2025/40 on packaging and packaging waste, in respect of the applicable requirements laid down in or pursuant to Articles 5 to 12, as identified in point 8. Other Union acts are outside the scope of this specimen unless separately listed.
6. Standards and technical specifications	List the harmonised standards, common specifications and other technical specifications actually used. If no applicable harmonised standard or common specification is available, identify the analytical methods, assessment methods and design solutions documented in the Annex VII technical file.
7. Notified body	Not applicable for Module A internal production control under Article 38 and Annex VII, unless another applicable Union act requires third-party involvement. No CE mark is created by this specimen.

Scope discipline

A declaration must identify the packaging type it covers. Do not use one generic declaration for an entire catalogue unless a controlled product family, its variants and the matching evidence are explicitly defined.

Specimen C - Additional Information

Importer-Own-Brand Paper Bowl with PP Lid

SPECIMEN - REPLACE ALL EXAMPLE STATUS ENTRIES WITH SKU-SPECIFIC EVIDENCE

8.1 Requirements applicability and conformity matrix

The matrix below is an illustrative starting point for an issue date of 12 August 2026. The manufacturer must replace each entry with a documented conclusion for the actual SKU, components, intended use, destination market and issue date.

PPWR area	Example status	Evidence / action required
Article 5 - substances	APPLICABLE / VERIFY	Map heavy-metal and PFAS evidence to the bowl, lining, ink and lid. Food-contact documents must cover the intended food types, time and temperature conditions.
Article 6 - recyclability	APPLICABLE / VERIFY	Assess the paper bowl and PP lid both separately and as a marketed set. State component separation and destination-market disposal instructions accurately.
Article 7 - recycled plastic	NOT YET APPLICABLE	Future recycled-content targets may apply to the PP lining and PP lid. Record plastic-part weights, manufacturing plants and any applicable exemptions.
Article 8 - bio-based plastic	NOT APPLICABLE	The specimen uses conventional PP components. Reassess if PLA, bio-attributed or other bio-based plastic is introduced.
Article 9 - compostability	NOT IN MANDATORY LIST	The set must not be described as fully compostable. PP components have a different end-of-life route. Any claim must identify which component it covers.
Article 10 - minimisation	NOT YET APPLICABLE	Document why the bowl wall, lining, lid geometry and empty-space performance are necessary for the intended foodservice use.
Article 11 - reusable packaging	NOT APPLICABLE	Single-use bowl and lid specimen.
Article 12 - labelling	NOT YET APPLICABLE	Maintain component-level material data and reserve space for future harmonised labels or digital information.

8.2 Technical documentation reference

Annex VII technical file reference: [TD-SPECIMEN-C-0001 v1.0]. The file should exist before signature and should include the material construction, drawings, intended use, applicable-requirement analysis, standards or technical methods, assessment records, manufacturing controls and test reports.

8.3 Retention and update control

- **Retention:** Keep the DoC and technical documentation for 5 years after single-use packaging is placed on the market; 10 years for reusable packaging.
- **Re-assessment:** Review the declaration when design, formulation, coating, ink, supplier, lid, production site, standard, specification or legal requirement changes in a way that could affect conformity.
- **Language:** Prepare or translate the DoC into the language or languages required by the Member State where the packaging is placed or made available on the market.
- **Authority response:** Maintain the file so it can be provided promptly to the relevant national authority when requested.

Signature block

Field	Entry
Signed for and on behalf of	Example EU Foodservice Imports S.A. (fictional)
Name and function	[Authorised signatory - insert actual name and role]
Place and date of issue	[City, Country, YYYY-MM-DD]
Signature	[Wet or valid electronic signature, as applicable]

Do not sign prematurely

The signatory takes responsibility for the declaration. Complete the Annex VII technical file, confirm the manufacturer role, and verify every applicable requirement before issue.

