

PPWR Compliance Statement

Confirmation of conformity pursuant to *Regulation (EU) 2025/40 (PPWR)*

Document No.: PPWR-CS-GER-2026-001

Version/date: 1.0 / 31.07.2026

Manufacturer/Importer:

Avery Zweckform GmbH

Miesbacher Str. 5

D-83626 Oberlindern/Valley

de.productcompliance@avery.com

OUR BRANDS

This statement applies to packaging of the following brands, which belong to our company and under which we place packaging or packaged products on the market:

- Avery
- Avery Zweckform
- Chronoplan
- europe100
- TriGo by Avery
- Z-Design

For all the brands above, we assume full manufacturer responsibility as manufacturer within the meaning of *Art. 3(1)(13)(a) PPWR* (conformity assessment under *Arts 5–12*, technical documentation under *Annex VII* and the EU Declaration of Conformity under *Annex VIII*).

This applies to packaging of these brands regardless of origin, and the resulting role under the PPWR.

SCOPE / DELIMITATION

This statement relates exclusively to packaging in which we place our own products on the market. It does not cover goods that we sell as a product/component (e.g. labels) and which only become part of the customer's packaging at the customer's premises; for such supplies we act as a supplier within the meaning of *Art. 3(1)(16) PPWR*, and manufacturer responsibility rests with the customer.

Reverse exception (micro-enterprises): Where we supply a customer that is a micro-enterprise within the meaning of Recommendation 2003/361/EC and we, as supplier, are established in the same Member State, we are considered the manufacturer pursuant to *Art. 3(1)(13)(b) PPWR* and assume full manufacturer responsibility for those supplies (*Arts 5–12, Annex VII, Annex VIII*). Such supplies fall under this statement, not under the supplier role pursuant to *Art. 16*.

1. ROLE AND ORIGIN OF THE PACKAGING

This statement covers packaging that we

- a) manufacture ourselves at our German site (role: manufacturer), and
- b) source from our production site in the UK under our own brand and import into the EU for the first time (role: importer; as we place this packaging on the market under our own brand, we are considered the manufacturer pursuant to *Art. 21* in conjunction with *Art. 3(1)(13)(a)*,

regardless of whether any other trademark is visible, and assume the manufacturer's obligations under *Art. 15*).

This confirmation relates to the packaging of the products we supply to you (primary, secondary and tertiary packaging). A detailed packaging list including is available on request.

Where an item is sourced from our UK site under our own brand, we act as importer and, as we place it on the market under our own brand, are considered the manufacturer pursuant to *Art. 21* in conjunction with *Art. 3(1)(13)(a)*; the importer information under *Art. 18(3)* is affixed accordingly.

For both origins we ensure conformity with *Articles 5–12* and hold the technical documentation (*Annex VII*) and the EU Declaration of Conformity (*Annex VIII*). For the UK-sourced goods we additionally keep, as importer, a copy of the EU Declaration of Conformity and ensure the technical documentation can be made available to the competent authorities (*Art. 18(7)*).

PACKAGING LEVELS ASSESSED

We have assessed conformity for all relevant packaging levels:

- ☒ Primary packaging (sales packaging)
- ☒ Secondary packaging (grouped packaging)
- ☒ Tertiary packaging (transport packaging)

Note: A separate conformity assessment has been carried out and a separate EU Declaration of Conformity drawn up for each distinct packaging level/type.

The full EU Declaration of Conformity and the technical documentation (*Annexes VII/VIII PPWR*) are held by us and made available to the competent authorities upon their reasoned request (*Art. 15(3)* and *15(10) PPWR; Annex VII, Module A*).

2. CONFORMITY IN DETAIL (Articles 5–12 PPWR)

Article 5 – Substances in packaging

Status: ✓ compliant. This was specifically requested from and confirmed by our suppliers. Evidence is held in the technical documentation (*Annex VII*).

- *Article 5(1)* Substances of Concern (SoC): Substances of concern are minimised in accordance with *Art. 5(1)*.
- *Article 5(4)* Heavy metals: The sum of lead, cadmium, mercury and hexavalent chromium is ≤ 100 mg/kg (*Art. 5(4)*);
- *Article 5(5) – PFAS limits (food contact)*: Not applicable to the packaging covered by this statement: it is not intended for food contact. The PFAS limits under *Art. 5(5)* apply only to food-contact packaging.

