PPWR (EU) 2025/40

Packaging and Packaging waste

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The **Regulation (EU) 2025/40** of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste (**P**ackaging and **P**ackaging **W**aste **R**egulation), hereinafter referred to as the **PPWR Regulation**, entered into force on 11 February 2025. The essential requirements have been directly applicable and legally binding in all Member States of the European Union since 12 August 2026.

It gradually replaces previous regulations and national implementing provisions, in particular through the amendment of Regulation (EU) 2019/1020 and Directive (EU) 2019/904, as well as through the repeal of the former Packaging Directive 94/62/EC.

The objective of the PPWR (Article 1) is to establish a harmonized European regulatory framework for packaging and packaging waste. The Regulation aims to reduce packaging waste, strengthen the circular economy, improve the recyclability of packaging, promote the use of recycled materials, and minimize the presence of substances of concern in packaging. Furthermore, it aims to improve the traceability of packaging and establish uniform packaging requirements throughout Europe.

The Regulation applies (Article 2) to all packaging, regardless of the material used, and to all packaging waste, irrespective of whether such packaging is used or such packaging waste is generated in industry, other manufacturing operations, retail or distribution businesses, administrative activities, the service sector, or households.

The Regulation distinguishes between **sales packaging** (primary packaging), **grouped packaging** (secondary packaging), and **transport packaging** (tertiary packaging). Sales packaging (Article 3 (5)) forms the sales unit for the end consumer or end user. Grouped packaging (Article 3 (6)) is used to group multiple sales units together or to provide additional protection and presentation functions. Transport packaging (Article 3 (7)) is used for storage, handling, and transportation within the supply chain.

The PPWR defines various roles (Article 3) throughout the supply chain. Depending on the type of packaging, different requirements apply to the respective economic operators, including, for example, the preparation of technical documentation and EU declarations of conformity. In addition, registration and reporting obligations may arise under Extended Producer Responsibility (EPR) schemes. Suppliers support these processes through corresponding verification, information, and documentation obligations.

With the application of the PPWR, essential requirements have already become legally binding. Numerous technical details will be further specified in the coming years through delegated acts and implementing acts of the European Commission, including assessment methodologies for the recyclability of packaging and harmonized labelling requirements.

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Verpackungen und Verpackungsabfälle

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The HUBER+SUHNER Ingun GmbH develops and markets products for the industrial manufacturing and testing of electronic components. As an internationally operating company with a broad product portfolio, we assume different roles within the value chain in accordance with the PPWR. We have aligned our internal processes with these requirements and are implementing them in accordance with the applicable provisions of the PPWR.

For packaging and packaged products that are manufactured under our own brand name or where we modify existing packaging, we act as a **producer** (Article 3 (13)). In this role, we fulfil the producer obligations:

- Performance of the required conformity assessment procedure
- Preparation of the technical documentation (Article 38 / Annex VII)
- Preparation of the EU declarations of conformity (Article 39 / Annex VIII)
- Retention of the technical documentation and EU declarations of conformity for the legally required period
- Ensuring the proper identification and marking of packaging (Article 15 (5, 6))

In cases where we place packaging on the market for the first time, we assume the role of **manufacturer** (Article 3 (15)). In this role, we fulfil the applicable manufacturer obligations under Extended Producer Responsibility (EPR):

- Registration with the relevant national registers
- Compliance with mandatory reporting obligations
- Payment of the required recycling and recovery fees

As part of our compliance efforts, we take into account the material requirements set out in **Article 5**. These include, in particular, the restrictions regarding heavy metals (Article 5(4)), under which the sum of the concentration levels of lead, cadmium, mercury, and hexavalent chromium in packaging or packaging components must not, as a general rule, exceed 100 mg/kg.

Technical Data Sheets for our packaging are available for download at www.ingun.com/ppwr. **EU Declarations of Conformity** are available upon request, specifying the relevant part numbers, through our Customer Service: customer.service@ingun.com.

The information contained in this statement is provided for general customer information purposes. It does not replace an assessment of the applicable requirements nor an EU Declaration of Conformity. For a specific packaging item, the relevant Technical Data Sheets and conformity documentation shall prevail. This statement does not constitute an EU Declaration of Conformity pursuant to Article 39 and Annex VIII.

This statement was generated electronically and is valid without a signature.

HUBER+SUHNER Ingun GmbH

Constance, October 2026

The Management