



Fastener
Solutions

Date: August 6, 2026

**Technical supplier information for Declaration of Conformity
on packaging and packaging waste
REGULATION (EU) 2025/40**

Dear Valued Customer,

This letter is provided by Avery Dennison Fastener Solutions Division (“Avery Dennison Fasteners”) in accordance with Article 16 of Regulation (EU) 2025/40 on packaging and packaging waste (the “PPWR”), which requires suppliers to provide their customers with the information necessary to comply with the PPWR. The PPWR was published on 22 January 2025 and replaces the Packaging and Packaging Waste Directive 94/62/EC.

The purpose of this letter is to support the conformity assessment procedure that must be carried out by the “manufacturer” of the finished packaging, as defined in Article 3(1) (13) of the PPWR that places the packaging on the market. This letter may accordingly be shared with, or otherwise used to support the compliance efforts of, your own customers.

As of the date of this letter, the following indicated information is applicable to all Avery Dennison Fasteners products (excluding trial materials, otherwise non-standard/tailored products, or applications intended for food contact) to support your conformity assessment in accordance with Articles 5 to 11 of the PPWR, as applicable. Please note that, as explained further below, not every PPWR obligation becomes subject to a conformity assessment requirement on 12 August 2026. The applicable obligations, and the corresponding conformity assessment, may also depend on the intended use of the packaging (for example, where it is intended for food-contact applications). Responsibility for assessing the finished packaging, and for its compliance with the applicable PPWR requirements, always remains with the manufacturer, as defined in Article 3(1)(13) of the PPWR.

This letter reflects the PPWR requirements applicable as of 12 August 2026 and may be updated, as appropriate, to reflect the phased application of additional PPWR requirements and other regulatory developments. The information in this letter reflects Avery Dennison’s current knowledge and understanding, based on information available within its supply chain as of the date of this letter.

The sections below summarize the PPWR articles relevant to the materials Avery Dennison Fasteners supplies to you, together with their current status of applicability and any relevant caveats.

Article 5(1) - Substances of Concern (SoC) Avery Dennison Fasteners is committed to minimizing the presence of substances of concern in its products, consistent with the objectives of Article 5(1) of the PPWR.

“Substances of concern” are defined in the EU’s Eco-design for Sustainable Products Regulation (EU) 2024/1781 (ESPR), referring broadly to substances that may negatively affect the reuse or recycling of packaging materials, or the safety and quality of recycled materials derived from packaging. Avery Dennison Fasteners manages such substances through compliance with existing chemicals legislation, including:

- **EU REACH** — consideration of the substance classification and restriction requirements under Regulation (EC) No 1907/2006, including REACH restrictions and Substances of Very High Concern (SVHC).
- **POP Regulation (EU) 2019/1021**
Our raw material streams are screened against persistent organic pollutant (POP) restrictions.

Article 5(4) - Heavy Metals - Based on the information currently available to Avery Dennison Fasteners, we have no reason to believe that the combined level of cadmium, mercury, lead and chromium (VI) in our products exceeds the 100 mg/kg limit set out in Article 5(4) of the PPWR.

Our supplier documentation under Article 16 of PPWR is based on the following evaluations:

- Upstream suppliers: Based on the information provided by our suppliers, heavy metals are either not present in our raw materials or the sum is below 100 mg/kg (ppm). Suppliers have provided the information that for their products any one or more of the following apply:
 - Heavy metal levels are below the PPWR thresholds.
 - Heavy metals are not intentionally added or used during their manufacturing processes.
 - Analysis conducted on representative materials indicates that the sum of heavy metals is below 100 mg/kg (ppm) or not detectable.
- Avery Dennison Fasteners manufacturing: We do not intentionally add any of the heavy metals as an ingredient, nor do we utilize them as processing aids during the manufacturing process of Avery Dennison Fasteners products.

Based on this information, Avery Dennison Fasteners does not consider dedicated testing necessary at this stage. While trace quantities may be present as a result of technically unavoidable impurities, cross-contamination, or background environmental levels within the supply chain, based on the information available to us, such trace levels are not expected to cause the combined level of these substances to exceed the 100 mg/kg limit under Article 5(4) of the PPWR.

Article 5(5) - PFAS - Food contact packaging

This statement covers Avery Dennison Fasteners products that are not intended for food contact applications. It remains the customer's responsibility to evaluate product suitability to verify whether Article 5(5) PFAS requirements apply to their finished packaging.

Article 6 - Recyclable packaging

The general recyclability requirement under Article 6(1) of the PPWR applies from 12 August 2026. However, manufacturers are not required to carry out a conformity assessment or issue a Declaration of Conformity for design-for-recycling criteria until the related implementing measures take effect, which is not expected before approximately 2030. Avery Dennison's technical documentation therefore does not currently include a design-for-recycling assessment for Article 6 purposes. We will update this letter, and our supporting documentation, once these requirements become subject to assessment and once further regulatory guidance is available.

Article 7 - Minimum recycled content in plastic packaging (Plastic packaging only)

The minimum recycled content targets under Article 7 of the PPWR apply to plastic packaging on a phased timeline and are not yet in effect.

Article 8 - Bio based feedstock in plastic packaging

There are no direct compliance obligations on suppliers or converters under this Article at this time.

Article 9 - Compostable packaging

This provision is not currently applicable to our products.

Article 10 - Packaging minimization

This provision is not currently applicable to our products.

Article 11 - Reusable packaging

Avery Dennison Fasteners' materials are not, by themselves, "reusable packaging" within the meaning of the PPWR, as they do not meet all of the relevant criteria under the Regulation. However, if the material is applied to or incorporated into a container or other packaging that is itself designed and intended to be reused, the reusability of that finished packaging is a determination that rests with the manufacturer of the finished product.

Avery Dennison Fasteners remains committed to monitoring regulatory developments and will update this documentation as necessary.

Avery Dennison Fasteners products are supplied on the understanding that the customer remains responsible for assessing them and for ensuring that the product, as a whole and in its constituent parts, is suitable for the customer's intended use and desired characteristics. Because analytical methods and detection capabilities continue to evolve, it is possible that substances not detectable using current methods may become detectable in the future; Avery Dennison Fasteners will update this letter, as appropriate, to reflect such developments.

The information in this letter is disclosed to the best of our knowledge, based on information provided by our raw material and component suppliers. We believe this information to be accurate and it is offered in good faith. This information is subject to revision as additional knowledge becomes available.

If you have any questions about this letter, please contact your Customer Care team.

Sincerely,

Product Regulatory Compliance Department
Avery Dennison Fasteners