

DECLARATION OF COMPLIANCE WITH THE PPWR REGULATION

Regulation (EU) 2025/40 (PPWR) introduces harmonized requirements across Europe for packaging and packaging waste with the aim of reducing waste, promoting recycling, and strengthening the circular economy. The Regulation will apply from 12 August 2026 and will be implemented in stages.

Based on the declarations, technical data, and specifications provided to us by our suppliers, we hereby confirm that the packaging materials used by us, including cardboard, printing inks, films, plastics, coatings, adhesives, and other packaging components, comply with the requirements of the PPWR Regulation.

The relevant declarations of conformity are available and can be provided to the competent market surveillance authorities upon request.

CONFIRMATION OF COMPLIANCE WITH HEAVY METAL CONCENTRATION LIMITS

We hereby confirm compliance with the heavy metal limit values set out in Regulation (EU) 2025/40 of the European Parliament and of the Council, known as the PPWR Regulation (Packaging and Packaging Waste Regulation).

The combined concentration of lead (Pb), cadmium (Cd), mercury (Hg), and hexavalent chromium (Cr(VI)) is below the legal maximum total concentration limit of 100 mg/kg.

To ensure compliance, we obtain supplier declarations for all packaging materials used, confirming adherence to these statutory limit values. These declarations are reviewed regularly to ensure that they remain current and valid.

IMPLEMENTATION OF THE PPWR REGULATION (EU) 2025/40

Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR) entered into force on 11 February 2025. However, the individual requirements will be introduced gradually and, in some cases, will not become applicable until 2026, 2028, or 2030.

We already take the requirements of the PPWR into account in the development, procurement, and selection of our packaging. Implementation is carried out in accordance with the applicable legal deadlines.



Article	Content	Applicable From
Art. 5	Substances in packaging (PFAS in food-contact packaging)	12 Aug 2026
Art. 6	Recyclable packaging	2030
Art. 7	Minimum recycled content in plastic packaging	2030
Art. 8	Bio-based raw materials in plastic packaging	12 Feb 2028
Art. 9	Compostable packaging	12 Feb 2028
Art. 10	Packaging minimization	2030
Art. 11	Reusable packaging	2030
Art. 12	Packaging labeling requirements	12 Feb 2028

Therefore, full implementation of all PPWR requirements is currently not yet possible, as certain provisions will only become legally binding in the coming years.

The requirements already in force are being complied with, and future requirements will be implemented within the applicable statutory deadlines.

Should you have any questions, please do not hesitate to contact me.

Freiburg, 7th August 2026



Andreas Beihofer
CEO & Member of the Board

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