

# STATEMENT OF COMPLIANCE WITH REGULATION (EU) 2025/40 ON PACKAGING AND PACKAGING WASTE (PPWR)

**Document number:** 2026/50

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**Area of validity:** European Union market

**Economic operator:** AS Latvijas Finieris, Bauskas 59, Riga, LV-1004, Latvia

**Role of economic operator:** supplier

**Object of statement:** raw and overlaid Riga Wood birch plywood panels for use as packaging or packaging components

**PPWR status:** supplier information supporting the conformity assessment of packaging manufactured or assembled by the customer.

## 1. Purpose and status of the compliance statement

This statement provides PPWR compliance information for raw and overlaid Riga Wood birch plywood supplied for use as packaging or packaging components. It supports the customer's technical documentation and conformity assessment under Regulation (EU) 2025/40 but is not an EU Declaration of Conformity for the final packaging. The manufacturer of the final packaging remains responsible for its technical documentation, conformity assessment and EU Declaration of Conformity.

## 2. Identification and description of the supplied material

This statement covers raw and overlaid Riga Wood birch plywood panels supplied for use as packaging or for conversion into packaging components, irrespective of production origin, commercial grade or internal material category.

Uncoated plywood consists principally of birch wood veneers and adhesive. Overlaid plywood additionally contains the surface film, resin-impregnated paper or other controlled surface system specified for the product.

Order-specific product designation, thickness, dimensions, surface variant and grade are identified in the applicable quotation, order confirmation, delivery documentation, product label or technical specification.

The customer determines the intended use, processing and final packaging design and verifies suitability for the specific application. This statement covers only the supplied plywood; components, treatments and materials added by others are excluded.

## 3. Applicable PPWR requirements and conformity basis

### *Article 5 - Requirements for substances in packaging*

#### Heavy metals — Article 5(4)

Based on the available supporting documentation and our knowledge of the manufacturing process, lead, cadmium, mercury and hexavalent chromium are not intentionally used in the manufacture of the Riga Wood birch plywood products. The products are therefore considered to comply with the 100 mg/kg limit specified in Article 5(4).

#### Per- and polyfluorinated alkyl substances (PFAS) in food-contact packaging — Article 5(5)

Based on declarations received from suppliers of the raw materials used in plywood production, PFAS are not intentionally added to those raw materials and are not expected to be present in the Riga Wood birch plywood products. The products are not marketed or supplied under this statement as food-contact packaging.

### *Article 6 - Recyclable packaging*

Subject to local acceptance criteria, the plywood may be separately collected and sorted as wood-based waste and mechanically processed for use as a secondary raw material in particleboard, fibreboard or other wood-based products. The final-packaging manufacturer shall assess recyclability under the applicable delegated acts and methodology. Pending the applicable PPWR criteria and methodology, EN 13430:2004 may be used as a supporting technical reference. EU design-for-recycling criteria are due by 1 January 2028 and apply from 1 January 2030 or 24 months after the delegated acts enter into force, whichever is later.

*Article 7 - Minimum recycled content in plastic packaging*

Article 7 does not apply to Riga Wood birch plywood as such. Any plastic-containing overlay, coating or other plastic component shall be assessed using the applicable product specification and the composition of the final packaging.

*Article 8 - Biobased feedstock in plastic packaging*

No requirement directly applicable to plywood has been identified. The principal material is wood. Any relevance to a plastic-containing surface system or other plastic component shall be assessed by the manufacturer of the final packaging.

*Article 9 - Compostable packaging*

The supplied plywood is not claimed or supplied as compostable packaging.

*Article 10 - Packaging minimisation*

The customer determines the necessary panel dimensions, thickness, quantity and configuration and shall document that the complete packaging does not exceed what is necessary for its protective and operational functions. Article 10 applies from 1 January 2030; pending a new or updated harmonised standard, EN 13428:2004 may be used as a supporting technical reference.

*Article 11 - Reusable packaging*

No reusable-packaging claim is made for the supplied plywood. Where the final packaging is placed on the market as reusable, its manufacturer shall establish the reuse system and demonstrate conformity with the applicable requirements.

*Article 12 - Labelling of packaging*

The manufacturer of the final packaging shall determine the applicable labelling obligations and any exemption according to the final packaging type and intended use. The harmonised material-composition label applies from 12 August 2028 or 24 months after the relevant implementing acts enter into force, whichever is later.

**4. Supporting technical documentation, additional information and limitations**

AS Latvijas Finieris maintains the controlled product specifications, order and delivery records, Product/Material Safety Data Sheet, internal material assessments and relevant supplier documentation, including raw-material supplier declarations concerning PFAS, that support this statement.

- The statement covers only the supplied raw and overlaid Riga Wood birch plywood identified in the applicable commercial and delivery documentation.
- Customer conversion and all components, coatings or treatments added by another party are outside its scope.
- Food-contact suitability or compliance is not established; such use requires a separate product-specific assessment.
- Changes affecting the conformity basis require documented review and, where relevant, reassessment. The statement shall also be reviewed when relevant legislation, standards, methodologies, labelling formats or official guidance are amended or updated.

**5. Approval**

Signed for and on behalf of AS Latvijas Finieris



Mārtiņš Lācis  
Executive Board Member,  
Head of Marketing, Sales and Logistics  
Riga, 4 August 2026