ANNEX VII TECHNICAL DOCUMENTATION INDEX (Module A — Internal Production Control)

Archive ID: PPWR-A7-DEMO-POUCH-250G-V1 | Unit: DEMO-POUCH-250G | Retention: 5 years | Authority SLA: 10 calendar days (Art. 15(10)/18(8))

Compliance engineering assistance tool output — not legal advice. Issued under the sole responsibility of the named economic operator; verify current applicability dates, delegated acts, and national enforcement rules against Official Journal Regulation (EU) 2025/40 (ELI: http://data.europa.eu/eli/reg/2025/40/oj).

Section 1 — General Packaging Description & Economic Operator Responsibility

Technical File Attribute	Recorded Specification
Packaging Unit Code & Name	DEMO-POUCH-250G — 250g Specialty Coffee Stand-Up Barrier Pouch (Sample Specimen)
Packaging Format & Intended Use	sales_primary | Direct dry food contact packaging for roasted coffee beans
Food-Contact Classification	Yes — subject to Article 5(5) PFAS restrictions
Total Mass & Dimensions	12.5 g | 160 x 240 x 80 mm
Economic Operator & PPWR Role	Nordic Leaf Roasters GmbH (Sample Specimen) (Speicherstadt 14, 20457 Hamburg, Germany) | Manufacturer (Own-Brand / Private-Label — Art. 3(1)(13) & Art. 21)
EU EORI / VAT & Auth. Rep.	EORI/VAT: DE000000000 | Authorised Representative: Not applicable
Statutory Retention Schedule	5 years from last market placement (single-use packaging, Art. 15(7))

Section 2 — Bill of Materials (BOM) & Component-Level Chemical Verification

ID	Component & Material	Mass (%wt)	Supplier	Recycled	Pb+Cd+Hg+Cr6	PFAS (Art. 5(5))	Verdict
COMP-SUBSTRATE	Unbleached FSC Kraft Paper + High-Barrier Liner (substrate_paper)	11.4 g (91.2%)	Binh Duong Eco-Pack Co., Ltd. (VN)	Not recorded	12.80 mg/kg	Indiv: 0 ppb, Sum: 0 ppb, Total F: 7.5 ppm	VERIFIED_PASS
COMP-INK-ADH	Water-Based Flexo Printing Ink & Solvent-Free Laminating Adhesive (printing_ink)	1.1 g (8.8%)	Shenzhen Green Ink Materials Ltd. (CN)	Not recorded	6.40 mg/kg	Indiv: 0 ppb, Sum: 0 ppb, Total F: 9.2 ppm	VERIFIED_PASS

Section 3 — Standards, Minimisation (Annex IV) & Articles 5–12 Assessment

PPWR Provision	Assessment Criterion	Technical File Status
Art. 5(1)-(4) Substances & Heavy Metals	Pb + Cd + Hg + Cr(VI) <= 100 mg/kg per component	Verified Pass (max component sum: 12.80 mg/kg <= 100 mg/kg limit)
Art. 5(5) Food-Contact PFAS Restriction	< 25 ppb indiv. / < 250 ppb sum / < 50 ppm total F	Verified Pass (< 25 ppb indiv., < 250 ppb targeted sum, < 50 ppm total F)
Art. 6 Recyclability Performance Grades	Design-for-recycling grades A / B / C (2030 phase)	Not yet applicable
Art. 7 Minimum Recycled Content (Plastics)	Post-consumer recycled plastic quotas (2030 phase)	Not yet applicable
Art. 9 Compostable Packaging	Industrial/home compostability conditions	Not yet applicable
Art. 10 & Annex IV Packaging Minimisation	Weight/volume reduced to minimum necessary	product_protection: Flexible 3-ply barrier pouch eliminates rigid secondary carton; headspace_control: Zero false bottoms or double walls (Annex IV verified)
Art. 11 Reusable Packaging	Reuse rotations, hygiene & reconditioning	Not applicable (single-use packaging — 5-year retention)
Art. 12 Harmonised Sorting Labelling	Union material composition & sorting labels	Not yet applicable

Section 4 — Module A Supply-Chain Non-Conformity Risk Register

- Tier-2 Printing Inks, Adhesives & Coatings Drift: Batch-level substitution of hot-melt glues or UV varnishes by sub-suppliers can breach the 100 mg/kg heavy metals sum (Art. 5(4)). Mitigation: component-level BOM lock + 24-month certificate renewal gate.
- Food-Contact Fluorochemical Contamination (Art. 5(5)): Mold-release agents or greaseproof barriers may introduce >= 25 ppb targeted PFAS or >= 50 ppm total fluorine. Mitigation: mandatory targeted PFAS + total fluorine lab verification.
- Certificate Staleness & Invalid Quality Certs: Factory uploads of ISO 9001 or expired RoHS summaries do not demonstrate PPWR Article 5 conformity. Mitigation: automated document-class gatekeeper and SHA-256 evidence pinning.

Section 5 — Cryptographic Archive Index (SHA-256 Evidence Manifest)

Archive Member Path	Document Class & Provenance	SHA-256 Digest (Prefix)
01-EU-Declaration-of-Conformity-Annex-VIII.pdf	Annex VIII EU DoC (PDF/A-2b + PDF/UA-1)	60538fcad290274c7b2fd6917089a506…
03-BOM-Snapshot.json	Canonical 3-Tier BOM Snapshot	62e48227699425f3b152d28ff0ffa821…
04-Verified-Evidence-Summary.json	Normalized Gate Verification Record	f8a92e1c9f5f84138230863bc9231ddc…