Article 6 – Recyclability

Most of Avery's packaging is already designed for recyclability today. The binding design-for-recycling criteria and recyclability performance grades under *Article 6* apply from 1 January 2030, or 24 months after the entry into force of the delegated acts under *Article 6(4)*. We review our packaging portfolio on an ongoing basis and work continuously on its further development to meet the requirements as they become applicable.

Article 7 – Minimum recycled content (plastic)

The plastic parts meet the minimum recycled-content percentages applicable from 1 January 2030 (or three years after the implementing act under *Article 7(8)*).

Article 8 – Bio-based plastic: no binding requirement currently applicable.

Article 9 – Compostability

Not applicable: the packaging covered by this statement does not include any of the packaging covered by *Art. 9(1)/(2)* (permeable tea/coffee bags or soft single-serve units under *Art. 3(1)(1)(f)*, sticky labels on fruit and vegetables, single-serve units, or plastic carrier bags). It is designed for material recycling in accordance with *Art. 9(3)* in conjunction with *Art. 6*.

Article 10 – Packaging minimisation

In our assessment, our primary and secondary packaging is designed to the weight and empty space necessary for product function and product protection. In the B2B area (palletised goods) and in the DtC business (use of a turn-fix carton), empty space is likewise reduced to the necessary level. For medium-sized transport packaging (shipping boxes) we are currently examining further optimisation options. The binding minimisation requirements of Article 10 apply from 1 January 2030; we design our packaging with a view to meeting them.

Article 11 – Reusable packaging

As reusable packaging, we currently use only Euro pallets within a re-use system. For these, the requirements of Article 11 apply in accordance with the provisions applicable in each case. We do not currently place any other packaging on the market as reusable.

Article 29 – Re-use targets (from 1 January 2030)

We are aware that the binding re-use targets under *Article 29* (including, among others, at least 40% reusable transport packaging under *Article 29(1)*, as well as the re-use obligation for certain transports between our own/linked sites and within the same Member State under *Article 29(2)/(3)*) may apply from 1 January 2030. We are continuously assessing which of our transport/grouped packaging is covered by these targets and are designing our packaging with a view to meeting the applicable targets from their date of application. Cardboard packaging (including corrugated board) is exempt from the transport packaging target under *Article 29(4)(d)*.

Article 12 – Labelling

The harmonised sorting labelling under Article 12(1) applies from 12 August 2028, or 24 months after the entry into force of the implementing acts under Article 12(6)/(7). We will apply the harmonised labelling to our labelling-obligated packaging once the labelling specifications and labels have been finally published by the European Commission and become applicable. This labelling obligation does not, in principle, apply to transport packaging; e-commerce/DtC packaging, which is an exception, is considered accordingly.

3. LABELLING AND MANUFACTURER INFORMATION

3.1 Manufacturer information in the supply chain (*Article 15(5)/(6)*)

Affixed to the packaging (or via QR code/data carrier or accompanying document where size/nature so requires):

- ☒ Packaging identification: item number (identification element under *Article 15(5)*)
- ☒ Name / registered trade name / registered trademark of the manufacturer

- ☒ Postal address (a single point of contact) of the manufacturer: mandatory, affixed on the packaging (full manufacturer address: see above)
- ☒ Electronic means of contact (e-mail / website), where available

3.2 Importer information (*Article 18(3)*) for UK-sourced goods

- ☒ Name / registered trade name / registered trademark and postal address of the EU importer, affixed on the packaging (or via QR code/data carrier or accompanying document).

The importer information reflects the entity that actually imports the goods into the EU. Where a packaging item is imported via more than one route, the importer information is provided per import route (separate marking or via QR code/accompanying document).

3.3 EPR / producer information (verification aid re *Article 19*)

Note: to be distinguished from the manufacturer information under *Article 15*. Avery Zweckform GmbH as manufacturer is established in Germany.

EPR producer for Germany: Avery Zweckform GmbH

Producer register no. **Germany (LUCID): DE1606038423067**

Note for the customer: Where you place the packaging on the market in your Member State for the first time (e.g. as a distributor/importer in the destination country), the EPR producer obligations (registration, reporting, fees) generally rest with you. Please assess your role under *Article 3(1)(15)* in conjunction with *Articles 44/45*.

Signed for and on behalf of Avery Zweckform GmbH
Stefanie Höpler, Sustainability & Compliance Specialist Europe
Oberlindern, 31.07.2026



Note: This statement is provided for the customer's information and does not replace the statutory EU Declaration of Conformity. It refers to the PPWR requirements applicable as of the issue date.