Example of accordance declarations

This is an OPTI-PACK suggestion to how an accordance declaration can be drawn up in different situations. According to the guide accordance declarations can be of relevancy in situations where one has not drawn up the documentation oneself, or it is not possible to obtain the documentation from the contractor.

If the company responsible does not possess the necessary documentation, it is important that the accordance declaration contains a guarantee from the subcontractor that they will provide the necessary documentation if the authorities demand written documentation. The responsible company should observe the following important issues:

- When changing subcontractor the whole documentation should be reconsidered.
- If the subcontractors accordance declaration is based on information from his own company, it could mean that the subcontractor’s documentation has be reconsidered when the conditions change.

In these areas an accordance declarations can be relevant:

- Packaging minimization (EN13428)
- Heavy metals (EN13428 and CR13695-1)
- Hazardous components (EN13428 and CR13695-2)
- Recycled packaging (EN13429)
- Material reuse (EN13430)
- Energy reuse (EN13431)
- Biodegradation and compostation (EN13432)

On the following pages in this enclosure OPTI-PACK has written a suggestion to how such an accordance declaration with different content could be made. It will be appropriate to have this declaration translated into foreign languages – as a minimum English and preferably all the European principle languages.

A company must always consider the actual situation and formulate its own specific declaration.
ACCORDANCE DECLARATION

Company X do hereby declare that our xzy packaging is in accordance with the EU Directive on packaging and packaging waste (94/62/EF) with alterations in 2004/12/EF as well as below mentioned harmonised European standards.

Should an authority wish documentation for below mentioned conditions, this authority can freely make an application to company X, att.: Abc, phone: +45 xx xx xx xx or e-mail: abx@companyX.dk. Company X will hereafter forward the necessary documentation directly to this authority.

This declaration includes following conditions:

Packaging minimization (EN13428)
On the basis of enclosed information from our customer a minimization of the above mentioned packaging has been made. On this basis we can document that the packaging system does not use more packaging material than it is necessary in order for the packaging being able to/must meet the functions mentioned in EN 13429. The process has been carried out according to EN 13428.

Heavy metals (EN13428 and CR13695-1)
An analysis of the content of heavy metals has been made for all packaging components which forms part of above mentioned packaging. The analysis is based on information from our subcontractor. On this basis we declare that the content of heavy metals, such as lead, cadmium, mercury and hexavalent chrome does not exceed 100 ppm.

Hazardous substances (EN13428 and CR13695-2)
- Our packaging contains none of the hazardous substances mentioned in Directive 67/548/EF.
- Our packaging can in some cases contain a few of the substances, which are mentioned in Directive 67/548/EF. When this is the case a minimization of these substances has been made, so that only the amount necessary is used. This assessment follows the demands of EN13428 and CR13695-2. In some cases this documentation is not available at company X. In these cases company X has secured accordance declarations from its subcontractors, where the subcontractor take on providing the necessary documentation to the authorities.

Recycled packaging (EN13429)
The packaging xyz is constructed as a recycled packaging compared to the conditions in EN13429. Company C can provide written documentation for this by request from any authority.

Material reuse (EN13430)
Following components in packaging xyy: y and z are suitable for material reuse compared to the demands of EN13430. Relevant collection systems are present in following countries or markets. Company C can provide written documentation for this by request from any authority.
Energy reuse (EN13431)

- Each packaging component contains more than 50% organic material. Therefore the demands in EN13431 are met for energy reuse. Company X can provide written documentation for this on request by any authority.

- Each packaging component contains less than 50% organic material. An analysis has been made to compare the demands in EN13431, which shows that the components comply with the demands for energy reuse. Company C can provide written documentation for this on request by any authority. In some cases this documentation is not available at company X. In these cases company C has secured accordance declarations from its subcontractors, where our subcontractors take on providing the necessary documentation to the authorities.

Biodegration and compostation (EN13432)

The components in packaging xyz have been analysed according to the demands in EN13432 and are suitable for biodegration and compostation. In some cases this documentation is not available at company C. In these cases company C has ensured accordance declarations from its subcontractors, where the subcontractor take on providing the necessary documentation to the authorities.

Company X does hereby declare that the above is correct, and that any authority with acceptance from our customer always can be provided with the necessary documentation.

Kind regards
Company X

Signature

Name
Title