

K-D Hermann GmbH
contact Labelling Systems
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Declaration of Conformity and Information Regarding Self-Adhesive Labels
with regard to Regulation (EU) 2025/40 on packaging and packaging waste, the REACH Regulation (EC) No 1907/2006 and other regulatory requirements

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Approved by: p.p. Kay Wagner
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1. Scope

On 12 August 2026, the EU Packaging Regulation (PPWR) will enter its main phase of implementation. As packaging will be a key compliance criterion for future market access, we are proactively informing you about the allocation of responsibilities and the technical support we can provide. This letter is provided for information purposes based on the details we have received from our suppliers; it does not constitute a stand-alone declaration of conformity or a guarantee in the legal sense.

As your printing service provider, we generally act as a supplier and our products are generally regarded as packaging components. As our customer, you generally act as the manufacturer and bear overall responsibility for the conformity assessment, signing the EU Declaration of Conformity, as well as extended producer responsibility (EPR, registration e.g. in LUCID).

2. Product differentiation

When supplied, self-adhesive labels may consist, in particular, of an upper material, adhesive, substrate/liner, silicone coating and, where applicable, inks, varnishes and auxiliary materials. Roll core materials are used for transport and processing and are not treated as part of the final packaging system for the purposes of this declaration. After application, the packaging usually retains some of the upper material, adhesive and, where applicable, inks and varnishes.

This does not affect the fact that, for the purposes of REACH, a self-adhesive label composite may consist of several products as supplied. In such cases, it may be necessary to consider the individual components separately.

3. Legal and evaluation basis

This statement takes particular account of Regulation (EU) 2025/40 on packaging and packaging waste, REACH Regulation (EC) No 1907/2006, Regulation (EU) 2019/1021 on persistent organic pollutants, Directive 2011/65/EU (RoHS) and – for printed and/or food-contact applications – the relevant EuPIA principles, supply chain-related ink information and the general requirements of the FCM Framework Regulation (EC) No 1935/2004 and the GMP Regulation (EC) No 2023/2006.

4. Material compliance (Art. 5 PPWR).

On the basis of the written assurances provided by our suppliers, we hereby inform you that, according to their information, the supplied components comply with the requirements of Article 5:

Heavy metals: The PPWR sets maximum limits for certain heavy metals in packaging. The total concentration of lead, cadmium, mercury and hexavalent chromium must not exceed the limit value of 100 mg/kg. All our raw material suppliers have confirmed to us that they comply with the limit value. Hence, all labels we supply are compliant with the limit value.

PFAS: In accordance with Article 5 of the PPWR, a limit of 50 mg/kg for PFAS (per- and polyfluoroalkyl substances) will apply to food-contact packaging from 12 August 2026. All our raw material suppliers have confirmed to us that PFAS (per- and polyfluoroalkyl substances) are neither intentionally added to raw materials nor intentionally used in the manufacturing process. We also confirm that, as of 1 August 2026, PFAS will no longer be used as constitutional components in the products we use to manufacture labels.

5. Other substances

Persistent organic pollutants

For standard materials, K-D Hermann has no evidence that substances are present in concentrations that contravene Regulation (EU) 2019/1021 on persistent organic pollutants. This applies in particular to well-known groups of POPs such as PFOS, PFOA, PCBs, lindane, decaBDE, UV-328 and Dechlorane Plus. We are not currently aware of any exceptions.

RoHS and other customer-specific enquiries regarding substances

Insofar as this is relevant to customer requirements, K-D Hermann declares, on the basis of the supplier information available and according to current knowledge, that the substances listed in the current RoHS classification – in particular lead, cadmium, mercury, hexavalent chromium, PBB, PBDE, DEHP, BBP, DBP and DIBP – are not intentionally used in standard materials in quantities exceeding the limit values specified therein.

This chapter is intended to provide supplementary information for customers; RoHS is not the primary product-specific regulatory framework for self-adhesive labels. RoHS sets maximum limits for certain substances in electrical and electronic equipment.

6. REACH and Article 33 information

K-D Hermann takes into account the requirements of the REACH Regulation and, in doing so, refers to the currently valid REACH Candidate List of Substances of Very High Concern (SVHC).

As far as K-D Hermann is aware, there is currently no evidence that standard materials contain any substances on the Candidate List in concentrations exceeding the information threshold of 0.1% by weight, unless otherwise specified in the annexes. The key factor here is the evaluation per product.

