Gerlinger Klebeband

Gerlinger GmbH & Co. KG · Dietrich-Gerlinger-Str. 1 · 86720 Nördlingen

24.07.2026
Rev.2

Statement on the EU Packaging Regulation (EU) 2025/40 PPWR

Dear Sir or Madam,

We hereby confirm that we are fully aware of the obligations introduced by the PPWR and are actively working towards their implementation.

While the first requirements of the Regulation will take effect from 12 August 2026, numerous other requirements will not come into force until later dates. Furthermore, the necessary delegated legislative acts from the European Commission are still pending with regard to the specific details and final assessment of these future requirements.

Under the new Packaging Regulation, Gerlinger GmbH & Co. KG will assume two distinct roles:

1. We are considered a **producer**, as we place our products on the market in their respective complete packaging. In this role, we are required to prepare technical documentation going forward and, on this basis, to make declarations of conformity available for our complete packaging. These must be provided to the relevant authorities upon request.

2. We act as a **supplier**, as our adhesive tapes for packaging purposes are sold to our customers and are incorporated by them as components into their own packaging. In this role, we are required under the Regulation to provide our customers with the necessary information to enable them, in turn, to fulfil their own obligations.

We are committed to fulfilling our respective responsibilities in both capacities within the applicable deadlines.

As we receive daily enquiries from both customers and suppliers on this subject, we are aware that there is currently considerable uncertainty in many cases regarding the precise requirements of the Packaging and Packaging Waste Regulation (EU) 2025/40 (PPWR).

We would therefore like to address the key requirements set out in **Articles 5 to 12** of the Regulation, together with our respective implementation status in more detail, as follows:

Article 5:

Heavy metals
(1) Packaging adhesive tapes
No heavy metals are intentionally added during the manufacture of our packaging adhesive tapes. Based on the corresponding confirmations provided by our raw material suppliers, we confirm that our products do not exceed the permissible cumulative limit of 100 mg/kg for lead (Pb), mercury (Hg), cadmium (Cd) and hexavalent chromium (Cr VI).

(2) Packaging
Based on information provided by the suppliers of our packaging components, we confirm that our own complete packaging components do not exceed the maximum permissible total limit of 100 mg/kg for lead (Pb), mercury (Hg), cadmium (Cd) and hexavalent chromium (Cr VI).

REACH
We confirm full REACH compliance for both our packaging adhesive tapes and our complete packaging.

Per- and polyfluoroalkyl substances (PFAS)
The restriction on PFAS applies exclusively to packaging and packaging components intended for direct contact with food. As this applies to neither our products nor our packaging, Gerlinger is not subject to this particular restriction. Regardless of this, we hereby confirm that no PFAS are intentionally added during the manufacture of our packaging tapes and packaging.

Article 6:

Recyclability
The packaging we currently use, as well as the adhesive tapes for packaging purposes, are already designed to be recyclable. However, a conclusive conformity assessment under the new PPWR requirements is not yet possible, as the corresponding delegated act from the European Commission is still pending. Furthermore, the binding provisions in this respect will not enter into force before 1 January 2030 at the earliest.

Article 7

Minimum recycled content
Binding minimum recycled content (PCR) requirements will be set for various plastic packaging types from 2030 onwards. Although these requirements are not yet binding, we are already working proactively with our raw material and packaging suppliers to progressively introduce recycled content into our products.

Article 8

Bio-based raw materials in plastic packaging
Technological developments in the field of bio-based plastic packaging will be evaluated at EU level by 12 February 2028. A decision on further legal action will then be taken on the basis of the results of this review.

Gerlinger GmbH & Co. KG
Klebeband- und Dichtstoffwerke
Dietrich-Gerlinger-Straße 1
D-86720 Nördlingen

Telefon (0 90 81) 213-0
Telefax (0 90 81) 213-100
E-Mail info@gerband.de
Internet www.gerband.de

Kommanditgesellschaft
Sitz Nördlingen
Registergericht Augsburg HRA 2045
Geschäftsführer Ulrich Gerlinger

Persönlich haftende Gesellschafterin
Gerlinger Verwaltungs-GmbH
Sitz Nördlingen
Registergericht Augsburg HRB 16696

Gerlinger Klebeband

Article 9

Compostability
The requirements regarding compostability apply specifically to products such as food labels or permeable tea and coffee bags. According to the current state of knowledge, our products and packaging are not affected by these requirements.

Article 10

Minimisation of packaging
Under the PPWR, packaging is to be reduced to the minimum required from 2030 onwards. We already take consistent care to ensure that our packaging is not oversized, thereby preventing avoidable packaging waste from arising in the first place. Our adhesive tapes for packaging purposes are likewise already designed in line with this principle of material minimisation.

Article 11

Reuse of packaging
From 2030, at least 40 % of transport and sales packaging (used for transport) must be reusable. A corresponding delegated legal act from the European Commission – setting out, amongst other things, the required minimum number of circulation cycles – is expected by 2027.

Article 12

Labelling of packaging
From 2028, packaging placed on the market must bear EU-wide harmonised labelling in the form of pictograms. As these pictograms have not yet been finalised, and a definitive decision is not expected before the end of this year, immediate implementation is not yet possible. We nevertheless assure you that we will fulfil these labelling obligations in a timely manner as soon as the final specifications become available.

The information contained in this document is based on data provided to us by our raw material and packaging suppliers and reflects our understanding at the time of writing.

Kind regards

Gerlinger GmbH & Co. KG

i.A. Dr. Dirk Ferber

Gerlinger GmbH & Co. KG
Klebeband- und Dichtstoffwerke
Dietrich-Gerlinger-Straße 1
D-86720 Nördlingen

Telefon (0 90 81) 213-0
Telefax (0 90 81) 213-100
E-Mail info@gerband.de
Internet www.gerband.de

Kommanditgesellschaft
Sitz Nördlingen
Registergericht Augsburg HRA 2045
Geschäftsführer Ulrich Gerlinger

Persönlich haftende Gesellschafterin
Gerlinger Verwaltungs-GmbH
Sitz Nördlingen
Registergericht Augsburg HRB 16696