

Customer Information on the PPWR – Regulation 2025/40 on Packaging and Packaging Waste from Labels

Dear Business Partner,

Thank you very much for your inquiry regarding Regulation (EU) 2025/40 ("Packaging and Packaging Waste Regulation" – PPWR).

Based on our current understanding and the information available to us regarding the materials used, we can provide you with the following information regarding the labels we supply:

Article 5(2) of the PPWR – Substances of Very High Concern:

The products we supply 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).

In addition, we would like to point out that the European Chemicals Agency (ECHA) and the European Commission will publish a report on substances of concern in packaging by December 31, 2026, in accordance with Article 5(2) of the Packaging Regulation (PPWR). This report could lead to additional or amended substance requirements under the Packaging Regulation. We will assess the potential impact on our products and inform our customers accordingly.

Article 5, Paragraph 4 of the PPWR – Heavy Metals:

Based on our current knowledge, we confirm that the labels we supply comply with the requirements of Article 5, Paragraph 4 of the PPWR.

The total concentration of lead, cadmium, mercury, and hexavalent chromium does not exceed the limit of 100 mg/kg.

Article 5, Paragraph 5 of the PPWR – PFAS:

Furthermore, based on declarations from our suppliers, our knowledge of the materials used, and our internal risk matrix, we can confirm—with regard to Article 5, Paragraph 5 for packaging intended to come into contact with food—that the limit of 50 ppm TF (total fluorine) is not exceeded in the labels we supply.

Article 6 of the PPWR – Recyclability:

The labels we manufacture are supplied with different adhesives depending on customer requirements and are tailored to the specific customer order. The adhesives used can range from removable to permanent.

For example, permanent adhesives cannot be easily removed from the container when used as intended.

Consequently, the assessment of recyclability and the final classification in accordance with Article 6 of the PPWR—including future “design for recycling” criteria and Recyclability Performance Grades—must always be carried out by the manufacturer or distributor of the finished packaging in conjunction with the respective container.

We would be happy to provide you with material-specific information about our labels upon request.

Article 9 of the PPWR – Compostability

The labels we supply are not designed for composting and are not marketed as compostable.

An assessment of compostability in accordance with Article 9 of the PPWR is therefore not required for these products.

Article 7 of the PPWR – Recycled Content in Plastic Packaging

The labels we supply as standard currently contain no recycled content.

One exception is a special recycled label, which is also available through our online store.

Since a label is a component of packaging, Article 7 of the PPWR must be assessed in each specific case by the manufacturer or distributor of the finished packaging. Whether and to what extent there are requirements regarding the recycled content depends, in particular, on the label's proportion of the packaging's total weight, the type of packaging, the intended use, and any possible exemptions.

A final assessment of the requirements under Article 7 of the PPWR can only be made by the producer or distributor of the complete packaging.

Article 10 PPWR – Packaging Minimization

Our labels are manufactured specifically according to the customer's specifications. The customer determines the size, materials used, printing, and scope of information based on the specific application, the contents, the container, and regulatory labeling requirements.

We support you in minimizing packaging by producing custom, needs-based label solutions.

The final assessment of whether the size, materials used, and design have been reduced to the necessary extent rests with you or the manufacturer of the finished packaging.

Article 12 of the PPWR – Labeling

We will review the requirements for harmonized labeling regarding material composition in accordance with Article 12 of the PPWR once they are published.

Until then, we will be happy to assist you upon request with material-related information about our labels.

Article 16 of the PPWR – Information Requirements (Packaging Materials)

This declaration also serves to fulfill the information obligation under Article 16 of the PPWR and assists you in preparing your EU Declaration of Conformity.

Upon request, we will be happy to provide you with further material-related information regarding our labels.

Zeithain, July 14, 2026

Sincerely,



Rico Krönert

Head of Quality Assurance