Where materials that are subject to known REACH-related exemptions or substance information are supplied or processed, the relevant information is provided on a product-by-product basis. Known supplier-specific REACH information on materials subject to exemptions, in particular substances listed in Annex XVII of REACH, is set out in Annex A.

7. Good Manufacturing Practice and traceability

K-D Hermann processes label materials in accordance with documented procurement, approval and production procedures. The aim is to ensure consistent product quality, to prevent mix-ups and cross-contamination, and to enable the traceable allocation of material systems to product groups.

Where inks and varnishes are used in sensitive applications, K-D Hermann adheres to the principles of GMP, supply-chain documentation and application-specific approvals. The supplier information, version statuses and exception lists on which this statement is based must be maintained and monitored internally.

8. Inks and printed labels

This section applies exclusively to printed labels.

The assessment of inks, varnishes and other printing aids is based on the available supplier information, statements of composition, technical data sheets and regulatory information. K-D Hermann processes inks in accordance with the relevant EuPIA principles and its customers' application-specific requirements. As there is no harmonised, specific solution at EU level exclusively for inks used on food-contact materials, the assessment of printed labels for sensitive applications is always carried out by considering the ink, design, printed side, substrate, migration and end use as a whole.

9. Food-contact applications

This declaration is not a general declaration of conformity for food contact.

The suitability of a printed or unprinted label for a specific food application depends in particular on its design, the side on which it is printed, potential for set-off, its functional barrier properties, the product it contains, storage period, temperature profile and other conditions of use. Hence, product-specific documentation and approvals are always decisive for food contact applications,

Unless materials have been tested for food contact: Not suitable for direct contact with food.

10. Documentation and duty to provide information (Art. 16 PPWR).

On request, we can provide you with technical data sheets and material declarations for your overall documentation. We are not obliged to disclose sensitive internal formulations, provided that the certificate of conformity is sufficient as evidence.

This statement remains valid until a new version is published. It must be updated in the event of regulatory changes, new relevant supplier information or the introduction of new materials or colour systems subject to exceptions. The main document and the annexes form a single unit.

11. Important information.

a) Upstream supply chain. All of the above information is provided based on our current knowledge and the written assurances of our suppliers. This information is provided for guidance only; it is expressly not a guarantee, a stand-alone warranty or a representation in the legal sense. We do not accept strict liability for the accuracy of supplier data; as part of our duty of care, we have checked it for plausibility. K-D Hermann does not carry out routine comprehensive analyses of all materials and articles to verify all substance-related statements set out in this declaration.

b) Design for Recycling vs. Recycled at Scale. Our assessment relates to design for recycling in accordance with current standards. From 2035 onwards, classifying the overall packaging as 'recyclable' will also require large-scale recycling, which depends on national schemes over which we have no control.

c) Intended use. Our assessment relates to the agreed intended use. If the product is used without the customer having expressly confirmed its suitability for food contact, the responsibility lies with the user.

d) Regulatory changes. The PPWR is a dynamic set of regulations; we reserve the right to make adjustments as soon as new harmonised standards or mandatory measurement methods are published.

e) Priority of contractual agreements. Any existing specific contractual arrangements between us shall take precedence. This information notice does not give rise to any obligations beyond those required by law.

12. Disclaimer

This statement is based on the information available to K-D Hermann GmbH as at the date of publication. It is provided for information purposes only and does not constitute either a guarantee of quality or a general assurance of suitability for a specific purpose. The suitability for a specific application must be assessed by the relevant user or packaging manufacturer.

Hirschhorn, 5 August 2026

A handwritten signature in blue ink, appearing to read 'Kay Wagner', is positioned below the date.

p.p. Kay Wagner
K-D Hermann GmbH
contact Labelling Systems

Appendix A

Known supplier-related REACH Annex XVII exemptions (phthalates)

Manufacturer	Product code	Product name	Notes
UPM Raflatac	M10104	Glossy white PVC, permanent	Diisodecyl phthalate (DIDP; CAS no. 68515-49-1) Diisononyl phthalate (DINP; CAS no. 28553-12-0)
UPM Raflatac	M10835	Glossy white PVC, permanent	contained in concentrations of more than 0.1%.

Inclusion in this list does not necessarily mean that the products listed form part of K-D Hermann GmbH's current standard portfolio. The list is intended solely for the purpose of documenting known supplier-related exemptions to the supplier information provided.