DAHLINGER

PPWR INFORMATION SHEET
PACKAGING AND PACKAGING WASTE REGULATION
(REGULATION ON PACKAGING AND PACKAGING WASTE)
FOR OUR MAJOR CUSTOMERS IN INDUSTRY AND RETAIL

As at: July 2026

Dear Sir or Madam,

The new EU Packaging Regulation (PPWR) – Regulation (EU) 2025/40 – came into force on 11 February 2025 and will, in principle, apply directly in all EU Member States from 12 August 2026. From 12 August 2028, the mandatory harmonised EU labelling of packaging (material, disposal) will apply, and national labelling requirements will cease to apply. From 2030, all packaging must be recyclable.

This information sheet provides an initial guide to the obligations that may be relevant to you as a brand manufacturer in the EU – and how Dahlinger supports you with packaging supplied by us. Please note, however, that this information sheet does not replace your own assessment of roles and responsibilities under the PPWR.

1. What does the PPWR regulate?

The PPWR essentially applies to all packaging – regardless of whether it is sales packaging, outer packaging, dispatch packaging, service packaging or transport packaging. The aim is to reduce packaging waste, improve recyclability, avoid unnecessary packaging and create more uniform requirements across Europe.

2. Definition of types of packaging

For you as a brand manufacturer, the following types of packaging may be particularly relevant:

- Retail packaging: Together with the product, this forms a sales unit for the end customer, e.g.
  - Jewellery and watch cases
  - jewellery pouches
- Service packaging: Packaging that is only filled at the point of sale, e.g.
  - Carrier bags
  - Fixed-size boxes
  - Folding boxes
  - Gift wrapping paper
- Transport packaging: Packaging used exclusively for transport and protection, e.g.
  - Shipping cartons
  - Unit cartons
  - Filling and protective material
  - Inserts, padding, wrapping paper

3. How Dahlinger is addressing the PPWR

Dahlinger is preparing for the implementation of the PPWR in a structured manner. For packaging produced by our company, this means:

- Conformity assessment
  We assess the relevant types of packaging against the applicable requirements of the PPWR. These include, in particular, material restrictions, recyclability, packaging minimisation and – where relevant – the proportion of recycled content, reusability or compostability. The requirements are set out in particular in Articles 5 to 12 of the PPWR.
- Technical documentation
  We organise the technical documentation on a product- or packaging-type-specific basis. This documentation is primarily intended for internal verification purposes and to respond to any enquiries from market surveillance authorities.
- EU Declaration of Conformity
  For the relevant types of packaging, we provide the EU Declaration of Conformity in accordance with the PPWR. This declaration confirms, on the basis of the technical documentation, that the packaging in question meets the relevant PPWR requirements.
- Support with enquiries from authorities
  Should you receive an enquiry from a regulatory authority regarding packaging supplied by Dahlinger, we will of course assist you. In such cases, please provide us with the following information where possible:
  - Invoice or delivery note
  - Description of which packaging is affected
  - Specific enquiry from the authorities

We will investigate the matter and provide the necessary information or appropriate supporting documentation.

4. What is your role as a brand manufacturer?

Your obligations depend on the role you play in relation to a specific item of packaging. The PPWR distinguishes between different roles. For the business relationship between Dahlinger and its customers, the distinctions between **producer**, **importer** and **manufacturer** are relevant.

A producer, as defined by the PPWR, is anyone who manufactures packaging or packaged products, as well as anyone who develops or commissions the manufacture of packaging for their product under their own brand. The producer is responsible for carrying out the conformity assessment and issuing the certificate of conformity.

An importer, within the meaning of the PPWR, is any person established in the EU who places packaging from a third country on the market.

A manufacturer, as defined by the PPWR, includes, amongst others, the distributor who first makes packaged products available within the EU.

The Regulation points out that the roles of producer and manufacturer may differ. According to the Regulation, the decisive factor for classification as a producer is who has the ability to exert a significant influence on the design and characteristics of the packaging in question. At the same time, there should be exactly one producer per item of packaging across the EU. It is not possible to predict with any certainty how these criteria will be distinguished in practice in the future by and the competent

authorities on a case-by-case basis. Each obligated party must therefore continuously assess their respective role on the basis of the applicable legal requirements for each item of packaging and supply chain.

Here are two case studies from Dahlinger's perspective, based on the currently applicable requirements:

Case 1: You purchase packaging from Dahlinger with delivery terms such as EXW warehouse in Germany

In this case, the allocation of roles is generally as follows:

- **Importer**: Dahlinger.
- **Producer**: The producer is the manufacturer of Dahlinger packaging (non-EU country); in this case, Dahlinger, as the importer, assumes the producer's obligations under the PPWR.
- **Manufacturer**: The brand manufacturer is the economic operator who fills the packaging with jewellery or watches and places it on the market.

If you purchase sales packaging from Dahlinger and pass this on to your customers together with jewellery, watches or other products, you are generally only **the manufacturer**.

Dahlinger is generally **responsible** for the technical compliance of the sales packaging supplied by Dahlinger with the PPWR, provided that Dahlinger acts as the responsible producer/importer within the meaning of the PPWR, which is the case in this example. The obligation to provide complete **technical documentation and to draw up the declaration of conformity then lies** with Dahlinger.

