

INFORMATION

INFORMATION ON REGULATION (EU) 2025/40 (PPWR) ON PACKAGING AND PACKAGING WASTE

The following company: **STAHL'S Europe GmbH**
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Germany

hereby provides information on its approach to **Regulation (EU) 2025/40 on packaging and packaging waste (Packaging and Packaging Waste Regulation – PPWR)**.

The PPWR entered into force on **11 February 2025** and has generally applied since **12 August 2026**.

STAHL'S Europe GmbH takes the requirements arising from the PPWR into account in its relevant procurement, packaging, logistics and sales processes.

ROLES OF STAHL'S EUROPE UNDER THE PPWR

Depending on the type of packaging, product, procurement channel and distribution channel, STAHL'S Europe GmbH may have different roles under the PPWR.

As a manufacturer within the meaning of Article 3(1)(13) of the PPWR, we fulfil the corresponding manufacturer obligations for the packaging concerned. These include, in particular, carrying out the conformity assessment procedure under Article 38, preparing the required technical documentation under Annex VII, and drawing up an EU declaration of conformity under Article 39 and Annex VIII.

The technical documentation and the EU declaration of conformity must generally be retained for **five years** for single-use packaging and **ten years** for reusable packaging, starting from the date the packaging is placed on the market.

As an importer, where packaging from third countries falls within the scope of our importer obligations, we ensure in particular that the prescribed conformity assessment procedure has been carried out, the required technical documentation is available, and the applicable labelling and information requirements are met.

As a distributor, we comply with the due diligence obligations under Article 19 of the PPWR. Where the respective requirements already apply, this includes in particular checking the required registration, labelling and identification of upstream economic operators.

TRANSPORT AND SHIPPING PACKAGING

STAHL'S Europe GmbH uses various types of transport, shipping and grouped packaging in its own logistics operations.

Regulatory responsibility for each type of packaging is assessed according to its origin, design and use. Where STAHL'S Europe GmbH is itself considered the manufacturer of packaging, it fulfils the corresponding obligations under Article 15 of the PPWR.

Where other companies are considered the manufacturers of the packaging used, the necessary supplier information and evidence are taken into account. Article 16 of the PPWR expressly requires packaging suppliers to provide manufacturers with the information and documents needed to demonstrate conformity.

For the packaging items currently documented, STAHL'S Europe has the relevant PPWR supplier declarations, material information and technical product data. Depending on the role of STAHL'S, these documents form a basis for further conformity assessment and documentation.

SUBSTANCE REQUIREMENTS AND RECYCLABILITY

The applicable PPWR requirements are taken into account for packaging for which STAHL'S Europe is responsible. These include, in particular:

- substance requirements and limit values under Article 5,
- recyclability under Article 6,
- requirements for recycled content, where applicable,
- packaging minimisation,
- labelling and identification,
- traceability, and
- the required documentation and evidence.

The PPWR supplier declarations available to us confirm, among other things, that for the documented packaging materials **the sum of the concentrations of lead, cadmium, mercury and hexavalent chromium does not exceed the limit of 100 mg/kg**. This is also consistent with the information in the newly added packaging documents.

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PACKAGING MINIMISATION AND EMPTY SPACE

When selecting and using packaging, STAHL'S Europe GmbH takes into account the aim of reducing packaging material and unnecessary empty space as far as possible without compromising the necessary protection of products or safe transport.

For economic operators who fill **grouped packaging, transport packaging or e-commerce packaging**, Article 24 of the PPWR provides for a future maximum empty space ratio of **50 %**.

This requirement must be applied by **1 January 2030 or three years after the entry into force of the implementing acts provided for this purpose, whichever is later**. The specific calculation method will be laid down in an implementing act of the European Commission.

In principle, filling materials such as paper, air cushions, foam or packing chips are also counted as empty space.

SPECIAL NOTE ON E-COMMERCE SHIPPING

If suitable **sales packaging is also used as e-commerce packaging** and no additional shipping packaging is used, the 50 % empty space requirement under Article 24(1) does not apply to that packaging.

The general packaging minimisation requirement under Article 10 of the PPWR remains unaffected.

STAHL'S Europe therefore also examines opportunities to avoid additional shipping packaging where this is reasonably possible in light of product protection, transport requirements and customer requirements.

EXTENDED PRODUCER RESPONSIBILITY (EPR)

Where STAHL'S Europe GmbH is considered a **producer within the meaning of Article 3(1)(15) of the PPWR** for packaging, it takes the resulting extended producer responsibility obligations into account.

Depending on the Member State and applicable national rules, these include in particular registration and reporting obligations and contributions to the costs of managing packaging waste. Article 45 of the PPWR assigns extended producer responsibility to the respective producer.

ONGOING IMPLEMENTATION

The PPWR provides for further delegated and implementing acts in several areas. As a result, individual technical requirements and calculation methods will be specified in greater detail over the coming years.

STAHL'S Europe GmbH will continue to monitor regulatory developments and review and adapt the relevant processes and packaging solutions in line with the requirements applicable at the time.

For further information on specific types of packaging, existing **supplier declarations, material information and packaging-specific conformity documents** can be provided on request.

Dillingen, 12.08.2026