

Declaration regarding the EU Packaging Regulation

Regulation (EU) 2025/40 on packaging and packaging waste (PPWR)

Dear Sir or Madam,

Regulation (EU) 2025/40 on packaging and packaging waste (PPWR) has applied directly in all Member States of the European Union since 12 August 2026 and replaces the former Directive 94/62/EC. With this letter we confirm the status of our packaging.

Scope

This declaration relates to all packaging that GREMCO GmbH places on the market in the European Economic Area in connection with the supply of its products – sales, grouped and transport packaging, including reels, cartons, films, bags, labels, adhesive tapes and cushioning material.

The packaging is supplied both in business-to-business trade and, through distance selling, to private end consumers. For distance selling, the requirements applicable to e-commerce packaging apply in addition.

Declaration

We confirm that the aforementioned packaging complies with the requirements of Regulation (EU) 2025/40 applicable at the time it is placed on the market, in particular:

- Article 5 – Restriction of substances: the sum of the concentrations of lead, cadmium, mercury and hexavalent chromium does not exceed 100 mg/kg; the content of substances of concern is minimised.
- Article 5(5) – PFAS: for packaging in contact with food, the limit values for per- and polyfluoroalkyl substances are complied with.
- Article 10 – Minimisation: weight and volume are reduced to the minimum necessary; double walls, false bottoms and comparable features that merely increase the perceived volume are not used.
- Article 15 – Marking and traceability: the packaging bears the required manufacturer and identification details.
- Regulation (EC) 1935/2004: where food contact applies, the corresponding declarations of compliance are available.

Existing packaging stock

The decisive point in time is when packaging is first placed on the market, not when it was manufactured. Packaging and packaging materials that were already placed on the market in the European Union before 12 August 2026 are therefore not retroactively subject to the new product requirements of the Regulation. We continue to use existing stocks of such packaging materials until they are used up. For all packaging materials procured thereafter, the requirements of the Regulation apply without restriction.

Basis

The conformity assessment is carried out by internal production control in accordance with Annex VII of the Regulation (Module A). For the packaging we place on the market, EU declarations of conformity pursuant to Article 39 in conjunction with Annex VIII and the associated technical documentation are available. Our suppliers have provided us with supplier declarations pursuant to Article 16 on the material composition.

Extended producer responsibility

GREMCO GmbH is registered in the LUCID packaging register under registration number DE5043079881707. Packaging supplied to private end consumers is covered by participation in a dual system.

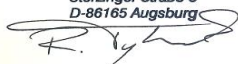
Future requirements

The requirements of Articles 6 (recyclability), 7 (minimum recycled content), 9 (compostability) and 12 (harmonised labelling) enter into force between 2028 and 2035. The re-use targets for transport packaging under Article 29 likewise apply from 1 January 2030. We monitor the delegated and implementing acts adopted in this respect and will implement the requirements within the applicable deadlines.

This declaration is reviewed regularly and updated in the event of changes to the legal situation or to our packaging. For any questions, please contact Mr Ralph Tybussek (rtybussek@gremco.de).

Augsburg, 12 August 2026

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R. Tybussek, Quality Manager

General company declaration; product-specific EU declarations of conformity pursuant to Annex VIII are available on request.