Client:
Klug Fachgroßhandel für Kellereibedarf GmbH
An den Nahewiesen 5
555450 Langenlonsheim
Germany

issued by: Ps247

Vetropack
Vetropack Austria GmbH
Kremsegger Straße 27
4550 Kremsmünster
Austria

Dear client,

We hereby confirm the compliance of the following glass containers:

Ref.no.	Article Description
25887/36927	750 ml Schlegel 330, BVS, cuvée
34221	750 ml Schlegel 330, BVS, weiß
21243/34848	750 ml Rheinwein Exkl., BVS, cuvée
26608/34221	750 ml Rheinwein Exkl., BVS weiß
19395	1000 ml Schlegel, MCA, grün
36304	1000 ml Schlegel, MCA, weiß
27668	1000 ml Schlegel, BVS, grün
34361	750 ml Burgunder Evolution, BVS, olive
32046	750 ml Burgunder Evolution, BVS, cuvée
35885	750 ml Burgunder Evolution, BVS, weiß
33794	750 ml Bordeaux 308, BVS, weiß
33805	750 ml Bordeaux 308, BVS, olive
37014	750 ml Rheinwein 330, BVS, olive

with the applicable legislations, directives and regulations listed below in their revision in force at the day of issue of this declaration. No other legislations, directives and regulations are to be considered implicitly part of this conformity declaration without written confirmation.

1. RAW MATERIAL

The glass containers are made of basic soda lime silicate glass with following general formula:

$$Na_nCa_oMg_pAl_q \cdots Si_mO_s$$

Where*: $s = n/2 + o + p + 3q/2 + \ldots + 2m$

They are obtained by melting at high temperature (~ 1500°C) of following main raw materials:

- Silica sand, limestone, dolomite (natural source)
- Sodium carbonate, pre- and post-consumer recycled glass cullet (industrial source)
- And further ingredients in small quantities

During this chemical process at high temperature, raw materials react completely and are no longer available as such in the final substance glass.

2. Recyclability & Design for Recycling

The glass containers are designed and produced for recycling within existing European glass collection and recycling systems.
Glass packaging is widely recycled through established collection, sorting and remelting infrastructures in the European Union.
The design avoids features that would reasonably impair collection, sorting or material recycling operations and supports the requirements of Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR).

3. Legal compliance with respect to food / food contact material

Given the composition and the available analytical results of a sample, the glass containers can be considered suitable for contact with all types of foodstuffs for any period of time and at any temperature in the view of following relevant legislation.

Relevant legislations the glass container mentioned above complies with:

European and international law:

- Regulation (EC) No. 1935/2004 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 October 2004 on materials and articles intended to come into contact with food.
- GMP regulation (EC) No. 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food.

The analyses comprised the following tests, based on periodic analyses of representative sample containers:

- Overall migration
- Specific migration:
  - Antimony
  - Arsenic
  - Barium
  - Boron
  - Cadmium
  - Cerium
  - Chromium
  - Rubidium
  - Cobalt
  - Fluoride
  - Lithium
  - Lead
  - Manganese
  - Nickel
  - Zirconium

* The composition of the final glass can be slightly modified for technical reasons.

Based on available supplier information, material specifications and knowledge of the manufacturing process, PFAS are not intentionally added to the glass packaging or its surface treatments based on currently available information.
Vetropack continuously evaluates relevant raw materials, coatings and ancillary materials as part of its compliance activities and risk assessment process.

4. Conformity according to European packaging directive

The glass container complies with applicable European packaging requirements relevant to glass packaging.
With respect to heavy metal content, the glass container complies with the applicable requirements historically established under Directive 94/62/EC on packaging and packaging waste, including:

- European Commission Decision 2001/171/EC of 19 February 2001, as applicable for glass packaging, establishing the limit value of 200 ppm for the sum of lead, cadmium, mercury and hexavalent chromium;
- European Commission Decision 2006/340/EC of 8 May 2006 establishing the conditions for a derogation for glass packaging regarding the heavy metal's concentration levels referred to above.

Furthermore, the container is produced in accordance with the applicable principles of the European packaging standards and, where relevant, the following standards:

- EN 13427: Packaging – Requirements for the use of European standards in the field of packaging and packaging waste;
- EN 13428: Packaging – Requirements specific to manufacturing and composition – Prevention by source reduction;
- EN 13429: Packaging – Reuse;
- EN 13430: Packaging – Requirements for packaging recoverable by material recycling.

In addition, Vetropack evaluates compliance with applicable provisions of Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR).
Compliance assessments are supported by product information, manufacturing process knowledge, supplier information, risk assessments and other available technical evidence maintained by Vetropack.
Glass packaging produced by Vetropack is designed to support recycling within established European glass collection and recycling systems and contributes to a circular economy through the use of recycled glass cullet and established material recycling infrastructures.

5. REACH

In accordance with REACH regulations, glass containers for packaging are considered to be products. We confirm that the glass containers produced by Vetropack are not subject to any registration requirements or restrictions in accordance with the regulations listed below.

- European Parliament and Commission Regulation no. 1907/2006 (EC) dated *18.12.2006* for the registration, evaluation, authorisation and restriction of chemical substances (REACH)
- European Regulation no. 987/2008 (EC) *dated 8.10.2008* amending EC Regulation 1907/2006 (with reference to Annex V)
- Made of glass which is not classified as dangerous in the Regulation (EC) No 1272/2008 on the classification, labelling and packaging of substances and mixtures (CLP Regulation). For the same reason there is no duty to provide Safety data Sheet according to art 31 of the REACH Regulation

6. Traceability

Pallet label information is essential to comply with traceability requirement stipulated in regulation (EC) 1935/2004. A detailed traceability can only be ensured on the condition that pallet labels information tracked and traced by filling/ bottling is available.
Traceability of the packaging units is ensured via pallet labels, supporting applicable traceability requirements under Regulation (EU) 2025/40.

7. Compliance with Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR)

Vetropack continuously monitors and evaluates the requirements of Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR).
Based on the available information and assessments performed at the date of issue of this declaration:

- the packaging is designed to support recycling within established European glass recycling systems;
- no intentional addition of PFAS to the glass composition has been identified;
- available information does not indicate the intentional introduction of substances restricted under Article 5 of Regulation (EU) 2025/40;
- traceability requirements are supported through production and pallet identification systems;
- compliance assessments are based on available supplier information, manufacturing process knowledge, risk assessments and relevant technical data.

Supporting technical documentation is maintained by Vetropack and is continuously updated in line with applicable legal requirements and available regulatory guidance.
This declaration reflects the state of regulatory implementation and available information at the date of issue

Vetropack Austria GmbH
Date: 2026-07-03

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Technical Customer Service

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