

EU Packaging Regulation (PPWR) — Preparation Status METAPAPER

Status April 2026 | Regulation EU 2025/40, binding from 12 August 2026

The PPWR now also covers pure transport packaging in the B2B sector for the first time. As a sender of paper and packaging materials, we are directly responsible as the “producer” of our transport packaging (pallets, stretch film, cartons) and are preparing the required conformity documentation.

Single-use wooden pallets

- Heavy metals: Uncritical for untreated wooden pallets; limit value of 100 mg/kg (PPWR) is met.
- Recyclability: Ensured via wood waste recycling.
- Documentation: Supplier declaration of PPWR conformity has been requested; will be included in the technical documentation upon receipt.

Cartons and corrugated board packaging

Statement from our supplier (Straub Verpackungen, February 2026) is available:

- Recycling rate over 95%; paper/cardboard transport packaging is exempt from the reuse obligation.
- Heavy metal content of representative samples is well below 100 mg/kg.
- PFAS are not used in either raw paper or corrugated board production; trace inputs from recycled paper cannot be completely ruled out.
- FSC-certified since 2013; supply chain transparency documented.

A comprehensive PPWR declaration of conformity is still pending, as implementing and delegated acts of the EU Commission (including on labeling and recyclability assessment) are still outstanding. This corresponds to the currently legally possible status.

Stretch film (machine stretch film XCS 23 my)

Article specification and food law declaration from borrmannplus (as of March / February 2026) are available:

- Material: LLDPE, mono-material, according to supplier 100% recyclable.
- Heavy metals: Sum Cd + Pb + Hg + Cr VI below 100 mg/kg in accordance with EU Packaging Directive 94/62/EC – PPWR limit met.
- Food contact: Compliant with (EC) No. 1935/2004 and (EU) No. 10/2011; overall migration values below OML limit (10 mg/dm²).
- From 2030: PPWR requires a minimum share of 35% post-consumer recycled content for plastic packaging. We are monitoring developments and will adjust our procurement in due time.

Our next steps

- Preparation of technical documentation and EU declarations of conformity for all packaging by August 2026.
- Obtaining the outstanding supplier declaration for wooden pallets.
- Ongoing updates upon publication of further EU implementing acts as well as maintenance of ZSVR registration.

This document reflects the preparation status at the time of publication and is regularly updated. Questions: service@metapaper.io