Cross-Product Applicability Matrix

Illustrative status as of 12 August 2026 - verify the actual SKU and issue date

Matrix use rule					
This page is a procurement and drafting aid, not a legal conclusion. Change one material, coating, lid, print, weight, brand, intended use or market role and the evidence path may change.					
Article	Topic	Bagasse clamshell	Paper cup	Paper bowl + PP lid	Core evidence path
Art. 5	Substances / PFAS	Applicable	Applicable	Applicable	Heavy metals; PFAS for food-contact packaging; technical-file mapping
Art. 6	Recyclability	Applicable	Applicable	Applicable	Assessment method, component construction and evidence
Art. 7	Recycled plastic content	Example: no plastic	Future - PE lining	Future - PP lining + lid	Plastic-part weights, plant/year data, methodology and exemptions
Art. 8	Bio-based plastic	Monitor formulation	Not applicable to PE example	Not applicable to PP example	Reassess when bio-based plastic is used
Art. 9	Compostability	Not mandatory category	Not mandatory category	Not mandatory category	Claims require separate finished-product evidence
Art. 10	Minimisation	From 2030	From 2030	From 2030	Dimensions, weights, performance basis and risk analysis
Art. 11	Reusable packaging	Single use - N/A	Single use - N/A	Single use - N/A	Reassess if reusable design or system is introduced
Art. 12	Labelling	Later / conditional date	Later / conditional date	Later / conditional date	Controlled component data, artwork space and implementing acts

Three recurring procurement risks

Risk	Why it matters	Control
Generic supplier statement	It may not identify the SKU, component, test method, formulation or production site.	Require document-to-SKU mapping and report scope.
Mixed lid options	PP, PET, paper and CPLA lids can change food-contact, recyclability, compostability and use claims.	Control each lid code and packaging combination.
Custom print or brand	Branding can change the manufacturer role and introduces inks, varnishes and artwork claims.	Confirm role before order approval and update the technical file.

Bioleader® buyer note	
For a real project, send the exact item code, material, coating, lid, colour, print, intended use, destination market and commercial role. Document availability should be confirmed for that selected configuration, not assumed for a product category.	

Annex VII Technical File Checklist

The evidence base behind the signed declaration

Annex VII requires the manufacturer to establish technical documentation that allows assessment of conformity, identifies the applicable requirements and covers the design, manufacture and operation of the packaging as far as relevant.

File section	Minimum contents	Foodservice packaging additions
1. General description	Packaging type, intended use, version and applicable requirements.	Food type, fill condition, hot/cold use, microwave scope, point-of-sale use and destination markets.
2. Design and materials	Conceptual design, manufacturing drawings and component materials.	Body, lid, liner, coating, ink, adhesive, label, sleeve, additive, colour, dimensions and unit weights.
3. Explanations	Information needed to understand the design and operation.	Component separation, sealing or seam design, barrier function, grease resistance and packing configuration.
4. Standards / specifications	Harmonised standards, common specifications, other technical specifications or alternative solutions.	Test methods, supplier specifications, certificate scope, recyclability method and claim rules.
5. Qualitative assessments	How Articles 6, 10 and 11 assessments were carried out.	Recyclability logic, minimisation rationale and reusable / single-use classification.
6. Test reports	Reports supporting the applicable requirements.	Heavy metals, PFAS, food-contact, migration, physical performance and any compostability evidence claimed.
7. Manufacturing control	Measures ensuring production remains consistent with the technical documentation.	Incoming materials, process settings, inspection, batch traceability, approved suppliers and non-conformity control.
8. Change control	Re-assessment when changes could affect conformity.	New paperboard, fibre formulation, barrier, ink, lid, mould, plant, artwork, supplier, standard or law.

Recommended document index

- TD-01 Product specification and intended-use statement
- TD-02 Bill of materials and component weights
- TD-03 Drawings, artwork and packaging images
- TD-04 Supplier declarations and material specifications
- TD-05 Food-contact compliance documents
- TD-06 Article 5 heavy-metal and PFAS evidence
- TD-07 Recyclability and component-separation assessment
- TD-08 Compostability evidence and claim scope, where used
- TD-09 Manufacturing control plan and inspection records
- TD-10 Risk assessment, change history and approval record

Finished-product mapping is essential

A raw-material certificate or generic material statement does not automatically cover the finished cup, bowl, clamshell, print, coating, adhesive, lid or complete set.

