

Statement on Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR)

Technical Supplier Information for Adhesive Material Composites | Article 5 PPWR | As of: August 2026

1. Purpose and scope

Regulation (EU) 2025/40 on packaging and packaging waste (PPWR) contains, among other things, requirements regarding certain substances in packaging and requirements for technical documentation. With this declaration, VPF GmbH & Co. KG provides its customers with the currently available information on the adhesive composites manufactured by VPF.

This statement relates to self-adhesive composites manufactured and supplied by VPF for the label industry. The responsibility for the evaluation of the finished packaging and for its conformity with the applicable requirements of the PPWR remains with the manufacturer or distributor of the finished packaging.

2. Heavy metals referred to in Article 5(4) of the PPWR

According to the information currently available to us from our raw material suppliers and on the basis of our product knowledge, the heavy metals lead (Pb), cadmium (Cd), mercury (Hg) and chromium (VI) (Cr⁶⁺) are not intentionally used in the production of our adhesive material composites.

According to our current state of knowledge, our products meet the requirements of Article 5 (4) of Regulation (EU) 2025/40, according to which the sum of these heavy metals must not exceed the limit value specified therein.

Supplier Information Reference Period

The above statements on heavy metals are based in particular on the product- and raw material-related information, declarations and data of our upstream suppliers for products that we have delivered in the last 24 months.

Technically unavoidable traces, which can result from raw materials, environmental contamination or process fluctuations, for example, cannot be completely ruled out. If individual products deviate from this, they will be expressly named product-specific.

3. PFAS in accordance with Article 5(5) of the PPWR

According to the information currently available to us from our raw material suppliers and on the basis of our product knowledge, PFAS are not intentionally added to the vast majority of our products.

For products with food contact approval, VPF currently has no indications that the PFAS limits set out in Article 5(5) PPWR are exceeded. The evaluation is based on the supplier information currently available to us, product data and our internal product knowledge.

Supplier Information Reference Period

The above statements on PFAS are based in particular on the product and raw material-related information, declarations and data of our upstream suppliers for products that we have supplied in the last 24 months.

However, due to the ubiquitous spread of PFAS in the environment and possible technically unavoidable background contamination, traces of PFAS cannot be ruled out in principle.

In addition, there are individual technically specialised products within the VPF portfolio in which PFAS-containing raw materials are used or whose compliance with the PFAS limit values in accordance with Article 5 (5) PPWR cannot be confirmed according to the current state of knowledge. According to our current state of knowledge, these products are not intended for food contact applications and are labelled accordingly in the respective technical product documentation.

A product-specific list of these materials will be maintained by VPF and will be made available or updated as needed and relevant.

4. Current regulatory status

Numerous requirements of the PPWR, in particular with regard to future design-for-recycling criteria and other technical implementation provisions, are currently still being further regulated. Against this background, the statements in this statement relate solely to the currently available legal requirements and the current state of knowledge of VPF.

5. Reservation and ongoing updating

This statement is based on the current state of legislation, the information currently available from our upstream suppliers, our product knowledge and the technical information available at the time of issuance.

The assessment of regulatory requirements is continuously evolving. Likewise, new findings from the supply chain, from analyses or from official publications may lead to adjustments to this declaration.

VPF therefore reserves the right to update or supplement this statement at any time. The current version can be published or made available on the website of VPF GmbH & Co. KG.

This statement does not constitute a guarantee, warranty or representation of any particular product characteristics. The suitability of a product for the respective intended use as well as the conformity of the finished packaging must be checked by the user on his own responsibility.

Sprockhövel, August 2026

Thomas Wulfert

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Note on the document

This statement is intended to inform our customers and supports the preparation of technical documentation in connection with the PPWR. It does not replace a separate assessment of the finished packaging by the respective manufacturer or distributor.