

## Information for customers regarding the new Packaging Regulation (PPWR)

The new EU **Packaging and Packaging Waste Regulation (PPWR)** came into force on **12 February 2025** and will become mandatory on **12 August 2026**. The regulation aims to reduce packaging waste, improve the recyclability of packaging, and introduce standardised labelling for packaging across Europe to ensure a functioning circular economy.

As your partner for corrugated board solutions, we would like to inform you about the current status and the resulting requirements.

### Restriction of hazardous substances (Art. 5):

From **12 August 2026**, packaging or packaging components must not exceed 100 mg/kg of lead, cadmium, mercury and hexavalent chromium.

- Our products already comply with the requirements of the REACH Regulation requirements and the heavy metal limits set out in the Packaging Directive 94/62/EC and its amendments.
- The requirements for compliance with PFAS limit values apply only to packaging that comes into direct contact with food. We can confirm that we do not intentionally use PFAS in the manufacture of corrugated board.

### Recyclability (Art. 6):

From **2030** onwards, all packaging and its integrated components must be recyclable. The European Commission is expected to set out the criteria for assessing recyclability by **1 January 2028**. Only then will it be possible to carry out a legally sound assessment and formal conformity check of the entire packaging. We confirm that our corrugated cardboard products comply with the harmonised standard EN 13430:2004 and the relevant requirements for material recycling.

### Minimum recycled content requirements (Art. 7):

The minimum recycled content requirements set out in Article 7 of the PPWR apply exclusively to plastic, or plastic components (accounting for more than 5% of the packaging's weight), in packaging. No such requirements apply to paper- and fibre-based packaging. Consequently, no evidence is required in the technical documentation or the declaration of conformity for packaging made of paper, paperboard and cardboard.

### Labelling (Art. 15):

From 12 August 2026, two separate labelling requirements will apply to producers in accordance with Article 15 of the PPWR:

- Packaging must bear a **type, batch or serial number**, or another identifier for its identification. If this is not possible due to the size or nature of the packaging, the required information may be provided in the documents accompanying the packaged product. Existing labelling or identification systems may be used for identification purposes.
- The **name or brand and address, as well as an electronic contact address** where applicable, must be stated on the packaging or on a QR code or an accompanying document.
- In principle, the information may be provided via suitable accompanying documents, provided that the traceability of the packaging is guaranteed at all times. Suitable accompanying documents may include, in particular, delivery notes, pallet notes, order documents or digital records.

- From 12 August 2028, **material labelling** (Art. 12) will also become mandatory for packaging (with the exception of transport packaging). The relevant implementing act has not yet entered into force, which is why no corresponding changes should be made at this stage.

## Roles and responsibilities

- **Supplier under PPWR**

A supplier is any natural or legal person who provides packaging or packaging materials to a producer or manufacturer. Suppliers must provide customers with all the necessary material and product information.

- **Manufacturer under PPWR**

A manufacturer develops or commissions packaging under its own name or brand. They determine the design of the packaging and are responsible for the choice of materials, recyclability and labelling, as well as the EU Declaration of Conformity for the packaging in its final form.

The requirements of the new EU regulation will come into force gradually from 12 August 2026.

Currently, many of the detailed regulations required for compliance assessing are still being drafted by the legislator. Furthermore, other implementation issues are still being clarified. We are closely monitoring developments and are in regular contact with industry associations and expert committees.

If you have any further questions, please do not hesitate to contact us.

As of May 2026