Buyer Document Request Form

Send this checklist with the item code before artwork or order approval

Project field	Buyer entry / supplier response
Buyer / company	_____
Destination market(s)	_____
Commercial role	☐ Importer ☐ Distributor ☐ Brand owner ☐ Filler ☐ Other
Product family	☐ Bagasse container ☐ Paper cup ☐ Paper bowl ☐ Other
Supplier item code	_____
Dimensions / capacity / weight	_____
Body material and colour	_____
Lining / coating / barrier	_____
Lid / accessory code and material	_____
Printing / ink / varnish	_____
Manufacturing site	_____
Intended food / time / temperature	_____
DoC number and version	_____
Annex VII technical-file reference	_____

Evidence requested

Document / evidence	Requested	Received / version	Scope confirmed
Product specification and bill of materials	☐	_____	☐
Food-contact documents for intended use	☐	_____	☐
Heavy-metal evidence	☐	_____	☐
PFAS-related evidence for food-contact packaging	☐	_____	☐
Recyclability assessment basis	☐	_____	☐
Compostability certificate / report, if claimed	☐	_____	☐
Component weights and plastic-part data	☐	_____	☐
Manufacturing and change-control statement	☐	_____	☐
Artwork / claim approval record	☐	_____	☐

Supplier change notification

Require written notice before changes to material, formulation, coating, ink, adhesive, lid, supplier, manufacturing plant, mould, dimensions, weight or any claim-relevant characteristic.

Environmental Claims and Evidence Matrix

Use specific, qualified claims that match the finished packaging

Claim	Evidence expected	Critical qualification
Industrially compostable	Finished-product testing or certification to the applicable standard; exact SKU, thickness, formulation, ink, coating and components.	Does not mean home compostable or accepted by every facility.
Home compostable	Separate home-composting evidence for the finished product.	Industrial compostability is not enough.
Biodegradable	Defined environment, timeframe, test method and product scope.	A broad biodegradable claim alone does not prove compostability.
PFAS-related claim	SKU-specific method, sample, reporting limit, result and construction; supplier declaration where relevant.	Compostability does not prove PFAS compliance.
Plastic-free	Verification of every component, coating, liner, adhesive, ink, label and lid.	Paper or bagasse appearance is not proof.
Recyclable	Documented assessment under the applicable framework plus market-specific collection and sorting qualification.	Technical recyclability is not the same as local acceptance.
Food-contact suitable	Documents covering the material, intended food, time and temperature conditions under applicable food-contact law.	PPWR DoC does not replace food-contact compliance.
Microwave suitable	Product-specific performance testing and clear limits; confirm lid separately.	PET lids and some coated-paper constructions may not be suitable.
Plant-based / renewable feedstock	Material-origin and formulation information.	Plant-based does not automatically mean compostable.
Recycled content	Verified percentage, calculation boundary, component scope, plant/year data and applicable methodology.	Do not extrapolate one resin declaration to the full packaging.

Approval statement for marketing teams

Claim control rule

The wording on the website, catalogue, quotation, carton, product label and distributor listing should match the same approved evidence and component scope. A broader public claim than the technical file can create greenwashing and compliance risk.

Examples of safer wording

Avoid	Prefer
100% eco-friendly packaging	Moulded-fibre food container with product-specific material and compliance documentation available for review.
Fully compostable bowl set	The bowl and lid materials are identified separately; compostability is stated only for components covered by matching evidence.
PFAS-free	Tested for specified PFAS parameters using the stated method and reporting limit; request the product-specific report.
Recyclable everywhere	Designed for the identified recycling pathway; acceptance depends on local collection and facility rules.

How Bioleader® Evidence Fits the PPWR File

Use each certificate for its proper purpose; none replaces Annex VII or Annex VIII

Bioleader® publicly groups certificates and test reports by material and product category. The defensible approach is to use the portfolio as an evidence stack: first determine the legal manufacturer and applicable PPWR requirements, then map supporting documents to the exact finished SKU, components, claims, manufacturing site and destination market.

