

Dear Ladies and Gentlemen,

the new EU Packaging and Packaging Waste Regulation officially entered into force on February 11, 2025. The new requirements will be phased in starting August 12, 2026.

At present, the legislature is still drafting a number of detailed regulations necessary for assessing compliance; therefore, we are also informing you of these in this letter. Furthermore, other implementation issues are still being clarified. We are closely monitoring developments and will inform you in a timely manner regarding the relevant criteria and how to meet them.

The European Commission's FAQs on the PPWR dated 3 August 2026 are not legally binding. They are not legally binding on either national authorities or courts, but merely provide guidance on the practical interpretation of the Regulation. Should the interpretation of the Regulation confirm that we have both manufactured and distributed fully finished packaging in the past and will continue to do so in the future, we have complete conformity assessments and declarations of conformity, including technical documentation, which are submitted exclusively to authorities in the context of inspections. Should labelling by Straub Verpackungen GmbH be required, this will be provided in the form of accompanying documents (pallet labels, delivery notes, sample consignment notes). Should adjustments to packaging, print designs or labelling elements be required at the customer's request, this may incur modification or implementation costs, which are to be borne by the customer.

In accordance with the provisions of Article 16 of the PPWR, we are writing to inform you of the following matters and to fulfill our corresponding duty to provide information.

The limit values for heavy metals specified in Article 5 of the PPWR are complied with in the products delivered to you. The total concentration of lead, cadmium, mercury, and hexavalent chromium from materials in packaging or packaging components must not exceed 100 mg/kg. (Paragraph 4)

Compliance with these heavy metal limits is verified annually by the German Corrugated Board Industry Association (VDW - Verband der Wellpappen-Industrie e. V.) using representative samples. The results of these tests confirm that the limits defined in Article 5 of the PPWR are reliably met. The VDW test report is available to you.

We do not intentionally or knowingly use PFAS in the manufacture and processing of corrugated cardboard. Therefore, we do not expect the limits specified in Article 5 of the PPWR to be exceeded. Consequently, we confirm that the products delivered to you comply with the relevant limits set forth in Article 5 of the PPWR.

The requirements for compliance with the PFAS limit values pursuant to Article 5(5) of the EU Packaging Regulation apply only to packaging that comes into contact with food (food-contact packaging). At present, the details of the conditions regarding the provision of evidence are still being developed. We intend to provide you with the relevant information regarding the conformity assessment procedure in a timely manner as soon as the necessary details have been finalized.

The products we supply to you are considered "articles" under the terminology of the REACH Regulation and are therefore not subject to any registration requirements under the REACH Regulation.

To the best of our current knowledge, the corrugated cardboard products we manufacture do not contain any substances of very high concern (SVHCs) from the Candidate List in concentrations exceeding 0.1%, in accordance with Article 33 of the REACH Regulation (Regulation (EC) No. 1907/2006). This statement is based on the currently valid REACH Candidate List published by the European Chemicals Agency (ECHA).

21.08.2026

The corrugated cardboard packaging and packaging components we manufacture are classified as “recyclable materials” in accordance with the Minimum Standard for Packaging 2025. They are therefore generally considered recyclable and, as of now, meet the requirements of Article 6 of the PPWR.

Recyclability requirements will take effect gradually starting January 1, 2030; that is, packaging must be at least 70% recyclable starting in 2030. By January 1, 2028, the European Commission will adopt delegated acts specifying the methods for assessing recyclability.

Minimum recycled content requirements for plastic components will be phased in starting January 1, 2030. Plastic packaging components that account for more than 5% of the packaging’s weight must, starting in 2030, consist of varying proportions of secondary materials derived from post-consumer waste, depending on the material.

Please also note that we cannot assume the responsibilities and obligations that apply to you as a producer under the PPWR. For this reason, we cannot prepare or provide technical documentation or a declaration of conformity under the PPWR for products for which you yourself are the producer as defined by the PPWR. We would like to point out that the EU Packaging and Packaging Waste Regulation (PPWR) clearly defines the producer of packaging within the supply chain.

The manufacturer remains legally responsible for the information contained in the Declaration of Conformity - even if there are corresponding supplementary contractual agreements.

In this regard, we do our best to support you in meeting the legal requirements and, as your supplier, do our part; however, we cannot assume the role of manufacturer and the associated legal obligations on your behalf.

As your supplier, we are happy to provide you with the necessary information for the technical documentation. According to the PPWR, there are no regulations governing how the information (regarding the use of the medium) is to be made available.

Unfortunately, we cannot relieve you of the responsibility for conducting the assessment procedure and issuing the declaration of conformity. The legal responsibility for this rests solely with you.

The right to inspect the declaration of conformity under the PPWR, as well as to request the technical documentation under the PPWR, is reserved exclusively for the competent national authority.

Unlike the issuance of the declaration of conformity, compliance with the 50% void space ratio—which takes effect on January 1, 2030, pursuant to Article 24(1) of the PPWR—is not the responsibility of the “producer” of the packaging, but rather of “the economic operators who fill outer packaging, transport packaging, or e-commerce packaging.”

Producer marking is mandatory. Regarding identification (Art. 15, para. 5): Paragraph 5 requires producers to ensure that their packaging bears a type, batch, or serial number, or another identifier for identification purposes; marking using a QR code is not mandatory. If this is not possible due to the size or type of packaging, or for other reasons, the required information may be provided in the documentation accompanying the packaged product. Labeling regarding material composition, which will be mandatory as of August 12, 2028, will be provided using pictograms. Digital labeling is intended solely as a supplementary, voluntary option and is not mandatory.

The above confirmations refer exclusively to the condition of the products at the time they leave our plants or warehouses. As soon as we have further reliable information and can confirm additional requirements from PPWR, we will, of course, inform you promptly.

We would like to politely point out that, as a general rule, we do not fill out customer-specific forms, questionnaires, or Excel files. However, to ensure that you have all the necessary information, we are providing you with our current declarations and certificates, which summarize the relevant details about our products.

Thank you for your understanding. If you have any questions or need further information, we will of course be happy to assist you.

A handwritten signature in blue ink, appearing to read "Steffen Würth".

Dr. Steffen Würth
Managing Director

A handwritten signature in black ink, appearing to read "Martin Rosenstiel".

Martin Rosenstiel
Purchasing Manager