

REACH, PFAS AND HEAVY METALS CONFIRMATION WITH PPWR CUSTOMER INFORMATION

regarding blank labels and thermal transfer ribbon pursuant to REACH Regulation (EC) No 1907/2006 and Regulation (EU) 2025/40 (PPWR)

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Subject:	Blank labels and thermal transfer ribbon – REACH, PFAS, heavy metals and recycled content
Scope of validity:	Labels on bottle and carton packaging

Löhne, 22 July 2026

Dear Sir or Madam,

In connection with the EU Packaging and Packaging Waste Regulation (PPWR, Regulation (EU) 2025/40), which becomes applicable on 12 August 2026, we are receiving an increasing number of enquiries regarding the blank labels and thermal transfer ribbon we supply. We would like to provide you with the following information.

Note on the Current Status

The following statements are based on the text of the PPWR

Regulation (EU) 2025/40 (PPWR), EUR-Lex: https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L_202500040

as well as the official FAQ of the European Commission in its currently published version:

Packaging and Packaging Waste Regulation (PPWR) – Frequently Asked Questions, European Commission, DG Environment, March 2026: https://environment.ec.europa.eu/publications/faq-packaging-and-packaging-waste-regulation-ppwr_en

Garburg Etiketten-Drucksysteme GmbH
Ringstr. 36 - 32584 Löhne

Various details relevant to practical implementation have not yet been conclusively clarified: in particular, the binding calculation methodology for recycled content will only be laid down by the European Commission in an implementing act by the end of 2026 (Art. 7(8) PPWR), and a German implementing act (VerpackDG) for the national transposition of the PPWR is so far only available in draft form. This assessment therefore represents a snapshot to the best of our current knowledge and is subject to future clarification by the European Commission and the national legislator.

I. Confirmation

1. REACH Conformity

We hereby confirm that both the blank labels we source and the thermal transfer ribbons we supply comply with the requirements of the REACH Regulation (EC) No 1907/2006.

2. PFAS-Free Status

In addition, we confirm that both the blank labels and the thermal transfer ribbons are free of PFAS. Our labels and thermal transfer ribbons therefore also meet the PFAS threshold limits under the PPWR (Art. 5(5)) for food-contact packaging, applicable from 12 August 2026.

3. Heavy Metals (Pb, Cd, Hg, Cr VI)

Our suppliers have confirmed to us in writing that the sum of the concentrations of lead (Pb), cadmium (Cd), mercury (Hg) and hexavalent chromium (Cr VI) in the blank labels and thermal transfer ribbons we source does not exceed the limit of 100 mg/kg (100 ppm). This requirement was originally set out in Art. 11 of Directive 94/62/EC and is continued under Art. 5(4) PPWR.

The above statements on REACH conformity, PFAS-free status and heavy metals refer to the status as of the date of issue of this letter. The REACH substance list (Annex XVII as well as the Candidate List of substances of very high concern) is updated and expanded regularly by ECHA, typically around twice a year. In particular, the topic of PFAS is currently subject to an ongoing EU-level evaluation procedure, so the regulatory framework may change at short notice. We monitor developments on an ongoing basis and update our confirmations as needed. For an up-to-date assessment, we recommend contacting us again if required.

II. Information on the Thermal Transfer Ribbon

1. Printing Ink and Adhesive – No Recycled Content Obligation

According to the official FAQ of the European Commission on the PPWR, printing inks, adhesives, varnishes and coatings are not considered plastic within the meaning of the Regulation. They are therefore generally not subject to the recycled content obligation under Article 7 PPWR – irrespective of their weight share of the packaging unit. This applies both to the thermal transfer ink we use and to the label adhesive, equally for labels on bottles and on cartons.

Garburg Etiketten-Drucksysteme GmbH
Ringstr. 36 - 32584 Löhne

The exact passage can be found in the official PPWR FAQ of the European Commission, Section V. Recycled content in plastic packaging, Question 3:

"3) Are adhesives, paints and inks covered by the recycled content requirements for plastic packaging?"

Adhesives, paints and inks are not deemed plastic under the PPWR and therefore do not need to fulfil the recycled content requirements.

This is regardless of whether they represent less than 5% of the packaging unit."

Enquiries regarding the RecyClass compatibility of the ink are in progress.

2. Label Substrate – Recycled Content Obligation Depending on Material and Carrier Packaging

Article 7 PPWR governs only the plastic content of a packaging unit. This results in the following scenarios:

Label on a Bottle (e.g. Glass or Plastic Bottle):

A plastic label is exempt from the recycled content obligation under Art. 7(5)(b) PPWR as long as its weight is less than 5% of the total weight of the packaging unit (bottle including label and closure). A paper label is not subject to this provision in any case, as it applies only to plastic.

Label on a Carton:

Here too, the 5% rule for plastic labels applies (Art. 7(5)(b) PPWR) – based on the total weight of the complete packaging unit including the carton. In the case of a paper label on a paper/carton body, Article 7 does not apply at all, since the carton itself is not plastic and therefore falls outside the scope of this provision from the outset.

In both cases, due to the typically very low weight share of our labels, we assume that the de minimis threshold is met. The binding calculation methodology for recycled content will be laid down by the European Commission in an implementing act by the end of 2026 (Art. 7(8) PPWR).

3. Recyclability and Composite Packaging

Independently of the recycled content obligation, it should be noted that labels are taken into account as part of the recyclability assessment of the overall packaging (Art. 6 PPWR, "Design for Recycling") – i.e. whether the adhesive and printing ink interfere with the recycling process of the primary packaging. In addition, if a material differing from the main material accounts for more than 5% of the total mass of the packaging unit, this may result in classification as "composite packaging" with stricter design requirements (Art. 3(1) No. 24 PPWR). A paper label on a paper carton generally does not count as a "differing material" in this context, as both belong to the same material category.

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Our sales team will be happy to work with you individually to determine which label substrate and adhesive are best suited to your particular primary packaging (bottle or carton).

We are available at any time to answer questions or provide additional supporting evidence.

Kind regards,

Place, date:	Name, position:
Löhne, 22 July 2026	Thomas Trusch, QMB (Quality Management Officer), UMB (Environmental Management Officer), Executive Assistant
	
Signature	Company stamp