Evidence layer	Bioleader® evidence examples	Proper use in the project file	What it does not prove
1. PPWR legal control	Annex VII technical documentation; Annex VIII EU Declaration of Conformity; manufacturer-role and SKU/version control.	Identify the responsible manufacturer, assess Articles 5-12 and issue the product-specific declaration.	A certificate portfolio cannot replace the manufacturer's own conformity assessment or signed DoC.
2. Food-contact and chemical evidence	FDA 21 CFR reports; Regulation (EC) No 1935/2004 and LFGB reports; plastic-layer or lid reports; PFAS/PFOA/PFOS-related testing.	Support the intended food-contact use and relevant Article 5 evidence when the report scope and method match the finished product.	Compostability, recyclability, carbon footprint, every PPWR PFAS threshold or every destination market.
3. Compostability and end-of-life evidence	DIN EN 13432, ASTM D6400, AS 5810, OK compost HOME, OK compost INDUSTRIAL and BPI documents.	Support a specific industrial- or home-compostability claim within the listed product family, formulation and certification scope.	Acceptance by every composting facility, compostability of a PET/PP lid or overall PPWR compliance.
4. Manufacturing and supplier assurance	BRC, NSF, ISO 9001, ISO 14001, BSCI and factory/audit evidence where applicable.	Support quality systems, process control, supplier assurance and audit readiness.	Finished-SKU food-contact, compostability, PFAS or PPWR conformity.
5. Supplemental environmental evidence	ISO 14067 product carbon-footprint report verified under ISO 14064-3 for the named manufacturing entity and declared unit.	Support a carefully qualified carbon-footprint statement with the same entity, period, declared unit and system boundary.	Carbon neutrality, a full life-cycle result, all Bioleader® SKUs or a PPWR certificate.

Core scope rule

Before a document is cited in a DoC or technical file, confirm the certificate holder, manufacturing site, product code or product family, material formulation, colour, thickness or weight, coating or lining, ink and adhesive, lid or accessory, intended use, test method, validity status and destination market. A raw-material or generic category document should not be presented as automatic evidence for every finished SKU.

Source basis for this edition

The evidence examples in pages 15-18 were mapped from Bioleader®'s public certificate and test-report page as reviewed on 5 August 2026, together with the TÜV Austria Shanghai greenhouse-gas verification statement for the named manufacturing entity. The underlying files must still be reviewed for their exact scope before use in a real declaration.

Sugarcane Bagasse Foodservice Packaging - Evidence Mapping

How public certificates can support a bagasse clamshell, bowl, tray or container file

Bagasse foodservice packaging may require separate evidence for food-contact suitability, PFAS and fluorine, compostability, manufacturing control, performance and environmental claims. The exact document package depends on the selected natural or white SKU, barrier treatment, lid, intended use and market.

Evidence question	Public Bioleader® examples	Suitable technical-file use	Required limitation / scope check
Food-contact suitability	SGS FDA 21 CFR report; SGS report referencing Regulation (EC) No 1935/2004 / LFGB / FDA; SGS LFGB-FDA report.	Map the exact report to intended foods, temperature, contact time and the finished bagasse construction.	Do not infer EU, US and German coverage from a title alone; review the underlying test conditions and sample identity.
PFAS and fluorine evidence	PFAS-Free Certificate; PFOA-Free & PFOS-Free Certificate.	Use as supporting Article 5 evidence only where the tested product, method, analyte scope, reporting limits and date are suitable.	A general PFAS-free title does not by itself prove compliance with all three PPWR limits: 25 ppb, 250 ppb and 50 ppm.
Industrial and home compostability	OK Compost Home; OK Compost Industrial; BPI; AS 5810; ASTM D6400; DIN EN 13432.	Support the specific compostability claim covered by the certificate or report.	Confirm holder, product family, colour, weight/thickness, formulation and whether the claim is industrial or home compostable.
Manufacturing and supplier assurance	BRC; NSF; ISO 9001; BSCI audit report.	Support quality management, production controls, audit readiness and supplier approval.	These are factory or management signals, not a substitute for the finished-SKU technical file or DoC.
Product information and safe use	MSDS Sugarcane Tableware and product specifications; performance or microwave evidence where separately available.	Describe composition, intended use, handling, storage and product limitations.	An MSDS is not a food-contact approval, compostability certificate or PPWR declaration.
Product carbon footprint	TÜV Austria Shanghai Greenhouse Gases Verification Statement for 1 kg Compostable Paper Tableware at GeoTegrity Eco Pack (Xiamen) Co., Ltd.	Use as supplementary environmental evidence when the selected product and production unit are within the verified scope.	The result is cradle-to-gate, not full life cycle, and must not be applied automatically to every bagasse SKU or production site.