For you, this means:

- You **do not** need **to draw up your own technical documentation** for Dahlinger packaging.
- Should the authorities make an enquiry regarding Dahlinger packaging, we will assist you by providing the necessary information.
- By filling the retail packaging (e.g. the jewellery box with the jewellery), you are generally considered a manufacturer with the following obligations:
    - Registration with the relevant national authority (a list for European countries can be found on the last page of this letter)
    - Entering into a contract with a scheme operator (a list for European countries can be found on the last page of this letter)
    - Reporting of weights (quantity reporting)
    - Covering the costs of the national scheme operator (by category and weight)

Case 2: You purchase packaging from Dahlinger on FOB Hong Kong terms:

In this case, the division of responsibilities is as follows:

- **Importer**: this is you, as the brand customer.
- **Producer**: The producer is the manufacturer of Dahlinger packaging (non-EU country); in this case, the brand customer, as the importer, assumes the producer's obligations under the PPWR.
- **Manufacturer**: The brand customer is the economic operator who fills the packaging with jewellery or watches and places it on the market.

What this means for you:

- As an importer and producer
  - Provision of the technical documentation and
  - the declaration of conformity
  - Compliance with retention periods
- as a manufacturer
  - Registration with the national authority
  - Conclusion of a contract with a national system operator
  - Reporting of weights (quantity reporting)
  - Covering the costs of the packaging register (by category and weight)

5. As a brand manufacturer, do you need to be able to provide a declaration of conformity?

For Dahlinger sales packaging as per **case 1** above, the following applies:

- You are **not** required **to draw up or maintain** the complete **technical documentation** and **the EU declaration of conformity yourself.**
- The **documentation** is held by Dahlinger. The relevant retention periods are observed.
- Should a regulatory authority request information from you regarding Dahlinger packaging, you can contact us. We will assist you with the necessary information or appropriate evidence of conformity for the items in question.

For Dahlinger transport packaging, Dahlinger handles the registration and pays the fees. You therefore do not need to take any action in this regard.

6. Producer information on packaging (labelling)

The PPWR stipulates that details of the producer/importer (name and address) must be provided for packaging. To comply with this legal obligation, Dahlinger GmbH provides the necessary information on the accompanying documents (delivery notes, invoices) for the packaging with the following text: **'For packaging, Dahlinger GmbH is the producer and importer in accordance with the PPWR.'**

We recommend that you also pass this information on to your customers in a suitable form, so that the necessary details are available throughout the supply chain. In practice, however, printing your logo on the packaging already ensures a certain degree of traceability.

7. What due diligence obligations do you still have as a manufacturer?

Even though you are not required to maintain the technical documentation for Dahlinger packaging yourself, you do have certain due diligence obligations as a manufacturer.

In practical terms, this means:

- Use packaging from trustworthy suppliers.
- Store orders, invoices and delivery notes.
- Forward any regulatory enquiries regarding Dahlinger packaging to us.

8. What specific steps should you, as a manufacturer, take now?

We recommend the following steps:

- **Check your national registration**
  Check whether you are already registered; if not, register.
- **Participation in the scheme**
  Enter into a contract with a national system operator. In the appendix, you will find an example of one system operator per European country; please pay the applicable licence fees based on the type and weight of the material.

Note: This information sheet is for general information purposes only and does not replace your own assessment of your role and responsibilities, nor does it constitute legal advice.

Our position on the PPWR: We naturally comply with the requirements of the PPWR and are prepared to implement the applicable regulations. Nevertheless, we take the view that boxes should not automatically be classified as packaging within the meaning of the PPWR.

Our boxes are durable storage and presentation solutions with intrinsic value. They remain with the product, provide long-term protection and form part of the brand and customer experience.

We are therefore advocating for a nuanced assessment. We will, of course, provide timely updates on any new legal assessments or developments.

If you have any questions, please contact our Sustainability Officer, Mr **Stefan Bösinger**, at stefan.boesinger@dahlinger.com or on 07821 289 120

Valerio d'Adamo
Managing Director

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Overview of European registration authorities and national system operators

Country	National registry	System operator
Germany	LUCID	Der Grüne Punkt / Interzero
France	SYDEREP (ADEME)	Citeo
Spain	RPP	Ecoembes
Italy	CONAI	CONAI
Belgium	IVCIE	Fost Plus / Valipac
Bulgaria	MOEW	Ecopack Bulgaria
Denmark	DPA	VANA
Estonia	Packaging Register	Eesti Pakendiringlus
Finland	RINKI	Finnish Packaging Producers
Greece	HERRCO Register	HERRCO
Ireland	EPA Register	Repak
Croatia	FZOEU	FZOEU system
Latvia	VVD	Zaļā Josta
Lithuania	GPAIS	Žaliasis Taškas
Luxembourg	Environmental Administration	Valorlux
Malta	ERA	GreenPak Malta
Netherlands	Packaging Waste Fund	Verpact
Austria	Federal Environment Agency EDM	ARA
Poland	BDO	Rekopol
Portugal	APA	Sociedade Ponto Verde
Romania	AFM	Eco-Rom Packaging
Sweden	Swedish Environmental Protection Agency	FTI / NPA
Slovakia	OZV Register	ENVI-PAK
Slovenia	ARSO	Slopak
Czech Republic	SEPNO	EKO-KOM
Hungary	MOHU Register	MOHU
Cyprus	Ministry of the Environment	Green Dot Cyprus