Responsible external wording

Selected Bioleader® bagasse foodservice packaging may be supported by product-specific food-contact, compostability, PFAS-related, factory-assurance and supplementary carbon-footprint documents. Applicability must be confirmed against the exact SKU, construction, certificate scope, production site and destination market.

Avoid blanket wording

Do not state that all Bioleader® bagasse products are universally PPWR compliant, PFAS-free under every method, home compostable, carbon neutral or covered by the same certificate. Do not use the value 2.2694 kg CO₂e/kg as a catalog-wide product footprint.

Paper Cups, Paper Bowls and Lids - Evidence Mapping

Control the paper body, lining, printing, adhesive and lid as separate scope dimensions

Paper appearance does not determine the legal or environmental result. The evidence file should distinguish kraft or white paperboard, PE or PLA lining, water-based or other barriers, ink and adhesive systems, printed or unprinted construction, and separate PET, rPET, PP or paper lids.

Evidence area	Public Bioleader® examples	Suitable technical-file use	Critical scope control
Food-contact reports by construction	EC/EU test reports for kraft paper products, PE white products, paper boxes, bamboo paper products, paper chicken buckets / soup cups / popcorn, PLA kraft soup cups and salad bowls, and PLA white soup cups and salad bowls.	Map the underlying report to the selected board, lining, colour, print, food type, contact time and temperature.	A report for one board/lining combination should not be reused for a different coating, colour, ink system or application without confirmation.
Compostability for PLA-lined paper	OK Compost Industrial - PLA Paper Products.	Support an industrial-compostability claim where the finished product and construction are within the certificate scope.	Do not describe PE-lined products, PET/rPET lids, PP lids or an entire mixed-material set as compostable.
PFAS-related evidence by construction	PLA kraft products PFAS/PFOA/PFOS/POPs-free report; PE kraft products PFAS/PFOA/PFOS/PFBA-free report; PE white products PFAS/PFOA/PFOS-free report.	Support a qualified chemical claim for the exact tested construction and sample.	Check method, analyte list, reporting limits, coating, colour and production version; titles alone are insufficient for PPWR Article 5 conclusions.
Separate lid evidence	rPET lid PFAS/PFOA/PFOS/POPs-free report; EC/EU test report for rPET lid; EC/EU test report for PP lid.	Treat each lid as a separate component in the bill of materials, food-contact file, end-of-life statement and DoC scope.	A compostable paper bowl with a PET or PP lid is not a fully compostable set. PET lids are for cold-use applications; PP lids may require separate heat/microwave confirmation.
Factory assurance	BRC and other applicable quality-system or audit documents.	Support supplier qualification, process controls and change management.	Factory certification does not automatically cover every coating, ink, adhesive, lid or private-label artwork.
Claim and artwork control	Product specification, component list, approved artwork and supplier change notification.	Keep website, catalogue, carton and distributor wording aligned with the same evidence package.	Do not use "plastic-free", "recyclable" or "compostable" without checking every component and the destination-market disposal system.

DoC configuration rule

A declaration may cover one clearly identified packaging type or a controlled product family only when all covered variants, materials, dimensions, coatings, printing systems, lids and supporting evidence are explicitly defined. Different lid materials or barrier constructions may require a different technical-file version or a separate declaration.

Carbon-Footprint Evidence and Certificate Scope Control

How to use the TÜV Austria Shanghai statement without overstating the claim

The greenhouse-gas statement is valuable supplementary evidence for the named production unit and declared product unit. It should be included in the sustainability-evidence section of the technical file, not in place of PPWR conformity, food-contact, PFAS or compostability evidence.

Verified statement field	Documented value
Verified subject	1 kg Compostable Paper Tableware
Named entity	GeoTegrity Eco Pack (Xiamen) Co., Ltd.
Reporting period	1 January 2024 - 31 December 2024
Standards	ISO 14067:2018; verification in accordance with ISO 14064-3:2019
Declared result	2.2694 kg CO2e per 1 kg declared unit
System boundary	Cradle-to-gate
Assurance and materiality	Reasonable assurance; 5% materiality level
Stage breakdown	Raw-material procurement: 0.5344 kg CO2e; production: 1.7350 kg CO2e
Not included in the declared boundary	Transport and delivery, use and end-of-life are recorded as not applicable / outside the stated result
Issue date and verifier	20 June 2025; TÜV Austria (Shanghai) Co., Ltd.

Recommended wording for customer-facing documents

Acceptable qualified statement A manufacturing-unit product carbon-footprint verification statement is available for 1 kg of compostable paper tableware. The statement was prepared to ISO 14067:2018 and verified by TÜV Austria Shanghai in accordance with ISO 14064-3:2019. The declared cradle-to-gate result for the 2024 reporting period was 2.2694 kg CO2e per 1 kg declared unit. Applicability to a selected SKU and production site must be confirmed before use.	
Before attaching a certificate to a DoC or technical file	Do not claim
1. Same certificate holder / production entity 2. Same SKU or controlled product family 3. Same material, formulation, colour and thickness/weight 4. Same coating, lining, ink, adhesive and lid 5. Same intended food, temperature and contact conditions 6. Valid document and permitted logo use 7. Test method and reporting limits fit the claim 8. Destination-market and PPWR article mapping completed	• “PPWR certified” • “All Bioleader® products have this footprint” • “Carbon neutral” • “Full life-cycle emissions verified” • “All components are compostable” when a PET/PP lid is included • “PFAS-free” without a defined method and scope • “Plastic-free” without checking coatings, inks, adhesives and lids • Universal compliance across every SKU and market
Continuous update commitment Bioleader® will keep this publication under review and issue revised editions when material PPWR delegated acts, implementing acts, harmonised standards, common specifications, official Commission guidance or relevant product-evidence changes affect the wording, matrices or document expectations. The latest downloadable edition should be treated as the current guidance, while historical versions used for a project should be retained in the project record.	

Version Control, Update Commitment and References

Use the latest edition and retain the version used for each project

Bioleader® continuous update commitment

This starter pack is intentionally maintained as a living document. Bioleader® will review it when material PPWR developments occur, including new delegated acts, implementing acts, harmonised standards, common specifications, official Commission guidance, relevant court decisions or other changes that affect the drafting or evidence expectations for foodservice packaging declarations.

A revised edition may update the manufacturer-role guidance, applicability matrices, evidence checklists, specimen wording or references. The latest downloadable edition should be treated as the current Bioleader® guidance. Historical versions should be retained with project records when they were used for a decision or approval.

Version history

Version	Publication date	Summary
1.0	5 August 2026	Initial public starter pack covering an unbranded bagasse clamshell, a customer-branded paper cup and an importer-own-brand paper bowl with PP lid.
2.0	5 August 2026	Added product-category evidence mapping for Bioleader® bagasse, paper cups, paper bowls and lids; added controlled use of the manufacturing-unit greenhouse-gas verification statement and strengthened certificate-scope limitations.

Primary official references

Regulation (EU) 2025/40 on packaging and packaging waste: <https://eur-lex.europa.eu/eli/reg/2025/40/oj/eng>

Commission Notice C/2026/3084 - Guidance document for Regulation (EU) 2025/40: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52026XC03084>

Bioleader® Certificates & Test Reports by Product Category: <https://www.bioleaderpack.com/certificate/>

TÜV Austria Shanghai Greenhouse Gases Verification Statement - 1 kg Compostable Paper Tableware:

<https://www.bioleaderpack.com/wp-content/uploads/2026/01/Greenhouse-Gases-Verification-Statement.pdf>

Publisher and contact

Organisation	Xiamen Bioleader Environmental Protection Technology Co., Ltd.
Brand	Bioleader®
Website	www.bioleaderpack.com
Scope	Sugarcane bagasse tableware, compostable PLA cups, CPLA cutlery, cornstarch tableware, paper cups, paper bowls, kraft food packaging and biodegradable takeaway food packaging.
Document enquiries	Request the latest edition and product-specific document review through the Bioleader® website contact channel.

Final disclaimer

This publication is for general information and procurement preparation only. It is not legal advice, a certificate, an issued Declaration of Conformity or a guarantee that any specific product complies with PPWR or other legislation. The responsible manufacturer must complete a product-specific assessment and sign its own declaration.